

Appendix N
Draft EIS Comments and Responses

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ACRONYMS AND ABBREVIATIONS

AGL	above ground level
ALCOM	Alaskan Command
AQ	Air Quality
AS	Airspace Management
BAX	Battle Area Complex
BR	Biological Resources
CFR	Code of Federal Regulations
CI	Cumulative Impacts
CR	Cultural Resources
DO	Description of Proposed Action and Alternatives
EIS	Environmental Impact Statement
EJ	Environmental Justice
G	Government comments
GA or GB	General Comment
HW	Hazardous Materials
I	Individual (citizen) comments
IT	Infrastructure and Transportation
LA	Land Use/Public Access
LM	Land Use/Management
LR	Land Use/Recreation
MOAs	Military Operations Area
MT	Mitigations
N	Non-government comments
NEPA	National Environmental Policy Act
NO	Noise
NP	NEPA Process
PN	Purpose and Need
PR	Physical Resources
SA	Safety (Airspace)
SB	Subsistence
SE	Socioeconomics
SG	Safety (Ground)
SUA	Special Use Airspace
T	Tribal comments
WR	Water Resources

APPENDIX N DRAFT EIS COMMENTS AND RESPONSES

N.1 PUBLIC AND AGENCY COMMENT SUMMARY

This section contains comments received from Alaska Native Tribes, Federal, State, and local agencies, and the public, during the public comment period for the draft Environmental Impact Statement (EIS). In accordance with the National Environmental Policy Act (NEPA), Alaskan Command (ALCOM) reviewed public and agency comments and incorporated new information, as appropriate, into the final EIS. ALCOM encouraged public comments in direct mailings to the project mailing list, newspaper advertisements, press releases, and flyers, as well as during public hearings held in the month of May 2012.

During the draft EIS review period that extended from March 30 to July 9, 2012, ALCOM received a total of 266 comment submittals. [Table N-1](#) displays the source of the comment submittals and [Table N-2](#) displays the approximate numbers for the formats in which the comments were received. These numbers are approximate as duplicate comments may have been submitted via multiple methods (i.e., mail, email, fax, website). These duplicate comments may have been consolidated, if the commenter was the same, so only one form of delivery was counted.

Table N-1. Summary of Comment Submittal Source

Government	27
Non-Government	48
Alaska Native Tribes	2
Individual Citizen	189
Total Public Comments Received (original submittals)	266

Table N-2. Summary of Comment Submittal Format

Public Hearing Written Comment	11
Public Hearing Testimony	61
Mail	26
Email	65
Website Submittal	98
Phone	2
Fax	3
Total Public Comments Received (original submittals)	266

ALCOM took public and agency comments into consideration in its decisionmaking process regarding preferred alternatives and mitigations and will continue to do so throughout the environmental impact analysis process. These decisions will be announced in the Record of Decision following the publication of the final EIS. To evaluate the comments, ALCOM subdivided the 266 comment submittals into 1,361 independent comments, categorized by

resource area. [Table N-3](#) identifies the resource areas and breaks out the number of individual comments by resource area.

The majority of the comments focused on proposed mitigations for airspace management and landuse. Specifically, the actions and topics of greatest concern include the proposed Fox 3 and Paxon Military Operations Areas (MOAs); the proposed lowering of the Special Use Airspace (SUA) to 500 feet above ground level (AGL); and related impacts on civil aviation, residents, recreation, hunting, wildlife, subsistence activities, the tourism industry, and commercial aviation access. Safety concerns mainly focus on airspace conflicts below 5,000 feet AGL, particularly the mix of high-speed aircraft and small, low-speed general aviation aircraft.

Table N-3. Response Code Guide for Response to Comments on Draft EIS

Response Code	Resource Area or Comment Topic	Number of Comments per Resource Area
AQ	Air Quality	7
AS	Airspace Management	160
BR	Biological Resources	96
CI	Cumulative Impacts	26
CR	Cultural Resources	12
DO	Description of Proposed Action and Alternatives	62
EJ	Environmental Justice	4
GA or GB	General Comment	254
HW	Hazardous Materials	7
IT	Infrastructure and Transportation	3
LA	Land Use/Public Access	37
LM	Land Use/Management	46
LR	Land Use/Recreation	71
MT	Mitigations	171
NO	Noise	42
NP	NEPA Process	46
PN	Purpose and Need	74
PR	Physical Resources	4
SA	Safety (Airspace)	67
SB	Subsistence	63
SE	Socioeconomics	77
SG	Safety (Ground)	25
WR	Water Resources	7
Total		1,361

Among other concerns are the potential dangers posed by hazardous waste, in particular unexploded ordnance and its potential for closing off access to public lands; proposed airspace restrictions over the Battle Area Complex (BAX) and Isabel Pass; and the potential for negative impact of the proposals on the populations closest to the highly used, road-accessible Alaskan beltway. Tourism is prominent among socioeconomic concerns; several commenters requested that training exercises avoid the summer and fall season due to the tourism traffic during those times of year. Of additional concern are potential impacts on personal freedoms; fundamental Alaskan values, notably including solitude and peace and quiet; and the use of nature for recreation as well as subsistence.

Copies of submitted comments are contained in the section titled [N.2](#) Public and Agency Comments. The following presents the comment and response process.

N.1.1 Public/Agency Comment Identification Guide

The paragraphs below outline the organization of comments, how ALCOM reviewed comments, and how commenters can find responses to their comments.

N.1.1.1 Comment Receipt and Review

Comment Receipt: Comments on the draft EIS included both written correspondence and oral testimony received during the public comment period. ALCOM assigned each comment a Comment Identification Number. All comments are included under the section titled [N.2](#) Public and Agency Comments. The comment submittals are printed in numerical order, by Comment Identification Number and are organized into four sections:

- Government agency comments: Comment Identification Numbers G0001 through G0028; G0023 was removed as the identical comment had been submitted via email and mail and it was duplicative.
- Alaska Native comments: Comment Identification Number T0001 through T0002
- Non-government comments: Comment Identification Numbers N0001 through N0049; N0028 was removed as the commenter running a test of the website
- Individual comments: Comment Identification Numbers I0001 through I0089

Comment Review: In accordance with 40 Code of Federal Regulations (CFR) 1503.4, ALCOM assessed and considered comments as follows.

Project personnel read and reviewed each comment letter or oral testimony carefully, and then identified and assigned comment categories to substantive comments within each comment letter or testimony. The reviewers utilized three guidelines for determining substantive comments:

- The comment questioned the Proposed Action, alternatives, or other components of the proposal.
- The comment questioned the methodology of the analysis or results.
- The comment questioned the use, adequacy, or accuracy of data.

Environmental resource specialists reviewed the comments. The resource specialists assigned a response number to each substantive comment. Response numbers are located in the section titled [N.3 Government Responses to Comments](#) in [Table N-5](#). A guide to the coding of the response numbers is in [Table N-4](#).

N.1.1.2 Locating Comments

The directory of commenters appearing in [Table N-4](#) presents the names of all commenters alphabetically by first, name of the organization (or “Private Citizen”), then last name. Each commenter can locate his/her name in this directory. As noted on the public displays, sign-in and comment sheets, providing names during the public comment process meant that each commenter understood that his/her name and comment would be made a part of the public record for this EIS. Each comment is assigned a Comment Identification Number. This is a number that was assigned to each comment form or oral testimony and is stamped on the letter or next to transcripts of oral comments. All verbal and oral comments are organized numerically by the Comment Identification Number in the next section, titled “Public/Agency Comments.”

N.1.1.3 Locating Responses to Comments

Army and Air Force responses to comments are contained in the section title [N.3 Government Responses to Comments](#). All responses are ordered by Comment Identification Number. To locate the response, the commenter should first locate the Comment Identification number in the left column. All responses for each comment letter are listed to the right, alphabetically. Each response is designed to be read along with the bracketed comment it addresses. Assistance with acronyms can be found at the front of the EIS.

Public and agency involvement is an important part of the NEPA process, and all comments are taken into consideration by the ALCOM in its decision making process. ALCOM would like to express appreciation for all comments. Many of the comments express the views and opinions of the commenters. Such comments do not require a specific response, but are included as part of the public input and are taken into consideration in the decision making process. The fact that a change in the proposed actions or the EIS analysis did not occur for a comment does not in any way reduce the value of anyone’s participation.

Table N-4. Directory of Comments

Organization (Private Citizen, etc.)	Commenter Name	Unique Identifier ID Number
Ahtna Incorporated	Martin, Kathryn	N0033-1 to N0033-27, N0033b-1 to N0033b-34, N0033c-1, N0033c-2
Aircraft Owners and Pilots Association (AOPA)	McCaffrey, Melissa	N0026-1 to N0026-28
Aircraft Owners and Pilots Association (AOPA)	Williams, Heidi J.	N0004-1, N0018-1
Alaska Airlines	Baker, Steve	N0043-1
Alaska Airman’s Association	White, Adam	N0017-1, N0017-2, N0041-2, N0041-3, N0041-4
Alaska Airports Association	Dale, Jane	N0046-1 to N0046-30
Alaska Department of Fish and Game	Fleener, Craig L.	G0022-1 to G0022-52
Alaska Department of Natural Resources - Division of Forestry	Mullen, Gary	G0010-1, G0010-2

Table N-1. Directory of Comments (continued)

Organization (Private Citizen, etc.)	Commenter Name	Unique Identifier ID Number
Alaska Department of Natural Resources - Division of Mining, Land and Water	Goodrum, Brent	G0014-1 to G0014-18
Alaska Department of Natural Resources - Office of Project Management and Permitting	Steele, Marie	G0024-1 to G0024-5
Alaska Department of Transportation	Hatter, Steven D.	G0018-1, G0018-2
Alaska Miners Association	Crockett, Deantha	N0030-1 to N0030-8
Alaska Outdoor Council	Arno, Rodney	N0031-1 to N0031-8
Alaska Quiet Rights Coalition (AQRC)	Hatton, Elizabeth	N0025-1 to N0025-16
Alaska Railroad Corporation	Leary, Linda	N0024-1
Alaska Survival	Long, Becky	N0027-1 to N0027-19
Alaskan Aviation Safety Foundation	Siebe, Carl	N0001-1, N0042-1 to N0042-4
Amber Lake North Homeowner's Association	Olson, Dana L.	N0022-1 to N0022-5
Chickaloon Village, Traditional Council (Nay'dini'aa' Na')	Wade, Doug	T0001-1 to T0001-5
Citizens' Advisory Commission on Federal Areas	Leaphart, Stan	G0026-1 to G0026-15
City of Delta Junction	Guess & Rudd P.C.; DeWitt, James D.	G0019-1
City of Delta Junction	Leith, Mary	G0007-1 to G0007-4
City of North Pole	Isaacson, Mayor Douglas W.	G0016-1 to G0016-9
City of Wasilla	Rupright, Verne	G0003-1, G0003-2, G0003-3
Coalition for Susitna Dam Alternatives (CSDA)	Board of Directors, Coalition for Susitna Dam Alternatives	N0038-1
Cook Inlet Region, Incorporated	Razo, Gregory	N0002-1 to N0002-6
Copper Basin Fish and Game Advisory Committee	McMahan, Charles	G0011-1
Copper Country Alliance	McHenry, Ruth	N0007-1, N0007-2, N0007-3, N0035-1 to N0035-12, N0050-1
Copper Valley Air Service; other air taxis	Parmenter, David	N0006-1, N0006-2, N0006-3
Delta Sportsman's Assn & ADF&G Advisory Committee	Aiton, Vern	N0003-1, N0003-2
Denali Air	McGregor, Dan	N0016-1, N0016-2, N0016-3
Denali Borough	Asbury, Terry	G0028-1, G0028-2
Denali Borough	Pieknik, Gail; Talerico, David M.	G0012-1
Denali Citizen Council	Ragland, Hannah	N0048-1 to N0048-29
EPA Region 10 - Environmental Review and Sediments Management Unit	Reichgott, Christine B.	G0027-1 to G0027-29
Experimental Aircraft Association (EAA)	Hansen, Randy	N0040-1, N0040-2, N0040-3
Fairbanks International Airport Operators Council (AOC)	Christian, Cory	N0032-1 to N0032-5
Fairbanks North Star Borough	Hopkins, Mayor Luke T.	G0004-1, G0017-1 to G0017-30, G0017-31
Fairbanks North Star Borough; City of Anchorage; City of Fairbanks; City of North Pole	Hopkins, Mayor Luke T.; Sullivan, Mayor Dan; Cleworth, Mayor Jerry; Isaacson, Mayor Douglas W.	G0002-1, G0002-2, G0008-1
Federal Aviation Administration (FAA)	Cruz, Michele L.; Henry, Robert; Warner, John	G0025-1 to G0025-4
Fish and Game Board, Central, AK	Glanz, William L.	N0036-1 to N0036-4
General Aviation Association of Fairbanks International Airport	Hussey, Arthur	N0029-1, N0029-2, N0029-3

Table N-1. Directory of Comments (continued)

Organization (Private Citizen, etc.)	Commenter Name	Unique Identifier ID Number
Greater Fairbanks Chamber of Commerce (GFCC)	Herbert, Lisa; Lundgren, Steve; Shaw, Lorna	N0019-1, N0049-1, N0049-2
Gulkana Hatchery	Catledge, Lucas	N0009-1
Gulkana Hatchery	Martinek, Gary	N0008-1, N0008-2
House District 12	Feige, Representative Eric	G0006-1, G0006-2
Kingdom Air Corps	King, Dwayne	N0023-1 to N0023-4
Knik Tribal Council	Call, Debra	T0002-1 to T0002-4
Lake Louise Lodge	Delaquito, John	N0005-1 to N0005-4
Lake Louise Non-Profit Corp. (LLCNPC)	Matthews, Beverly	N0020-1 to N0020-5
Matanuska Susitna Borough	DeVilbiss, Larry	G0020-1 to G0020-17
Matanuska Susitna Borough	Krueger, Emerson	G0001-1
National Outdoor Leadership School	Hutchins, Janeen	N0044-1 to N0044-14
National Park Service, Alaska Regional Office	Cellarius, Barbara A.; Hunter, Paul	G0013-1, G0013-2, G0013-3
Northern Alaska Environmental Center (NAEC)	Hertz, Jenna; Miller, Pamela A.	N0039-1 to N0039-51
on behalf of the Alaska Mental Health Trust Authority by the Trust Land Office (TLO)	Jones, Greg	G0009-1 to G0009-5
Paxson Fish and Game Advisory Committee	Schandelmeier, John	N0011-1, N0011-2, N0011-3, N0014-1, N0014-2
Paxson Lodge	Peterson, Tony	N0010-1, N0010-3 to N0010-6, N0012-1, N0013-1
Pico Aviation	Lowe, Barney	N0021-1
Private Citizen	Alcott, Gary	I0060-1, I0060-2
Private Citizen	Ameen, Rasool	I0078-1 to I0078-4, I0079-1 to I0079-4
Private Citizen	Anderson, Curt	I0087-1 to I0087-7
Private Citizen	Anderson, Travis	I0114-1
Private Citizen	Arno, Rod	I0023-1, I0023-2, I0023-3
Private Citizen	Baggett, Cody	I0105-1
Private Citizen	Bakewell, Audubon	I0059-1
Private Citizen	Barrette, Al	I0070-1
Private Citizen	Barrette, Allen F.	I0157-1 to I0157-12, I0183-1 to I0183-12
Private Citizen	Bartlett, Jane L.; Bartlett, Mark A.	I0011-1, I0011-2
Private Citizen	Bartlett, Mark	I0115-1
Private Citizen	Beck, Lewis	I0143-1, I0143-2
Private Citizen	Beckley, John	I0041-1, I0041-2
Private Citizen	Berg, Timothy	I0133-1, I0133-2
Private Citizen	Bertholl, Dwayne	I0055-1, I0099-1 to I0099-6
Private Citizen	Billington, Donnie	I0043-1 to I0043-11
Private Citizen	Billman, Danny	I0095-1
Private Citizen	Binggeli, Mark	I0144-1, I0144-2
Private Citizen	Braund, Tom	I0052-1
Private Citizen	Brocke, Deborah	I0102-1, I0102-2, I0102-3
Private Citizen	Brown, John	I0147-1, I0147-2
Private Citizen	Burgess, Bill	I0125-1, I0125-2
Private Citizen	Byers, Maurice	I0118-1
Private Citizen	Cartee, Terry	I0015-1, I0015-2, I0138-1 to I0138-4
Private Citizen	Cassara, Nick	I0124-1 to I0124-5
Private Citizen	Catalone, Chris	I0155-1, I0155-2, I0155-3
Private Citizen	Cellarius, Barbara	I0164-1 to I0164-10
Private Citizen	Chambrone, Maureen	I0169-1, I0169-2, I0169-4, I0169-5, I0169-6

Table N-1. Directory of Comments (*continued*)

Organization (Private Citizen, etc.)	Commenter Name	Unique Identifier ID Number
Private Citizen	Chesney, Scott	I0137-1, I0137-2
Private Citizen	Chythlook, Franklin	I0037-1, I0037-2, I0037-3
Private Citizen	Cook, Eli	I0188-1
Private Citizen	Cook, John P.	I0158-1
Private Citizen	Cooper, Matthew	I0112-1
Private Citizen	Corcoran, Mary	I0096-1 to I0096-12
Private Citizen	Corle, Gary L.	I0046-1 to I0046-5, I0130-1 to I0130-8
Private Citizen	Cross, Jay	I0126-1
Private Citizen	Dansby, Mike	I0062-1, I0062-2
Private Citizen	Davidson, George	I0001-1 to I0001-4
Private Citizen	Dickens, John	I0048-1
Private Citizen	Dittrick, Bob	I0026-1, I0026-2
Private Citizen	Eklund, Janelle	I0117-1 to I0117-5
Private Citizen	English, Maureen	I0146-1 to I0146-5
Private Citizen	Farrar, Diana	I0040-1 to I0040-4, I0068-1, I0068-2, I0068-3
Private Citizen	Folsom, Bill	I0021-1 to I0021-5, I0033-1, I0033-3 to I0033-7
Private Citizen	Foster, Peg	I0047-1
Private Citizen	Fread, Beth	I0045-1
Private Citizen	Frey, Bill	I0083-1
Private Citizen	Garrett, Don	I0007-1, I0113-1, I0113-2
Private Citizen	Gastrock, Robert	I0156-1, I0156-2, I0156-3
Private Citizen	Gatzke, Thomas	I0108-1
Private Citizen	Gay, Harry	I0053-1, I0053-2
Private Citizen	Gerlach, Robert	I0091-1 to I0091-9
Private Citizen	Gerwig, Joe	I0036-1, I0036-2, I0036-3
Private Citizen	Gilman, Orville	I0084-1, I0084-2, I0084-3
Private Citizen	Godduhn, Anna	I0071-1, I0071-2, I0071-3
Private Citizen	Graham, Robert	I0080-1
Private Citizen	Gray, Rex	I0176-1
Private Citizen	Harlan, Brian	I0148-1 to I0148-4
Private Citizen	Harris, Jay	I0069-1
Private Citizen	Harris, John	I0076-1
Private Citizen	Hartman, Jean	I0097-2 to I0097-5
Private Citizen	Herman, Dianne	I0010-1
Private Citizen	Hester, John	I0136-1, I0136-2
Private Citizen	Heusser, Heather	I0049-1, I0049-2, I0049-3
Private Citizen	Hicks, Whit	I0039-1 to I0039-14, I0064-1
Private Citizen	Hobson, George	I0167-1
Private Citizen	Hodel, Chris	I0154-1, I0154-2
Private Citizen	Holt, Harry; Holt, Jean	I0093-1 to I0093-4
Private Citizen	Holt, Jean	I0028-1, I0028-2, I0032-1, I0032-2
Private Citizen	Hurlburt IV, Ward	I0160-1, I0160-2
Private Citizen	Hutchins, Jeanine	I0034-1 to I0034-5
Private Citizen	Johnston, David	I0100-1 to I0100-4
Private Citizen	Kalakias, Deborah	I0014-1, I0014-2
Private Citizen	Kehoe, Sarah	I0104-1 to I0104-4
Private Citizen	Keizer, Terry	I0042-1 to I0042-6
Private Citizen	Kelly, Robert	I0145-1

Table N-1. Directory of Comments (continued)

Organization (Private Citizen, etc.)	Commenter Name	Unique Identifier ID Number
Private Citizen	Kendall, Paul D.	I0016-1, I0016-2, I0017-1, I0017-2
Private Citizen	Koskovich, Michael	I0165-1, I0165-2
Private Citizen	Kreger, Ann	I0030-1, I0030-2
Private Citizen	Kreger, Frank	I0027-1, I0027-2
Private Citizen	Lamal, Tom	I0073-1, I0073-2
Private Citizen	Long, Becky	I0139-1 to I0139-12
Private Citizen	Lopez, Guy	I0151-1, I0151-2
Private Citizen	MacCallum, Nancy	I0063-1 to I0063-4
Private Citizen	Maher, Michael; Maher, Robin	I0131-1, I0131-2
Private Citizen	Marshall, Peter	I0140-1
Private Citizen	Matthews, Beverly	I0029-1
Private Citizen	Matthews, Beverly; Matthews, Corwin	I0089-1, I0089-2
Private Citizen	McKelvey, Kate	I0106-1 to I0106-6
Private Citizen	McMahan, Charles	I0122-1, I0122-2, I0122-3
Private Citizen	McQueen, Mike	I0004-1, I0005-1, I0006-1 to I0006-10
Private Citizen	Millard, Doug	I0103-1
Private Citizen	Miller, Karen	I0094-1
Private Citizen	Monetti, Karl	I0008-1 to I0008-15
Private Citizen	Monetti, Susan	I0088-1, I0088-2, I0088-3
Private Citizen	Moorehead, Lisa	I0018-1, I0018-2, I0018-3, I0024-1, I0024-2
Private Citizen	Mortimer, Lee	I0009-1
Private Citizen	Mulford, Robert	I0072-1 to I0072-4
Private Citizen	Murry, John	I0187-1, I0187-2
Private Citizen	Musgrove, Jay W.	I0066-1
Private Citizen	Napier, Brian	I0175-1 to I0175-7
Private Citizen	Nienhueser, Helen; Nienhueser, Gayle	I0184-1 to I0184-5
Private Citizen	Nord, Marge	I0110-1 to I0110-9
Private Citizen	O'Connor, Patrick	I0163-1
Private Citizen	Obermiller, Matt	I0182-1 to I0182-5
Private Citizen	Odden, Mary	I0038-1 to I0038-22, I0057-1 to I0057-7
Private Citizen	Okonek, Brian	I0081-1 to I0081-7, I0119-1 to I0119-7
Private Citizen	Osborn, Phil	I0075-1, I0075-2
Private Citizen	Oskolkoff, Debra	I0142-1, I0142-2
Private Citizen	Oudal, Joanna	I0141-1, I0141-2, I0141-3
Private Citizen	Ownby, Janet	I0127-1 to I0127-6
Private Citizen	Page, Linda	I0101-1 to I0101-4
Private Citizen	Parker, David	I0013-1 to I0013-7
Private Citizen	Parrott, John	I0153-1, I0153-2, I0153-4
Private Citizen	Pearson, Charles	I0150-1, I0150-2, I0150-5
Private Citizen	Peterson, Marvin	I0162-1 to I0162-5
Private Citizen	Pickus, Norman	I0116-1, I0116-2
Private Citizen	Poirot, Steven	I0149-1, I0149-2, I0149-3
Private Citizen	Prescott, Robert	I0135-1 to I0135-4
Private Citizen	Probasco, Peter M.	I0025-1 to I0025-8, I0035-1
Private Citizen	Public, Jean	I0107-1

Table N-1. Directory of Comments (*continued*)

Organization (Private Citizen, etc.)	Commenter Name	Unique Identifier ID Number
Private Citizen	Quarberg, Don	I0065-1 to I0065-6, I0067-1, I0067-2, I0067-3
Private Citizen	Raffaelli, Jennifer	I0173-1, I0173-2
Private Citizen	Raffaelli, Michael	I0171-1, I0171-2, I0171-3
Private Citizen	Ransy, Denis	I0179-1 to I0179-8
Private Citizen	Reed, W.R.	I0132-1 to I0132-4
Private Citizen	Riddles, Michael	I0181-1, I0181-2, I0181-3
Private Citizen	Riedel, Felicia	I0092-1 to I0092-8
Private Citizen	Roberts, Shawn	I0003-1 to I0003-4
Private Citizen	Robinson, Noel	I0050-1, I0051-1
Private Citizen	Rodina, Jenny	I0061-1
Private Citizen	Ruff, Doyle	I0166-1, I0166-2, I0166-3
Private Citizen	Ruta, Scott	I0120-1 to I0120-4
Private Citizen	Rutledge, Charlie; Rutledge, Linda	I0086-1, I0086-2
Private Citizen	Salasky, Sheryl	I0109-1, I0109-2
Private Citizen	Sayre, Carolyn (Cari)	I0189-1 to I0189-7
Private Citizen	Schandelmeier, John	I0054-1, I0054-2
Private Citizen	Schapansky, Elwood	I0082-1, I0082-2
Private Citizen	Schwanke, Becky	I0170-1 to I0170-14
Private Citizen	Shier, Patrick	I0174-1
Private Citizen	Smart, John	I0002-1
Private Citizen	Smith III, Donald M.	I0056-1
Private Citizen	Smith, Randall	I0177-1
Private Citizen	Smith, Ron	I0180-1
Private Citizen	Stern, Peter	I0098-1 to I0098-17
Private Citizen	Stickwan, Gloria	I0058-1 to I0058-6
Private Citizen	Stocker, Jim	I0022-1 to I0022-4, I0031-1 to I0031-5
Private Citizen	Stokes, Peter	I0186-1 to I0186-4
Private Citizen	Strabel, Mark	I0161-1, I0161-2
Private Citizen	Strassenburgh, John	I0090-1 to I0090-10
Private Citizen	Sullivan, Dave	I0012-1
Private Citizen	Tappen, Paul William	I0134-1, I0134-2, I0134-3
Private Citizen	Teich, Cathy	I0044-1 to I0044-10, I0178-1 to I0178-6
Private Citizen	Terwilliger, Miranda; Stoeberl, Todd	I0172-1, I0172-2, I0172-3
Private Citizen	Theuer, William	I0159-1
Private Citizen	Turner, Gary	I0019-1
Private Citizen	Tyler, Randy	I0085-1 to I0085-7
Private Citizen	Valley, Earl	I0123-1 to I0123-4
Private Citizen	Wallin, Susan	I0121-1, I0121-2, I0121-3
Private Citizen	Wegner, Gary	I0168-1, I0168-3 to I0168-6
Private Citizen	Wesley, Robert	I0152-1 to I0152-4, I0152-6
Private Citizen	White, Chris	I0074-1 to I0074-5, I0077-1, I0077-2
Private Citizen	Wilken, Gary R.	I0128-1
Private Citizen	Wisdorf, Marcus	I0129-1, I0129-2
Private Citizen	Wojnowski, Matthew	I0111-1
Private Citizen	Wood, Mike	I0020-1 to I0020-5
Private Citizen	Wood, Ruth D.	I0185-1 to I0185-5
Resource Development Council (RDC)	Hall, Marleanna	N0045-1, N0045-2
State of Alaska	Parnell, Governor Sean	G0005-1

Table N-1. Directory of Comments (*continued*)

Organization (Private Citizen, etc.)	Commenter Name	Unique Identifier ID Number
Talkeetna Air Taxi	Roderick, Paul	N0034-1 to N0034-5
Talkeetna Community Council, Inc.	The Talkeetna Community Council, Inc.	N0047-1 to N0047-30
U.S. Department of the Interior	Bergmann, Pamela	G0015-1 to G0015-35
U.S. Senator, State of Alaska	Murkowski, Lisa	G0021-1
Veterans for Peace	Mulford, Robert	N0015-1
Wellwood Center	Wellman, Dave	N0037-1 to N0037-4

N.2 PUBLIC AND AGENCY COMMENTS

- **G is Government comments in order by Identifier ID Number**
- **T is Tribal comments in order by Identifier ID Number**
- **N is Non-government comments in order by Identifier ID Number**
- **I is Individual comments in order by Identifier ID Number**

N.2.1 Government Comments in Order by Identifier ID Number

G0001

[REDACTED]

From: Emerson Krueger [REDACTED]
Sent: Friday, April 27, 2012 12:15 PM
To: ALCOM J08 Admin Box
Cc: Warren Keogh; John Moosey; Eileen Probasco
Subject: Joint Pacific Alaska Range Complex EIS
Attachments: MSB_JPARC_EIS_comments_27Apr12.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Good Day,

Please find attached letter with an initial comment on behalf of the Matanuska Susitna Borough on the draft JPARC EIS.

A paper copy was put in the mail today.

I was unable to submit the comment via the website.

v/r

Emerson Krueger
Planner
Matanuska-Susitna Borough
[REDACTED]

G0001



MATANUSKA-SUSITNA BOROUGH

Planning and Land Use Department
350 East Dahlia Avenue • Palmer, AK 99645
Phone (907) 745-9833 • Fax (907) 745-9876
Email: planning@matsugov.us

April 26, 2012

ALCOM Public Affairs
9480 Pease Ave, Suite 120
JBER, AK 99506

Re: JPARC DRAFT EIS Initial Comments

Dear Sir or Madam,

I have begun review of the draft EIS for the JPARC Modernization and Enhancement.

The comment and request for clarification was determined to require a response, ideally, before the borough proceeds with comments on the effects of the proposed alternatives.

Many of the tables in Chapter 3 that include various information on the extent and effects of the Alternatives appear to fail to list the extent and effects of Alternative E Fox 3 MOA as a standalone alternative.

Many Chapter 3 tables list three Fox 3 proposal areas:

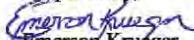
- 1 = Existing Fox 3 MOA
- 2 = Fox 3 MOA Alternative A and B
- 3 = Fox 3 MOA Alternative A

Review of Figure 2-1 and Figure 2-2 suggests that Fox 3 MOA Alternative A completely encompasses Fox 3 MOA Alternative E. These two figures lead one to believe that proposal area 2 is the same as proposal area 3.

Please clarify how the reader can discern the extent and effects of Alternative B in Chapter 3.

A reader could assume a typo in the footnotes and that the third proposal area is Alternative E. However, there are several tables that show the third proposal area to include items not included in proposal area 2. Therefore, it does not appear to be a simple typographic error

Respectfully,


Emerson Krueger
Planner

CF: Warren Keogh, District 1 Assembly Member
John Moosey, Manager
Eileen Probasco, Acting Director, Planning and Land Use

G0002

[REDACTED]

From: Karen Moneymaker [REDACTED]
Sent: Friday, April 27, 2012 12:12 PM
To: Hoog, Stephen L LtGen USAF PACAF 11 AF/CC; Post, James N III BrigGen USAF PACAF 354 FWCC; Stepovich, Melissa M (GOV); Tom Moyer; Althea St. Martin; Chad Padgett; ALCOM J08 Admin Box
Subject: Request for JPARC EIS comment extension
Attachments: JPARK EIS LETTER.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Lt. Gen Hoog,

Please find attached the request to extend by 60 days the public comment period on the JARC draft EIS. The four mayors have strong concerns that the F-16 move has not been included in this document. Therefore our request is made to extend this comment period.

Thank you ,
Luke Hopkins
Mayor
Fairbanks North Star Borough

G0002



April 24, 2012

Lieutenant General Stephen L. Hoog
Commander, Alaskan Command
9480 Pease Avenue, Suite 110
JBER, AK 99506-2101

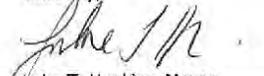
Dear Sir,

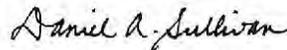
The Mayors of Fairbanks North Star Borough (FNSB), City of Fairbanks and City of North Pole respectfully requests the extension of the comment period of the Joint Pacific Alaska Range Complex draft EIS comment period for an additional 60 days to allow for further comment and analysis based on recent proposals and basing decisions the USAF proposed for Alaskan installations in February of 2012.

The Air Force, by this force restructuring action which is not considered in the current EIS draft of shifting the Eielson F-16s, associated military and civilian personnel and possible the Alaska Red Flag mission from Eielson to JBER has created undetermined impacts on Alaska air space and Alaska's population that are more than sufficient to warrant an extended period for analysis and comment by the local governments, businesses, organizations and individuals negatively affected by, as yet, unidentified impacts and Alaska's land, water and air space.

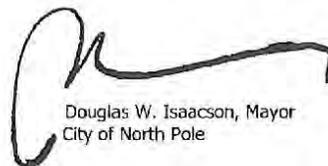
Thank you in advance.

Sincerely,


Luke T. Hopkins, Mayor
Fairbanks North Star Borough


Dan Sullivan, Mayor
City of Anchorage


Jerry Cleworth, Mayor
City of Fairbanks


Douglas W. Isaacson, Mayor
City of North Pole

Cc. Brigadier General James N. Post III
Alaska Governor Sean Parnell
US Congressman Don Young
US Senator Lisa Murkowski
US Senator Mark Begich

G0003

Joint Pacific Alaska Range Complex Modernization and Enhancement
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Written Comment Form

For more information and to submit comments online, please go to:
www.jparceis.com

Public comments are requested pursuant to the National Environmental Policy Act, 42 United States Code 4321, et seq. All written comments received during the comment period will be considered during Final EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Final EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Final EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

Name (First and Last): VERNO RUPPELBT Date: 5-23-12

Title: MAYOR

Organization: CITY OF WASILLA

is this a government agency (choose one): yes no

Comment submitted on behalf of (choose one):

- your organization/business/agency
 yourself as a private citizen

If you know, please check the boxes below that relate to your comment. This will assist us in organizing and reviewing your comment.

Comment Topic(s):

- General (to the EIS)
 NEPA Process
 Purpose/Need
 Description of Proposed Actions and Alternatives (DOPAA)
 Cumulative Impacts
 Mitigations

Resource Areas:

- All resource areas
 Airspace Management
 Noise
 Safety (Airspace)
 Safety (Ground)
 Air Quality
 Physical Resources
 Land Use
 Infrastructure and Transportation
 Water Resources
 Hazardous Materials
 Biological Resources
 Cultural Resources
 Socioeconomics
 Subsistence
 Environmental Justice

Proposed Actions:

- All proposed actions
 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxson MOA
 2 - Realistic Live Ordnance Delivery
 3 - Battle Area Complex Restricted Area Addition
 4 - Expansion of R-2205 Restricted Area
 5 - Night Joint Training
 6 - Unmanned Aerial Vehicle Access
 7 - Enhanced Access to Ground Maneuver Space Areas
 8 - Tanana Flats Training Area Access Road
 9 - Joint Air-Ground Integration Complex
 10 - Intermediate Staging Bases
 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska
 12 - Joint Precision Airdrop System Drop Zones

Please provide your comment(s) on the back of this form and turn it in at a public hearing, or submit

by June 7, 2012, to: ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506;

Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

G0003

Comment(s):

1. CARIBOU HERD + OTHER WILDLIFE IMPACTS?
 2. ROAD MOVEMENT THROUGHOUT AREA IN FUTURE -
WILL IT HAPPEN & THEN WHAT RESTRICTIONS
ARE IN PLACE?
 3. WHAT CHANGES TO THE CURRENT PLAN
ARE PREDICTED WITHIN THE NEXT
30 YEARS??
- (IF YOU DON'T HAVE A PLAN FOR
THE FUTURE IN LIGHT OF THE EVER
CHANGING TRAINING NEEDS + EQUIPMENT -
AND POTENTIAL OPEOR WHY NOT?
AND SUPPOSING YOU DO - THEN DISCLOSE
THE POSSIBLE SCENARIOS -

Use additional sheets as needed.

Please turn in this form at a public hearing or submit by June 7, 2012, to:
ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506
Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

Thank you for your input.

G0004

[REDACTED]

21 COLONEL ORR: All right. Our next speaker is Mr. Luke
22 Hopkins.

23 MR. HOPKINS: Yes, thank you. Luke Hopkins, Fairbanks
24 North Star Borough, the Mayor. So I will be submitting written
25 comments that would be much more extensive. I don't have those

[REDACTED]

G0004

■

1 formulated at this time. I do want to state though that I am
2 disappointed that this public hearing is on a Saturday, has been
3 scheduled here in Fairbanks, one of the major -- the second
4 largest community in Alaska, that it was scheduled for Saturday.
5 There are two sessions, I understand that, but Saturday night is
6 not a good time to have a public hearing. So I'm hoping that if
7 there are further public hearings held in this overall process
8 that they are scheduled in Fairbanks. We have the best turnout
9 and information dissemination on weekdays and I would ask that
10 that please be put into any further scheduling. I don't think
11 it's appropriate to have a -- as I said, a public hearing on
12 this issue on Saturday noon, especially in the summer. Thank
13 you.

■ [REDACTED]

[REDACTED]

G0005

STATE CAPITOL
P.O. Box 110001
Juneau, AK 99811-0001
907-465-3500
fax: 907-465-3532



Governor Sean Parnell
STATE OF ALASKA

550 West Seventh Avenue, Suite 1700
Anchorage, AK 99501
907-269-7450
fax 907-269-7461
www.Gov.Alaska.Gov
Governor@Alaska.Gov

May 24, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
Joint Base Elmendorf-Richardson, AK 99506

To Whom It May Concern,

As Governor of the State of Alaska, I fully support the modernization and enhancement of the Joint Pacific Alaska Range Complex (JPARC). As the largest military training range in the United States, JPARC is critical to securing and defending our nation. In this heightened threat environment, it is vital that we make every effort to maximize the training opportunities for the brave men and women who serve in our Armed Forces.

I take seriously my constitutional duty as Governor to ensure the safety and security of Alaska's citizens and communities. Our Administration will continue to support the military industrial complex in Alaska while doing everything in our power to protect Alaska's pristine environment. For this reason, I believe the JPARC Environmental Impact Statement is an important and welcomed process.

I am confident that the State of Alaska and the United States Armed Forces will partner together in identifying a course of action that will allow for the expansion of military training capabilities, as well as the continued protection of our beautiful, natural environment.

Regards,

A handwritten signature in blue ink that reads "Sean Parnell".

Sean Parnell
Governor

G0006

[REDACTED]

22 REPRESENTATIVE FEIGE: Okay. I guess for the record, I'm
23 Representative Eric Feige. I represent House District 12 which
24 includes most of the JPARC area that we're talking about. One
25 of the things I'd like the folks to address is the issue of the

[REDACTED]

G0006

1 proposed floor for the Fox 3 MOA. Currently it's proposed to go
2 to 500 feet AGL and in talking to a number of the air taxi
3 operators, the pilots, for the record I'm -- I am a commercial
4 pilot with 17 years of bush flying experience here in Alaska.
5 I'm very familiar with the Talkeetna mountains and essentially
6 the rest of the Fox 3 MOA and do fly through it on a regular
7 basis in -- just in doing this job.

8 The area that really gets the most general aviation
9 traffic is the area sort of -- if you draw a line from about the
10 Susitna River across to the Alphabet Hills and south that area
11 seems to have the most -- the densest amount of general aviation
12 traffic, you know, mostly Supercubs and Cessnas and whatnot,
13 small float planes getting in and out of hunting cabins. It's
14 primarily during the non-winter months where you see a lot of
15 that traffic. It's during the, you know, primarily May to
16 October with a lot more activity occurring in the late August
17 through mid-October timeframe. It's kind of the highlight of
18 hunting season.

19 If that floor were to be raised to say 1,500 feet AGL or
20 at least a -- perhaps a new sector created within the MOA that
21 can be left off most of the time but only turned on when
22 absolutely necessary I think that would go a long way to
23 reducing some of the general aviation pilots' concerns about
24 basically getting run over by an F-16 or something larger. So
25 I'd ask that the folks putting this proposal together go ahead

[REDACTED]

G0006

■

1 and take a good long look at that.

2 I think alternative E where the southern boundary of the
3 Fox 3 MOA was -- instead of being south of Lake Louise it was
4 moved a little bit to the north so it only covered Tyone or Lake
5 Tyone or Lake Susitna I believe. Even if you move that southern
6 boundary in that sector to the outlet of Lake Susitna at the
7 very mouth of Tyone Creek that would be another good point to
8 put in there that would, again, relieve some of the concerns
9 that folks in the Lake Louise area have. And that's all I got
10 for now.

11 COLONEL ORR: Thank you.

12 THE REPORTER: Could you please spell your last name for
13 the record, sir?

14 REPRESENTATIVE FEIGE: It's spelled F-E-I-G-E and first
15 name is Eric with a C.

■ [REDACTED]

E

G0007

[REDACTED]

17 COLONEL ORR: Thank you. Our next speaker is Ms. Mary
18 Leith is it?

19 MS. LEITH: Leith.

20 COLONEL ORR: Leith. All right. Thank you.

21 MS. LEITH: I'm Mary Leith, Mayor of the city of Delta
22 Junction. And the city of Delta Junction wants to state that we
23 made a memorandum of agreement with the Army in '06 and upon
24 investigation it was essentially omitted from the full JPARC
25 Draft EIS and as a result we feel the EIS is -- the Draft EIS is

[REDACTED]

G0007



1 defective.

2 There -- will there be an amended version of this before a
3 final version -- of the EIS before a final version comes out is
4 something that we're concerned about. Because we think, again,
5 it should be available for public comments after we see -- after
6 you've heard what people are concerned with. We will object
7 JPARC -- to JPARC moving the Final EIS without this opportunity
8 for review and comment. We note that JPARC was provided with a
9 copy of the '06 MOA by -- at the scoping meetings and still
10 failed to address it in the Draft EIS.

11 Numerous commitments contained in the '06 MOA are violated
12 by the proposed changes in the Donnelly training area and other
13 portions of training ranges near Delta and Gulkana. A partial
14 listing of the violations will be included in our written
15 comments which will be coming. The failure to discuss these
16 violations and the necessity for them makes the EIS incomplete
17 and inaccurate.

18 The proposed changes violate many of the concerns
19 underlying the '06 MOA, including, but not limited to, danger
20 from wildfire which is a big concern in this area, danger from
21 flooding, public safety arising from increased levels of
22 activities and increased noise in the area. The issues are more
23 critical given the higher intensity levels of training, the
24 broader types of training and greater expanded use of the
25 training area. These issues are not addressed or inadequately



G0007

1 addressed in the Draft EIS.

2 When the city acquiesced to the inadequate use or ac --
3 Donnelly range expansion EIS in '06 it did so with the
4 commitment by USARAK that training at the Caktif (ph) and Backs
5 (ph) would be limited to those described in the supplemental EIS
6 prepared by USARAK. The city pressed for those facilities to be
7 located at the south end of the Donnelly training area. USARAK
8 pressed for a location at the north end of the Donnelly training
9 area immediately joining city limits. We did much of this based
10 upon our own experience with fire only a little bit prior to
11 that. The compromise described in the 2006 MOA is that the city
12 would acquiesce to the closer, more dangerous location, but only
13 with safeguards and with the Army's assurance that the training
14 activities would be limited to those described in the
15 supplemental Draft EIS. The JPARC Draft EIS fails to address
16 that bargain or JPARC's reasons for violating the bargain.
17 Which we searched it, there -- it was never mentioned once.

18 These comments to the public hearing are not a complete
19 list of our concerns. Complete written comments will be
20 submitted to you by June 7th, 2012, but unless these issues are
21 fully addressed in a supplemental Draft EIS it's more likely
22 than not that the city will challenge the adequacy of the JPARC
23 Draft EIS leaving aside any claim by the city for breach of the
24 '06 MOA. And if we have any -- like I say, we really do expect
25 to see again the Draft EIS so that -- you know, amended one so



G0008



April 24, 2012

Lieutenant General Stephen L. Hoog
Commander, Alaskan Command
9480 Pease Avenue, Suite 110
JBER, AK 99506-2101

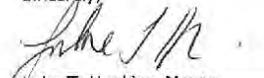
Dear Sir,

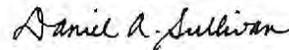
The Mayors of Fairbanks North Star Borough (FNSB), City of Fairbanks and City of North Pole respectfully requests the extension of the comment period of the Joint Pacific Alaska Range Complex draft EIS comment period for an additional 60 days to allow for further comment and analysis based on recent proposals and basing decisions the USAF proposed for Alaskan installations in February of 2012.

The Air Force, by this force restructuring action which is not considered in the current EIS draft of shifting the Eielson F-16s, associated military and civilian personnel and possible the Alaska Red Flag mission from Eielson to JBER has created undetermined impacts on Alaska air space and Alaska's population that are more than sufficient to warrant an extended period for analysis and comment by the local governments, businesses, organizations and individuals negatively affected by, as yet, unidentified impacts and Alaska's land, water and air space.

Thank you in advance.

Sincerely,


Luke T. Hopkins, Mayor
Fairbanks North Star Borough


Dan Sullivan, Mayor
City of Anchorage


Jerry Cleworth, Mayor
City of Fairbanks


Douglas W. Isaacson, Mayor
City of North Pole

Cc. Brigadier General James N. Post III
Alaska Governor Sean Parnell
US Congressman Don Young
US Senator Lisa Murkowski
US Senator Mark Begich

G0009

The TRUST
LAND OFFICE

June 4, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

Re: JPARC Draft EIS comments

These comments are submitted on behalf of the Alaska Mental Health Trust Authority by the Trust Land Office (TLO). The TLO's scoping comments dated January 28, 2011, appear to have had no influence on development of the draft EIS. Because of this I am incorporating the TLO's previous objections by reference in this review to the draft EIS.

Our earlier objection to remotely piloted aircraft (RPA)/unmanned aerial vehicle (UAV) corridors identified over Trust land needs to be corrected and expanded. The lack of spatial references in the scoping documents resulted in an underestimation of the amount of Trust land that will be impacted by unmanned aerial vehicle overflights. The following table shows specifically the number of Trust parcels involved and the total acreage for each of the proposed corridors.

Area	Parcels	Acres
Eielson R-2205	12	1,034
Eielson R-2211	31	1,898
Ft. Wainwright R-2205	20	3,363
Ft. Wainwright R-2211	87	3,532
Total acres		9,827

Establishment of these corridors with RPA/UAV overflights can be expected to diminish value of these Trust lands for residential and/or recreational development; although difficult to quantify, any reduction in land values from these plans is unacceptable.

The TLO continues to object to inclusion of live fire on the west and northwest boundaries of the Yukon Training Area.

The TLO continues to object to expansion of any use of the Yukon 1 MOA that could interfere with mineral development of the Trust Salcha Block of land.

My staff contact for this review is Cindi Bettin, Senior Lands Manager, who can be contacted at (907) 269-8751 or <cindi.bettin@alaska.gov>.

Sincerely,


Greg Jones
Executive Director

Alaska Mental Health Trust Land Office

2200 Eads Avenue, Suite 1100, Anchorage, Alaska 99503, (907) 269-2966 (voice) (907) 269-0905 www.alaskamentalhealth.org

G0010

Submittal ID	Commenter	Title	Organization	Topic List	Comment
G0010	gary mullen			Description of Proposed Actions and Alternatives (DOPAA), Mitigations, Airspace Management, Safety (Airspace), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxton MOA	As stated in the previous comment period the airspace starting at 500 AGL throughout the MOA along with no restrictions on the scheduling of active use is unacceptable. This type of unrestricted activity is a serious hazard to wildland fire fighting and fire detection is flown in this area throughout the summer months. Simply raising the ceiling would create a safety buffer for all civilian aircraft and would allow Part 135 aircraft to operate legally within the airspace.

G0011

Submittal ID	Commenter	Title	Organization	Topic List	Comment
G0011	Charles McMahan	Chairman	Copper Basin Fish and Game Advisory Committee	General (to the EIS), Airspace Management, Safety (Airspace), All proposed actions, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	On behalf of the Copper Basin Fish And Game Advisory Committee I am formally opposing the expansion of the Fox 3 MOA and more specifically the lowering of the floor of these areas from 5,000 feet to 500 feet for military operations with high speed aircraft. There are many reasons but the main reason we oppose this is for safety purposes for the countless flights that are flown for game counts, surveys, predator control, radio collar tracking of game, and for the thousands of hours of recreational flights for hunting, fishing and other outdoor activities. By mixing high speed jets with slow and hard to see private aircraft in the same airspace, we feel safety would be severely compromised and it would be unacceptable. There are thousands of hours flown each year by hundreds of folks in these areas, and a mid-air collision would be inevitable at some point in time if these changes are made. Sincerely, Charles McMahan Chairman, Copper Basin F&G Advisory Committee

G0012

From:

06/20/2012 13:46

#068 P.001/002

P.O. Box 480 Healy, Alaska 99743
Phone: 907 683-1330
Fax: 907 683-1340
Email: dbgov@mtaonline.net

DENALI BOROUGH

Fax

To: ALCOM Public Affairs	From: Gail Pieknik, Borough Clerk
Fax: (907) 552-5411	Pages: 2
Phone:	Date: 6/20/2012
Re: JPARC	CC:

Urgent **For Review** **Please Comment** **Please Reply** **Please Recycle**

• **Comments:**

The Denali Borough Assembly met at a regular meeting on Wednesday, June 13, 2012. At this meeting, the Borough Assembly voted unanimously to have the Borough Clerk resubmit Denali Borough Resolution 11-05 as the Borough's comment on the JPARC draft EIS. Please see the attached Denali Borough Assembly Resolution 11-05.

G0012

From:

06/20/2012 13:47

#068 P.002/002

DENALI BOROUGH, ALASKA
RESOLUTION NO. 11-05

A RESOLUTION BY THE DENALI BOROUGH ASSEMBLY SUPPORTING THE NO ACTION ALTERNATIVE CONCERNING THE JOINT PACIFIC ALASKA RANGE COMPLEX (JPARC).

WHEREAS, the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Environmental Impact Statement proposes extending training, including live ordnance delivery, within the confines of the Denali Borough; and

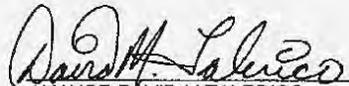
WHEREAS, the Denali Borough Assembly is the governing body of the Denali Borough; and

WHEREAS, the areas in question are important to Denali Borough residents for a variety of uses including hunting, recreation, and access to private property; and

WHEREAS restrictive and constraining uses of Denali Borough lands have been identified by the extension of the in-place bombing and military lands identified in the JPARC Environmental Impact Study.

NOW THEREFORE BE IT RESOLVED: that the Denali Borough Assembly supports the "No Action" alternative concerning proposed realistic live ordnance delivery.

PASSED and APPROVED by the DENALI BOROUGH ASSEMBLY this 9th day of FEBRUARY, 2011.


MAYOR DAVID M TALERICO

ATTEST: 
GAIL PIEKNIK, BOROUGH CLERK



Ayes: PASSED UNANIMOUSLY
Absent: HOLMES, LAUSEN, BULARD and EVANS

G0013

Submittal ID	Commenter	Title	Organization	Topic List	Comment
G0013	Paul Hunter	External Review Coordinator	National Park Service, Alaska Regional Office	All resource areas, Subsistence, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>VIA ELECTRONIC MAIL: NO HARD COPY TO FOLLOW National Park Service Alaska Regional Office 240 W. 5th Avenue Anchorage, AK 99501 ALCOM Public Affairs 9480 Pease Avenue, Suite 120 IBER, AK 99506 The following comments are provided for the draft environmental impact statement (DEIS) for proposed U.S. Department of Defense military training for the Joint Pacific Alaska Range Complex (JPARC) in Alaska: While the JPARC does not include park areas directly, it is near the Wrangell-St. Elias National Park and Preserve (WRST). Impacts on subsistence in one area necessarily influence subsistence in nearby areas. For this reason, there is concern regarding the effects of training operations on subsistence users within Alaska Game Management Unit 13, especially along the Denali and Richardson Highways. The subsistence analysis for the expanded Fox 3 and new Paxon MOAs is incomplete in terms of the communities analyzed, the data upon which the analysis is based, and how the communities are classified with regard to their dependence on subsistence. Limiting the subsistence analysis to the eight communities within 20 nautical miles of the MOAs does not accurately represent patterns of resource use and distribution in the Nelchina Basin/Copper Basin area. Many communities beyond those addressed in the analysis rely on resources in the impacted areas and consequently will be negatively impacted by the proposed actions. Resources are spread across the local landscape, and local residents go to where the resources are. Sometimes that means driving substantial distances. Instead of the handful of communities included in the draft EIS, the analysis should be expanded to all those communities with a positive customary and traditional use determination (C&T) under the Federal Subsistence Program for moose, caribou or both on lands within the Fox and Paxon MOAs. Customary and traditional use determinations are based on an analysis of all available data regarding patterns of resource use and provide a more realistic basis for identifying impacted communities than the 20 nautical mile rule. In what follows, the phrase "potentially affected rural communities" refers to the communities that have C&T for moose or caribou in the MOAs.</p> <p>Also, community harvest data that is over twenty years old is not adequate to evaluate impacts to contemporary subsistence livelihoods (To those familiar with this data, the "most representative year" referred to in the analysis is identifiable as the most recent year for which comprehensive subsistence survey data are available.). JPARC could follow the lead of the Alaska Gas Pipeline Project and base its analysis on updated comprehensive community subsistence data, providing funding to support updated surveys where needed. The Sustina-Watana Hydroelectric Project is similarly considering the need to conduct updated comprehensive subsistence surveys as part of its planning process.</p>

G0013

As a first step, the list of potentially affected rural communities (as discussed above) could be examined in terms of when the most recent comprehensive harvest survey took place and whether an update is scheduled in the next year or two. For those potentially affected rural communities that are five or more years out from the most recent update and not on the list for an update, funding could be provided to the Alaska Department of Fish and Game Subsistence Division or a similarly qualified independent organization to collect this information. A decision on the project should be delayed until up-to-date subsistence information for the potentially affected rural communities can be incorporated into the subsistence impact analysis. Finally, limiting the communities with high dependence on subsistence to only those with majority Alaska Native populations fails to recognize the importance of subsistence to other local residents. While it is appropriate for predominately Alaska Native communities to fall in the “high dependence” category, there are other rural communities in the area that should also be classified as such. Once up-to-date information is obtained regarding the harvest and use of subsistence resources (as described in the previous paragraph), this question should be revisited for all the potentially affected rural communities. Communities in which 80 percent or more of the households report using subsistence resources should be classified as high dependence regardless of the community’s composition. Thank you for the opportunity to comment, and for extending the comment period. If you have questions, you may contact Barbara A. Cellarius, Ph.D., Cultural Anthropologist/Subsistence Specialist, Wrangell-St. Elias National Park and Preserve, P.O. Box 439, Copper Center, AK 99573-0439, Tel. 907 822 7236, Fax: 907 822 7216, Email: barbara_cellarius@nps.gov, for further information. Sincerely /s/ Paul Hunter for Joan Darnell, Team Manager Environmental Planning and Compliance

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[REDACTED]

From: Phelps, Bruce G (DNR) [REDACTED]
Sent: Thursday, July 05, 2012 3:20 PM
To: ALCOM J08 Admin Box
Cc: Goodrum, Brent W (DNR); Parsons, Martin W (DNR)
Subject: DNR Comments on JPARC Proposal
Attachments: ADNR response to JPARC 5 July 2012.pdf

See attached. If any clarification is needed contact me at [REDACTED]

G0014

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF MINING, LAND AND WATER

SEAN PARNELL, GOVERNOR

550 WEST 7TH AVENUE, SUITE 1070
ANCHORAGE, ALASKA 99501-3579
PHONE: (907) 269-8600
FAX: (907) 269-8904

July 5, 2012

ALCOM Public Affairs
9480 Pease Av. Suite 120
JBER, AK 99506-2101

Subject: Review of Realistic Live Ordinance Delivery, EIS for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska

Dear Sir:

The following are the Alaska Department of Natural Resources' (DNR) comments and recommendations on the Definitive Action described in the EIS related to the Realistic Live Ordinance Delivery proposal. The first part of this response identifies issues related to clarity of the proposal and provides additional background information pertinent to the closure of state land. The second identifies proposed changes to the Realistic Live Ordinance Delivery option, and a final section focuses on those actions that may be required by the state to ensure public safety when live fire exercises are underway. These comments assume that either the Donnelly Training Area or the Blair Lakes Training Area are available and that the actual delivery of ordinance occurs within a limited area within each of these training areas.¹ It is also assumed that the military can or should be able to identify specific portions of the overall target area that may be affected at specific periods of the year.

Clarity of Proposal. Table 2-5 identifies Airspace Designation and the annual days of use. In the case of R-2202A, B, C, and D the number of days of use is approximately 250. In the case of R-2211 it is 170. However, on page 2-12, line 27, use days are identified as 150 annually. The text needs to be clarified to explain why R-2211 cannot be used more frequently, and there needs to be discussion, if Alternative B is selected, on the distribution of use days between the two Training Areas. It would seem that a more even distribution would result if alternative training sites were available. There also needs to be some discussion as to whether there is the ability by the military to shift the sortie approach from one attack angle/area to another in order to avoid the public recreation and hunting. This is important since the public uses particular areas at specific times of the year, and the avoidance of these areas through the selection or specific attack vectors would mitigate impacts.

Background Information. The following information was compiled through discussions with the ADF&G area biologist, staff within the Northern and South-central Regional Offices of the Division of Mining, Land, and Water (DMLW), Northern Regional Office of the Division of Parks and Outdoor Recreation, and the DMLW Mining Section.

¹ Based on discussions with JPARC personnel, the delivery of ordinance occupies a specific horizontal and vertical portion of the Drop Areas. For example, a delivery could use the area of R-2202A, as depicted in Figure 2-4. It would seem, then, that this horizontal and vertical airspace could be managed in such a way that during periods of the year when a sensitive public activity occurred near the impact zone, that the vector furthest away from this site could be selected for use at that time.

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Moose Hunting. The principal use in the ground evacuation areas is for moose hunting, conducted during two general time periods during the year – fall and winter. The fall period extends from August 15 to September 15 with the highest use period occurring from September 1 to 15. Hunting during the fall season occurs on every day of the week, including weekends. The winter hunt is primarily conducted during two time periods early winter (November 15 to December 15) and late winter (January 15 to February 28). Winter hunts generally occur on weekend days when weather conditions permits. The time period between December 15 and January 15 is generally avoided due to seasonal low temperatures. During the fall hunting period, access for hunting is generally provided by ATV trails, rivers, and airstrips. During the winter hunting period, access is generally more widespread as more areas are accessible via snowmobile. Of the areas affected by the “Definitive Actions”, the foothills on the south flank of the Alaska Range are more extensively used than the adjacent low-lying wetlands. This is because the foothills support a diversity of high quality moose habitats and generally have higher densities of moose. Furthermore, the foothills offer vantage points for use by hunters in pursuit of game.

Recreation and Other Uses. Recreation use is scant, especially in relation to other areas that are closer to the road system, with some amount of concentration occurring at Rainbow Lake and the Richardson/Clear areas. Other areas experience some use, with most of that occurring on weekends along the Rex Trail and the Wood River. Access from the east is provided by DNR Division of Forestry roads, from the north by Wood River and the airstrip near Gold King, and from the west by the Rex Trail. Much of this use is related to access to home sites in the Wood River drainage, where a state subdivision exists, and mostly occurs on the weekends, but also including Friday afternoon activity. Mining operations are limited to some exploration activity in the area of the mining claims west of the Donnelly Training Area, and it is not expected that mining activity will concentrate in the ground evacuation areas owing to the absence of mineralized deposits. Finally, depending on the source consulted, there are between six and 12 trap-lines that are run in this area. These target wolf, lynx, and martin.

In general, then, the principal use of the ground evacuation area is related to moose hunting, but this hunting occurs during two periods, as noted above. The EIS identifies only the September period for moose hunting and it uses different dates than those actually associated with this hunting activity. Mitigation measures should therefore focus on this period of time. Moreover, this pattern is also likely to continue in the future; there are no additional state land disposals that are planned and the area lacks access and economically usable resources.

Changes to Mitigation Measures. While the state is very much interested in providing a training area for the military that permits the continuation of the current forces in the Fairbanks area, this must be weighted against the impact that the Realistic Live Ordinance Delivery option upon the public and, specifically, their use of state land. Our interest is in minimizing that impact. The following changes to the current mitigation measures are recommended. We also believe that the use of both the Blair Lake and Donnelly impact areas is appropriate since this alternative (B) minimizes adverse effects to public activity on state land during high use periods, which tend to occur during the fall hunting season.

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- The number of actual days that the ground evacuation area is closed under the Definitive Actions needs to be clarified. The text on pg 2-12 line 27 states activities would be conducted 150 days annually, while the table 2-5 presented just prior indicates 250 days of annual use.
- Information provided by ALCOM planners indicates that no training activities will occur during Saturday and Sunday throughout the year. Additionally, pg 6 line 29 indicates that no training activities will occur after 7:00 pm on Friday including Saturday and Sunday. In recognition of use patterns by hunters, the year round restriction on training activities on weekends should be extended to include Friday afternoon. People using the ground evacuation area often gear up, travel to the area, and start using these areas beginning in the early afternoon of Friday. It is therefore appropriate to accommodate this activity since it is directly related to the weekend use of this area. Openings on Fridays should be restricted to 0700 to 1400 hours.
- The period when no training exercises will occur related to moose hunting season should be changed, to reflect the actual current pattern of use. Closure should occur from August 15 to September 15, November 15 to December 15, and January 15 to February 28. These dates may change over time and it is recommended that the military review the closure dates with the ADF&G at the beginning of the year (or another time that may be appropriate for the parties. The closure of the ground evacuation area between June 27 and July 11 is considered appropriate.
- Include alternatives and/or recommendations for the horizontal/vertical stratification of the attack vectors, to provide for diversity of approach and to minimize impacts on the public. See comments that immediately follow.
- During the moose hunting periods, sorties should be directed to the Blair Training Area for inert ordnance and to the use of attack vectors that are more distant from Wood River. During the same period, inert and live ordnance may use the Donnelly Training Area. Our preference is that the more northerly/easterly attack vectors be used during this period within this area.
- At other times of the year, operations are appropriate in either training area, although our preference is to use attack vectors that are to the north and east and that avoid the Wood River and Rex Trail areas in the Blair Lakes Impact Area and to use attack vectors with a similar orientation for the Oklahoma Impact Area, to avoid use areas to the west.
- In addition to these measures it is recommended that the military publish, at the beginning of the calendar year, proposed closure areas and the dates associated with this use. This will allow the public to know in advance which areas are to be avoided, especially if it is ultimately determined that both military training areas are to be used and that specific attack vectors are to be used. This information should be displayed on maps that are easy for the public to understand.
- The military should coordinate with local government and the Alaska Department of Natural Resources on an annual basis, or as needed, to provide information and maps that identify closures and public access restrictions.

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State to Prepare Regulations. As we have indicated in both discussions with military staff and in correspondence, since the military must have control over the surface at the times of ordinance delivery, the state will be obliged to develop a special use designation (SUD) for the impacted areas as well as implementing regulations. Without the use of these methods the federal government will not be able to ensure control over this area and therefore meet federal requirements for the control of surface activities in areas that it does not own.

From our perspective, the SUD and its regulations must be developed in such a way that maximum public use of the ground evacuation areas is retained while closing such areas for the minimum period of time necessary to conduct such operations. The SUD will have to identify areas and dates of closure and will have to indicate which activities are affected. (We presume that all public access to and uses within the ground evacuation areas may not be precluded.) To ensure that we meet the test of minimizing impacts to the public, the mitigation measures that are identified above must be given careful consideration and incorporated where feasible. We also recommend Alternative B as described on p. 2-16 as the preferable option. The regulations must reflect the access recommendations contained in the SUD.

Although this letter deals with the Realistic Live Ordinance Delivery proposal, I need to emphasize that DNR has also serious concerns with the proposed Military Operating Area (for aircraft) and specifically with the probable impacts of that proposal on public access, including both land access and aircraft movement. These concerns and the state's response to these issues are to be provided, however, by the Alaska Department of Transportation and Public Facilities in separate correspondence.

Should you wish to discuss this further or require clarification of issues that are identified here, please contact Bruce Phelps, Chief, Resource Assessment and Development Section at 269-8592 or bruce.phelps@alaska.gov


Brent Goodrum, Director
Division of Mining, Land, and Water

G0015

[REDACTED]

From: Mutter, Doug [REDACTED]
Sent: Thursday, June 28, 2012 4:37 PM
To: ALCOM J08 Admin Box
Cc: Bergmann, Pamela
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission
Attachments: ER12_235_JPARC_DEIS_DOI_comments.pdf

Attached are the U.S. Department of the Interior comments on the Draft JPARC Modernization and Enhancement Environmental Impact Statement.

Douglas Mutter
Regional Environmental Assistant
U.S. Department of the Interior
Office of Environmental Policy and Compliance

[REDACTED]





United States Department of the Interior

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

9043.1
PEP/ANC
ER 12/235

June 28, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506-0898

Dear Lieutenant General Hoog:

The Department of the Interior has reviewed the March 2012 Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Draft Environmental Impact Statement (Draft EIS). The Draft EIS analyzes twelve military training improvement actions proposed on military range lands, maritime training areas, and airspace units of the U.S. Department of Defense (DoD) in Alaska.

Our comments and recommendations are made in accordance with the National Environmental Policy Act, Endangered Species Act, Fish and Wildlife Coordination Act, Bald and Golden Eagle Protection Act, Migratory Bird Treaty Act, Wild and Scenic Rivers Act, and Federal Land Policy and Management Act. Our general comments are below; specific comments are provided in Attachment 1. We believe these comments need to be addressed in the Final EIS.

Threatened and Endangered Species

The short-tailed albatross (*Phoebastria albatrus*) is listed as endangered under the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq; 87 stat 884, as amended). Short-tailed albatross is a pelagic seabird whose range includes the Gulf of Alaska in the Temporary Maritime Activities Area during the months of April through October. In February 2010, the U.S. Navy (Navy) produced a *Biological Evaluation (BE) for the Gulf of Alaska Navy Training Activities* (referenced in Navy 2011). The BE assessed potential effects of Navy training activities on short-tailed albatross and described effective protective measures for the species. Information on potential effects of the proposed training activities and mitigation measures that will be used to avoid adverse impacts to short-tailed albatross in the Gulf of Alaska need to also be included in the Final EIS.

The proposed programmatic action for "Missile Live Fire for AIM-9 and AIM-120" occurs in the summer range of the short-tailed albatross in the Gulf of Alaska. Therefore, the Final EIS needs to state that DoD will initiate consultation with the Fish and Wildlife Service (FWS) for short-

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tailed albatross, if the “Missile Live Fire for AIM-9 and AIM-120” action is developed into a “Definitive Action.”

Migratory Birds and Bald and Golden Eagles

As discussed below, existing data and additional information for eagles need to be presented and analyzed in the Final EIS. For example, the number of bald and golden eagles that inhabit the proposed Fox 3 and Paxson Military Operations Areas (MOAs) needs to be included and analyzed in the Final EIS. FWS maintains a geospatial database with historic eagle nest locations (see Attachment 2). These data, which represent nests easily observed from roads and highways, are available for public and agency use. It should be noted that, although not a complete depiction of all eagles in the area, the map indicates records of approximately 1,074 bald and golden eagle nest sightings within the JPARC Region of Influence as described in the Draft EIS. The Final EIS also needs to more clearly identify the number of bald and golden eagles potentially at risk during nesting periods due to DoD activities along the definitive low-level flight paths.

The Final EIS also needs to analyze mitigation measures to help ensure all nesting and/or molting migratory birds are not adversely impacted by low-level flights. Scientific literature indicates human-caused disturbance can change behavior and spatial distribution of waterfowl (Manci et al. 1988, Dahlgren and Korschgen 1992). Effects include interruption of feeding (Madsen 1985, Ward et al. 1994), displacement from feeding areas (Kramer et al. 1979, Belanger and Bedard 1989, Conomy et al. 1998), and increased energy expenditure resulting from escaping behaviors (Korschgen et al. 1985, Jensen 1990). If disturbances are sufficiently frequent, disturbance may result in reduction of energy reserves (White-Robinson 1982, Belanger and Bedard 1990, Miller et al. 1994) important for migration (Owen and Black 1989), molt (Taylor 1993, 1995), and survival (Haramis et al. 1986). The Draft EIS acknowledges significant bird migration routes in Interior Alaska and identifies high-density areas of nesting waterfowl that underlie the Expanded Fox 3 and Paxson MOAs; page 3-47 notes “Habitat used by ducks, geese and trumpeter swans is especially important under the southwestern part of the Fox 3 expansion area and the southern part of the proposed Paxson MOA, coinciding with the larger river systems and marshy areas.” The combined Fox 3 and Paxson MOAs cover more than 2 million acres of nationally-significant waterfowl nesting habitat. Most migratory bird nesting (and the associated post-nesting molt of adult birds) occurs in Interior Alaska between April 15 and August 1. Prohibiting low-level flights (i.e., flights below 1,600 feet) between April 15 and August 1 (USFWS(2) 2007) could help reduce or eliminate the potential impact to nesting and molting migratory birds.

Moreover, the Final EIS needs to provide and analyze information on the potential effects of aircraft overflights on nesting birds. While some studies have been conducted in Alaska on potential effects of aircraft on migratory birds; as noted below, the effects appear to differ widely among species of birds, and their potential habituation to aircraft disturbance. For example, Palmer et al. (2003) studied the effect of jet aircraft overflights on the parental care of peregrine falcons (*Falco peregrinus*) breeding along the Tanana River in Alaska during 1995-1997. Military jets flying at or below 150 meters (about 500 feet) in the vicinity of specific nest cliffs within established Military Training Routes caused only subtle differences in peregrine parental behavior, no significant differences in nest attendance patterns, and no reduction in productivity

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of nesting pairs (Nordmeyer 1999). Ward et al. (1999) observed the behavioral response of fall-staging flocks of Pacific Brant (*Branta bernicla nigricans*) and Canada geese (*B. canadensis taverneri*) to a variety of aircraft and found 75 percent of brant flocks and 9 percent of Canada goose flocks flew in response to overflights, with an inverse relation between altitude and response and with the greatest response occurring at aircraft altitudes between 305 and 760 meters (1,000 to 2,500 feet). In that study, lateral distance was a more consistent predictor of response than altitude, with the greatest disturbance occurring when aircraft were within a lateral distance of ≤ 1.6 kilometer (about 1 mile) to the flock. Please refer to Attachment 3 for citations of studies we believe will help facilitate analysis of the potential impacts of aircraft overflights on nesting birds. The resulting analysis needs to be included in the Final EIS.

We are concerned the newly proposed low-altitude MOA, extending from 500 to 5,000 feet above ground level (AGL) in both the Fox 3 and Paxson MOAs, could result in significant adverse impacts to nesting migratory birds. The "Definitive Actions" in the Draft EIS are vague and do not provide specific actions to protect a given resource. For example, the Proposed Mitigation for the Fox 3 and Paxson MOAs (Table K-2 on page K-9), states: "Consult with the USFWS with regard to compliance with Bald and Golden Eagle Act and MBTA. As required, conduct bald and golden eagle surveys in proposed Fox 3 and Paxson MOAs over previously unsurveyed areas. Coordinate the results with USFWS." The Final EIS needs to clarify and specify proposed mitigation measures for "Biological Resources," including nesting migratory birds. The most commonly-recommended best management practice for protecting nesting swans, other waterbirds, and raptors (as well as other wildlife) in the vicinity of aircraft overflight is to maintain aircraft operating guidelines limiting helicopter and fixed-wing overflights to a minimum of 400-500 meters (approximately 1,300-1,600 feet AGL) with no circling over nests or aggregations (Komenda-Zehnder et al. 2003, and Churchill and Holland 2003). The National Bald Eagle Management Guidelines (USFWS 2007) recommend helicopters and fixed-winged aircraft avoid eagle nests by 1,000 feet during the breeding season, except where eagles have demonstrated tolerance for that activity. DoD needs to consult with the FWS prior to completing the Final EIS to determine what specific protective mitigation will need to be included in the Final EIS to protect nesting migratory birds.

Recreation Resources and Activities

We recommend that the footprint of the Fox 3 MOA, as described in Alternative E, be moved to the north by approximately 20 nautical miles to help reduce the negative effects on opportunities for solitude in the Lake Louise area.

We are concerned that the flight ceiling for both the FOX 3 and Paxson MOAs in both Alternatives A and E has been lowered from 5,000 feet AGL to 500 feet AGL. It should be noted that the Bureau of Land Management (BLM), through its recreation program, has documented over the years, numerous encounters by recreational users of BLM-managed lands with military overflights. These encounters have included low level overflights in the current Fox 3 MOA on the Upper Tangle Lakes and Delta River; some of these encounters included shockwaves and loud noise associated with aircraft breaking the sound barrier. We believe a lower flight ceiling in the Fox 3 MOA, combined with the same lower flight ceiling in the proposed new Paxson MOA, would likely reduce opportunities for solitude on many of the lands BLM manages. With recreational visitation to developed facilities and backcountry trails on

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BLM-managed lands in this area and on the Gulkana and Delta Wild and Scenic Rivers annually exceeding 150,000 visitors, the Final EIS needs to include avoidance areas and mitigation measures that will preserve opportunities for solitude on the nationally-designated Gulkana and Delta Wild and Scenic Rivers and associated developed facilities for the Fox 3 and Paxson MOAs in both Alternatives A and E.

We recommend that the Final EIS identify a mechanism (e.g., telephone number or web site) for providing the public and land managers at least annually, or more often as appropriate, information on flights and maneuvers. This mechanism should be structured so that it offers the opportunity for recreational users to provide feedback to DoD, such as reports of non-compliance and/or complaints. This could also be used by both DoD and BLM for tracking issues and documenting successful mitigation.

Wildland Fire Management

Under the proposed action #6, newly created “corridors” between Eielson Air Force Base (AFB) to R-2211; Eielson AFB to R-2205; Allen Airfield to R-2202; R-2202 to R-2211; R-2205 to R-2202; Fort Wainwright to R-2211; and Fort Wainwright to R-2205 would, in essence, create a virtual “wall” extending nearly 90 air miles from Fairbanks and Fort Greely. This virtual “wall” would go from 1,200 AGL to 17,999 AGL. DoD has indicated that these corridors would be in operation from 07:00-19:00 Monday through Friday, or as extended by a Notice to Airmen. It is our understanding that the purpose of these corridors is to allow operation of Unmanned Aircraft Systems (UAS). According to the Draft EIS, if the Army meets all Federal Aviation Administration requirements for UAS use in the National Air Space, the Certificate of Authorization process, as it currently stands, would shut down the airspace in these proposed corridors. However, even if military Unmanned Aerial Vehicle aircraft were outfitted with Mode-C transponders, most of the BLM Alaska Fire Service (AFS) air fleet and contracted aircraft do not have Traffic Collision Avoidance avionics.

A virtual “wall” of this magnitude, as described in the Draft EIS, would likely result in significant negative effects on the BLM AFS and Alaska Department of Natural Resources Division of Forestry (DOF) joint aviation operations for fire management by cutting off access to the east for AFS and DOF, and cutting off access for DOF to the west. Three of the five wildland fire air tanker bases located in Alaska are on either side of this virtual “wall” in addition to all of the helitack and smokejumper bases. Furthermore, 1,200 to 17,999 AGL cuts off all Visual Flight Rules (VFR) traffic heading in either direction. As a result, only pressurized aircraft (the majority of which are not part of the BLM air fleet or their contracted fire management aircraft) could make the east-west transition, since only pressurized aircraft are capable of flying at altitudes of 18,000 and above.

We believe DoD needs to include in the Final EIS, an alternative approach to UAS use of air space and corridors that does not negatively impact AFS/DOF aviation operations for fire management, which are essential to helping protect life and property during wildland fires. In order to eliminate this virtual “wall,” we recommend DoD continue the practice of moving UAS between MOAs and other special use air space via ground transportation.

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We appreciate the opportunity to comment on this document. For technical assistance or questions regarding threatened/endangered species or migratory birds (including bald and golden eagles), please contact Jewel Bennett at the Fairbanks FWS Field Office at 907-456-0324. For technical assistance or questions regarding BLM-managed lands, wildfire activities, or Wild and Scenic Rivers, please contact Serena Sweet at the Anchorage BLM State Office at 907-271-4543.

Sincerely,



Pamela Bergmann
Regional Environmental Officer - Alaska

Attachments

G0015**Attachment 1****Specific Comments**

Page 1-36, Line 42, Section 1.6.4.3.1 Federal Agencies with Jurisdiction by Law, United States Fish and Wildlife Service: The jurisdictional responsibility of the FWS for administration of the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act needs to be added to this section.

Pages 2-6 and 2-7, Section 2.1.1.1. Alternative A: The Draft EIS states that the flight ceiling for routine training exercises in Alternative E for the Paxson MOA would be limited to 13,000 feet Mean Sea Level (MSL) and above (see page 2-7), while the flight ceiling for routine training exercises in Alternative A is 14,000 feet MSL and above (see page 2-6). The Final EIS needs to clarify why the flight ceiling is lower in Alternative E than Alternative A, given that Alternative E was designed to “provide a greater separation from the airways, jet routes, and airfields located south of the proposed airspace boundaries” (page 2-7). We believe the flight ceiling for routine training exercises in the Paxson MOA for Alternative E needs to at least match the flight ceiling for routine training exercises for the Paxson MOA in Alternative A at 14,000 feet MSL and above, and that this information needs to be included in the Final EIS.

Page 3-13, Line 13, Section 3.1.1.3.1 Alternative A: To ensure accuracy, the reference to “fire” needs to be changed here, and throughout the Final EIS, to “wildland fire.”

Page 3-30, Lines 23-26, Section 3.1.3.3.1 Alternative A, Bird/Wildlife-Aircraft Strike Hazards: The Draft EIS does not specify the “consideration of additional means for monitoring...heightened risks of bird strikes” in the Fox 3 and Paxson MOAs zones. The Final EIS needs to specify “limits that would be placed on low-altitude flight activities.” The BLM-managed lands within these proposed MOA expansions provide habitat for populations of sensitive species (e.g., trumpeter swan and golden eagle) that may be adversely affected due to bird strikes caused by military aircraft between the 500 to 2,500 foot AGL. The Final EIS also needs to include information on what scientific means would be used to track migrations of birds, since “anecdotally observing lots of birds” is insufficient. As identified in Bruderer (1997) and Gauthreaux and Belser (2003), use of radar equipment can help in determining when large flights of birds are traveling north before and/or during Major Flying Exercise (MFEs) and regular training events. In addition, monitoring weather systems, especially wind speed and direction, can also help determine when to expect higher frequencies of migrations (Gauthreaux and Belser 2003).

Page 3-31, Line 4, Section 3.1.3.3.1 Alternative A, Ground Safety: The phrase “wildlife fires” needs to be corrected in the Final EIS to read “wildland fire” and “wildfire management” needs to be corrected to read “wildland fire management.”

Page 3-31, Line 6, Section 3.1.3.3.1 Alternative A, Ground Safety: The phrase “fire management” needs to be corrected in the Final EIS to read “wildland fire management.”

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Page 3-49, Lines 25-29, Section 3.1.8.3.1 Alternative A: The Final EIS needs to ensure that the proposed Fox 3 and Paxson MOAs include the 3,000-foot AGL overflight buffer over the Nelchina Caribou Herd Calving Grounds (represented in Figure 3.5 on page 3-41) annually from May 15 to June 15. This also corresponds with Wolfe et al. 2000, who recommends minimizing disturbance during critical stages (i.e., calving season) when cows were the most susceptible to elevated energy requirements.

Page 3-50, Lines 2-3, Section 3.1.8.3.1 Alternative A: We recommend maintaining in the Final EIS, a limitation of supersonic operations at altitudes of 5,000 feet AGL, or 12,000 feet MSL to help minimize noise disturbance to wildlife inhabiting the area when operations take place.

Page 3-50, Line 35, Section 3.1.8.4 Mitigations: In addition to all mitigation measures listed, the Final EIS needs to include an extension of “established noise sensitive areas” (see Figure D-3 on page D-13) that encompasses the west fork of the Gulkana National Wild and Scenic River. This extension is necessary due to the high number of active Bald Eagle nests located in that area, as identified by BLM productivity surveys conducted there every three years.

Page 3-50, Line 35, Section 3.1.8.4 Mitigations: The Final EIS needs to include the Dall sheep lambing area within the Clearwater Mountains and establish a noise sensitive area in that identified location. Identified Dall sheep spring mineral licks also need to be included in the established seasonal flight avoidance areas within the Clearwater Mountains and upper Susitna drainages.

Page 3-99, Lines 17-18, Section 3.1.13.4 Mitigations, first bullet: We believe that use of aircraft, which has been determined as a customary and traditional use for all federal subsistence communities affected by the Fox 3 and Paxson MOAs expansion/creation, may be significantly affected during open federal subsistence hunting from August 1 through August 31, October 1 through November 30, and January 1 through March 31 (caribou season). Therefore, we recommend in the Final EIS, an extension of the time frame for “No MFEs” to cover the period of August 1 through September 30 in the Fox 3 and Paxson MOAs to avoid the federal subsistence moose season and the first half of the federal subsistence caribou season, the most intensively hunted season. Since the Fox 3 and Paxson MOAs encompass most of unencumbered BLM lands open to federal subsistence hunting, this would help ensure that potential adverse effects on federal subsistence use would be minimized.

Page 3-99, Lines 26-29, Section 3.1.13.4 Mitigations, fourth bullet: The Final EIS needs to (1) specify the time frames for this proposed mitigation; i.e., “Conduct regular meetings with regulating agencies...” and (2) identify what thresholds would be required for the USAF to “adjust flight avoidance locations, or to add new ones.”

Page 3-237, Line 15, Section 3.4.8.1 Affected Environment, Table 3-50: This table references a U.S. Geological Survey (USGS) 2011 publication; however, the publication is not included in the list of references in Section 6. This needs to be corrected in the Final EIS.

Page 3-330, Lines 23-24, Section 3.7.6.1 Affected Environment: The Draft EIS references USGS surface-water discharge data (USGS 2011-1); however, the data publication is not included in the list of references in Section 6. This needs to be corrected in the Final EIS.

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Page 4-27, Line 3, Section 4.8.8 Biological Resources: The Final EIS needs to more fully discuss cumulative impacts to biological resources in the Fox 3 and Paxson MOAs and adjacent areas. With new mineral exploration, large hydro power projects (e.g., the Sunitna-Watana project), new oil/gas pipelines, and various other land developments in place or reasonably foreseeable, the cumulative effects of all of these land decisions, in addition to these airspace/temporary ground structures, could have a significant and synergistic effect on many biological resources. Therefore, we believe both direct and indirect cumulative effects issues; geographic scope; timeframe; and past, present, and reasonably foreseeable actions, need to be more fully analyzed for the proposed expansion of Fox 3 and Paxson MOAs.

Pages D-15 and 16, Table D-6 Flight Avoidance Areas: The Table D-6 Flight Avoidance Area entry for row #36 is incorrect. This needs to be corrected in the Final EIS to read “Gulkana” and not “Juliana” National Wild and Scenic River.

While we agree with the Flight Avoidance Areas depicted in Table D-6 for both the Delta and Gulkana National Wild and Scenic River areas (row 19 and row 36 [as corrected], respectively); we believe that the flight ceiling for those areas needs to be changed in the Final EIS to 5,000 feet AGL, rather than 5,000 feet MSL. Because much of the land underneath the Fox 3 and Paxson MOAs is at an elevation of approximately 1,500 to 3,000 feet above sea level (e.g., Paxson is approximately 2,500 feet above sea level), a 5,000 feet MSL ceiling is effectively only 2,000 to 3,500 feet AGL. To preserve the opportunity for solitude, overflight operations in the vicinity of the Gulkana and Delta Wild and Scenic Rivers would need to occur at least 5,000 feet AGL.

In addition, we believe the flight avoidance times of year need to be expanded to include the busy summer recreation and fall hunting seasons. Therefore, the proposed avoidance time of year for the Gulkana and Delta Wild and Scenic Rivers needs to be changed in the Final EIS from June 27 through July 11 to May 15 through September 30. These dates more closely match many of the dates for the other avoidance areas listed, and would offer more opportunities for solitude, since most of BLM’s busiest recreational facilities, as well as the Gulkana Wild and Scenic River, would be underneath the new Paxson MOA.

Pages K-19, 23, and 24, Table K-2 Proposed Mitigations: We believe “Land Use-Recreation” and “Land Use” mitigations identified to occur from June 27 to July 11 and from August 20 to September 30 for MFE operations in the Fox 3 and Paxson MOAs need to be changed in the Final EIS to include the dates of May 15 through September 30. The May 15 through September 30 timeframe dates more closely match many of the dates for the other avoidance areas listed, and offer more opportunities for solitude since most of BLM’s busiest recreational facilities as well as the Gulkana Wild and Scenic River would be contained underneath the new Paxson MOA.

Page K-20, Table K-2 Proposed Mitigations: While we support the avoidance area extending five nautical miles on either side of both the Gulkana and Delta Wild and Scenic River areas, in order to preserve solitude, a 5,000-foot AGL (rather than a 5,000 foot MSL) flight ceiling needs to be included in the Final EIS. We also believe the Final EIS needs to indicate that the expanded avoidance area will be in effect from May 15 through September 30 annually.

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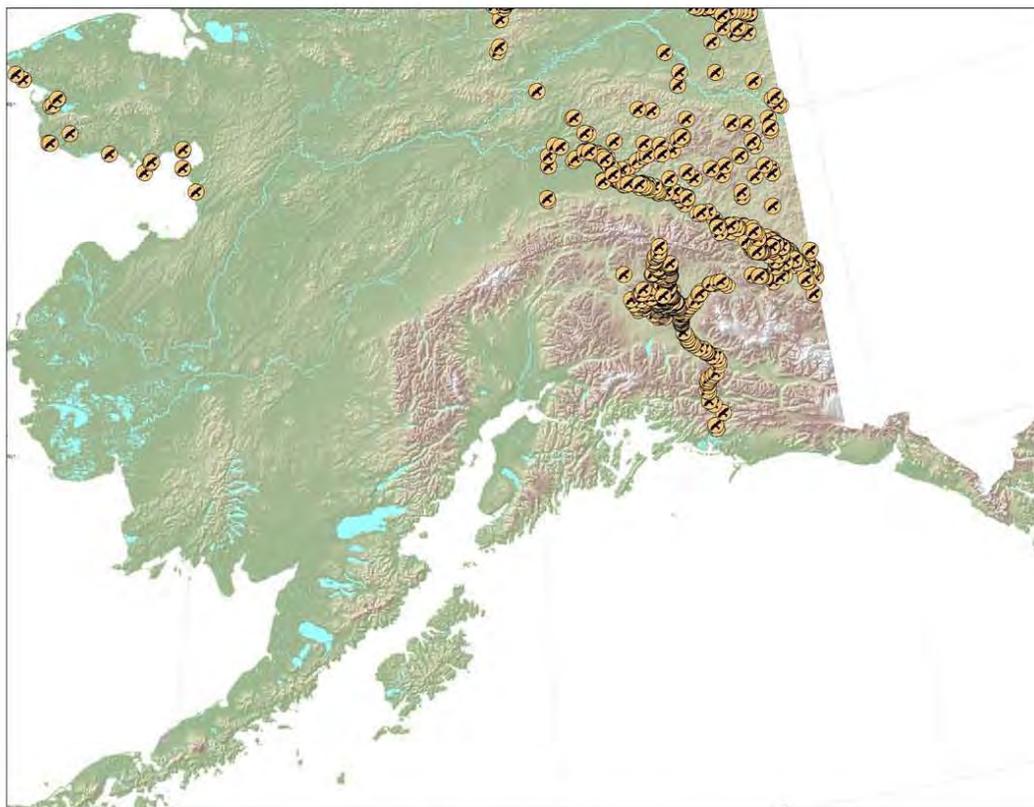
Page K-21, Table K-2 Proposed Mitigations: The Final EIS needs to identify a flight ceiling of 5,000 feet AGL, an avoidance area extending 5 nautical miles, and a time frame to include May 15 through September 30 for the "Land Use-Recreation" mitigation. This will ensure consistency with previous comments regarding BLM-managed lands and subsistence use areas.

Page K-25, Table K-2 Proposed Mitigations: Because of the importance of reducing or eliminating the potential to ignite wildfires on BLM (and other) lands within these MOAs, we support the mitigations for the release of flares and chaff in the Fox 3 and Paxson MOAs, and recommend specifying in the Final EIS, a release altitude of at least 2,000 feet AGL between October and May, and 5,000 feet AGL between June and September.

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Attachment 2

Map of Historic Eagle Nest Locations



NOTE: GIS shape files and maps to be used in analysis for the Final EIS are available through the Fairbanks Fish and Wildlife Service Field Office. Please contact Jewel Bennett at 907-456-0324.

Attachment 3

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Lieutenant General Stephen L. Hoog
 Commander, Alaska Command
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RE: *Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC) in Alaska (JPARC Modernization and Enhancement Draft EIS).*

Dear Sir,

The City of North Pole (CONP) would like to take this opportunity to comment on the Draft *Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC) in Alaska.*

The City of North Pole supports the U.S. Air Force and Army and their missions in Alaska and recognizes the need for expanding JPARC to accommodate current and future training needs. The CONP supports the increased use of JPARC, and the planned expansion as it represents no overall negative impact on the community. However, the analysis of the environmental impacts assumes the current force structure at Eielson Air Force Base and Fort Wainwright as a baseline and does not consider an alternative force structure basing scenario identified in the Air Force's proposed fiscal year (FY) 2013 budget.

The JPARC ranges and facilities far surpass the quality and quantity of similar range functions found in other locations within the continental United States and Hawaii. The large size of the JPARC ranges allow for the use of live ammunition from all Army, Air Force, and Navy platforms and weapons systems; allows the Air Force to fly at combat speeds well over Mach 1; allows for joint exercises between the Army, Air Force, Marines, Navy, Coast Guard and our Allies in weather conditions ranging from sub-zero arctic temperatures to hot humid summer days; and results in the finest training opportunities in the United States for our soldiers, sailors, and airmen. The CONP is proactive in addressing military concerns on JPARC utilization and strives to lead the nation in willingness and ability to ensure that the military can conduct world class training missions and significantly improve readiness status.

The CONP believes it is necessary for the State of Alaska and the Department of Defense to continue working closely and cooperatively in order to enhance both the use of the JPARC and the development of the natural resources located within the JPARC, and surrounding environs, for the benefit of the State and its citizens.

The proposal by the Air Force to move the F-16 Aggressor squadron from Eielson Air Force Base (Eielson) to Joint Base Elmendorf-Richardson (JBER) could change the dynamics of JPARC

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training scenarios and conduct, and could affect our community's support for JPARC use and expansion. The CONP's comments will be divided into two broad sections - comments dealing directly with the current Draft EIS and existing Alaska force structure locations, and additional comments on the potential impacts resulting from the Air Force's proposed Aggressor Squadron movement to JBER.

Review and Comments from the CONP on the Draft JPARC EIS

The CONP joins with the Fairbanks North Star Borough (FNSB) in the following comments. We understand that four factors are driving the need for enhanced and modernized training and testing facilities at JPARC. These four factors are technological advances; changes in combat tactics and techniques; the need to achieve diversified realistic training in an efficient, effective manner within the tightening budget of the Department of Defense (DoD); and the potential joint training to leverage synergies that better meet the mission training needs of Service components. The JPARC EIS separates the major actions into stand-alone activities; the CONP's comments are arranged in a similar format.

Proposed Paxon MOA Addition and Proposed Fox 3 Military Operations Area Expansion

Proposed Fox 3 MOAs: The proposed expansion of the Fox 3 MOA is a significant increase in both lateral extent and vertical dimension, lowering the floor from 5,000 ft above ground level (agl) to 500 ft agl. This is a direct conflict with areas that are frequently used by general aviation pilots and air taxi operators to support hunting camps and mining operations; to conduct air tour operations; to access recreational areas or to make other uses of this region. Due to its proximity to population centers in Anchorage, the Mat-Su Borough and Fairbanks, this airspace is heavily used by civil aviation, which results in an increased collision potential with high-speed military aircraft executing training maneuvers on MOA airspace. The civil aviation community within the FSNB is very active and large, and is a crucial part of our lifestyle.

The aviation community has experience with similar operations in the existing MOAs in the JPARC that also have low altitude floors. The Special Use Airspace Information Service (SUAIS), created as a result of the mid-1990's expansion of the MOAs that today comprise the JPARC, was a direct result of similar concerns at that time. In areas where radio coverage has been provided by the Air Force, this service has greatly reduced the potential for mid-air collision between civil and military aircraft. It has also undoubtedly reduced loss of training time when non-participating aircraft would have otherwise interrupted training activities. This service has an economic impact on military training.

While both civil and military organizations generally agree on the value that SUAIS provides for deconflicting aircraft, to date fifteen years after the MOAs were expanded aviation organizations are continuing to ask for adequate VHF radio coverage in the eastern portions of the existing JPARC complex. Correspondingly, the complaints that are received from civil aviation pilots are normally in regions of the airspace that lack adequate communication.

Recommendation: Due to the importance of the airspace for access to the southern Alaska Range, Denali Highway and Talkeetna Mountains, and to minimize the risk of mid-air collision, expansion of the Fox MOA should be limited to 5,000 feet agl, and to the smallest possible lateral extent to minimize the risk of mid-air collision.

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Recommendation: Any expansion of MOA airspace must have accompanying radio coverage, staffing and other elements of the SUAIS infrastructure to allow civil pilots to communicate with U.S. Air Force Range Control during times the MOAs are active. It is also essential that the tape-recorded message, broadcast during hours when Range Control is unmanned, be more uniformly broadcast across the JPARC complex. While the current language in the Draft EIS indicates that “funding will be pursued,” given that we still do not have adequate communication in the existing airspace, it is essential that:

(a) Radio repeaters to provide adequate coverage for any expanded airspace be installed and operational before airspace is granted and,

(b) Mitigations include raising the floor any time a station is down or the system is otherwise not fully operational, to allow general aviation or commercial pilots to operate without unanticipated encounters with high-speed military traffic.

Implementation of this recommendation would greatly increase safety, better coordinate air traffic, and probably result in more efficient and frequent use of air space by the civil aviation community. The CONP is actively working on expanding its hub status for communities throughout the State and upgrades of aviation communication and navigation systems.

Paxson MOA Low Altitude Structure: The military has proposed a Paxson MOA, which covers Isabel Pass and portions of the eastern Alaska Range. The pass is a major VFR route which links northern Alaska with south central and south east regions of the State. Along the southern flanks of the Alaska Range are mining operations, recreational cabins, airstrips and lakes which experience high levels of use, which are not compatible with high speed, low level military aircraft. While the concept of VFR corridors has been discussed, the variable weather in this area is not conducive to identifying a single corridor which concentrates VFR traffic and increases the mid-air collision risk.

Recommendation: The proposed Paxson MOA should be limited to high altitude usage near and over Isabel Pass and the air traffic routes extending from the interior south to Gulkana and beyond for civil aviation.

IFR Access to MOA airspace

Considerable public investment is being made to expand airways, instrument approaches, weather reporting and remote communication outlets across Alaska. The CONP has supported these investments for several years now through support of federal funding requests and authorizing language in various FAA bills. A corresponding private investment will be made by aircraft owners to utilize these facilities. Expansion of MOAs over IFR airways precludes civil access to the airways when the MOAs are active, except for emergency and lifeguard flights. Experience gained over recent years with the Delta MOAs, which overlay V-444 between Fairbanks, Delta, Tok and Northway, have continued to demonstrate difficulties for lifeguard repositioning flights and other uses such as wild fire suppression logistical flights. Asking these operators to fly VFR is a potential reduction in safety. The loss of IFR access also impacts the economy of communities within and beyond the boundaries of the proposed airspace.

Recommendation: We would like to ensure that provisions are made to provide real-time IFR access through active MOAs. While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities both inside and adjacent to MOA airspace given the critical role that civil aviation plays in the Alaskan transportation system. The relatively low volumes of IFR operations suggest that the impact to military training would be minimal. As more military actions across the globe are conducted around civil flight operations, learning how to dynamically allocate airspace will

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also help the military "train like they fight." The JPARC provides an ideal test bed to develop this capability, which will require cooperation with FAA and military agencies.

When military exercises are planned that would close either MOA, the CONP would like to ensure that planners contact the state concerning hunting and fishing seasons and schedule around those time periods. CONP residents access the lands and waters within these MOAs by air and we want to ensure this access and use can continue.

Proposed Realistic Live Ordnance Delivery in proposed restricted area

The military has proposed to establish restricted airspace for live ordnance delivery impact access between Fairbanks, Delta, the Richardson Highway corridor, and the recreational and mineralized areas in the Alaska Range to the south. Further restriction of airspace limits access to these areas.

Recommendation: The existing Restricted Areas (2211 and 2202) already limit access between the road corridor communities in the region. We oppose any option that connects these two restricted areas making an overall ground barrier to access in this area. We do understand limiting access during exercises; however a ground corridor must be available for access to cabins and traditional hunting, fishing, and food gathering grounds. We also want to ensure that when the ranges are not in use, civil aviation can use the current corridor between 2211 and 2202.

The CONP supports Alternative B. Alternative B allows for greater flexibility in ranges and gives pilots a more diverse array of targets for ordnance drops.

Proposed Battle Area Complex Restricted Area

The proposal to establish restricted airspace over the Battle Area Complex southeast of Delta Junction is of particular concern to the civil aviation community. Existing Restricted Area 2202 to the west already forces civil traffic out of the most desirable terrain route to and from Isabel Pass, a major VFR corridor connecting the northern half of the state to south central and south eastern Alaska. Winds and highly variable weather associated with the Alaska Range and the mountain pass make it impractical to confine civil traffic to a single, narrow corridor in this area. Five years ago, during an EIS process, the aviation community raised the issue about the possible need for restricted airspace, given that there were other locations available to site the military training facilities that already offered this type of airspace.

Recommendation: Continue to work with the aviation community as currently many local pilots oppose the addition of restricted airspace as proposed in this area, given the need to access the mountain pass, unique weather and terrain, and presence of existing restricted airspace.

The CONP supports Alternative B, as the proposed boundaries meet the current and future expansion needs for new firing points, range impact areas and targets required for the action. Alternative B will allow the Army the necessary time for training that regulations require.

Proposed Expansion of R-2205 Restricted Area, including the DMPTR

The CONP supports the expansion of the R-2205 Restricted Area; the airspace and ground access to DMPTR and YTA are already recognized as training areas and are avoided.

Proposed Night Joint Training in all military special use airspace

The CONP supports Alternative B and feels the JPARC draft EIS adequately addresses all the concerns with extension of training hours.

G0016***Proposed Unmanned Aerial Vehicle (UAV) Corridors***

The CONP is actively supporting efforts to greatly expand the use of UAVs within the interior of Alaska. We have met with FAA personnel, the congressional delegation, state legislators, and the Governor to try and secure the region as a national UAV testing, development, and deployment center. There is no doubt that unmanned aerial vehicles play an important role in today's military, and that training is required. Integrating these vehicles into the National Airspace System is currently a topic of discussion at the national level. Restricting civil airspace to accommodate UAV transits next to the second largest air transportation hub in the state is a concern for the civil aviation community and as such the CONP would like the final JPARC EIS to develop other options besides segregated airspace.

Recommendation: While awaiting development of a FAA-certified sense-and-avoid capability that will allow full integration of unmanned aerial vehicles into the National Airspace System, we must rely on other means to separate unmanned from manned aircraft without necessarily segregating airspace. Corridors that are proposed would interfere with the safe and efficient access between Fairbanks, the Richardson Highway Corridor and the Alaska Range. Other means to separate UAV from civil aircraft should be pursued and completely developed within the final JPARC EIS.

The CONP supports Alternative B's establishment of corridors via a Certificate of Authorization (COA). The CONP is more than willing to participate in the COA process. COAs are only activated for the period at which a UAV is transiting a corridor. The CONP is confident that the COA process will work to the benefit of both the military and the civilian aviation communities.

Proposed Enhanced Access to Ground Maneuver Space Areas

The CONP supports enhanced access to the Ground Maneuver Space areas and feels the draft JPARC EIS adequately addresses the issue. The CONP played a very active role in securing funds to construct the Tanana River Bridge, seeking construction funds from federal and state appropriations processes. All told the CONP was able to secure nearly \$100 million for construction of the bridge. We support year-round access to the training grounds and improvements to the ranges.

Proposed Tanana Flats Training Area Access Road

The CONP supports construction of the Tanana Flats Training Access Road to access the Ground Maneuver Space areas and we are satisfied the draft JPARC EIS adequately addresses the issue. We support year-round access to the training grounds and improvements to the ranges.

Proposed Joint Air-Ground Integration Complex

The CONP supports development of the JAGIC and feels the draft JPARC EIS adequately addresses the various components of the issue.

Proposed Intermediate Staging Bases

The CONP supports development of the proposed Intermediate Staging Bases and believes the draft JPARC EIS adequately addresses the various components of developing the four sites. Development of the staging areas is an exciting development as the staging areas will decrease military traffic during exercises and allow the military to spend less time in transit and more time in training. Construction of the staging bases is a win-win for all parties and will strengthen the operational utility of JPARC.

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Proposed Missile Live Fire for AIM-9 and AIM-120 in Gulf of Alaska

The CONP supports use of the Gulf of Alaska for training with AIM-9 and AIM-120 missiles.

Proposed Joint Precision Airdrop System

The CONP supports development of the JPADS and feels the draft JPARC EIS adequately addresses the various components of the issue.

Review and Comments on the movement of the F-16 Aggressor Squadron to JBER and the impacts on the JPARC Draft EIS

While not analyzed as an alternative in the JPARC Draft EIS, the Air Force announced plans to relocate the F-16 Aggressor Squadron, currently based at Eielson AFB in support of military training activities, to JBER. The stated purpose of the proposed move is to reduce operating costs. Statements in the Draft EIS indicate that part of the justification for expanding the FOX MOA airspace to the south, is to reduce operational costs of training exercises, by lowering the amount of fuel required to reach the training airspace from JBER. These two statements seem to be in conflict with one another. It is also not clear what the impacts of relocation of the F-16 squadron might have on airspace and the corresponding civil facilities in Anchorage, including Anchorage International Airport. The objective of the following review is to determine what facts and findings within the draft EIS require greater review for this alternative, and which impacts would invalidate or contradict the stated reasons for planned move.

The JPARC EIS was prepared for anticipated scenarios exclusive of the proposed Aggressor Squadron move. The relocation of the Aggressors is only briefly mentioned in the Draft EIS. However, discussion of the proposed FOX3 MOA expansion and creation of the PAXON MOA are predicated on reducing travel time to useable airspace from JBER and creating a common ground for JBER-assigned aircraft and the Aggressors.

The following concerns arise based on the proposed airspace expansions:

1. Cost for "dry targets" in the new airspace.
2. Transit distance for Aggressors to the YUKON range airspace.
3. Travel time vs. play time in the proposed airspace.
4. Erroneous assumption that airspace entry equates to effective airspace use.

The following considerations arise related to environmental analysis and aircraft relocation:

1. It appears precedent exists for Environmental Analysis (EA) for aircraft relocation and beddown in Alaska (F-22, C-17, C-130s); however, none of these beddowns involved introduction of new aircraft to a geographical area and airspace.
2. The JPARC EIS in no way considers the relocation of the Aggressors.
3. The assumptions and justifications for the JPARC expansion rest heavily on the Aggressors' Eielson basing.
4. The EIS does not consider the increased utilization of the FOX areas versus YUKON areas due to proximity to JBER.
5. The southern YUKON MOA/ATCAAs are currently utilized approximately 160 days annually.
6. The proposed PAXON MOA will be limited to 60 days utilization below 14,000 ft MSL.

The following considerations arise concerning estimated cost savings:

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1. Increased travel time by fighter aircraft result in either more support sorties (air refueling) or reduced effective training time per sortie.
2. The center points of the existing FOX3 airspace and the proposed PAXON airspace are closer to Eielson than JBER via direct routing or normally utilized ATC routing.
3. Recovery routings/procedures may be less efficient and more flight time consuming due to airspace congestion and weather requirements at JBER.
4. Weather requirements for additional reserve fuel demand reduced training time or refueling support for JBER-based aircraft.

Primarily, the justification for the expansion of the FOX/PAXON airspaces is fuel savings based on current usage of FOX3, PAXON and STONY. The EIS reasons that FOX3/PAXON usage will reflect current usage plus half of the STONY sorties, totaling 11,237 sorties per year compared to 9,987 sorties as reported in 2010. Either the Aggressors will commute from JBER to the YUKON 1/2 areas, where over 8,000 sorties occurred in 2010, or the FOX/PAXON/STONY airspaces will see a substantially higher utilization rate than the 2010 baseline identified by the EIS for its estimated utilization rates of the proposed expanded airspace.

In an effort to provide a comprehensive review of the JPARC EIS and better understand related Alaskan military airspace issues, a review was completed of the Letters of Agreement regarding Red Flag-Alaska airspace and recovery procedures, Description of Military Airspace (DOMA), Alaskan Military Procedures and ATC Service, and FAA 7400.8U, *Special Use Airspace*. The review revealed no additional significant factors related specifically to the relocation of the Aggressor Squadron.

In summary, the JPARC EIS related to the FOX3/PAXON expansion faces practical challenges related to the relative inaccessibility of the YUKON areas for JBER-based aircraft without substantially reduced training time or additional refueling support.

Expanded Data Points

Airspace Expansions:

1. According to the EIS, page 2-3 lines 14-17, the dry targets will be added to both new MOAs and utilized six times annually for 10 days each occurrence. Dry targets occupy approximately 1 acre and are either emitters or simulated threat vehicles (page 1-24, lines 25-32). The proposed dry targets are temporary in nature and will be placed on military lands, federal lands or private property with landowner concurrence. Civilian contractors manage the threat emitters, placing, maintaining and operating them for the Air Force. Either additional threats will be required or threats from other ranges will be relocated. In either case, it appears additional expense would be incurred.
2. Transit distance for the Eielson-based Aggressors to either YUKON or FOX airspace is negligible. Multiple Standard Instrument Departures (SIDs) exist for Eielson AFB and were analyzed for purposes of transit distance. The distances discussed below relate to the nearest entry gate to the airspace and do not equate to effective fight airspace or the scheduled "play areas." MOAs and ATCAAs are accessed through entry gates – points on the boundaries of the airspace where ATC can initiate or terminate IFR/VFR clearances and issue airspace clearances. These gates can be likened to the

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ticket counters at a sports arena. Everybody enters through the limited access/egress points, but may wander freely once cleared into the arena.

The FOX-FIVE departure from Eielson delivers aircraft to the AXEM gate (western corner of YUKON1/2 MOAs) in 52 nautical miles (NM), and the FALCO FOUR arrival return routes aircraft from YUKON2 via the EYEGO gate in 49NM. Access to this airspace from JBER via the EEEGL TWO departure would require 287NM to reach the AXEM gate and a similar distance to return. The STOON gate to the STONY airspace is approximately 85 miles from JBER, though one can assume the STONY airspace is less desirable airspace by reviewing the 2010 utilization figures compared to the FOX or PAXON ATCAAs referenced on page 2-5 in Table 2-2. Additionally, the justification for the enhanced FOX/PAXON airspace includes the desire to utilize closer airspace as discussed on lines 14 and 26 of page 2-5.

The possible solutions to the issue of transit distance include, but are not limited to: 1) extended sortie durations permitted by limited maneuvering 2) extended sorties through additional air refueling requirements 3) greater reliance on FOX/PAXON airspace than is forecast in the March 2012 Draft JPARC EIS.

3. Transit time diminishes "play time", or opportunities to execute training events due primarily to lost fuel efficiencies. Foregoing discussions related to transit distance reveal transit times approaching 30 minutes each way to enter the YUKON airspace, while access to the existing FOX3 MOA via the HOJOE gate/EEEEGL TWO SID from JBER requires approximately 15 minutes, with anticipated return legs of similar duration. Contrast the travel distance with an Eielson-based aircraft utilizing the ARUNY ONE departure to enter the DICEMAN Airspace package (EIELSON MOA/ATCAA, FOX1 MOA/ATCAA, FOX2 ATCAA, FOX3 MOA/ATCAA as described in the 11th AF Airspace Handbook, 29 Dec 2010). The Eielson aircraft would be in the FOX3 ATCAA in approximately 10 minutes and could reach HOJOE (the southernmost gate in FOX3 and an entry gate for JBER aircraft) in approximately the same time as a JBER-based aircraft of the same make.
4. While transit time to the airspace is a justification for expansion of the FOX3 MOA and creation of the PAXON MOA as outlined in the Draft JPARC EIS, transit time is only part of the efficiency equation. Traditionally, and unless revised once the airspace is expanded, the air combat (ACBT) for Large Force Exercises (LFEs) occurs in airspace centered slightly north of Eielson. The expectation of realized efficiencies is seemingly blind to the utilization patterns of the airspace by participants both north and south of the Alaska Range.

Environmental Study:

1. Table 4-2 summarizes a variety of environmental research related to prior DoD actions including relocation or initial beddown of Air Force aircraft. An accepted precedent exists for environmental research limited to an Environmental Assessment (EA) in conjunction with aircraft relocation. Included in the table are the relocation of the 176th Wing from Kulis ANGB to JBER AFB (20 aircraft), F-22A beddown at JBER (including construction of support facilities), C-17 initial beddown at JBER (replacing C-130s), and the F-22A plus up (replacement of F-15s). Every instance cited, with the exception of the Kulis relocation, involved

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replacement of some or all aircraft, with minimal changes in overall assigned aircraft with similar mission capabilities/sets. The Kullis relocation is most disruptive to the movement toward an EIS requirement for the Aggressor relocation since it involved moving 20 aircraft, construction, renovation and reassignment of personnel. However, the Kullis relocation did not alter airspace utilization on the broader scale considering the relocated aircraft remained in the same terminal area (the Anchorage local air traffic area).

2. Chapter 4, *Cumulative Impacts and Secondary Effects*, paragraph 4.8.1, page 4-19, lines 25-34 expressly states, "Any future basing of a new aircraft type in Alaska, or the relocation of F-16s from Eielson AFB to JBER, as is now being considered, would require that the appropriate environmental impact analysis processes be completed to include the potential impacts of such actions on all military and civil aviation airspace uses." Furthermore, the primary justification for the expansions of the FOX3 airspace and creation of the PAXON MOA is centralization of training airspace for the Aggressors and JBER based aircraft (paragraphs 1.5.1.1 and 1.5.1.2, Table 1-3 and page 2-2, lines 5-10,15).
3. The relocation of the Aggressors not only requires its own assessment of environmental effects, but consideration of the alternative substantially changes the character of the Draft JPARC EIS. As cited in the previous paragraph, the Draft EIS assumes the F-16s operate from Eielson. Justifications for airspace expansion, including utilization rates and efficiencies are predicated on Aggressors originating and recovering to Eielson. No mention of F-16 relocation exists in the Draft JPARC EIS with the exception of the requirement for additional study should such a relocation occur.
4. The Draft JPARC EIS predicates its MOA/ATCAA usage on status quo basing for JBER and Eielson. Appendix D to the Draft JPARC EIS, Table D-2, *Description and Representative Annual Use of Alaska Training Airspace*, reflects FOX3 sortie totals of 9,877. STONY ATCAA reflects 2,500 and the YUKON1/2 ATCAA show 8,034 and 7,076 respectively. Table 2-2 on page 2-5 of the Draft EIS reflects a new estimated usage of the FOX3/PAXON airspace under the proposed changes of 11,237 per year. The assumptions reflect a relocation of prior STONY missions but no relocation of the over 8,000 sorties in the YUKON airspace to the north. While approximately 3,600 of the FOX3 sorties were F-16s (not including F-16Cs) in 2010 according to Table 2-3, similar numbers for the YUKON airspace are not available. Assuming a similar ratio in the north, an additional 2,400 F-16 sorties may either lose training effectiveness or require relocation to the southern airspaces. Additionally, skewing the results are the over 2,700 F-22A sorties in the FOX3 airspace since these aircraft rarely access the YUKON airspace.
5. According to Appendix D, Table D-2, the YUKON1/2 airspace is actively utilized 163 days and 104 days annually, respectively. The FOX3 airspace is utilized approximately 211 days annually. As detailed in the previous paragraph, the Draft JPARC EIS does not consider the shift in sorties associated with the relocation of the F-16s.

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6. As detailed on page 2-6, the PAXON MOA low sector (below 14,000' MSI) would only be available for Major Flying Exercises (MFES) for up to 60 days annually, consisting of 6, ten-day windows. This is of interest primarily to air-to-ground assets and has limited applicability to the Aggressors as they complete their training sorties. It may, however, continue to force other participants in non-MFE training events to utilize Interior ranges. The Aggressors, in their efforts to penetrate defensive air sovereignty assets to eliminate adversary combat air support (CAS), will continue to operate in the airspace centered over Eielson AFB.

Cost savings:

1. As discussed previously, the additional transit time/distance will erode cost benefits that may be claimed through relocation of the Aggressors to JBER. The accounting methods associated with determining cost savings are incongruous at times. The arguments related to cost savings seldom consider the quality of the flight time for the cost expended. Flight hours are allocated to units to complete their required training events to maintain a combat ready or mission ready status. The flight hour totals may remain unchanged or even diminish due to constrained budgets. This constraint will demand more training/proficiency events per flight hour expended. Virtually no recurrent training requirements for Air Force pilots are accomplished during en route cruise flight. To combat this loss of training time due to fuel/flight hours expended in transit, fighter aircraft require additional fuel to expend during high performance maneuvers in the reserved airspace. The unrecognized/hidden cost is the air refueling sorties generated to meet the fighter training requirement. While it is true that air refueling aircrews also require recurrency training, the potential volume of additional refueling sorties required may exceed the maximum training events required by air refueling assets and detract from other aircrew training by demanding extended loiter times and larger offloads.
2. The center points of the PAXON and FOX3 ATCAAs, as currently published, are closer to Eielson than JBER. The center point of the PAXON ATCAA is 106NM from Eielson via the HAWGG departure to the SLICK gate. The same point is 179NM via the EEEGL TWO departure, HOJOE gate in FOX3, then direct to the PAXON center point. The center point of the FOX3 ATCAA is 100NM from Eielson via the ARUNY ONE departure transiting through the EIELSON MOA and the FOX1 ATCAA/MOA. The same point is 153NM from JBER via the EEEGL TWO departure and HOJOE gate.

One should note the air combat for MFES occurs in an area centered over Eielson and its aircraft can be in the airspace within a couple minutes of departure.

3. According to the FAA Administrator's Factbook, March 2011, Anchorage TRACON (Terminal Radar Control) ranked 36th busiest nationwide in calendar year 2009 with over 261,000 aircraft operations. CY2010 reported over 277,000 operations according to the Administrator (pg. 14). Fairbanks TRSA (Terminal Radar Service Area) is not listed in the report. However, according to the Alaska DOT website and the FAA data sheet for Fairbanks International Airport, Fairbanks experienced over 133,000 aircraft operations in CY2009. The

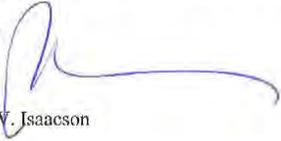
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congested nature of the Anchorage airspace in contrast to the relatively unencumbered access to the ranges enjoyed by Interior aircraft bears further research. A deeper analysis may reveal appreciable minutes of time lost due to required spacing for IFR aircraft and deconfliction in the Anchorage terminal area in contrast to the ease of recovery to Eielson AFB.

4. Weather considerations plague both locations. Eielson suffers from the bitter cold of winter while Anchorage experiences strong winds and occasional IFR conditions. Aircraft operating in the JPARC require fuel reserves – greater reserves for IFR terminal weather – and subsequently lose training time. Due to the distances discussed previously, JBER aircraft will lose even more of the already reduced play time when the requirement to carry fuel for an alternate field exists.

Thank you for the opportunity to offer comment on the *Draft Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska*. The CONP looks forward to continuing our productive relationship with Alaska Command, the U.S. Air Force, and the U.S. Army.

Sincerely,


Douglas W. Isaacson
Mayor

References:

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Lieutenant General Stephen L. Hoog
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RE: *Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC) in Alaska (JPARC Modernization and Enhancement Draft EIS).*

Dear Sir,

As Mayor of the Fairbanks North Star Borough (FNSB) I would like to take this opportunity to comment on the Draft *Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC) in Alaska.*

The FNSB wholeheartedly supports the U.S. Air Force and Army and their missions in Alaska and welcomes the expansion of the JPARC to accommodate current and future training needs. The FNSB supports the increased use of JPARC, and the planned expansion as this action is beneficial to the community, Alaska Command, and the U.S. Military with no overall negative impact on the community. However, the analysis of the environmental impacts assumes the current force structure at Eielson Air Force Base and Fort Wainwright as a baseline and does not consider an alternative force structure basing scenario identified in the Air Force's proposed fiscal year (FY) 2013 budget.

The JPARC ranges and facilities located within the FNSB far surpass the quality and quantity of similar range functions found in other locations within the continental United States and Hawaii. The large size of the JPARC ranges allow for the use of live ammunition from all Army, Air Force, and Navy platforms and weapons systems; allows the Air Force to fly at combat speeds well over Mach 1; allows for joint exercises between the Army, Air Force, Marines, Navy, Coast Guard and our Allies in weather conditions ranging from sub-zero arctic temperatures to hot humid summer days; and results in the finest training opportunities in the United States for our soldiers, sailors, and airmen. The FNSB is proactive in addressing military concerns on JPARC utilization and strives to lead the nation in willingness and ability to ensure that the military can conduct world class training missions and significantly improve readiness status.

The proposal by the Air Force to move the F-16 Aggressor squadron from Eielson Air Force Base (Eielson) to Joint Base Elmendorf-Richardson (JBER) could change the dynamics of JPARC training scenarios and conduct, and could affect our community's support for JPARC use and expansion. The FNSB's comments will be divided into two broad sections - comments dealing directly with the current Draft EIS and existing Alaska force structure locations, and additional comments on the potential impacts resulting from the Air Force's proposed Aggressor Squadron movement to JBER.

Review and Comments from the FNSB on the Draft JPARC EIS

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techniques; the need to achieve diversified realistic training in an efficient, effective manner within the tightening budget of the Department of Defense (DoD); and the potential joint training to leverage synergies that better meet the mission training needs of Service components. The JPARC EIS separates the major actions into stand-alone activities; the FNSB's comments are arranged in a similar format.

Proposed Paxson MOA Addition and Proposed Fox 3 Military Operations Area Expansion

Proposed Fox 3 MOAs: The proposed expansion of the Fox 3 MOA is a significant increase in both lateral extent and vertical dimension, lowering the floor from 5,000 ft above ground level (agl) to 500 ft agl. This is a direct conflict with areas that are frequently used by general aviation pilots and air taxi operators to support hunting camps and mining operations; to conduct air tour operations; to access recreational areas or to make other uses of this region. Due to its proximity to population centers in Anchorage, the Mat-Su Borough and Fairbanks, this airspace is heavily used by civil aviation, which results in an increased collision potential with high-speed military aircraft executing training maneuvers on MOA airspace. The civil aviation community within the FSNB is very active and large, and is a crucial part of our lifestyle.

The aviation community has experience with similar operations in the existing MOAs in the JPARC that also have low altitude floors. The Special Use Airspace Information Service (SUAIS), created as a result of the mid-1990's expansion of the MOAs that today comprise the JPARC, was a direct result of similar concerns at that time. In areas where radio coverage has been provided by the Air Force, this service has greatly reduced the potential for mid-air collision between civil and military aircraft. It has also undoubtedly reduced loss of training time when non-participating aircraft would have otherwise interrupted training activities. This service has an economic impact on military training.

While both civil and military organizations generally agree on the value that SUAIS provides for deconflicting aircraft, to date — fifteen years after the MOAs were expanded—aviation organizations are continuing to ask for adequate VHF radio coverage in the eastern portions of the existing JPARC complex. Correspondingly, the complaints that are received from civil aviation pilots are normally in regions of the airspace that lack adequate communication.

Recommendation: Due to the importance of the airspace for access to the southern Alaska Range, Denali Highway and Talkeetna Mountains, and to minimize the risk of mid-air collision, expansion of the Fox MOA should be limited to 5,000 feet agl, and to the smallest possible lateral extent to minimize the risk of mid-air collision.

Recommendation: Any expansion of MOA airspace must have accompanying radio coverage, staffing and other elements of the SUAIS infrastructure to allow civil pilots to communicate with U.S. Air Force Range Control during times the MOAs are active. It is also essential that the tape-recorded message, broadcast during hours when Range Control is unmanned, be more uniformly broadcast across the JPARC complex. While the current language in the Draft EIS indicates that “funding will be pursued,” given that we still do not have adequate communication in the existing airspace, it is essential that:

- (a) Radio repeaters to provide adequate coverage for any expanded airspace be installed and operational before airspace is granted and,
- (b) Mitigations include raising the floor any time a station is down or the system is otherwise not fully operational, to allow general aviation or commercial pilots to operate without unanticipated encounters with high-speed military traffic.

Implementation of this recommendation would greatly increase safety, better coordinate air traffic, and probably result in more efficient and frequent use of air space by the civil aviation community.

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The FNSB is actively working on expanding its hub status for communities throughout the State and upgrades of aviation communication and navigation systems.

Paxson MOA Low Altitude Structure: The military has proposed a Paxson MOA, which covers Isabel Pass and portions of the eastern Alaska Range. The pass is a major VFR route which links northern Alaska with south central and south east regions of the State. Along the southern flanks of the Alaska Range are mining operations, recreational cabins, airstrips and lakes which experience high levels of use, which are not compatible with high speed, low level military aircraft. While the concept of VFR corridors has been discussed, the variable weather in this area is not conducive to identifying a single corridor which concentrates VFR traffic and increases the mid-air collision risk.

Recommendation: The proposed Paxson MOA should be limited to high altitude usage near and over Isabel Pass and the air traffic routes extending from the interior south to Gulkana and beyond for civil aviation.

IFR Access to MOA airspace

Considerable public investment is being made to expand airways, instrument approaches, weather reporting and remote communication outlets across Alaska. The FNSB has supported these investments for several years now through support of federal funding requests and authorizing language in various FAA bills. A corresponding private investment will be made by aircraft owners to utilize these facilities. Expansion of MOAs over IFR airways precludes civil access to the airways when the MOAs are active, except for emergency and lifeguard flights. Experience gained over recent years with the Delta MOAs, which overlay V-444 between Fairbanks, Delta, Tok and Northway, have continued to demonstrate difficulties for lifeguard repositioning flights and other uses such as wild fire suppression logistical flights. Asking these operators to fly VFR is a potential reduction in safety. The loss of IFR access also impacts the economy of communities within and beyond the boundaries of the proposed airspace.

Recommendation : We would like to ensure that provisions are made to provide real-time IFR access through active MOAs. While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities both inside and adjacent to MOA airspace given the critical role that civil aviation plays in the Alaskan transportation system. The relatively low volumes of IFR operations suggest that the impact to military training would be minimal. As more military actions across the globe are conducted around civil flight operations, learning how to dynamically allocate airspace will also help the military "train like they fight." The JPARC provides an ideal test bed to develop this capability, which will require cooperation with FAA and military agencies.

When military exercises are planned that would close either MOA, the FNSB would like to ensure that planners contact the state concerning hunting and fishing seasons and schedule around those time periods. FNSB residents access the lands and waters within these MOAs by air and we want to ensure this access and use can continue.

Proposed Realistic Live Ordnance Delivery in proposed restricted area

The military has proposed to establish restricted airspace for live ordnance delivery impact access between Fairbanks, Delta, the Richardson Highway corridor, and the recreational and mineralized areas in the Alaska Range to the south. Further restriction of airspace limits access to these areas.

Recommendation : The existing Restricted Areas (2211 and 2202) already limit access between the road corridor communities in the region. We oppose any option that connects these two restricted areas

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making an overall ground barrier to access in this area. We do understand limiting access during exercises; however a ground corridor must be available for access to cabins and traditional hunting, fishing, and food gathering grounds. We also want to ensure that when the ranges are not in use, civil aviation can use the current corridor between 2211 and 2202.

The FNSB supports Alternative B. Alternative B allows for greater flexibility in ranges and gives pilots a more diverse array of targets for ordnance drops.

Proposed Battle Area Complex Restricted Area

The proposal to establish restricted airspace over the Battle Area Complex southeast of Delta Junction is of particular concern to the civil aviation community. Existing Restricted Area 2202 to the west already forces civil traffic out of the most desirable terrain route to and from Isabel Pass, a major VFR corridor connecting the northern half of the state to south central and south eastern Alaska. Winds and highly variable weather associated with the Alaska Range and the mountain pass make it impractical to confine civil traffic to a single, narrow corridor in this area. Five years ago, during an EIS process, the aviation community raised the issue about the possible need for restricted airspace, given that there were other locations available to site the military training facilities that already offered this type of airspace.

Recommendation: Continue to work with the aviation community as currently many local pilots oppose the addition of restricted airspace as proposed in this area, given the need to access the mountain pass, unique weather and terrain, and presence of existing restricted airspace.

The FNSB supports Alternative B, as the proposed boundaries meet the current and future expansion needs for new firing points, range impact areas and targets required for the action. Alternative B will allow the Army the necessary time for training that regulations require.

Proposed Expansion of R-2205 Restricted Area, including the DMPTR

The FNSB supports the expansion of the R-2205 Restricted Area; the airspace and ground access to DMPTR and YTA are already recognized as training areas and are avoided.

Proposed Night Joint Training in all military special use airspace

The FNSB supports Alternative B and feels the JPARC draft EIS adequately addresses all the concerns with extension of training hours.

Proposed Unmanned Aerial Vehicle (UAV) Corridors

The FNSB is actively supporting efforts to greatly expand the use of UAVs within the interior of Alaska. We have met with FAA personnel, the congressional delegation, state legislators, and the Governor to try and secure the region as a national UAV testing, development, and deployment center. There is no doubt that unmanned aerial vehicles play an important role in today's military, and that training is required. Integrating these vehicles into the National Airspace System is currently a topic of discussion at the national level. Restricting civil airspace to accommodate UAV transits next to the second largest air transportation hub in the state is a concern for the civil aviation community and as such the FNSB would like the final JPARC EIS to develop other options besides segregated airspace.

Recommendation: While awaiting development of a FAA-certified sense-and-avoid capability that will allow full integration of unmanned aerial vehicles into the National Airspace System, we must rely on other means to separate unmanned from manned aircraft without necessarily segregating airspace. Corridors that are proposed would interfere with the safe and efficient access between Fairbanks, the Richardson Highway Corridor and the Alaska Range. Other means to separate UAV from civil aircraft should be pursued and completely developed within the final JPARC EIS.

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The FNSB supports Alternative B's establishment of corridors via a Certificate of Authorization (COA). The FNSB is more than willing to participate in the COA process. COAs are only activated for the period at which a UAV is transiting a corridor. The FNSB is confident that the COA process will work to the benefit of both the military and the civilian aviation communities.

Proposed Enhanced Access to Ground Maneuver Space Areas

The FNSB supports enhanced access to the Ground Maneuver Space areas and feels the draft JPARC EIS adequately addresses the issue. The FNSB played a very active role in securing funds to construct the Tanana River Bridge, seeking construction funds from federal and state appropriations processes. All told the FNSB was able to secure nearly \$100 million for construction of the bridge. We support year-round access to the training grounds and improvements to the ranges.

Proposed Tanana Flats Training Area Access Road

The FNSB supports construction of the Tanana Flats Training Access Road to access the Ground Maneuver Space areas and we are satisfied the draft JPARC EIS adequately addresses the issue. We support year-round access to the training grounds and improvements to the ranges.

Proposed Joint Air-Ground Integration Complex

The FNSB supports development of the JAGIC and feels the draft JPARC EIS adequately addresses the various components of the issue.

Proposed Intermediate Staging Bases

The FNSB supports development of the proposed Intermediate Staging Bases and believes the draft JPARC EIS adequately addresses the various components of developing the four sites. Development of the staging areas is an exciting development as the staging areas will decrease military traffic during exercises and allow the military to spend less time in transit and more time in training. Construction of the staging bases is a win-win for all parties and will strengthen the operational utility of JPARC.

Proposed Missile Live Fire for AIM-9 and AIM-120 in Gulf of Alaska

The FNSB supports use of the Gulf of Alaska for training with AIM-9 and AIM-120 missiles.

Proposed Joint Precision Airdrop System

The FNSB supports development of the JPADS and feels the draft JPARC EIS adequately addresses the various components of the issue.

Review and Comments on the movement of the F-16 Aggressor Squadron to JBER and the impacts on the JPARC Draft EIS

While not analyzed as an alternative in the JPARC Draft EIS, the Air Force announced plans to relocate the F-16 Aggressor Squadron, currently based at Eielson AFB in support of military training activities, to JBER. The stated purpose of the proposed move is to reduce operating costs. Statements in the Draft EIS indicate that part of the justification for expanding the FOX MOA airspace to the south, is to reduce operational costs of training exercises, by lowering the amount of fuel required to reach the training airspace from JBER. These two statements seem to be in conflict with one another. It is also not clear what the impacts of relocation of the F-16 squadron might have on airspace and the corresponding civil facilities in Anchorage, including Anchorage International Airport. The objective of the following review is to determine what facts and findings within the draft EIS require greater review for this alternative, and which impacts would invalidate or contradict the stated reasons for planned move.

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The JPARC EIS was prepared for anticipated scenarios exclusive of the proposed Aggressor Squadron move. The relocation of the Aggressors is only briefly mentioned in the Draft EIS. However, discussion of the proposed FOX3 MOA expansion and creation of the PAXON MOA are predicated on reducing travel time to useable airspace from JBER and creating a common ground for JBER-assigned aircraft and the Aggressors.

The following concerns arise based on the proposed airspace expansions:

1. Cost for "dry targets" in the new airspace.
2. Transit distance for Aggressors to the YUKON range airspace.
3. Travel time vs. play time in the proposed airspace.
4. Erroneous assumption that airspace entry equates to effective airspace use.

The following considerations arise related to environmental analysis and aircraft relocation:

1. It appears precedent exists for Environmental Analysis (EA) for aircraft relocation and beddown in Alaska (F-22, C-17, C-130s); however, none of these beddowns involved introduction of new aircraft to a geographical area and airspace.
2. The JPARC EIS in no way considers the relocation of the Aggressors.
3. The assumptions and justifications for the JPARC expansion rest heavily on the Aggressors' Eielson basing.
4. The EIS does not consider the increased utilization of the FOX areas versus YUKON areas due to proximity to JBER.
5. The southern YUKON MOA/ATCAAs are currently utilized approximately 160 days annually.
6. The proposed PAXON MOA will be limited to 60 days utilization below 14,000 ft MSL.

The following considerations arise concerning estimated cost savings:

1. Increased travel time by fighter aircraft result in either more support sorties (air refueling) or reduced effective training time per sortie.
2. The center points of the existing FOX3 airspace and the proposed PAXON airspace are closer to Eielson than JBER via direct routing or normally utilized ATC routing.
3. Recovery routings/procedures may be less efficient and more flight time consuming due to airspace congestion and weather requirements at JBER.
4. Weather requirements for additional reserve fuel demand reduced training time or refueling support for JBER-based aircraft.

Primarily, the justification for the expansion of the FOX/PAXON airspaces is fuel savings based on current usage of FOX3, PAXON and STONY. The EIS reasons that FOX3/PAXON usage will reflect current usage plus half of the STONY sorties, totaling 11,237 sorties per year compared to 9,987 sorties as reported in 2010. Either the Aggressors will commute from JBER to the YUKON1/2 areas, where over 8,000 sorties occurred in 2010, or the FOX/PAXON/STONY airspaces will see a substantially higher utilization rate than the 2010 baseline identified by the EIS for its estimated utilization rates of the proposed expanded airspace.

In an effort to provide a comprehensive review of the JPARC EIS and better understand related Alaskan military airspace issues, a review was completed of the Letters of Agreement regarding Red Flag-Alaska airspace and recovery procedures, Description of Military Airspace (DOMA), Alaskan Military Procedures and ATC Service, and FAA 7400.8U, *Special Use Airspace*. The review revealed no additional significant factors related specifically to the relocation of the Aggressor Squadron.

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In summary, the JPARC EIS related to the FOX3/PAXON expansion faces practical challenges related to the relative inaccessibility of the YUKON areas for JBER-based aircraft without substantially reduced training time or additional refueling support.

Expanded Data Points

Airspace Expansions:

1. According to the EIS, page 2-3 lines 14-17, the dry targets will be added to both new MOAs and utilized six times annually for 10 days each occurrence. Dry targets occupy approximately 1 acre and are either emitters or simulated threat vehicles (page 1-24, lines 25-32). The proposed dry targets are temporary in nature and will be placed on military lands, federal lands or private property with landowner concurrence. Civilian contractors manage the threat emitters, placing, maintaining and operating them for the Air Force. Either additional threats will be required or threats from other ranges will be relocated. In either case, it appears additional expense would be incurred.
2. Transit distance for the Eielson-based Aggressors to either YUKON or FOX airspace is negligible. Multiple Standard Instrument Departures (SIDs) exist for Eielson AFB and were analyzed for purposes of transit distance. The distances discussed below relate to the nearest entry gate to the airspace and do not equate to effective fight airspace or the scheduled "play areas." MOAs and ATCAAs are accessed through entry gates – points on the boundaries of the airspace where ATC can initiate or terminate IFR /VFR clearances and issue airspace clearances. These gates can be likened to the ticket counters at a sports arena. Everybody enters through the limited access/egress points, but may wander freely once cleared into the arena.

The FOX-FIVE departure from Eielson delivers aircraft to the AXEM gate (western corner of YUKON1/2 MOAs) in 52 nautical miles (NM), and the FALCO FOUR arrival return routes aircraft from YUKON2 via the EYEGO gate in 49NM. Access to this airspace from JBER via the EEEGL TWO departure would require 287NM to reach the AXEM gate and a similar distance to return. The STONON gate to the STONY airspace is approximately 85 miles from JBER, though one can assume the STONY airspace is less desirable airspace by reviewing the 2010 utilization figures compared to the FOX or PAXON ATCAAs referenced on page 2-5 in Table 2-2. Additionally, the justification for the enhanced FOX/PAXON airspace includes the desire to utilize closer airspace as discussed on lines 14 and 26 of page 2-5.

The possible solutions to the issue of transit distance include, but are not limited to: 1) extended sortie durations permitted by limited maneuvering 2) extended sorties through additional air refueling requirements 3) greater reliance on FOX/PAXON airspace than is forecast in the March 2012 Draft JPARC EIS.

3. Transit time diminishes "play time", or opportunities to execute training events due primarily to lost fuel efficiencies. Foregoing discussions related to transit distance reveal transit times approaching 30 minutes each way to enter the YUKON airspace, while access to the existing FOX3 MOA via the HOJOE gate/EEEGL TWO SID from JBER requires approximately 15 minutes, with anticipated return legs of similar duration. Contrast the travel distance with an Eielson-based aircraft utilizing the ARUNY ONE departure to enter the DICEMAN Airspace package (EIELSON MOA/ATCAA, FOX1 MOA/ATCAA, FOX2 ATCAA,

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FOX3 MOA/ATCAA as described in the 11th AF Airspace Handbook, 29 Dec 2010). The Eielson aircraft would be in the FOX3 ATCAA in approximately 10 minutes and could reach HOJOE (the southernmost gate in FOX3 and an entry gate for JBER aircraft) in approximately the same time as a JBER-based aircraft of the same make.

4. While transit time to the airspace is a justification for expansion of the FOX3 MOA and creation of the PAXON MOA as outlined in the Draft JPARC EIS, transit time is only part of the efficiency equation. Traditionally, and unless revised once the airspace is expanded, the air combat (ACBT) for Large Force Exercises (LFEs) occurs in airspace centered slightly north of Eielson. The expectation of realized efficiencies is seemingly blind to the utilization patterns of the airspace by participants both north and south of the Alaska Range.

Environmental Study:

1. Table 4-2 summarizes a variety of environmental research related to prior DoD actions including relocation or initial beddown of Air Force aircraft. An accepted precedent exists for environmental research limited to an Environmental Assessment (EA) in conjunction with aircraft relocation. Included in the table are the relocation of the 176th Wing from Kulis ANGB to JBER AFB (20 aircraft), F-22A beddown at JBER (including construction of support facilities), C-17 initial beddown at JBER (replacing C-130s), and the F-22A plus up (replacement of F-15s). Every instance cited, with the exception of the Kulis relocation, involved replacement of some or all aircraft, with minimal changes in overall assigned aircraft with similar mission capabilities/sets. The Kulis relocation is most disruptive to the movement toward an EIS requirement for the Aggressor relocation since it involved moving 20 aircraft, construction, renovation and reassignment of personnel. However, the Kulis relocation did not alter airspace utilization on the broader scale considering the relocated aircraft remained in the same terminal area (the Anchorage local air traffic area).
2. Chapter 4, *Cumulative Impacts and Secondary Effects*, paragraph 4.8.1, page 4-19, lines 25-34 expressly states, "Any future basing of a new aircraft type in Alaska, or the relocation of F-16s from Eielson AFB to JBER, as is now being considered, would require that the appropriate environmental impact analysis processes be completed to include the potential impacts of such actions on all military and civil aviation airspace uses." Furthermore, the primary justification for the expansions of the FOX3 airspace and creation of the PAXON MOA is centralization of training airspace for the Aggressors and JBER based aircraft (paragraphs 1.5.1.1 and 1.5.1.2, Table 1-3 and page 2-2, lines 5-10,15).
3. The relocation of the Aggressors not only requires its own assessment of environmental effects, but consideration of the alternative substantially changes the character of the Draft JPARC EIS. As cited in the previous paragraph, the Draft EIS assumes the F-16s operate from Eielson. Justifications for airspace expansion, including utilization rates and efficiencies are predicated on Aggressor's originating and recovering to Eielson. No mention of F-16 relocation exists in the Draft JPARC EIS with the exception of the requirement for additional study should such a relocation occur.
4. The Draft JPARC EIS predicates its MOA/ATCAA usage on status quo basing for JBER and Eielson. Appendix D to the Draft JPARC EIS, Table D-2, *Description and Representative Annual Use of Alaska Training Airspace*, reflects FOX3 sortie totals of 9,877. STONY

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ATCAA reflects 2,500 and the YUKON1/2 ATCAA show 8,034 and 7,076 respectively. Table 2-2 on page 2-5 of the Draft EIS reflects a new estimated usage of the FOX3/PAXON airspace under the proposed changes of 11,237 per year. The assumptions reflect a relocation of prior STONY missions but no relocation of the over 8,000 sorties in the YUKON airspace to the north. While approximately 3,600 of the FOX3 sorties were F-16s (not including F-16CJs) in 2010 according to Table 2-3, similar numbers for the YUKON airspace are not available. Assuming a similar ratio in the north, an additional 2,400 F-16 sorties may either lose training effectiveness or require relocation to the southern airspaces. Additionally, skewing the results are the over 2,700 F-22A sorties in the FOX3 airspace since these aircraft rarely access the YUKON airspace.

5. According to Appendix D, Table D-2, the YUKON1/2 airspace is actively utilized 163 days and 104 days annually, respectively. The FOX3 airspace is utilized approximately 211 days annually. As detailed in the previous paragraph, the Draft JPARC EIS does not consider the shift in sorties associated with the relocation of the F-16s.
6. As detailed on page 2-6, the PAXON MOA low sector (below 14,000' MSL) would only be available for Major Flying Exercises (MFEs) for up to 60 days annually, consisting of 6, ten-day windows. This is of interest primarily to air-to-ground assets and has limited applicability to the Aggressors as they complete their training sorties. It may, however, continue to force other participants in non-MFE training events to utilize Interior ranges. The Aggressors, in their efforts to penetrate defensive air sovereignty assets to eliminate adversary combat air support (CAS), will continue to operate in the airspace centered over Eielson AFB.

Cost savings:

1. As discussed previously, the additional transit time/distance will erode cost benefits that may be claimed through relocation of the Aggressors to JBER. The accounting methods associated with determining cost savings are incongruous at times. The arguments related to cost savings seldom consider the quality of the flight time for the cost expended. Flight hours are allocated to units to complete their required training events to maintain a combat ready or mission ready status. The flight hour totals may remain unchanged or even diminish due to constrained budgets. This constraint will demand more training/proficiency events per flight hour expended. Virtually no recurrent training requirements for Air Force pilots are accomplished during en route cruise flight. To combat this loss of training time due to fuel/flight hours expended in transit, fighter aircraft require additional fuel to expend during high performance maneuvers in the reserved airspace. The unrecognized/hidden cost is the air refueling sorties generated to meet the fighter training requirement. While it is true that air refueling aircrews also require recurrency training, the potential volume of additional refueling sorties required may exceed the maximum training events required by air refueling assets and detract from other aircrew training by demanding extended loiter times and larger offloads.
2. The center points of the PAXON and FOX3 ATCAAs, as currently published, are closer to Eielson than JBER. The center point of the PAXON ATCAA is 106NM from Eielson via the HAWGG departure to the SLICK gate. The same point is 179NM via the EEEGL TWO departure, HOJOE gate in FOX3, then direct to the PAXON center point. The center point

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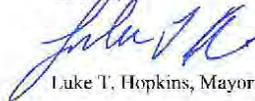
of the FOX3 ATCAA is 100NM from Eielson via the ARUNY ONE departure transiting through the EIELSON MOA and the FOX1 ATCAA/MOA. The same point is 153NM from JBER via the EEEGL TWO departure and HOJOE gate.

One should note the air combat for MFEs occurs in an area centered over Eielson and its aircraft can be in the airspace within a couple minutes of departure.

3. According to the FAA Administrator's Factbook, March 2011, Anchorage TRACON (Terminal Radar Control) ranked 36th busiest nationwide in calendar year 2009 with over 261,000 aircraft operations. CY2010 reported over 277,000 operations according to the Administrator (pg. 14). Fairbanks TRSA (Terminal Radar Service Area) is not listed in the report. However, according to the Alaska DOT website and the FAA data sheet for Fairbanks International Airport, Fairbanks experienced over 133,000 aircraft operations in CY2009. The congested nature of the Anchorage airspace in contrast to the relatively unencumbered access to the ranges enjoyed by Interior aircraft bears further research. A deeper analysis may reveal appreciable minutes of time lost due to required spacing for IFR aircraft and deconfliction in the Anchorage terminal area in contrast to the ease of recovery to Eielson AFB.
4. Weather considerations plague both locations. Eielson suffers from the bitter cold of winter while Anchorage experiences strong winds and occasional IFR conditions. Aircraft operating in the JPARC require fuel reserves – greater reserves for IFR terminal weather – and subsequently lose training time. Due to the distances discussed previously, JBER aircraft will lose even more of the already reduced play time when the requirement to carry fuel for an alternate field exists.

Thank you for the opportunity to offer comment on the *Draft Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska*. The FNSB looks forward to continuing our productive relationship with Alaska Command, the U.S. Air Force, and the U.S. Army. The FNSB point of contact for this action is Jeff Jacobson, Chief of Staff, jjacobson@fnsb.us 907-459-1300.

Sincerely,



Luke T. Hopkins, Mayor

References:

Air Force (U.S. Air Force). 2010. 11th Air Force Airspace Handbook. 29 December.

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THE STATE
of **ALASKA**
GOVERNOR SEAN PARNEILL

Department of Transportation and
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July 9, 2012

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Re: *JPARC Modernization & Enhancement Draft EIS*

To whom it may concern,

Thank you for the opportunity to comment on the *Joint Pacific Alaska Range Complex (JPARC) Modernization & Enhancement Draft Environmental Impact Statement (DEIS)*. The Alaska Department of Transportation and Public Facilities' (DOT&PF) mission is to *Get Alaska Moving* through service and infrastructure. We do this by providing for the safe and efficient movement of people and goods and delivery of state services. In this regard we will comment on safe access and the potential impacts on aviation by the proposed actions. Other State of Alaska departments are providing comments on various aspects of the DEIS that fall within their purview. It is in this context that I provide comments to you on the JPARC DEIS.

Alaska and the military have a long and mutually beneficial history, and the State of Alaska wants to preserve and expand our relationship wherever possible. Alaska's unique and spacious environment already provides superb military training opportunities and we support and endorse modernization and enhancement of this unique capability to support the Department of Defense (DoD) for the next century. It is in Alaska's best interest to seek creative methods to share the combination of air, ground, and sea resources that provide a realistic training environment for the military. While we desire to be both a gracious host and a partner with the military in Alaska, we have concerns about some of the proposed actions in the JPARC DEIS that must be addressed in the National Environmental Policy Act (NEPA) process.

Importance of Aviation in Alaska

We like to say that in Alaska, the general-aviation small aircraft is the equivalent to the mini-van for people living in the contiguous 48 states. There are over 10,000 aircraft in Alaska and over six times as many pilots per capita when compared to the rest of the U.S.A. Furthermore aviation is a major

"Get Alaska Moving through service and infrastructure."

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economic force by contributing more than \$3.5 billion annually to our economy, or about 8% of gross state product. Aviation is the fifth largest employment sector in Alaska, with over 47,000 aviation related jobs. Perhaps most importantly, aviation is the essential means of access to rural Alaska because of our expansive geography.

Safe Access

Providing for the safe transportation of the flying public in Alaska is a very important part of the State's responsibility. We want to help create a culture of safe travel in Alaska. The number of aircraft mid-air collisions is disturbingly high, which we want to eliminate or at least reduce the potential causes of whenever possible.

We believe it would be beneficial for the DoD to articulate and explain the on-board sensing capability possessed by military aircraft, as well as help Alaska stakeholders understand the relative frequency of military operations below 5,000 feet agl. These explanations should go a long way towards addressing concerns of Alaska general aviation and commercial operators.

These explanations are especially important due to the need for access to the southern Alaska Range, Denali Highway, and Talkeetna Mountains. Furthermore Isabel Pass is a major VFR "highway in the sky" that connects the northern half with the south central and southeastern portions of Alaska. The proposal to establish restricted air space over the Battle Area Complex (BAX) southeast of Delta Junction is of notable concern to state stakeholders as well. The concept of "turn on/turn off" airspace has been articulated by the DoD in past discussions. How might this concept apply to the BAX restricted airspace?

Enhance Communications for Safety

DoD created the Special Use Airspace Information Service (SUAIS) in the mid-1990's to address deconfliction of air space use. SUAIS greatly reduced the potential for mid-air collisions between civil and military aircraft. While both civil and military organizations generally agree upon the value SUAIS provides for deconflicting aircraft, to date aviation organizations continue to ask for adequate VHF radio coverage in the eastern portions of the existing JPARC complex. Correspondingly, the complaints that are received from civil aviation pilots are normally in regions of the airspace that lack adequate communication.

Any expansion of MOA airspace should have accompanying radio coverage, staffing, and other elements of the SUAIS infrastructure to allow civil pilots to communicate with US Air Force Range Control during times the MOAs area active. It is also important that the audio recorded message, broadcast during hours when Range Control is unmanned, be more uniformly broadcast across the JPARC complex.

Unmanned Aerial Vehicles

We provided comments for the scoping phase of the JPARC EIS regarding Unmanned Aerial Vehicles (UAVs), and want to reiterate our concerns. UAVs clearly represent an important and growing technology for the military and other agencies. We think now is the time to address how UAVs might be employed in a training environment while simultaneously ensuring safe separation from traditional aircraft. We believe an Alaska-as-prototype methodology is possible in meeting the challenge if all stakeholders work together to achieve the best approach. We look forward to participating with Department of Defense (DoD) planners in this area. The University of Alaska is working to secure a

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UAV training area under the auspices of the FAA. Perhaps DoD and the University of Alaska could work together to improve UAV safety.

Conclusion

Alaska has a long, productive, and collaborative history with the U.S. military. We want to build upon our history and continue to provide the remarkable environment for realistic military training opportunities so that our military can continue to be the best trained forces in the world. It is in both Alaska's and DoD's best interests to seek cooperative solutions to be able to share the unique combination of air, ground, and sea resources found in Alaska in a safe and mutually beneficial way.

The State of Alaska wants to continue to be both a gracious host and a full partner with the DoD in Alaska; however we have concerns and needs that must be addressed in the EIS and Record of Decision. I believe we can meet both the military's need for realistic training while ensuring that Alaskans continue to have reliably safe access to the areas within the proposed expanded MOAs.

Sincerely,



Steven D. Hatter
Deputy Commissioner - Aviation

G0019

[REDACTED]

From: Jim DeWitt [REDACTED]
Sent: Friday, July 06, 2012 5:27 PM
To: ALCOM J08 Admin Box
Cc: Mike Tvenge; Peter Hallgren; Mary Leith; Dennis J. Dunn
Subject: Joint Pacific Alaska Range Complex EIS - Comments of the City of Delta Junction
Attachments: DeltaJPARC-DEISComments.pdf

Dear Sir or Madam -

I am the City Attorney for the City of Delta Junction, Alaska. Enclosed is a PDF of a letter dated July 6, 2012, from the City commenting on the proposed Modernization and Enhancement Draft Environmental Impact Statement.

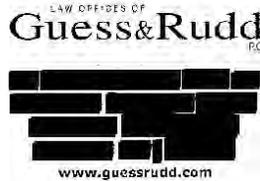
By copy of this email, I am advising Dennis Dunn of the City's comments, insofar as they relate to the City's claim of breach of the 2006 Agreement described in the enclosed letter.

Please contact me if you have questions.

Jim DeWitt, City Attorney
City of Delta Junction, Alaska

G0019

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W. EUGENE GUESS 1932-1975
JOSEPH RUDD 1889-1978
FRANCIS E. SMITH, JR. 1941-1991

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Via U.S. Mail and Email:
alcom.j08@elmendorf.af.mil

July 06, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
Joint Base Elmendorf-Richardson, Alaska 99506

Re: Joint Pacific Alaska Range Complex
Modernization and Enhancement
Draft Environmental Impact Statement
Comments of City of Delta Junction, Alaska
Our File No. 11025.020

Gentlemen:

We are city attorneys for the City of Delta Junction, Alaska. We submit these comments to the *Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska* ("JPARC DEIS"). The comments submitted here are in addition to the City's claims for breach of the Memorandum of Agreement USARAK-MOA-029 of May 16, 2006 ("the 2006 Agreement"). Neither these comments nor the City's participation in the JPARC DEIS process is a waiver by the City of those breaches.

The City believes that the context for its comments is critical and will provide background. The U.S. Army has admitted that changes in staffing at the U.S. Army have cost the Army its historical context.

I. BACKGROUND

The City of Delta Junction ("Delta") is a general law city located immediately to the north of the Donnelly Training Area East and Ft. Greely. The surrounding area along the Richardson Highway and the Alaska Highway, outside of Delta, is home to several thousand additional citizens ("Deltana").

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Beginning in 2001, United States Army Alaska ("USARAK") sought to develop two training facilities in the Eddy Drop Zone of the Donnelly Training Area East, the Combined Arms Collective Training Facility ("CACTF") and the Battle Area Complex ("BAX"). The proposed location for the CACTF and BAX was immediately adjoining the southern city limits of Delta and a considerable stretch of Deltana along the Alaska Highway. Through a series of disputes in the context of the National Environmental Policy Act, Delta objected to and resisted the location of the CACTF and BAX so close to populated areas. Some of the history of those objections and the background to their resolution are described in Delta Ordinance 2006-06 ("the 2006 Ordinance"), attached as Exhibit A, and Memorandum of Agreement USARAK-MOA-029 of May 16, 2006 ("the 2006 Agreement"), attached as Exhibit B. More detailed discussion and analyses can be found in the City's comments to the various environmental impact documents, the pleadings filed in federal court and the working papers leading to the 2006 Agreement.

The City argued strongly for an alternate location for the CACTF and BAX, at the south end of the Donnelly Drop Zone, described as "Alternative 3" in the Supplemental Draft Environmental Impact Statement for the Construction and the operation of a Battle Area Complex and a Combined Arms Collective Training Facility within U.S. Army Training Lands in Alaska dated March 2006 ("the 2006 SDEIS").¹ USARAK objected to Alternative 3 because of added costs of construction, as detailed in the 2006 SDEIS. USARAK insisted on Alternative 2 in the 2006 SDEIS, the "preferred alternative," which adjoins Delta and Deltana.²

An agreement was reached: Delta would withdraw its objections to Alternative 2 in exchange for commitments from USARAK for public safety, and USARAK's agreement that use of the CACTF and BAX would not be further expanded without the consent of Delta. The agreement was reduced to the writing attached as Exhibit B, and approved by the City under Ordinance 2006-06, attached as Exhibit A.

Note that to interpret the 2006 Agreement you must have at hand both Exhibit A to the 2006 Agreement and the 2006 SDEIS itself, which both the 2006 Agreement and Exhibit A to the 2006 Agreement reference.

¹ 2006 SDEIS, Vol. 2, Figure 2.f.

² 2006 SDEIS, Vol. 2, Figure 2.e.

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Much of the activity described in the JPARC DEIS is removed from the Delta and Deltana area, although the JPARC DEIS is vague about many of the impacts. However, many parts of the JPARC DEIS are specific to the Donnelly Training Area and to the BACX and CACTF in particular. Generally, Delta's comments to the JPARC DEIS go to the environmental impacts on the Donnelly Training Area East. To the extent that other aspects of the JPARC Modernization and Enhancement carry the potential to impact Delta and Deltana, those comments are intended to extent to those changes as well.

II. COMMENTS

A. Comments Related to Memorandum of Agreement USARAK-MOA-029.

It is very frustrating to Delta to have to discuss and review all of these issues again.

1. The JPARC DEIS Is Defective Because JPARC Failed to Consult with Delta As a Local Government Impacted by the Proposed Activity.

As the JPARC DEIS acknowledges, consultation with local governments impacted or potentially impacted by the proposed activities is mandatory.³ That simply did not happen. Indeed, Delta did not even make the distribution list for local agencies impacted.⁴ Given the troubled history of range expansion between USARAK and Delta, the omission is inexcusable. Delta and Deltana are the areas most likely to be impacted by increased activities in the Donnelly Training Area. The failure to contact and consult with Delta is an astonishing oversight.

Delta has litigated the adequacy of NEPA documents with USARAK. Delta has vigorously participated in NEPA proceedings on the 2001 Environmental Assessment for the CACTF and BAX, forcing USARAK to a full environmental impact statement process. Delta's comments to the Draft Environmental Impact Statement for the CACTF and BAX contributed to USARAK's decision to issue a Supplemental EIS. Delta, without question, is the municipality with the most at stake in any expansion of activities in the Donnelly Training Range.

The failure to consult with a major stakeholder, with a record of active participation in prior range expansions, makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

³ JPARC DEIS, Vol. 1, p. 1-33.

⁴ JPARC DEIS, Vol. 2, p. A-45.

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2. The JPARC DEIS Is Defective Because JPARC Failed to Discuss the 2006 Agreement.

At no point in the JPARC DEIS that we can find does JPARC even mention the specific terms of the 2006 Agreement.⁵ The omission is astonishing, because city council member Pete Hallgren handed a copy of the 2006 Agreement to JPARC at a scoping meeting. JPARC had actual notice of the existence of the 2006 Agreement, quite apart from USARAK being a party to it.

Yet JPARC failed to acknowledge the consequences of the 2006 Agreement, let alone discuss the impact of the commitments made in that agreement to Delta and Deltana. Because of that omission, substantial portions of the discussion of proposed changes to the BAX in the JPARC DEIS ignore the contractual commitments made in the 2006 Agreement.⁶ Among other issues, the proposed level of increased activities ignores the restrictions on training under specific weather conditions because of fire hazards, ignores known flood plain risks and ignores restrictions and limitations on noise and training activities.

This omission is separate from the breaches of the 2006 Agreement. The 2006 Agreement is a part of the scope of the proposed range enhancements. It is an issue to be addressed as a part of any environmental impact statement. The omission of the 2006 Agreement from the JPARC DEIS makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

⁵ The JPARC DEIS briefly acknowledges the existence of the 2006 Agreement; JPARC DEIS p. 3-206, lines 31-33. The reference cites to the wrong USARAK number. Nowhere in the hundreds of pages of the JPARC DEIS are the terms of the 2006 Agreement discussed, or analyzed in relation to the JPARC DEIS.

⁶ JPARC DEIS, vol. 1, 3-178 to 220

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B. Comments Relating to Fire Danger.

As Delta demonstrated in the negotiations and litigation over the BAX and CACTF Ranges, the risks associated with wildfire are a critical concern. Very strong winds gust through the Black Rapids Canyon, Deltana and Delta routinely. Hot, dry conditions can extend for weeks at a time. A wildfire in those conditions is uncontrollable. Delta experienced just such a wildfire in 1999, when a wind-driven fire originating in the Donnelly Training Area East burned buildings on Ft. Greely and blew hot cinders several miles downwind. Uncontrollable wildfire originating from training activities is a critical concern.

The presence of unexploded ordinance in portions of Donnelly Training Area East exacerbates the dangers from wildfire in training areas. Where a danger of unexploded ordinance is present, ground crews cannot be used to attempt to control the wildfire. Only aerial systems (air drops of water and fire retardant) can be used. Thus, efforts to control wildfire may be further hampered.

The importance of those concerns is reflected in the 2006 Agreement. Substantial portions of that agreement address mitigating the risk of wildfire and providing for immediate, on-site control if a fire is started. The mitigation and control requirements demonstrate the significance both USARAK and Delta attach to this risk.⁷

Note that under extreme fire conditions, no training would occur at the BAX except for troops scheduled for immediate deployment and then only after prior consultation with Delta.⁸ For lower levels of fire conditions, specific levels of staffing and staffing locations are provided.

By contrast, the discussion of fire danger associated with the proposed JPARC Range Enhancement is incomplete and inadequate. The only consideration given to wildfire is fires ignited by munitions and incendiaries, and even that inadequate discussion is cast as nearly meaningless generalities.⁹ Wildfires can also be ignited by careless smoking, exhaust manifolds on vehicles, escaped campfires and many other sources. The failure to address other man-made causes

⁷ See 2006 Agreement, pp. 3.4.

⁸ Ibid, p. 3.

⁹ See, e.g., JPARC DEIS 3-118 to 119.

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of wildfire makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

The proposal to increase training activities from 106 days annually to 238 days annually¹⁰ is effectively an impossibility without violating the 2006 Agreement or greatly increasing training activities during the harsh Interior Alaska winter. A 225% increase is not feasible.

Because wildfire is uncontrollable in high and extreme weather conditions, and because those kinds of weather conditions prevail in the Donnelly Training Area for days and sometimes weeks at a time, the goals of the BAX Range Expansion cannot be met without extremely high jeopardy of wildfire. The failure of the JPARC DEIS to address these environmental realities makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

Delta notes that the solution to the wildfire risk is not to offer more staffing or more equipment, or even more removal of vegetation. Under high and extreme fire conditions, wildfire is *uncontrollable*. The only means of "controlling" wildfire risk in high and extreme conditions is to sharply curtail human activity in the Donnelly Training Area. That single solution is contradicted by the overly ambitious training days goal described in the JPARC DEIS. The failure by the JPARC DEIS to directly address that contradiction makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

C. Comments Relating to Flooding.

As Delta demonstrated from historical records and from the work of an independent hydrologist, the area where USARAK chose to locate the BAX and CACTF are prone to sheet flooding and aufeis-generated seasonal flooding. Those risks were addressed in the 2006 Agreement and Exhibit A to the Memorandum.¹¹

"Sheet flooding" is an unusual condition that occurs in the Donnelly Training Area East in which instead of channelized flow, water flows over the entire area. Man-made structures disrupt and channelize that sheet flow, creating very serious downstream risks. Delta, and the Deltana region, are downstream.

¹⁰ JPARC DEIS, p. 6.

¹¹ 2006 Agreement, p. 4; Exhibit A, pp. 2-3.

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"Aufeis-generated seasonal flooding" occurs in the Jarvis Creek channel, which flows south to north through the Donnelly Training Area East. The risk is mentioned but not assessed in the JPARC DEIS.¹² In the Executive Summary, the JPARC DEIS ultimately concluded that the BAX will have no adverse impact on the flood plain.¹³ That unsupported claim stands in sharp contrast to events on the ground. In the spring of 2006, an aufeis event occurred on Army land, that caused a massive diversion of spring runoff from Jarvis Creek, overland through the BAX site and then more than 10 miles through the Delta and Deltana area north to ultimately discharge into the Tanana River. This rapidly rising floodwater ran down the street in front of the Delta High School as volunteer crews using heavy equipment dug emergency ditching to keep the water from flowing into residential neighborhoods and downtown Delta, while miles to the north State of Alaska Department of Transportation deliberately breached Tanana Loop Extension road in several places to allow the floodwater to more quickly drain into the Tanana River. A number of residents were stranded for several days in their homes due to this action. Anything that alters the topography in Donnelly Training Area East, including the range expansions contemplated by the JPARC DEIS, carries the risk of worsening the risk of aufeis-generated flooding, disruption of the sheet flow flooding or both.

USARAK acknowledged these risks and partially addressed them in the 2006 Agreement.¹⁴ The unspecified enhancements to the BAX contemplated by the JPARC DEIS involve a careful assessment of what changes will be made to the Jarvis Creek channel, the alternate flood channel and the areas prone to sheet flooding. The failure of the JPARC DEIS to meaningfully discuss these risks makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

In the case of both sheet flow and aufeis-generated flooding, it is important that vegetation remain in place to slow and impound the velocity of the water. Delta notes that this important requirement is inconsistent with removal of that vegetation to manage the risk of wildfire. The failure of the JPARC DEIS to address this inconsistency makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

Because the area in which the BAX is located is in a known flood plain, Executive Order 11988 bars construction unless there is no

¹² JPARC DEIS, §3.3.6.1 at p. 3-195.

¹³ JPARC DEIS, vol. 1, p. 12, Table ES-1.

¹⁴ 2006 Agreement, p. 4.

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practicable alternative. A word search of the JPARC DEIS demonstrates that Executive Order 11988 is never mentioned in the discussion of the BAX, and only briefly acknowledged to exist in Volume 2 of the JPARC DEIS.¹⁵ There is no discussion of the relationship of Executive Order 11988 to the proposed BAX range expansions. The failure by the JPARC DEIS to meaningfully discuss the risks of construction in a floodplain and the impact of EO 11988 makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

Aufeis occurs throughout the flatter areas in Donnelly Training Area East. As Delta has demonstrated previously, any structures that impede the flow of water, even relatively small amounts of water, create potential for aufeis formation during the winter. Over the course of the long Alaska winter, that aufeis can thicken into layers many feet thick. That aufeis not only jeopardizes whatever structures may have been created; it also impacts the flow of water during spring runoff in unpredictable ways.

The JPARC DEIS baldly claims that the BAX range expansions will have no adverse impact on water resources or flood plains.¹⁶ The assertion is simply wrong. These cumulative risks identified by Delta as far back as 2005 demonstrate that there are very serious hydrologic risks. These are risks, which USARAK acknowledged to exist in the 2006 Agreement. For the JPARC DEIS to claim otherwise now makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

D. Comments Relating to Public Safety.

The Donnelly Training Area East directly abuts the southern boundary of Delta and, along the Richardson and Alaska Highways, the Deltana region. Delta and Deltana will bear significantly increased safety risks from the proposed range enhancements. The risks go beyond the wildfire and flood risks described earlier in this letter. The increased overflights, increased air-to-ground and ground-to-air weapon activity, increased unmanned aerial vehicle activity and increased night training all pose safety risks for Delta and Deltana.

¹⁵ JPARC DEIS, Vol. 2, p. B-48. This omission is particularly frustrating to Delta. In 2005-2006, in the discussions regarding the adequacy of the Supplemental Draft Environmental Impact Statements, it was Delta that had to point out the existence of Executive Order 11988 to USARAK. It is frustrating, even alarming, that JPARC has apparently already forgotten its existence.

¹⁶ JPARC DEIS, §3.3.6 at p. 3-195.

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Yet Delta was not meaningfully consulted. And to the extent that Delta participated in the scoping meetings, by providing a copy of the 2006 Agreement, for example, it was simply ignored. The failure by the task force charged with drafting the JPARC DEIS to even consult with Delta makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

The JPARC DEIS acknowledges that existing activities generate munitions-related rubble in the BAX.¹⁷ Munitions-related rubble contains hazardous materials. The JPARC DEIS concludes that there will be no increased adverse impact. Delta is at a loss to understand how a proposed 225% increase in training activities can fail to substantially increase the amount of munitions-related rubble. That rubble, apparently, is stored on the Donnelly Training Area, at or near the BAX. As such, it presents a risk to Delta in the event of a flood event, to give just one example. Unless JPARC can show that Delta's assumptions are in error, the failure by the JPARC DEIS to address this issue makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

Finally, it is deeply troubling to Delta that JPARC is using the location of the CACTF and the BAX as a basis for increased air activity over inhabited areas. As described earlier in this letter, the basis for Delta's entry into the 2006 Agreement was the agreement that in exchange for acquiescing in the BAX and the CACTF being at the north end of the Donnelly Training Area East, as opposed to the south end favored by the City, the use of those ranges would not be expanded without the agreement of Delta. The failure by the JPARC DEIS to meaningfully discuss the breach of that bargain and the increased risk to Delta and Deltana makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

E. Comments Relating to Noise.

The importance of noise and noise management is evident in the 2006 Agreement: the agreement was predicated on a demonstration of the noise from a 105mm Stryker Mobile Gun System immediately prior to the public hearing on the ordinance to adopt the 2006 Agreement. Additionally, the JPARC DEIS concluded that there is a potential adverse impact

As Delta understands the JPARC DEIS, the BAX range expansion contemplates a 225% increase in training days, greatly increased amounts of fixed and rotary wing air traffic, some of it jet traffic,

¹⁷ JPARC DEIS, §3.3.7 at pp. 3-196 to 3-197.

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immediately above and along the southerly boundary of Delta. The hours during which the activity would occur are greatly increased. Night training would be added, creating noise issues into the evening.

This would not be as great an issue if USARAK had agreed to locate the BAX and CACTF at the south end of Donnelly Training Range East. But USARAK insisted on the very northern end, abutting the City limits, and promised noise would not be an issue. Now, apparently, residents of Delta and Deltana can expect helicopter traffic 500 feet overhead at 10 PM two-thirds or more of the year.

The JPARC DEIS admits that the EPA has determined noise levels above 55 dB are annoying to adjoining property owners.¹⁸ Further, the JPARC DEIS recognizes that the noise from the BAX will potentially have an adverse impact on the environment surrounding it.¹⁹ But the JPARC DEIS goes on to assert, without citation to authority, that levels of 65 dB are permissible, even though it means that 12% or more of the population will be highly annoyed.²⁰ The activities described in the JPARC DEIS also represent a substantial increase in noise levels for residents of Delta and Deltana. Under the 2006 Agreement, Delta agreed to tolerate noise below 65 dB.²¹ Now Delta residents are being told to expect noise "that would not be expected to exceed 65 dB."²² Delta knows from experience that changes in phrasing like this are a wedge to much higher activity levels. The proposed increase in tolerated levels of noise is a breach of the 2006 Agreement. No justification is offered for this breach of the 2006 Agreement. The failure by the JPARC DEIS to address the unilateral increase in noise levels and noise duration makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.

F. Relationship Between City of Delta Junction and U.S. Army.

Delta prides itself on a long, mutually cordial and mutually beneficial relationship with the U.S. Army. Many Delta and Deltana residents are veterans, most of whom were stationed at Ft. Greely during their military careers. Delta values that relationship and does not want to unnecessarily damage it.

¹⁸ JPARC DEIS, Vol. 2, pp. E-14 to E-15.

¹⁹ JPARC DEIS, Vol. 1, p. 12, Table ES-1.

²⁰ JPARC DEIS, Vol. 2, pp. E-14 to E-15.

²¹ 2006 Agreement, Exhibit A, pp. 5-6.

²² JPARC DEIS, Vol. 1, pp. 3-187 to 3-188.

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Delta is also mindful of the risk that Eielson Air Force Base may be reduced in size, or even realigned, and understands the importance of adequate training facilities and conditions to the continued operation of the Base.

Finally, Delta is mindful of the importance of adequate training to our troops, for their safety and security, and to allow them to perform the missions that may be assigned to them.

Delta took those considerations in mind when it made the settlement described in the 2006 Agreement. Some of the factors that led to Delta's agreement in 2006 were the very considerations described above.

Now, however, in the face of the U.S. Army's apparent abandonment of the 2006 Agreement, it is difficult for Delta to once again make concessions that jeopardize its safety and values. It is deeply troubling that, despite having a copy of the 2006 Agreement provided at the scoping meeting, JPARC chose to completely ignore its existence and the contractual obligations made by USARAK under that agreement. From the point of view of Delta, the U.S. Army has breached and proposes to further breach its agreement with the City.²³

G. Conclusion.

In light of these circumstances, a further issue that the JPARC DEIS should address is how a level of trust and confidence between the U.S. Army and Delta may be restored. Delta would strongly prefer to resolve these issues by compromise and agreement, but is understandably concerned that USARAK, JPARC and the U.S. Army will not abide by whatever agreement might be made. The City of Delta Junction invites the U.S. Air Force and the U.S. Army to suggest ways in which some settlement can be made.

As drafted, Delta believes the DEIS is inadequate as a matter of law. A Supplemental Environmental Impact Statement, with further notice and comment periods, is very likely required. Separately, the City and Delta Junction must resolve the very serious breaches of the

²³ At the public hearing in Delta Junction, the military suggested that because the JPARC DEIS is a joint effort of the Air Force and Army, the 2006 Agreement might not apply. The claim is wrong as a matter of law. Donnelly Training Area East was USARAK land at the date of the 2006 Agreement. Whatever rights the Air Force may have can only derive from those the Army has. Those rights are limited by the 2006 Agreement.

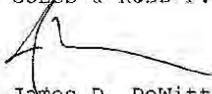
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2006 Agreement. Otherwise, the important objectives of the JPARC DEIS will be delayed, at least as to the BAX modifications, while the NEPA requirements are satisfied, and, at least potentially, an action for breach of the 2006 Agreement ensues. Delta strongly urges meeting to resolve these issues without another five year cycle of environmental and contract litigation.

Sincerely yours.

GUESS & RUDD P.C.



James D. DeWitt

cc: Mary Leith, Mayor
City of Delta Junction

Mike Tvenge, City Administrator
City of Delta Junction

Dennis Dunn, (via email only, dennis.j.dunn2.civ@mail.mil)
USARAK G3, TSS Chief

G0020

[REDACTED]

From: Brenda Henry [REDACTED]
Sent: Friday, July 06, 2012 7:08 PM
To: ALCOM J08 Admin Box; SMART, JOAN M GS-11 USAF ALCOM JTF AK/J08
Cc: Lonnie McKechnie
Subject: Matanuska-Susitna Borough Resolution Serial No. 12-076
Attachments: RS 12-076.pdf

Importance: High

Good Afternoon:

Attached to this email you will find a copy of Matanuska-Susitna Borough Resolution Serial No. 12-076, providing comment on the March 12, 2012, Joint Pacific Alaska Range Complex Environmental Impact statement.

If you have any questions please let us know through the contact information provided below.

Thank you.

Brenda J. Henry
Clerk's Office
Matanuska-Susitna Borough

[REDACTED]

"Who can truly harm you if you are deeply committed to doing what is right?"

G0020

Sponsored By: Assemblymember Keogh
Amended: 06/28/12
Adopted: 06/28/12

**MATANUSKA-SUSITNA BOROUGH
RESOLUTION SERIAL NO. 12-076**

A RESOLUTION OF THE MATANUSKA-SUSITNA BOROUGH ASSEMBLY PROVIDING PUBLIC COMMENT ON THE MARCH 12, 2012, JOINT PACIFIC ALASKA RANGE COMPLEX ENVIRONMENTAL IMPACT STATEMENT REGARDING THE EXPANSION OF EXISTING MILITARY OPERATING AREAS WITHIN THE MATANUSKA-SUSITNA BOROUGH BOUNDARIES AND ADJACENT AREA, PARTICULARLY THE FOX 3 MILITARY OPERATING AREA AND THE PAXSON MILITARY OPERATING AREA.

WHEREAS, the United States Air Force and United States Army are proposing to modernize, enhance, and expand the Joint Pacific Alaska Range Complex, (JPARC); and

WHEREAS, the Matanuska-Susitna Borough is supportive of the United States military presence in Alaska and recognizes its needs for training; and

WHEREAS, much of the existing Fox 3 Military Operation Area (MOA) is situated within the external boundaries of the Matanuska-Susitna Borough; and

WHEREAS, the United States Air Force and the United States Army are requesting public comment on its a draft Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska; and

WHEREAS, the Matanuska-Susitna Borough is the fastest growing area in the state of Alaska; and

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WHEREAS, the Matanuska-Susitna Borough population is expected to double in the next 20 to 25 years; and

WHEREAS, all the proposed alternatives, except the No Action Alternative, consist of increases in combat flight training exercises within airspace above the Matanuska-Susitna Borough; and

WHEREAS, the proposed Fox 3 MOA and Paxson MOA would expand the existing training airspace southerly, extending to much of the Talkeetna Mountains areas adjacent to the growing communities of Lake Louise, Wasilla, Palmer, Sutton, Chickaloon, and Glacier View; and

WHEREAS, expansion of the existing Fox 3 MOA and Paxson MOA airspace easterly could encompass the community of Lake Louise and the adjacent areas of Lake Susitna, Lake Tyone, and Crosswind Lake; and

WHEREAS, there are approximately 500 private property parcels and 80 year round residents in the greater Lake Louise area; and

WHEREAS, the Lake Louise Community Non-Profit Corporation, that represents property owners and residents of the greater Lake Louise area has expressed its many concerns about noise impacts on the local economy, lifestyle, wildlife, recreational use, aviation, etc., by letter correspondence dated

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February 11, 2011, to the Borough Assembly, and June 2, 2012, to the Alaskan Command; and

WHEREAS, the Talkeetna Community Council has expressed its concerns about civilian aviation safety and the undesired impacts of noise on the tourism industry and wildlife by letter correspondence dated June 4, 2012; and

WHEREAS, many Matanuska-Susitna Borough residents and visitors depend upon the airspace within the proposed expanded airspace, as well as the natural resource rich lands and waters below, for accessing private and public lands via aircraft, for commercial enterprise such as air taxi operations, outfitting, hunter/hiker guiding, operating lodges, operating mines, etc., and for various non-commercial, recreational, and subsistence activities, such as hunting, hiking, food gathering, sightseeing, etc.; and

WHEREAS, there exists an abundance of wildlife resources within the area proposed for expansion; and

WHEREAS, the proposed expansion of the Fox MOA airspace would cover the Nelchina caribou herd calving grounds, all of which is located within the boundaries of the Matanuska-Susitna Borough; and

WHEREAS, the proposed lateral expansion of the current Fox 3 MOA would enlarge the military operating area within Borough boundaries by an estimated 5,500 square miles in Alternative "A"

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and by an estimated 3,500 square miles in Alternative "E;" and

WHEREAS, the United States Air Force, in its August, 1995, "Final Environmental Impact Statement - Alaska Military Operations Areas," and Record of Decision that followed in April, 1997, diminished the Fox MOA by 910 square miles to its present location and dimension due to undesirable impacts of noise; and

WHEREAS, the proposals will expand airspace vertically to include training areas between 500 feet Above Ground Level (AGL) and 18,000 feet above Mean Sea Level (MSL); and

WHEREAS, the United States Air Force, in its August, 1995, "Final Environmental Impact Statement - Alaska Military Operations Areas," and Record of Decision that followed in April, 1997, raised the proposed minimum flight altitude from 3,000 feet AGL to 5,000 feet AGL due to undesirable noise impacts and in order to "preclude the potential for direct over flight of sensitive resources"; and

WHEREAS, proposed lateral and vertical expansions of training airspace would increase the probability of conflict between civilian and military aircraft; and

WHEREAS, the potential for near misses or midair collisions between military and civil aviation within the proposed Fox 3 and Paxson MOA, is significant and will impact general aviation pilots, air taxi pilots, and air charter pilots who use these

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areas for hunting, fishing and other recreational and subsistence activities who travel at low altitudes under Visual Flight Rules (VFR); and

WHEREAS, general aviation, air taxi, and air charter pilots flying under Instrument Flight Rules (IFR) conditions would be prohibited from travel through an active MOA, the Richardson Highway is a major aviation transportation corridor for civil aviation traveling north-south, and IFR air travel will be impacted during military operations in the proposed Paxson MOA where the low sector airspace is proposed to extend from 500 feet AGL up to 14,000 feet MSL; and

WHEREAS, the existing communication system in the northern MOA's, Special Use Airspace Information Service (SUAIS), is vital for pilots to receive real time information on all military airspace uses and for the military to receive real time information on civilian aeronautical activity.

NOW, THEREFORE, BE IT RESOLVED, that the Matanuska-Susitna Borough Assembly prefers the two EIS alternatives with smaller lateral and vertical footprints; either the "No Action Alternative" that maintains the current Fox 3 MOA or "Alternative E" for the Fox 3 and Paxson MOAs because it moves the proposed southern boundary of "Alternative A" 20 nautical miles to the north.

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BE IT FURTHER RESOLVED, that if Alternative E is the selected alternative, an Overflight Avoidance Area be established twenty (20) nautical miles north of the parallel to the southern boundary of Alternative E, with flight altitude minimums of 5,000 feet AGL.

BE IT FURTHER RESOLVED, that the Matanuska-Susitna Borough Assembly opposes lowering the minimum flight training altitude to 500 feet for the Fox 3 MOA and the Paxson MOA due to potential impacts on wildlife, civilian aircraft traffic, and recreational uses.

BE IT FURTHER RESOLVED, that the Air Force conduct all supersonic operations in the Fox and Paxson MOAs at or above 5,000 feet AGL or 12,000' MSL, whichever is higher, to reduce sonic boom intensity and its effects on the surface.

BE IT FURTHER RESOLVED, that the Department of Defense delineate and establish seasonal flight avoidance areas and overflight/operational restrictions over wildlife areas underlying any new or expanded MOAs consistent with the current restrictions identified in the 1997 Alaska MOA EIS.

BE IT FURTHER RESOLVED, that these restrictions would include, but not be limited to, minimum overflight altitudes over wildlife areas, including waterfowl, raptor and other migratory bird nesting/breeding/concentration areas, Dall sheep lambing areas, caribou and moose critical season habitat areas,

G0020

etc., be reviewed, identified and, if necessary, expanded, with the cooperative assistance of the Alaska Department of Fish and Game and the U.S. Fish and Wildlife Service.

BE IT FURTHER RESOLVED, that spatial and temporal management options (time and area restrictions) be evaluated and established to facilitate the public's use of the area and to ensure the sustainability of the area's natural resources; and

BE IT FURTHER RESOLVED, that there be no Major Flying Exercises (MFE) and overflight of popular subsistence areas, hunting areas, campgrounds, and trails (5,000 feet AGL and half-mile lateral distance) during peak use periods between June 27 and July 11, from mid-August through September, and during other important hunting seasons determined by the Alaska Department of Fish and Game.

BE IT FURTHER RESOLVED, that the Department of Defense shall provide detailed maps, aeronautical charts and information to the public, especially in the communities near the Fox 3 and Paxson MOAs, identifying flight corridors, restricted or closure areas, and dates of training use.

BE IT FURTHER RESOLVED, that the Matanuska Susitna Borough Assembly encourages mitigation measures be taken to minimize the impacts on VFR and IFR air traffic in the proposed Fox 3 and Paxson MOAs and urges funds be secured for communication enhancements to SUAIS and expand coverage within the proposed

G0020

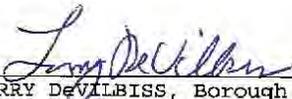
Fox3 and Paxson MOAs prior to the issuance of any airspace.

BE IT FURTHER RESOLVED, should SUAIS not be expanded or become inoperable, the floor of the Fox 3 MOA reverts from 500 feet AGL to 5,000 feet AGL to preserve safety for civil VFR operations.

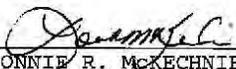
BE IT FURTHER RESOLVED, that the Assembly opposes the establishment of the Paxson MOA between 500 AGL to 14,000 MSL be eliminated due to the importance of the Richardson Highway Corridor.

BE IT FURTHER RESOLVED, that the Assembly opposes any additional Military Operations Areas unless the Federal Aviation Administration and military provide real-time access by IFR aircraft to MOAs to preserve access and safety that are associated with the IFR infrastructure for these parts of Alaska.

ADOPTED by the Matanuska-Susitna Borough Assembly this 28 day of June, 2012.


LARRY DEWITT, Borough Mayor

ATTEST:


LONNIE R. MCKECHNIE, CMC, Borough Clerk (SEAL)

PASSED UNANIMOUSLY: Keogh, Woods, Arvin, Colligan, Salmon,
Colver, and Halter

Page 8 of 8

Resolution Serial No. 12-076
IM No. 12-148

G0021

[REDACTED]

From: Bergerbest, Nathan (Murkowski) [REDACTED]
Sent: Monday, July 09, 2012 2:45 PM
To: ALCOM J08 Admin Box
Cc: GRATION, JULIE A Maj USAFR ALCOM JTF AK/J021; Strain, Steven A Lt Col MIL USAF SAF/FMBL
Subject: Joint Pacific Alaska Range Complex EIS
Attachments: 120709 JPARC DEIS COMMENT.pdf

Here are Senator Murkowski's comments on the JPARC DEIS for official filing.

Nathan Bergerbest
Senior Counsel

[REDACTED]

G0021

LISA MURKOWSKI
ALASKA

COMMITTEES:
ENERGY AND NATURAL RESOURCES;
INDIAN AFFAIRS;
APPROPRIATIONS;
HEALTH, EDUCATION, LABOR,
AND PENSIONS;
INDIAN AFFAIRS

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July 9, 2012

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(907) 376-7885

SUBMITTED VIA E-MAIL AND US MAIL

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
Joint Base Elmendorf Richardson, AK 99506

COMMENTS ON JPARC DRAFT ENVIRONMENTAL IMPACT STATEMENT

Ladies and Gentlemen:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex Alaska (JPARC). The DEIS presents a comprehensive look at the environmental effects of expanding and modernizing JPARC to address technological advances in military equipment and systems, advances in combat tactics and techniques, a continued need for diversified, efficient and realistic training and the need to maximize scarce resources by maximizing joint training in difficult financial times. I have heard from key stakeholders that the DEIS is a high quality environmental document and the DEIS team is to be commended for their efforts.

As the comment period on the DEIS closes my office has not been given the opportunity to review the comments submitted by stakeholders. Accordingly I will reserve judgment on the various alternatives presented by the DEIS at this time. I do believe, however, that the "No Action" alternative should not be adopted. The world class JPARC is a key attribute of Alaska's value to the military in the 21st Century. No place else in America does the military have the opportunity to conduct state of the art training in diverse terrains without risk of encumbrance.

Alaska has been proud to share its lands and airspace with the military for generations. However, it is important for our military leaders to appreciate that this is an earned privilege rather than a right. Military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. General aviation is particularly important in Alaska as a means of commerce, subsistence, recreation and emergency transportation. In preparing the Final Environmental Impact Statement (FEIS) every effort should be undertaken to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible.

[\[LOVE PAGE AND WEB MAIL\]](#)
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Alaskans stand among the most patriotic people in America and have long been willing to sacrifice personal convenience in order to ensure that our military is the best trained and best equipped fighting force in the world. Alaskans have a long track record of supporting our military families like none other.

For decades the military has proven to be a good partner through its significant year-round contributions to Alaska's economy. In recent months, as the Interior Alaska community has been forced to come to grips with the prospect of a devastating possible downsizing of Eielson Air Force Base, this longstanding trust has been tested.

I fully expect that the people of Alaska will once again rise to support the military's needs in JPARC. However it is also appropriate that the military provide Alaskans with a modicum of certainty that in return our Armed Forces will continue to be good stewards of Alaska's economy.

Over the next few months, as the DEIS team reviews stakeholder comments and formulates a FEIS leading to a Record of Decision the opportunity to rebuild the critical social contract between Alaskans and their Armed Forces presents anew. I sincerely hope that our military leaders take advantage of the upcoming opportunity to expand and modernize JPARC in harmony with Alaska's values and the way of life we hold dear.

Respectfully submitted,



Lisa Murkowski
United States Senator

G0022

[REDACTED]

From: Palach, Brad M (DFG) [REDACTED]
Sent: Monday, July 09, 2012 6:07 PM
To: ALCOM J08 Admin Box
Cc: Fleener, Craig L (DFG); Vincent-Lang, Douglas S (DFG); Mulligan, Ben (DFG); Brookover, Thomas E (DFG)
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission
Attachments: 7-9-2012 ADF&G JPARC Comments.pdf

Please find attached the JPARC comments being submitted on behalf of the Alaska Department of Fish and Game by Deputy Commissioner Craig Fleener. If you need clarification or additional information regarding these comments please contact:

Brad Palach

[REDACTED]

G0022



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

**Department of
Fish and Game**

OFFICE OF THE COMMISSIONER
Central Region Office

333 Raspberry Road
Anchorage, Alaska 99518-1565
Main: 907.267.2156
Fax: 907.267.2419

July 9, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506-2101

Ladies and Gentlemen,

Alaska Department of Fish and Game (Department) reviewed the March 2012 Draft Environmental Impact Statement (DEIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC). The Department understands and is supportive of the need of the military to conduct training exercises to prepare personnel for defense missions across the globe.

We appreciate the efforts the military has taken to provide information in the development of this planning process. This is especially important since the area under consideration is one of the most accessible and heavily used areas for outdoor activities in the State. However, we are disappointed that federal law and policy restricts the military's training efforts on the many millions of acres of nearby federally administered National Wildlife Refuges, National Parks and BLM lands and instead forces it onto State lands which are highly desired by the general public for outdoor activities. With this in mind, the comments developed below are intended to accommodate the need of the military to use these State public lands while at the same time maintaining public use and access consistent with the desires of the public and the intent of the Constitution of the State of Alaska.

The following are the comments of the Department.

Coordination

We appreciate the intentions of numerous mitigation measures calling for increased communication and coordination with the Department and members of the public, including subsistence and other resource users. To ensure these meetings take place, we recommend this intent be specifically recognized in the Record of Decision and be scheduled to take place on a biannual basis, or as issue specific items emerge so that adaptive management strategies may be more easily developed to address issues as they develop. This action would ensure that the important discourse between the responsible State managers and various user groups and the representatives of the military take place in a timely manner. This is particularly important as uses by the public alter from year to year, resources change in frequency, abundance and location, and as the uses of the military are better understood as the plan is implemented.

G0022

ALCOM Public Affairs

- 2 -

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Administrative Activities Conducted by the Alaska Department of Fish and Game

We recognize that minimum over flight of 5,000 ft above ground level (AGL) is proposed as mitigation for many areas with identified populations of fish and wildlife, popular hunting and fishing areas, trails, and campgrounds. The sustainability of the fish and wildlife and the popularity of these areas is dependent on plentiful fish and wildlife that is intensively managed by the Department. Through active management, which includes frequent aerial surveys and other flights, we are able to provide opportunities that drive the popularity of these areas with the public, which includes residents of the two largest cities in Alaska, Anchorage and Fairbanks, as well as the Matanuska-Susitna Borough and North Star Borough and other smaller communities near the affected areas. These surveys entail numerous flight hours and flight days, for example, the Department estimates roughly 400 hours of flight time annually in the Proposed Paxson and Fox 3 MOAs for wildlife surveys alone. Without the ability to conduct comprehensive aerial survey work, we will find it exceedingly difficult, if not nearly impossible, to manage populations of fish and wildlife for sustained yield and maintain the current levels of subsistence and other hunting and fishing opportunities.

To accommodate the Department's need for aerial survey work, we recommend the following mitigating measure:

- Throughout the area covered by this planning process, establish a 5,000 ft above ground level (AGL) over annually identified areas as necessary to accommodate the need of Department staff to conduct aerial survey work. Recognize that flexibility and close coordination with the Department will be necessary to accommodate the conduct of this essential work, while respecting the needs of the military for training. (Additional comments provided below will identify some specific dates of use, and locations that staff consider essential for aerial operations or for the conservation of fish, wildlife and habitat, as well as to provide a separation between military operations and the public, both on the ground and in the air.)

The following mitigation measures are intended to identify specific concerns and actions that can be taken to mitigate them. Please be aware that as our knowledge and understanding of the actions of military exercises increases, alterations may be necessary to reduce impacts to fish, wildlife and the public, or to reduce constraints on the military. To support the development of information related the military's use of the area, we request the JPARC planning process consider additional funding for future studies by the Department to help determine if and how military activities affect fish, wildlife, habitat and public uses. Specific localized knowledge of some uses is limited and additional studies may assist in the development of effective mitigation measures, or allow for additional training opportunities. This is consistent with the language in Chapter 4.8.14, Environmental Justice, which notes the need for additional studies regarding cumulative impacts to "airspace management and use, noise, biological resources, cultural resources, land use, socioeconomics, and subsistence."

Of special note, one aspect of these studies should be to consider if closures of airspace or areas are reducing subsistence opportunities or causing disproportionate effects through displacement of users. While the EIS (4.8.14, page 4-36) notes that disproportionate effects due to access restrictions are not expected for subsistence since access to other subsistence resources is available in the vicinity, it does not evaluate the costs in monetary terms or effort that could be involved by having to focus on those alternate resources, or the problems that may be associated with displacement of users into areas where resources may already be fully

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allocated. For subsistence users, including those on low, fixed incomes, minor alterations in expenditures necessary to access alternate resources may be barriers to realistic participation.

Nelchina Caribou Herd and Moose Calving

Because low level flight operations can drive caribou off their calving and post calving areas, leading to increased calf mortality, we request extending the 5,000 ft AGL from May 15 through July 15 throughout the entire Fox3 MOA. This would reduce stress for a significant portion of the period when the Nelchina Caribou Herd are pre and post calving. Without this mitigation, we would have significant concerns for caribou because of their sensitivity to loud human activities, such as low level jet aircraft, at this early life stage. In addition, a 5000 ft AGL floor will allow for safe conduct of the Departments late May parturition surveys and late June/early July population surveys that are essential to management of this important and heavily utilized caribou herd. These surveys also require a great amount of flexibility in survey timing as they are dependent on favorable conditions to cause caribou to aggregate.

A similar situation exists for moose calving. During the moose calving period of May 15 to July 15, a 5,000 ft AGL will be necessary across the entire Fox 3 and the Proposed Paxson MOAs. Unlike caribou, moose do not have concentrated calving areas and spread out to calve, but are also susceptible to intense, low flying aircraft noise. Twinning surveys and calf mortality and survival studies are also conducted during this period from low-level fixed and rotor-wing aircraft. These surveys cannot be safely conducted with a 500 ft AGL floor to the MOAs.

We recommend the following mitigations to reduce stress on caribou and moose calves from low flying military aircraft during an important life stage.

- Establish a 5,000 ft above ground level (AGL) over annually identified pre and post calving areas for moose and caribou from May 15 to July 15 in the Fox3 MOA and the Proposed Paxson MOA

Delta Caribou Herd

We recommend increasing the height and extending the duration of the minimum over flight altitude to reduce stress on Delta Caribou calves during the important pre and post calving period of their lifecycle. The following modification to this mitigation will also allow for our annual count/census and composition surveys necessary to maintain herd sustainability and provide a popular hunting opportunity.

Protect/Conserve the Delta caribou herd by establishing a minimum overflight altitude of 35,000 feet AGL over annually identified pre and post calving areas (nominally from May 15 to July 15).

Talkeetna Dall Sheep

Similar to mitigation provided for Dall sheep in the Delta River Corridor, we request minimum overflight altitudes in the Eastern Talkeetna Mountains for conservation of Dall sheep populations from May 15 to July 15 in the following areas:

- The mountains north and east of Chickaloon River,
- The block of land generally between the Upper Talkeetna River, northeast to Mt. Watana (just west of Lower Kosina Creek),

- The mountain block from the Parks Highway (Talkeetna up to Healy) then east over to Brushkana Creek, and east over to Jay/Coal Creek.

Delta Bison

Proposed actions in the Donnelly Training Area Battle Area Complex Restricted Area (BAX RA) could have an impact on Delta bison movements and behavior, and cause bison to move toward the Delta Agricultural Project area earlier in the year, or discourage them from moving through the BAX RA during migration back to the Delta River in the spring. We recommend that the existing restrictions on disturbance to bison habitat areas under the U.S. Army Garrison Fort Wainwright, Alaska Special Interest Management Area be maintained.

Moose Hunting, Fox 2 and Eielson MOAs: The principal use in the identified ground evacuation areas within Eielson and Fox 2 MOA's is moose hunting, conducted during two general periods of the year – fall and winter. The fall period extends from August 15 to September 25, with the highest use period occurring from September 1 to 15. Hunting during the fall season occurs on every day of the week, including weekends. The winter hunt is primarily conducted during two time frames, early winter (November 15 to December 15), and late winter (January 15 to February 28), and are generally conducted on weekend days when weather conditions permit. The time period between December 15 and January 15 is generally avoided by hunters due to seasonally low temperatures. Hunting access in the fall is generally conducted through ORV trails, rivers, and airstrips and tends to be concentrated near or along these access points. Access in the winter is more dispersed due to snowmobile use. Of the areas affected by the "Definitive Actions", the foothills on the south flank of the Alaska Range are more extensively used than the adjacent low-lying wetlands. This is because the foothills support a diversity of high quality moose habitats and generally have higher densities of moose. Furthermore, the foothills offer vantage points for use by hunters in pursuit of game.

As a mitigating measure, we recommend that low level flights (below 5000 AGL) and ground based use not occur in the Fox 2 or Eielson MOAs during scheduled hunting seasons. Additionally, we request that low level flights not occur during the May 15 to July 15 pre and post calving period for caribou, moose and Dall sheep.

Wildlife Mortalities

Throughout the training areas, we request that all known wildlife mortalities caused by military activities be reported within 72 hours to the Department's Area Wildlife Staff.

Habitat Enhancement and Stream Crossings

If it is determined by the military that stream crossings, habitat enhancement or alteration in any of the MOAs is a desired mitigation, we request consultation with the responsible Area Wildlife and Habitat Biologists to avoid unintended consequences and to obtain necessary permits. Recommended contacts are the Regional Supervisor's for the Division of Habitat, and Division of Wildlife Conservation based in the Departments Fairbanks area office.

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Bears

Human generated waste products, primarily discarded or improperly stored food, from 1000 troops during field maneuvers could pose a wildlife attractant, particularly to bears. We previously noted that the DEIS did not address management actions to prevent wildlife from becoming habituated to human generated food and its associated negative impacts. A review of the draft document shows that there remains the need for the development of a comprehensive program to educate military personnel on how to manage human waste that may attract bears that could cause them to become habituated to human waste.

New Public Overflight Restriction Area

We appreciate the development of Alternative A. This Alternative does not expand R-2202 to the west or R-2211 to the East, and therefore leaves a popular area for hunting open for the public and for the Department's use on a regular basis. This area is one of the highest utilized hunting areas in GMU 20A (Figure 3-11, Page 3-58). Closing this area through the expansion of restricted areas R-2211 and R-2202 would have created a significant access hardship for the public and the Department.

Harvest of Wildlife for Subsistence and other uses

The discussion in Chapter 3.1.13.1 Impact Assessment Methodology contains confused and incorrect definitions of public lands and Conservation System Units (CSUs), as well as erroneous descriptions and ratings of community dependence on subsistence based on racial criteria.

Federal Public lands are defined in Section 102(3) of ANILCA as "...land situated in Alaska which, after the date of enactment of this Act, are federal lands...". Conservation system units (CSUs) are defined in ANILCA at 102(4) as "...any unit in Alaska of the National Park System, National Wildlife Refuge System, National Wild and Scenic Rivers Systems, National Trails System, National Wilderness Preservation System, or a National Forest Monument..." Because of the legal application of subsistence to federal public lands it is important to properly define these legal terms.

The discussion related to the dependence of subsistence by communities and their ratings is also flawed by the inclusion of the criteria "...whether the communities are predominately Alaska Native." Neither the Alaska Constitution or federal law regarding subsistence in Alaska differentiates subsistence use along racial lines, unless specifically permitted by Congress (re: Marine Mammal Protection Act, Endangered Species Act, etc.). While it is recognized that the Alaskan Native community has a long history of subsistence use, we request that the EIS revise this section to properly include existing State and Federal law regarding subsistence use and participation.

It should also be noted that through interpretation of the Alaska Constitution, under state law, all Alaska residents are considered eligible to conduct subsistence activities where that activity is allowed. The discussion as presented in the referenced section should be recognized as having no bearing on the allocation of fish and wildlife, which is under the purview of the Alaska Boards of Fisheries and Game, and the Federal Subsistence Board.

Also related to subsistence and other uses,

We appreciate the proposed mitigation to not conduct major flying exercises (MFEs) during the fall hunting season; however, the proposed September prohibition does not encompass all of the most important use periods, when over 5000 hunters and their households rely on this area for subsistence harvest of moose and caribou. Big game hunting in the area for subsistence and general uses begins with the August 10 opening for caribou and reaches a peak during the September 11 to September 20 period. Hunters are also in the field throughout the Proposed Paxson MOA and the Fox 3 MOA during the winter season – most heavily between October 21 and the end of November, after which use is reduced as caribou migrate from the area and winter weather sets in. The Proposed Paxson MOA and the Fox 3 MOA also constitute the most popular and highly used areas in the state for small game hunting. This hunting occurs year-around with peak activity in August-October and February-March. To encompass these periods, we recommend the following mitigation:

- Conduct no MFEs from August 10 to September 30 and October 21 to November 31 in the Fox 3 MOA and the proposed Paxson MOA, and minimize MFEs during the February-March period to avoid disturbance or displacement of small game hunters.

Safety

The mitigation, *"Notify Alaska press outlets of the annual MFE schedule for release in publications such as the Milepost, visitor and travel guides, and various newspapers"* will help keep the public informed. We recommend development of a specific website devoted to this information, as well as publishing in local outlets such as the Valley Frontiersmen and Delta News (web and hard copy) in addition to the Fairbanks News Miner and Anchorage Daily News, and physically posting notices at public and impromptu access points along the road system. In addition, the DEIS should recognize that hunters, trappers, fisherman, landowners, miners, agency personnel, and other users employ float, ski, and tundra tire equipped aircraft and light helicopters to access these popular and high-use areas. Private airfields (See Appendix D) do not capture the vast number of "off-field" areas used for access with this equipment. Avoidance by military aircraft, as well as SUAIS radio-coverage, must be implemented with recognition of these uses if public safety is to be maintained.

We also recommend that the training schedules with associated area or airspace restrictions be published as early as possible in the calendar year to allow residents, subsistence and recreation visitors to the area to coordinate plans for use of the area. Many hunting and other outdoor use plans are made many months in advance so that this type of information would be useful to visitors and reduce conflicts.

Watana – Susitna hydroelectric Project

The DEIS fails to recognize the Watana-Susitna Hydroelectric Project in the Fox 3 MOA. This major effort includes numerous engineering, wildlife, fisheries and habitat studies that all use small aircraft for access, surveys, aerial radio-telemetry, and mapping that will greatly increase VFR traffic for many years. For example, wildlife studies alone will approximately double the flight hours in the Fox 3 MOA to over 800 hours per year. The study areas for this project compose up to 500 square miles in the existing Fox 3 MOA. While a 5000 ft AGL floor poses little safety concerns, the high level of traffic associated with this project creates serious potential airspace conflicts

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at the lower 500ft AGL floor. Close coordination with the Alaska Energy Authority and associated agencies and contractors will be crucial to maintaining safety.

Civilian Airspace Management

We recommend meetings be scheduled on an annual or biannual basis and include ADFG staff participation. A commitment in the Record of Decision to conduct these meetings on a regularly scheduled basis would assist in ensuring that public input and the development of adaptive management is employed in this high public use area.

Coordinate with the FAA, ADFG, and local civilian aviation interests/stakeholders through the ACMAC, the U.S. Army Alaska Aviation Safety Standard Council, and other such forums to discuss and resolve issues of mutual interest affecting military and civilian airspace uses for existing and new SUA and restricted airspace on an annual or biannual basis.

Major Fighting Exercises (MFEs)

We recognize that expanded MFEs are integral to training needs in the JPARC; however, the September, December, January prohibition against MFEs will not adequately mitigate their affect on caribou and moose calving areas, sheep lambing and rutting areas, and popular hunting seasons. We recommend the following mitigation:

Conduct no MFEs during May 15 to July 15, August 10 to September 30, October 21 to November 31, and December, and January.

Spelling

We recommend a word search be performed to address spelling issues throughout the plan. For example Goodness River should be Goodnews River, and Paxon MOA should be Paxson MOA.

Page Specific Comments

Page 3-71. Hunting. Add ptarmigan to the primary species hunted in the area and revise the document to show that Dall sheep and goat seasons are not short, with the sheep season 40 days long and encompassing other high use seasons. There are no goat seasons within the proposed MOAs (there are few goats within the area).

Page 3-82: line 4. The vast majority of fish and wildlife surveys in the Proposed MOAs are conducted by the Department and not the land management agencies. The statement on line 6 regarding survey timing ("Mostly these occur in late summer/early fall and before the first snow") is incorrect. The routine survey schedule is as follows (surveys marked with asterisks are essential surveys that are conducted every year):

May 15 – June 10: Caribou parturition surveys*; moose twinning*, calf survival and periodic mortality surveys; occasional bear surveys.

June 20 – July 10: Caribou population estimate* and composition surveys*

Mid summer; Dall sheep surveys*

October 1-10: Caribou composition survey*

Following first adequate snow cover (~mid-October) and before Dec. 7: Moose population estimates*

May 5-June 5: Ptarmigan surveys (aircraft access)

Late March-Early April: Watana Su-Hydro winter range moose surveys* (scheduled for the next several years).

Monitoring of moose and caribou movements via aerial radio-telemetry: Year-around.

Page 3-82: Line 14. We appreciate that the DEIS recognizes the significant impacts of reduced access on livelihoods. It is important to also recognize that most of the Departments wildlife surveys are charter flights flown by small air taxi operators from around the region. Most of these operators also generate revenue from the transport of hunters, fishermen and other recreationists. A reduction in this economic activity could result in reduced availability of local air taxi operators for fish and wildlife surveys and monitoring, hindering the Departments ability to successfully manage fish and wildlife.

Page 3-82: Lines 22-24: It is misleading to state that avoidance of 1 or 3 NM allows access to private and public airports, respectively. Consider that, to avoid military training activities, aircraft will have to operated below 500' AGL enroute to the airport avoidance area. Many pilots will choose to avoid prolonged operation at below 500 ft AGL for safety purposes. Furthermore, mountainous terrain and windy conditions may further preclude safe flight at those low altitudes. These airports, as well as numerous "off-field" landing areas are critical for wildlife survey and animal capture activities. Also consider that "planning around military schedules" will likely have economic effects on aviation related business through reduction in overall activity and the generation of fees.

Page 3-84: Alternative E: Most of the comments above also apply to all action alternatives.

Page 3-97: Line 38. Harvesting subsistence resources is not a certain event. Thus a delays result in lost opportunity.

Page 3-97: Line 41. The stated intent of allowing for administrative survey flights to be conducted with minimal disruption is appreciated. Because of its importance and to ensure that it will be implemented in an agreed to manner, we request that date-specific mitigation efforts and agreements be specifically noted in the ROD for ease of reference.

Page 3-97: Line 43: See comments above for page 3-82, lines 22-24 above

Page 3-99 (Section 3.2.13.4 and elsewhere) Mitigations:

- No MFEs August 10 – September 30 and October 21 – November 30.
- No training activities below 5000 ft AGL to allow for essential wildlife surveys during the following periods:
 - May 15 – June 10
 - June 20 – July 10

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- o October 1-10
- o After first adequate snow cover (~mid-October) and before Dec. 7 (this request will vary from year to year depending on snowfall and can take 5 to 10 days to complete depending on weather conditions. This effort can be coordinated on a seasonal basis.

To improve coordination between the military and local subsistence users, we request the final document commit to scheduling annual or biannual meetings in effected communities to determine and seek solutions to identified issues related to the subsistence use of the area. We request the following changes to this mitigation measure.

The preceding analysis of effects on this resource has identified potential adverse impacts. The following preliminary mitigation is under consideration as possible ways to reduce these impacts.

- All alternatives:

Expand consultation efforts with subsistence parties in the affected area on an annual or biannual basis to determine current subsistence use levels and areas on USAG-FWA lands as input into scheduling. Expand tribal consultation efforts with subsistence users about hunting and fishing programs on USAG FWA land. Continue to use a newsletter to provide information to subsistence users about existing and new military activities and the changes in access for subsistence users. Expand research and cooperative studies with Tribes to address possible effects of Air Force and Army activities on subsistence resources both directly within USAG-FWA installation boundaries and those outlying resources that may also be affected by military activities on DTA West, DTA East, YTA, and TFTA.

Appendix I

Page I-2. It appears that several plans in this appendix are outside the area of the plan and we question their inclusion in this plan. For example: Draft Revised Special Use Land Designation for the Togiak National Wildlife Refuge and Lower Goodnews River State DNR Hatcher Pass Planning, Chugach State Park, Nancy Lake State Recreational Area, BLM Bay Proposed Resource Management Plan and Final EIS.

Page I-43. The June 27 to July 11 flight avoidance area along the Delta River is inadequate to conserve Dall sheep lambing and rutting habitat. We recommend the flight avoidance period include May 15 to July 15 for lambing areas, and from November 15 to December 15 over rutting areas. We request annual contact with the Department to ensure these locations have not shifted or need adjustment.

Page I-48. We question the need to include game management units outside the area of the plan. These include GMU 9, 16, 17, and 19.

Appendix G

Page G-2, No. 9, Caribou - Overflights. Fox1 MOA, Fox2 MOA, and Proposed Paxson MOA should be included in this mitigation. We recommend increasing altitude and extending the minimum duration of the period to conserve the Delta Caribou calves during an important period of their life cycle and ensure their sustainability. The following modification to this mitigation measure will also allow for annual count/census and composition surveys necessary for us to continue to provide a popular hunting opportunity.

~~Protecting~~ Conserving the Delta caribou herd by establishing a minimum overflight altitude of 35,000 feet above ground level (AGL), over calving and post calving areas, in appropriate areas of the Fox1, Fox2, proposed Paxson, Birch, and Eielson MOAs from May 15 to ~~July~~ 15. Annually contact ADF&G to determine specific areas of avoidance.

Page G-2, No. 10 Dall Sheep - Overflights. We recommend adding the proposed Paxson MOA to the list of areas establishing a minimum overflight altitude. This is needed to conserve Dall sheep in the mountainous region north of the Black Rapids. Similar to mitigation provided for Dall sheep in the Delta River Corridor, we request minimum overflight altitudes in the Eastern Talkeetna Mountains for conservation of Dall sheep populations. In particular:

- The mountains north and east of Chickaloon River,
- The block of land generally between the Upper Talkeetna River, northeast to Mt. Watana (just west of Lower Kosina Creek),
- The mountain block from the Parks Highway (Talkeetna up to Healy) then east over to Brushkana Creek, and east over to Jay/Coal Creek.

To encompass these concerns, we recommend the following mitigation measure be implemented:

~~Protect~~ Conserve Dall sheep by establishing a minimum overflight altitude of 5,000 feet AGL over lambing areas and spring mineral licks, in appropriate areas of Yukon 1, 2, 3, and 4, Buffalo, Eielson, Paxson, and Fox MOAs (nominally May 15 to July 15), and over rutting areas (nominally from November 15 to December 15). These areas will be identified during annual consultation with ADF&G prior to the May 15 and November 15 dates stated above.

Page G-3, No. 22 Aircraft, Habitat Protection. The document provides a good discussion of this important mitigation measure to protect important wildlife habitat in JPARC; however, to provide a more comprehensive list we request an annual meeting to update it. For example, we recommend adding the Oshetna River caribou calving grounds, Watana Creek caribou calving grounds, and the Eastern Talkeetna Mountains for Dall sheep populations. In particular, the mountains north and east of Chickaloon River, the mountain block between the Upper Talkeetna River northeast to Mt. Watana (west of Lower Kosina Creek), and the mountain block from the Parks Highway (Talkeetna up to Healy) then east over to Brushkana, and east over to Jay/Coal Creek. We request the following change to this mitigation.

Avoiding the creation of aircraft noise around the Gulkana and Delta National Wild and Scenic Rivers, Tangle Lakes area, Richardson Highway, and trumpeter swan nesting areas within the Fox MOA eastern boundary. These areas will be updated during annual consultation with ADF&G prior to May 15.

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Appendix K, Mitigation Measures

Page K-11, Biological, 4th Proposed Mitigation. This mitigation measure should also apply to Fox3 MOA and the Proposed Paxson MOA. We also request a start date for this study.

Expand effort to conduct a detailed study to assess the impacts and effects of noise on wildlife, particularly key species, such as caribou and bison during critical life cycle seasons. Use information to include protection requirements within a noise management plan.

Page K-19, Land Use-Recreation. GMU 13 is an important moose and caribou hunting area, likely the most heavily used area in the state due to accessibility of the area to residents from Anchorage, the Matanuska Susitna Borough, and Fairbanks. In 2010, 5,015 individual moose hunters reported hunting in GMU 13, a number that has been steadily increasing since 2002. This increase is partially credited to the current active management programs which the state has invested significant time and energy to increase moose abundance for the benefit of consumptive users. Current objectives for moose are being achieved, with some additional increases planned. The overall management objective is to maintain a high level of harvestable moose with sufficient hunter participation annually to avoid habitat impacts. Caribou hunting is also highly popular with 4,887 hunters reporting hunting this area in 2010, with a peak participation of 19,397 hunters in 1996. As shown by the above discussion, GMU 13 is an important moose and caribou hunting area.

Currently, the EIS only lists Crosswind Lake and the Matanuska Valley Moose Range as hunting areas to avoid. However, the additional areas listed below support intense hunting for moose and caribou on a seasonal basis and should be added to the list. To accommodate this continued and important use, we request the following modifications to the first proposed mitigation measure shown on page K-19

Avoid overflight of popular hunting areas, campgrounds, and trails (5,000 feet AGL and half-mile lateral distance) during peak use periods between June 27 and July 11, ~~and from mid-~~ August 10 through September 20, and October 21 to November 30, and other important hunting seasons determined in annual consultation with ADFG. Locations to avoid include:

- Crosswind Lake, ~~and~~
- Matanuska Valley Moose Range,
- Denali Highway between Cantwell and Paxson,
- Richardson Highway between Gulkana and Black Rapids,
- Tak Cutoff (Glenn Highway) between Gakona and Mentasta,
- The Gakona/Chistochina River drainages,
- Upper Susitna River drainage (above Tyone R),
- Brushkana River drainage,
- Coal Creek drainage,
- Watana Creek drainage,
- Upper Nenana River/Wells Creek area,
- Lake Louise/Susitna/Tyone Lake system,
- Maclaren River drainage,
- Tangle Lake system,
- Hungry Hollow/Paxson/Summit/Fielding Lake areas,

- Swede Lake drainage in Hungry Hollow down to the Alphabet Hills [bordered on the south by the W Fork Gulkana River].
- Gillespie/June/Nita/Dick Lakes along the Richardson Highway south of Paxson.
- Nelchina Public Use Area from the Glenn Highway near Eureka north to the Susitna River.

Page K-21, Land Use – Recreation. The list of areas to avoid currently appears to consist primarily of BLM campgrounds. However, many additional popular trails for hunting and other recreating in the area exist and merit inclusion. Several trails exist up and down the MacLaren River, including the MacLaren Summit Trail to the north, and trails on both sides going generally north, and a trail on the west side going south. Another trail system extends through the Glacier Lake/Sevenmile Lake/MacLaren River, with an additional trail up the West Fork MacLaren River for XX miles. Other known popular trails include:

- Swede Lake Trail,
- Middle Fork Trail (heads west of Meier's Lake),
- Round Top trail which heads east of the Richardson Highway towards Round Top Mtn,
- Haggard Creek Trail,
- Ewan Lake Trails (one from the east and one from the south of the lake),
- Lake Louise/Crosswind Trail,
- Tolsona Lake/Crosswind Trail,
- Butte Lake Trail,
- Coal Creek trail (starts east of Butte Lake),
- Moore's Camp Trail (starts at Mile 51 on Denali Highway goes south over the mountain and down to a MacLaren River crossing),
- Top of the World Trail near Paxson/Black Rapids,
- Chistochina River Trail,
- Mankomen Lake Trail,
- Indian River Trail,
- Slana River Trail.
- There is a huge network of trails all through the Nelchina Public Use Area, dozens, starting with the Eureka/Little Nelchina Trails, north to the Oshetna/Black River/Goose Creek/Busch Creek/Clarence Lake, and east over to the Moore Lake/Grayling Lake/Marie Lake areas west of Lake Louise/Susitna.

To accommodate the use of additional popular trails in the area, we request the following modifications to the fifth proposed mitigation measure shown on page K-21.

Avoid overflight of popular hunting areas, campgrounds, and trails (5,000 feet AGL and half-mile lateral distance) during peak use periods between June 27 and July 11, ~~and from mid-August 10 through September 20, and October 21 to November 30,~~ and other important hunting seasons determined annually with ADFG. Locations to avoid include:

- Brushkana Creek campground,
- Tangle Lakes campground,
- Paxson Lake campground,

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- *Clearwater Wayside,*
- *One Mile Creek/Wolverine Mountain,*
- *Tangle Lakes trail,*
- *Gulkana River Raft trail,*
- *Castner Glacier trail,*
- *Sourdough campground,*
- *Lake Louise State Recreation Area,*
- *MacLaren Summit Trail,*
- *Glacier Lake/Sevenmile Lake/MacLaren River Trail System,*
- *West Fork MacLaren River Trail,*
- *Swede Lake trail,*
- *Middle Fork Trail,*
- *Round Top Trail,*
- *Haagard Creek Trail,*
- *Ewan Lake Trails,*
- *Lake Louise/Crosswind Trail,*
- *Tolsona Lake/Crosswind Trail,*
- *Butte Lake Trail,*
- *Coal Creek trail,*
- *Moore's Camp Trail,*
- *Top of the World Trail,*
- *Chistochina River Trail,*
- *Mankomen Lake Trail,*
- *Indian River Trail,*
- *Slona River Trail,*
- *Nelchina Public Use Area Trail System,*
- *Eureka/Little Nelchina Trails,*
- *Oshetna/Black River/Goose Creek/Busch Creek/Clarence Lake Trail,*
- *Moore Lake/Grayling Lake/Marie Lake Trail,*

Page K-24, Subsistence. The period prohibiting MFEs should encompass the period from 10 August – 30 September and 21 October – 31 November, instead of 20 August – September 20. This change will protect the most important subsistence hunting seasons for caribou and moose. We request the following modification,

No MFEs conducted during 10 August – 30 September and 21 October – 31 November ~~20 August – 20 September~~ in Fox 3 and expansion areas and new Paxon MOA. This restriction does not apply to US Army training or testing.

Page K-24, Subsistence. Biannual coordination meetings with the Department to review and determine the efficacy of avoidance areas and flight restrictions are essential to conservation and management activities.

Delineate and establish seasonal flight avoidance areas and overflight/operational restrictions over wildlife and other areas underlying new MOAs consistent with current restrictions identified in the 1997 Alaska MOA EIS. These restrictions would include minimum overflight altitudes over Dall sheep lambing

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areas, spring mineral licks, and limiting overflights of wildlife in critical life periods as determined in coordination with ADFG.

Page K-24, Subsistence. We support modifying the existing Letter of Agreement in the following areas.

Modify existing Letter of Agreement with ADFG to avoid overflight of caribou and moose calving areas, and sheep lambing, mineral licks and rutting areas in Fox 3 expansion areas and new Paxon MOA.

Page K-25, Subsistence. We support these approaches, but request that the final Record of Decision commit to regularly scheduled annual or biannual meetings with the Department to monitor and review issues related to airspace.

Conduct annual or biannual meetings with regulating agencies and with communities dependent on subsistence resources under new airspace with a view to monitor impacts of Air Force activities on subsistence. Information would be used to adjust flight avoidance locations, or to add new ones.

Update the current SUAIS to include information on MOA activation and provide advanced notice of MFES to communities and management agencies that use and access lands underlying the Fox 3 MOA, the Fox 3 expansion areas, and the new Paxon MOA.

Sincerely,


Craig L. Fleener
Deputy Commissioner

G0022

[REDACTED]

-----Original Message-----

From: Palach, Brad M (DFG) [REDACTED]
Sent: Tuesday, July 24, 2012 3:45 PM
To: ALCOM J08 Admin Box
Cc: Fleener, Craig L (DFG); Cheney, Jason L (DFG)
Subject: FW: Joint Pacific Alaska Range Complex EIS Comment Submission

On July 9, 2012, the Alaska Department of Fish and Game submitted comments on the March 2012 Draft Environmental Impact Statement (DEIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC) (see attached). In reviewing the comments we submitted, it was found that the comment submitted on page 5, regarding the New Public Overflight Restriction Area (R-2202 and R-2211), had important information that was unintentionally omitted. At this time I am requesting that you accept the revised, corrected comment provided in the attached document entitled "12-7-24 ADFG Amended Comment" to replace the previously submitted comment regarding this specific subject. All other comments remain as previously submitted.

If you need additional information, please contact me.

Thank you
Brad Palach

G0022

Alaska Department of Fish and Game

(907) 267-2145

From: Palach, Brad M (DFG)
Sent: Monday, July 09, 2012 3:07 PM
To: 'alcom.j08@elmendorf.af.mil'
Cc: Fleener, Craig L (DFG); Vincent-Lang, Douglas S (DFG); Mulligan, Ben (DFG); Brookover, Thomas E (DFG)
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission

Please find attached the JPARC comments being submitted on behalf of the Alaska Department of Fish and Game by Deputy Commissioner Craig Fleener. If you need clarification or additional information regarding these comments please contact:

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THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

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July 24, 2012

ALCOM Public Affairs
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Ladies and Gentlemen

On July 9, 2012, the Alaska Department of Fish and Game submitted comments on the March 2012 Draft Environmental Impact Statement (DEIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC). In reviewing the comments submitted, we determined that the comment on page 5, regarding the New Public Overflight Restriction Area (R-2202 and R-2211), had important information that was unintentionally omitted. At this time I am requesting that you accept the revised, corrected comment provided below in place of the previously submitted comment.

New Public Overflight Restriction Area

Both alternatives A and B considerably expand R-2202 and/or R-2211 into areas of private and public land that receives high public use and is heavily used by the Departments for administrative activities for management and research purposes. The solution is to consider the most recent alternative written into the EIS, called the "North-South Run-In Headings for Inert Ordnance Delivery." This alternative does not expand R-2202 to the west or R-2211 to the East, and therefore leaves that area open for public and Department use on a regular basis. Closing the area between R-2211 and R-2202 would create a significant access hardship for the public and the Department.

To effectively resolve this concern, we request that a new alternative be developed for live ordnance that is similar to the new inert ordnance alternative. It appears that the proposed live ordnance target could be relocated so that the drop area and ground exclusion area would be located entirely within the Donnelly Training Area. This would limit air restrictions and ground exclusion areas exclusively to the Donnelly Training Area, does not expand live ordnance restricted areas R-2202 or R-2211, and would reduce the impact to the public and the Department.

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July 24, 2012

I apologize for this inconvenience and ask that you direct any questions concerning this issue to me.

Thank you for your attention to this matter.

Sincerely,

Brad Palach
Natural Resource Manager III

cc: Craig Fleener, Deputy Commissioner, ADF&G

G0022



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

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July 9, 2012

ALCOM Public Affairs
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Ladies and Gentlemen,

Alaska Department of Fish and Game (Department) reviewed the March 2012 Draft Environmental Impact Statement (DEIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC). The Department understands and is supportive of the need of the military to conduct training exercises to prepare personnel for defense missions across the globe.

We appreciate the efforts the military has taken to provide information in the development of this planning process. This is especially important since the area under consideration is one of the most accessible and heavily used areas for outdoor activities in the State. However, we are disappointed that federal law and policy restricts the military's training efforts on the many millions of acres of nearby federally administered National Wildlife Refuges, National Parks and BLM lands and instead forces it onto State lands which are highly desired by the general public for outdoor activities. With this in mind, the comments developed below are intended to accommodate the need of the military to use these State public lands while at the same time maintaining public use and access consistent with the desires of the public and the intent of the Constitution of the State of Alaska.

The following are the comments of the Department.

Coordination

We appreciate the intentions of numerous mitigation measures calling for increased communication and coordination with the Department and members of the public, including subsistence and other resource users. To ensure these meetings take place, we recommend this intent be specifically recognized in the Record of Decision and be scheduled to take place on a biannual basis, or as issue specific items emerge so that adaptive management strategies may be more easily developed to address issues as they develop. This action would ensure that the important discourse between the responsible State managers and various user groups and the representatives of the military take place in a timely manner. This is particularly important as uses by the public alter from year to year, resources change in frequency, abundance and location, and as the uses of the military are better understood as the plan is implemented.

Administrative Activities Conducted by the Alaska Department of Fish and Game

We recognize that minimum over flight of 5,000 ft above ground level (AGL) is proposed as mitigation for many areas with identified populations of fish and wildlife, popular hunting and fishing areas, trails, and campgrounds. The sustainability of the fish and wildlife and the popularity of these areas is dependent on plentiful fish and wildlife that is intensively managed by the Department. Through active management, which includes frequent aerial surveys and other flights, we are able to provide opportunities that drive the popularity of these areas with the public, which includes residents of the two largest cities in Alaska, Anchorage and Fairbanks, as well as the Matanuska-Susitna Borough and North Star Borough and other smaller communities near the affected areas. These surveys entail numerous flight hours and flight days, for example, the Department estimates roughly 400 hours of flight time annually in the Proposed Paxson and Fox 3 MOAs for wildlife surveys alone. Without the ability to conduct comprehensive aerial survey work, we will find it exceedingly difficult, if not nearly impossible, to manage populations of fish and wildlife for sustained yield and maintain the current levels of subsistence and other hunting and fishing opportunities.

To accommodate the Department's need for aerial survey work, we recommend the following mitigating measure:

- Throughout the area covered by this planning process, establish a 5,000 ft above ground level (AGL) over annually identified areas as necessary to accommodate the need of Department staff to conduct aerial survey work. Recognize that flexibility and close coordination with the Department will be necessary to accommodate the conduct of this essential work, while respecting the needs of the military for training. (Additional comments provided below will identify some specific dates of use, and locations that staff consider essential for aerial operations or for the conservation of fish, wildlife and habitat, as well as to provide a separation between military operations and the public, both on the ground and in the air.)

The following mitigation measures are intended to identify specific concerns and actions that can be taken to mitigate them. Please be aware that as our knowledge and understanding of the actions of military exercises increases, alterations may be necessary to reduce impacts to fish, wildlife and the public, or to reduce constraints on the military. To support the development of information related the military's use of the area, we request the JPARC planning process consider additional funding for future studies by the Department to help determine if and how military activities affect fish, wildlife, habitat and public uses. Specific localized knowledge of some uses is limited and additional studies may assist in the development of effective mitigation measures, or allow for additional training opportunities. This is consistent with the language in Chapter 4.8.14, Environmental Justice, which notes the need for additional studies regarding cumulative impacts to "airspace management and use, noise, biological resources, cultural resources, land use, socioeconomics, and subsistence."

Of special note, one aspect of these studies should be to consider if closures of airspace or areas are reducing subsistence opportunities or causing disproportionate effects through displacement of users. While the EIS (4.8.14, page 4-36) notes that disproportionate effects due to access restrictions are not expected for subsistence since access to other subsistence resources is available in the vicinity, it does not evaluate the costs in monetary terms or effort that could be involved by having to focus on those alternate resources, or the problems that may be associated with displacement of users into areas where resources may already be fully

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allocated. For subsistence users, including those on low, fixed incomes, minor alterations in expenditures necessary to access alternate resources may be barriers to realistic participation.

Nelchina Caribou Herd and Moose Calving

Because low level flight operations can drive caribou off their calving and post calving areas, leading to increased calf mortality, we request extending the 5,000 ft AGL from May 15 through July 15 throughout the entire Fox3 MOA. This would reduce stress for a significant portion of the period when the Nelchina Caribou Herd are pre and post calving. Without this mitigation, we would have significant concerns for caribou because of their sensitivity to loud human activities, such as low level jet aircraft, at this early life stage. In addition, a 5000 ft AGL floor will allow for safe conduct of the Departments late May parturition surveys and late June/early July population surveys that are essential to management of this important and heavily utilized caribou herd. These surveys also require a great amount of flexibility in survey timing as they are dependent on favorable conditions to cause caribou to aggregate.

A similar situation exists for moose calving. During the moose calving period of May 15 to July 15, a 5,000 ft AGL will be necessary across the entire Fox 3 and the Proposed Paxson MOAs. Unlike caribou, moose do not have concentrated calving areas and spread out to calve, but are also susceptible to intense, low flying aircraft noise. Twinning surveys and calf mortality and survival studies are also conducted during this period from low-level fixed and rotor-wing aircraft. These surveys cannot be safely conducted with a 500 ft AGL floor to the MOAs.

We recommend the following mitigations to reduce stress on caribou and moose calves from low flying military aircraft during an important life stage.

- Establish a 5,000 ft above ground level (AGL) over annually identified pre and post calving areas for moose and caribou from May 15 to July 15 in the Fox3 MOA and the Proposed Paxson MOA

Delta Caribou Herd

We recommend increasing the height and extending the duration of the minimum over flight altitude to reduce stress on Delta Caribou calves during the important pre and post calving period of their lifecycle. The following modification to this mitigation will also allow for our annual count/census and composition surveys necessary to maintain herd sustainability and provide a popular hunting opportunity.

Protect/Conserve the Delta caribou herd by establishing a minimum overflight altitude of 35,000 feet AGL over annually identified pre and post calving areas (nominally from May 15 to ~~July~~ June 15).

Talkeetna Dall Sheep

Similar to mitigation provided for Dall sheep in the Delta River Corridor, we request minimum overflight altitudes in the Eastern Talkeetna Mountains for conservation of Dall sheep populations from May 15 to July 15 in the following areas:

- The mountains north and east of Chickaloon River,
- The block of land generally between the Upper Talkeetna River, northeast to Mt. Watana (just west of Lower Kosina Creek),

- The mountain block from the Parks Highway (Talkeetna up to Healy) then east over to Brushkana Creek, and east over to Jay/Coal Creek.

Delta Bison

Proposed actions in the Donnelly Training Area Battle Area Complex Restricted Area (BAX RA) could have an impact on Delta bison movements and behavior, and cause bison to move toward the Delta Agricultural Project area earlier in the year, or discourage them from moving through the BAX RA during migration back to the Delta River in the spring. We recommend that the existing restrictions on disturbance to bison habitat areas under the U.S. Army Garrison Fort Wainwright, Alaska Special Interest Management Area be maintained.

Moose Hunting, Fox 2 and Eielson MOAs: The principal use in the identified ground evacuation areas within Eielson and Fox 2 MOA's is moose hunting, conducted during two general periods of the year – fall and winter. The fall period extends from August 15 to September 25, with the highest use period occurring from September 1 to 15. Hunting during the fall season occurs on every day of the week, including weekends. The winter hunt is primarily conducted during two time frames, early winter (November 15 to December 15), and late winter (January 15 to February 28), and are generally conducted on weekend days when weather conditions permit. The time period between December 15 and January 15 is generally avoided by hunters due to seasonally low temperatures. Hunting access in the fall is generally conducted through ORV trails, rivers, and airstrips and tends to be concentrated near or along these access points. Access in the winter is more dispersed due to snowmobile use. Of the areas affected by the "Definitive Actions", the foothills on the south flank of the Alaska Range are more extensively used than the adjacent low-lying wetlands. This is because the foothills support a diversity of high quality moose habitats and generally have higher densities of moose. Furthermore, the foothills offer vantage points for use by hunters in pursuit of game.

As a mitigating measure, we recommend that low level flights (below 5000 AGL) and ground based use not occur in the Fox 2 or Eielson MOAs during scheduled hunting seasons. Additionally, we request that low level flights not occur during the May 15 to July 15 pre and post calving period for caribou, moose and Dall sheep.

Wildlife Mortalities

Throughout the training areas, we request that all known wildlife mortalities caused by military activities be reported within 72 hours to the Department's Area Wildlife Staff.

Habitat Enhancement and Stream Crossings

If it is determined by the military that stream crossings, habitat enhancement or alteration in any of the MOAs is a desired mitigation, we request consultation with the responsible Area Wildlife and Habitat Biologists to avoid unintended consequences and to obtain necessary permits. Recommended contacts are the Regional Supervisor's for the Division of Habitat, and Division of Wildlife Conservation based in the Departments Fairbanks area office.

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Bears

Human generated waste products, primarily discarded or improperly stored food, from 1000 troops during field maneuvers could pose a wildlife attractant, particularly to bears. We previously noted that the DEIS did not address management actions to prevent wildlife from becoming habituated to human generated food and its associated negative impacts. A review of the draft document shows that there remains the need for the development of a comprehensive program to educate military personnel on how to manage human waste that may attract bears that could cause them to become habituated to human waste.

New Public Overflight Restriction Area

We appreciate the development of Alternative A. This Alternative does not expand R-2202 to the west or R-2211 to the East, and therefore leaves a popular area for hunting open for the public and for the Department's use on a regular basis. This area is one of the highest utilized hunting areas in GMU 20A (Figure 3-11, Page 3-58). Closing this area through the expansion of restricted areas R-2211 and R-2202 would have created a significant access hardship for the public and the Department.

Harvest of Wildlife for Subsistence and other uses

The discussion in Chapter 3.1.13.1 Impact Assessment Methodology contains confused and incorrect definitions of public lands and Conservation System Units (CSUs), as well as erroneous descriptions and ratings of community dependence on subsistence based on racial criteria.

Federal Public lands are defined in Section 102(3) of ANILCA as "...land situated in Alaska which, after the date of enactment of this Act, are federal lands...". Conservation system units (CSUs) are defined in ANILCA at 102(4) as "...any unit in Alaska of the National Park System, National Wildlife Refuge System, National Wild and Scenic Rivers Systems, National Trails System, National Wilderness Preservation System, or a National Forest Monument..." Because of the legal application of subsistence to federal public lands it is important to properly define these legal terms.

The discussion related to the dependence of subsistence by communities and their ratings is also flawed by the inclusion of the criteria "...whether the communities are predominately Alaska Native." Neither the Alaska Constitution or federal law regarding subsistence in Alaska differentiates subsistence use along racial lines, unless specifically permitted by Congress (re: Marine Mammal Protection Act, Endangered Species Act, etc.). While it is recognized that the Alaskan Native community has a long history of subsistence use, we request that the EIS revise this section to properly include existing State and Federal law regarding subsistence use and participation.

It should also be noted that through interpretation of the Alaska Constitution, under state law, all Alaska residents are considered eligible to conduct subsistence activities where that activity is allowed. The discussion as presented in the referenced section should be recognized as having no bearing on the allocation of fish and wildlife, which is under the purview of the Alaska Boards of Fisheries and Game, and the Federal Subsistence Board.

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Also related to subsistence and other uses,

We appreciate the proposed mitigation to not conduct major flying exercises (MFEs) during the fall hunting season; however, the proposed September prohibition does not encompass all of the most important use periods, when over 5000 hunters and their households rely on this area for subsistence harvest of moose and caribou. Big game hunting in the area for subsistence and general uses begins with the August 10 opening for caribou and reaches a peak during the September 11 to September 20 period. Hunters are also in the field throughout the Proposed Paxson MOA and the Fox 3 MOA during the winter season – most heavily between October 21 and the end of November, after which use is reduced as caribou migrate from the area and winter weather sets in. The Proposed Paxson MOA and the Fox 3 MOA also constitute the most popular and highly used areas in the state for small game hunting. This hunting occurs year-around with peak activity in August-October and February-March. To encompass these periods, we recommend the following mitigation:

- Conduct no MFEs from August 10 to September 30 and October 21 to November 31 in the Fox 3 MOA and the proposed Paxson MOA, and minimize MFEs during the February-March period to avoid disturbance or displacement of small game hunters.

Safety

The mitigation, “*Notify Alaska press outlets of the annual MFE schedule for release in publications such as the Milepost, visitor and travel guides, and various newspapers*” will help keep the public informed. We recommend development of a specific website devoted to this information, as well as publishing in local outlets such as the Valley Frontiersmen and Delta News (web and hard copy) in addition to the Fairbanks News Miner and Anchorage Daily News, and physically posting notices at public and impromptu access points along the road system. In addition, the DEIS should recognize that hunters, trappers, fisherman, landowners, miners, agency personnel, and other users employ float, ski, and tundra tire equipped aircraft and light helicopters to access these popular and high-use areas. Private airfields (See Appendix D) do not capture the vast number of “off-field” areas used for access with this equipment. Avoidance by military aircraft, as well as SUAIS radio-coverage, must be implemented with recognition of these uses if public safety is to be maintained.

We also recommend that the training schedules with associated area or airspace restrictions be published as early as possible in the calendar year to allow residents, subsistence and recreation visitors to the area to coordinate plans for use of the area. Many hunting and other outdoor use plans are made many months in advance so that this type of information would be useful to visitors and reduce conflicts.

Watana – Susitna hydroelectric Project

The DEIS fails to recognize the Watana-Susitna Hydroelectric Project in the Fox 3 MOA. This major effort includes numerous engineering, wildlife, fisheries and habitat studies that all use small aircraft for access, surveys, aerial radio-telemetry, and mapping that will greatly increase VFR traffic for many years. For example, wildlife studies alone will approximately double the flight hours in the Fox 3 MOA to over 800 hours per year. The study areas for this project compose up to 500 square miles in the existing Fox 3 MOA. While a 5000 ft AGL floor poses little safety concerns, the high level of traffic associated with this project creates serious potential airspace conflicts

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at the lower 500ft AGL floor. Close coordination with the Alaska Energy Authority and associated agencies and contractors will be crucial to maintaining safety.

Civilian Airspace Management

We recommend meetings be scheduled on an annual or biannual basis and include ADFG staff participation. A commitment in the Record of Decision to conduct these meetings on a regularly scheduled basis would assist in ensuring that public input and the development of adaptive management is employed in this high public use area.

Coordinate with the FAA, ADFG, and local civilian aviation interests/stakeholders through the ACMAC, the U.S. Army Alaska Aviation Safety Standard Council, and other such forums to discuss and resolve issues of mutual interest affecting military and civilian airspace uses for existing and new SUA and restricted airspace on an annual or biannual basis.

Major Fighting Exercises (MFEs)

We recognize that expanded MFEs are integral to training needs in the JPARC; however, the September, December, January prohibition against MFEs will not adequately mitigate their affect on caribou and moose calving areas, sheep lambing and rutting areas, and popular hunting seasons. We recommend the following mitigation:

Conduct no MFEs during May 15 to July 15, August 10 to September 30, October 21 to November 31, and December, and January.

Spelling

We recommend a word search be performed to address spelling issues throughout the plan. For example Goodness River should be Goodnews River, and Paxon MOA should be Paxson MOA.

Page Specific Comments

Page 3-71. Hunting. Add ptarmigan to the primary species hunted in the area and revise the document to show that Dall sheep and goat seasons are not short, with the sheep season 40 days long and encompassing other high use seasons. There are no goat seasons within the proposed MOAs (there are few goats within the area).

Page 3-82: line 4. The vast majority of fish and wildlife surveys in the Proposed MOAs are conducted by the Department and not the land management agencies. The statement on line 6 regarding survey timing ("Mostly these occur in late summer/early fall and before the first snow") is incorrect. The routine survey schedule is as follows (surveys marked with asterisks are essential surveys that are conducted every year):

May 15 – June 10: Caribou parturition surveys*; moose twinning*, calf survival and periodic mortality surveys; occasional bear surveys.

June 20 – July 10: Caribou population estimate* and composition surveys*

Mid summer; Dall sheep surveys*

October 1-10: Caribou composition survey*

Following first adequate snow cover (~mid-October) and before Dec. 7: Moose population estimates*

May 5-June 5: Ptarmigan surveys (aircraft access)

Late March-Early April: Watana Su-Hydro winter range moose surveys* (scheduled for the next several years).

Monitoring of moose and caribou movements via aerial radio-telemetry: Year-around.

Page 3-82: Line 14. We appreciate that the DEIS recognizes the significant impacts of reduced access on livelihoods. It is important to also recognize that most of the Departments wildlife surveys are charter flights flown by small air taxi operators from around the region. Most of these operators also generate revenue from the transport of hunters, fishermen and other recreationists. A reduction in this economic activity could result in reduced availability of local air taxi operators for fish and wildlife surveys and monitoring, hindering the Departments ability to successfully manage fish and wildlife.

Page 3-82: Lines 22-24: It is misleading to state that avoidance of 1 or 3 NM allows access to private and public airports, respectively. Consider that, to avoid military training activities, aircraft will have to operated below 500' AGL enroute to the airport avoidance area. Many pilots will choose to avoid prolonged operation at below 500 ft AGL for safety purposes. Furthermore, mountainous terrain and windy conditions may further preclude safe flight at those low altitudes. These airports, as well as numerous "off-field" landing areas are critical for wildlife survey and animal capture activities. Also consider that "planning around military schedules" will likely have economic effects on aviation related business through reduction in overall activity and the generation of fees.

Page 3-84: Alternative E: Most of the comments above also apply to all action alternatives.

Page 3-97: Line 38. Harvesting subsistence resources is not a certain event. Thus a delays result in lost opportunity.

Page 3-97: Line 41. The stated intent of allowing for administrative survey flights to be conducted with minimal disruption is appreciated. Because of its importance and to ensure that it will be implemented in an agreed to manner, we request that date-specific mitigation efforts and agreements be specifically noted in the ROD for ease of reference.

Page 3-97: Line 43: See comments above for page 3-82, lines 22-24 above

Page 3-99 (Section 3.2.13.4 and elsewhere) Mitigations:

- No MFEs August 10 – September 30 and October 21 – November 30.
- No training activities below 5000 ft AGL to allow for essential wildlife surveys during the following periods:
 - May 15 – June 10
 - June 20 – July 10

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- o October 1-10
- o After first adequate snow cover (~mid-October) and before Dec. 7 (this request will vary from year to year depending on snowfall and can take 5 to 10 days to complete depending on weather conditions. This effort can be coordinated on a seasonal basis.

To improve coordination between the military and local subsistence users, we request the final document commit to scheduling annual or biannual meetings in effected communities to determine and seek solutions to identified issues related to the subsistence use of the area. We request the following changes to this mitigation measure.

The preceding analysis of effects on this resource has identified potential adverse impacts. The following preliminary mitigation is under consideration as possible ways to reduce these impacts.

- All alternatives:

Expand consultation efforts with subsistence parties in the affected area on an annual or biannual basis to determine current subsistence use levels and areas on USAG-FWA lands as input into scheduling. Expand tribal consultation efforts with subsistence users about hunting and fishing programs on USAG FWA land. Continue to use a newsletter to provide information to subsistence users about existing and new military activities and the changes in access for subsistence users. Expand research and cooperative studies with Tribes to address possible effects of Air Force and Army activities on subsistence resources both directly within USAG-FWA installation boundaries and those outlying resources that may also be affected by military activities on DTA West, DTA East, YTA, and TFTA.

Appendix I

Page I-2. It appears that several plans in this appendix are outside the area of the plan and we question their inclusion in this plan. For example: Draft Revised Special Use Land Designation for the Togiak National Wildlife Refuge and Lower Goodnews River State DNR Hatcher Pass Planning, Chugach State Park, Nancy Lake State Recreational Area, BLM Bay Proposed Resource Management Plan and Final EIS.

Page I-43. The June 27 to July 11 flight avoidance area along the Delta River is inadequate to conserve Dall sheep lambing and rutting habitat. We recommend the flight avoidance period include May 15 to July 15 for lambing areas, and from November 15 to December 15 over rutting areas. We request annual contact with the Department to ensure these locations have not shifted or need adjustment.

Page I-48. We question the need to include game management units outside the area of the plan. These include GMU 9, 16, 17, and 19.

Appendix G

Page G-2, No. 9, Caribou - Overflights. Fox1 MOA, Fox2 MOA, and Proposed Paxson MOA should be included in this mitigation. We recommend increasing altitude and extending the minimum duration of the period to conserve the Delta Caribou calves during an important period of their life cycle and ensure their sustainability. The following modification to this mitigation measure will also allow for annual count/census and composition surveys necessary for us to continue to provide a popular hunting opportunity.

~~Protecting~~ Conserving the Delta caribou herd by establishing a minimum overflight altitude of 35,000 feet above ground level (AGL), over calving and post calving areas, in appropriate areas of the Fox1, Fox2, proposed Paxson, Birch, and Eielson MOAs from May 15 to ~~July~~ 15. Annually contact ADF&G to determine specific areas of avoidance.

Page G-2, No. 10 Dall Sheep - Overflights. We recommend adding the proposed Paxson MOA to the list of areas establishing a minimum overflight altitude. This is needed to conserve Dall sheep in the mountainous region north of the Black Rapids. Similar to mitigation provided for Dall sheep in the Delta River Corridor, we request minimum overflight altitudes in the Eastern Talkeetna Mountains for conservation of Dall sheep populations. In particular:

- The mountains north and east of Chickaloon River,
- The block of land generally between the Upper Talkeetna River, northeast to Mt. Watana (just west of Lower Kosina Creek),
- The mountain block from the Parks Highway (Talkeetna up to Healy) then east over to Brushkana Creek, and east over to Jay/Coal Creek.

To encompass these concerns, we recommend the following mitigation measure be implemented:

~~Protect~~ Conserve Dall sheep by establishing a minimum overflight altitude of 5,000 feet AGL over lambing areas and spring mineral licks, in appropriate areas of Yukon 1, 2, 3, and 4, Buffalo, Eielson, Paxson, and Fox MOAs (nominally May 15 to July 15), and over rutting areas (nominally from November 15 to December 15). These areas will be identified during annual consultation with ADF&G prior to the May 15 and November 15 dates stated above.

Page G-3, No. 22 Aircraft, Habitat Protection. The document provides a good discussion of this important mitigation measure to protect important wildlife habitat in JPARC; however, to provide a more comprehensive list we request an annual meeting to update it. For example, we recommend adding the Oshetna River caribou calving grounds, Watana Creek caribou calving grounds, and the Eastern Talkeetna Mountains for Dall sheep populations. In particular, the mountains north and east of Chickaloon River, the mountain block between the Upper Talkeetna River northeast to Mt. Watana (west of Lower Kosina Creek), and the mountain block from the Parks Highway (Talkeetna up to Healy) then east over to Brushkana, and east over to Jay/Coal Creek. We request the following change to this mitigation.

Avoiding the creation of aircraft noise around the Gulkana and Delta National Wild and Scenic Rivers, Tangle Lakes area, Richardson Highway, and trumpeter swan nesting areas within the Fox MOA eastern boundary. These areas will be updated during annual consultation with ADF&G prior to May 15.

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Appendix K, Mitigation Measures

Page K-11, Biological, 4th Proposed Mitigation. This mitigation measure should also apply to Fox3 MOA and the Proposed Paxson MOA. We also request a start date for this study.

Expand effort to conduct a detailed study to assess the impacts and effects of noise on wildlife, particularly key species, such as caribou and bison during critical life cycle seasons. Use information to include protection requirements within a noise management plan.

Page K-19, Land Use-Recreation. GMU 13 is an important moose and caribou hunting area, likely the most heavily used area in the state due to accessibility of the area to residents from Anchorage, the Matanuska Susitna Borough, and Fairbanks. In 2010, 5,015 individual moose hunters reported hunting in GMU 13, a number that has been steadily increasing since 2002. This increase is partially credited to the current active management programs which the state has invested significant time and energy to increase moose abundance for the benefit of consumptive users. Current objectives for moose are being achieved, with some additional increases planned. The overall management objective is to maintain a high level of harvestable moose with sufficient hunter participation annually to avoid habitat impacts. Caribou hunting is also highly popular with 4,887 hunters reporting hunting this area in 2010, with a peak participation of 19,397 hunters in 1996. As shown by the above discussion, GMU 13 is an important moose and caribou hunting area.

Currently, the EIS only lists Crosswind Lake and the Matanuska Valley Moose Range as hunting areas to avoid. However, the additional areas listed below support intense hunting for moose and caribou on a seasonal basis and should be added to the list. To accommodate this continued and important use, we request the following modifications to the first proposed mitigation measure shown on page K-19

Avoid overflight of popular hunting areas, campgrounds, and trails (5,000 feet AGL and half-mile lateral distance) during peak use periods between June 27 and July 11, ~~and from mid-~~ August 10 through September 20, and October 21 to November 30, and other important hunting seasons determined in annual consultation with ADFG. Locations to avoid include:

- Crosswind Lake, ~~and~~
- Matanuska Valley Moose Range,
- Denali Highway between Cantwell and Paxson,
- Richardson Highway between Gulkana and Black Rapids,
- Tak Cutoff (Glenn Highway) between Gakona and Mentasta,
- The Gakona/Chistochina River drainages,
- Upper Susitna River drainage (above Tyone R),
- Brushkana River drainage,
- Coal Creek drainage,
- Watana Creek drainage,
- Upper Nenana River/Wells Creek area,
- Lake Louise/Susitna/Tyone Lake system,
- Maclaren River drainage,
- Tangle Lake system,
- Hungry Hollow/Paxson/Summit/Fielding Lake areas,

- Swede Lake drainage in Hungry Hollow down to the Alphabet Hills [bordered on the south by the W Fork Gulkana River].
- Gillespie/June/Nita/Dick Lakes along the Richardson Highway south of Paxson.
- Nelchina Public Use Area from the Glenn Highway near Eureka north to the Susitna River.

Page K-21, Land Use – Recreation. The list of areas to avoid currently appears to consist primarily of BLM campgrounds. However, many additional popular trails for hunting and other recreating in the area exist and merit inclusion. Several trails exist up and down the MacLaren River, including the MacLaren Summit Trail to the north, and trails on both sides going generally north, and a trail on the west side going south. Another trail system extends through the Glacier Lake/Sevenmile Lake/MacLaren River, with an additional trail up the West Fork MacLaren River for XX miles. Other known popular trails include:

- Swede Lake Trail,
- Middle Fork Trail (heads west of Meier's Lake),
- Round Top trail which heads east of the Richardson Highway towards Round Top Mtn,
- Haggard Creek Trail,
- Ewan Lake Trails (one from the east and one from the south of the lake),
- Lake Louise/Crosswind Trail,
- Tolsona Lake/Crosswind Trail,
- Butte Lake Trail,
- Coal Creek trail (starts east of Butte Lake),
- Moore's Camp Trail (starts at Mile 51 on Denali Highway goes south over the mountain and down to a MacLaren River crossing),
- Top of the World Trail near Paxson/Black Rapids,
- Chistochina River Trail,
- Mankomen Lake Trail,
- Indian River Trail,
- Slana River Trail.
- There is a huge network of trails all through the Nelchina Public Use Area, dozens, starting with the Eureka/Little Nelchina Trails, north to the Oshetna/Black River/Goose Creek/Busch Creek/Clarence Lake, and east over to the Moore Lake/Grayling Lake/Marie Lake areas west of Lake Louise/Susitna.

To accommodate the use of additional popular trails in the area, we request the following modifications to the fifth proposed mitigation measure shown on page K-21.

Avoid overflight of popular hunting areas, campgrounds, and trails (5,000 feet AGL and half-mile lateral distance) during peak use periods between June 27 and July 11, ~~and from mid-August 10 through September 20, and October 21 to November 30,~~ and other important hunting seasons determined annually with ADFG. Locations to avoid include:

- Brushkana Creek campground,
- Tangle Lakes campground,
- Paxson Lake campground,

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- *Clearwater Wayside,*
- *One Mile Creek/Wolverine Mountain,*
- *Tangle Lakes trail,*
- *Gulkana River Raft trail,*
- *Castner Glacier trail,*
- *Sourdough campground,*
- *Lake Louise State Recreation Area,*
- *MacLaren Summit Trail,*
- *Glacier Lake/Sevenmile Lake/MacLaren River Trail System,*
- *West Fork MacLaren River Trail,*
- *Swede Lake trail,*
- *Middle Fork Trail,*
- *Round Top Trail,*
- *Haqqard Creek Trail,*
- *Ewan Lake Trails,*
- *Lake Louise/Crosswind Trail,*
- *Tolsona Lake/Crosswind Trail,*
- *Butte Lake Trail,*
- *Coal Creek trail,*
- *Moore's Camp Trail,*
- *Top of the World Trail,*
- *Chistochina River Trail,*
- *Mankomen Lake Trail,*
- *Indian River Trail,*
- *Slona River Trail,*
- *Nelchina Public Use Area Trail System,*
- *Eureka/Little Nelchina Trails,*
- *Oshetna/Black River/Goose Creek/Busch Creek/Clarence Lake Trail,*
- *Moore Lake/Grayling Lake/Marie Lake Trail,*

Page K-24, Subsistence. The period prohibiting MFEs should encompass the period from 10 August – 30 September and 21 October – 31 November, instead of 20 August – September 20. This change will protect the most important subsistence hunting seasons for caribou and moose. We request the following modification,

No MFEs conducted during 10 August – 30 September and 21 October – 31 November ~~20 August – 20 September~~ in Fox 3 and expansion areas and new Paxon MOA. This restriction does not apply to US Army training or testing.

Page K-24, Subsistence. Biannual coordination meetings with the Department to review and determine the efficacy of avoidance areas and flight restrictions are essential to conservation and management activities.

Delineate and establish seasonal flight avoidance areas and overflight/operational restrictions over wildlife and other areas underlying new MOAs consistent with current restrictions identified in the 1997 Alaska MOA EIS. These restrictions would include minimum overflight altitudes over Dall sheep lambing

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7/9/12

areas, spring mineral licks, and limiting overflights of wildlife in critical life periods as determined in coordination with ADFG.

Page K-24, Subsistence. We support modifying the existing Letter of Agreement in the following areas.

Modify existing Letter of Agreement with ADFG to avoid overflight of caribou and moose calving areas, and sheep lambing, mineral licks and rutting areas in Fox 3 expansion areas and new Paxon MOA.

Page K-25, Subsistence. We support these approaches, but request that the final Record of Decision commit to regularly scheduled annual or biannual meetings with the Department to monitor and review issues related to airspace.

Conduct annual or biannual meetings with regulating agencies and with communities dependent on subsistence resources under new airspace with a view to monitor impacts of Air Force activities on subsistence. Information would be used to adjust flight avoidance locations, or to add new ones.

Update the current SUAIS to include information on MOA activation and provide advanced notice of MFES to communities and management agencies that use and access lands underlying the Fox 3 MOA, the Fox 3 expansion areas, and the new Paxon MOA.

Sincerely,


Craig L. Fleener
Deputy Commissioner

G0023

[REDACTED]

From: Lisa Herbert [REDACTED]
Sent: Monday, July 09, 2012 6:18 PM
To: ALCOM J08 Admin Box
Subject: Fairbanks Chamber Comment Letter on DRAFT JPARC EIS
Attachments: Fairbanks Chamber Comment Letter for DRAFT JPARC EIS.pdf

Please see attached letter that was adopted by the Fairbanks Chamber's Board of Directors at their meeting this afternoon.

Thank you,

Lisa Herbert | Executive Director | **Greater Fairbanks Chamber of Commerce**
100 Cushman Street, Suite 102, Fairbanks, AK 99701 | O: (907) 452-1105 | D: (907) 374-6706 | C: (907) 347-8006
E: Lisa@FairbanksChamber.org | www.FairbanksChamber.org

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July 9, 2012

Lieutenant General Stephen L. Hoog
Commander, Alaska Command
9480 Pease Avenue, Suite 110
JBER, AK 99506-2101

RE: Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC) in Alaska (JPARC Modernization and Enhancement Draft EIS)

Dear Sir,

The Greater Fairbanks Chamber of Commerce would like to take this opportunity to comment on the referenced Draft JPARC EIS.

The Fairbanks Chamber supports the United States Air Force and the United States Army and its missions in Alaska and welcomes the expansion of the JPARC to accommodate modern and future training needs. We support the increased use of the JPARC and its planned expansion as this action is beneficial to the training of our military and the defense of our Nation, with no unmanageable negative impacts on our community under the current force structure at Eielson Air Force Base and Fort Wainwright.

The JPARC military training ranges and facilities, as a whole, far surpass in quality and quantity those found in other U.S. locations. The sheer size of the ranges:

- allows for the use of live ammunition from all Army, Air Force, and Navy platforms and weapons systems;
- allows for the Air Force to fly at combat speeds well over Mach 1;
- allows for joint exercises between the Army, Air Force, Marines, Navy, Coast Guard and our Allies in weather conditions ranging from sub-zero arctic temperatures to hot humid summer days; and
- results in the finest training opportunities for soldiers, sailors, and airmen within the United States.

A recent proposal by the Air Force to move the F-16 Aggressor squadron from Eielson Air Force Base (Eielson) to Joint Base Elmendorf-Richardson (JBER) could change the dynamic of the JPARC and affect our support for JPARC use and expansion.

The Fairbanks Chamber encourages the military to consider expansion of their missions and manning within Interior Alaska, and in return we will consider supporting associated reasonable requests to increase Alaska land and air space usage that accommodates this increased military activity. However, we will reconsider our position of support if the military proposes actions that may lead to a reduction of missions and manning in Interior Alaska

Mission: The Greater Fairbanks Chamber of Commerce represents our members by advocating for a healthy economic environment and by building partnerships that promote the greater Fairbanks area as an attractive place for business and community.

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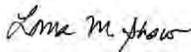
without a corresponding reduction in military restrictions and use of Alaska land and air space assets.

We also encourage DOD to continue to work cooperatively and closely with the State of Alaska to develop the natural resources within the JPARC and the surrounding environment.

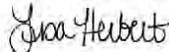
Thank you for the opportunity to offer comment on the *Draft JPARC EIS*. The Greater Fairbanks Chamber of Commerce looks forward to continuing a productive relationship with Alaska Command, the U.S. Air Force, and the U.S. Army.

Sincerely,

GREATER FAIRBANKS CHAMBER OF COMMERCE



Lorna Shaw
Board of Directors, Chair



Lisa Herbert
Executive Director



Steve Lundgren
Military Affairs, Chair

Cc: Senator Lisa Murkowski
Senator Mark Begich
Congressman Don Young
Governor Sean Parnell
Brigadier General James Post, 354th Fighter Wing
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AMFAST
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North Pole City Council
Alaska State Chamber of Commerce
Greater Fairbanks Chamber of Commerce Membership

Mission: The Greater Fairbanks Chamber of Commerce represents our members by advocating for a healthy economic environment and by building partnerships that promote the greater Fairbanks area as an attractive place for business and community.

G0024

From: Steele, Marie C (DNR) [REDACTED]
Sent: Monday, July 09, 2012 4:38 PM
To: ALCOM J08 Admin Box
Cc: Crafford, Thomas C (DNR); Dyok, Wayne M (AIDEA); Parsons, Martin W (DNR); Phelps, Bruce G (DNR); Klein, Joseph P (DFG)
Subject: Joint Pacific Alaska Range Complex EIS Comments
Attachments: JPARC Modernization and Enhancement Draft EIS Comments_AEA_ADNR OPMP.pdf

Thank you for the opportunity to provide comment on the JPARC Modernization and Enhancement EIS. As the Alaska Department of Natural Resources Large Project Coordinator for the proposed Susitna-Watana Hydroelectric Project, I am forwarding the attached letter from the Alaska Energy Authority (AEA), the proponent for the Susitna-Watana project. Please reply with confirmation that the comments have been received by your offices.

The Susitna-Watana project information is relative to the JPARC Modernization and Enhancement EIS as the hydroelectric project anticipates construction of a 7000-foot long runway to accommodate Boeing 737 aircraft and construction of transmission lines connecting into the existing Railbelt transmission system. The attached letter provides information on the project area, the anticipated activities, transportation corridor alternatives, and the estimated project schedule for the Susitna-Watana Hydroelectric Project.

Please do not hesitate to contact myself or the Susitna-Watana AEA Project Manager, Mr. Wayne Dyok, if you need any further information.

*Marie Steele, Large Project Coordinator
Office of Project Management and Permitting
Alaska Department of Natural Resources
550 W. 7th Ave., Suite 1430
Anchorage, Alaska 99501-3577
Office: (907) 269-8473*

G0024



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

Department of Natural Resources

OFFICE OF PROJECT MANAGEMENT & PERMITTING

550 West Seventh Avenue, Suite 1430
Anchorage, Alaska 99501
Main: 907.269.8690
Fax: 907.269.5673

July 9, 2012

Alaskan Command Office of Public Affairs
9480 Pease Ave, Ste 120
JBER, AK 99506-2100

RE: Submittal of comments concerning the Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the JPARC in Alaska (JPARC Modernization and Enhancement EIS)

Thank you for the opportunity to provide comment on the JPARC Modernization and Enhancement EIS. As the Alaska Department of Natural Resources Large Project Coordinator for the proposed Susitna-Watana Hydroelectric Project, I am forwarding the attached letter from the Alaska Energy Authority (AEA), the proponent for the Susitna-Watana project.

The Susitna-Watana project information is relative to the JPARC Modernization and Enhancement EIS as the hydroelectric project anticipates construction of a 7000-foot long runway to accommodate Boeing 737 aircraft and construction of transmission lines connecting into the existing Railbelt transmission system. The attached letter provides information on the project area, the anticipated activities, transportation corridor alternatives, and the estimated project schedule for the Susitna-Watana Hydroelectric Project.

In addition to the points raised by the AEA, it is important to note an increased level of public recreational use is expected due to the reservoir behind the dam, as well as lighting and electrical "noise" due to the hydroelectrical power generation.

Further information relating to Alaska's long range electrical generation capital improvement projects can be found in the Regional Integrated Resource Plan (RIRP), at <http://www.akenergyauthority.org/regionalintegratedresourceplan.html>.

Please do not hesitate to contact myself, or the Susitna-Watana AEA Project Manager, Mr. Wayne Dyok, if you need any further information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Marie Steele".

Marie Steele, Large Project Coordinator
Alaska Department of Natural Resources

G0024

Attachment: Alaska Energy Authority (AEA) comments on the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Draft Environmental Impact Statement (Draft EIS).

cc:

Thomas Crafford, Director DNR, Office of Project Management and Permitting (OPMP)
Martin Parsons, Deputy Director, DNR Division of Mining, Land, and Water (DMLW)
Bruce Phelps, Section Chief, DMLW Resource Assessment & Development Section (RADS)
Joseph Klein, P.E., Alaska Department of Fish and Game Aquatic Resources Unit (ADFG ARU)
Wayne Dyok, P.E., AEA Project Manager, Susitna-Watana Hydroelectric Project

AEA Comments JPARC Modernization and Enhancement EIS

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July 9, 2012

INTRODUCTION

The Alaska Energy Authority (AEA) appreciates the opportunity to provide comments on the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Draft Environmental Impact Statement (Draft EIS). AEA is in the process of conducting environmental and engineering studies for the Susitna-Watana Hydroelectric Project to support a license application to the Federal Energy Regulatory Commission (FERC). AEA initiated the formal licensing process in December 2011 with the filing of a Pre-Application Document to FERC. Construction of the Susitna-Watana Project is expected to occur from 2017 through 2023, after which the facility will be placed in operation with a life of 100 years or more.

The Susitna-Watana Project would be located in the FOX 3 Military Operations Area (MOA). There is a potential for conflicts particularly because of AEA's need for and use of an airstrip to construct and operate the hydropower project and the military's need for low-altitude threat training, as well as other activities. AEA would like to ensure that the military's proposed actions would not adversely affect the construction and operation of the Susitna-Watana Project and vice versa. AEA proposes to meet with the Department of Defense (DOD) to discuss how both programs can coexist. We request further that the DOD consider the cumulative effects of the Susitna-Watana Project in the Final EIS.

DESCRIPTION OF SUSITNA-WATANA PROJECT

This section provides a brief overview of the Project location, facilities and proposed operational characteristics. For more detail regarding the Project facilities and operational characteristics, please refer to the PAD (AEA 2011; available on the Susitna-Watana Hydroelectric Project website, <http://www.susitna-watanahydro.org>). The proposed Project is located in the Southcentral region of Alaska, approximately 120 miles (mi) north-northeast of Anchorage and 110 mi south-southwest of Fairbanks. The Southcentral region of the state is geographically bounded by the Alaska Range to the north and west, the Wrangell Mountains to the east, and the Talkeetna Mountains to the south. This region encompasses 86,000 square mi of the total 586,000 square mi of the state. As proposed, the Project would include construction of a dam, reservoir and power plant on the Susitna River starting at river mile (RM) 184, approximately 34 mi upstream of Devils Canyon. Transmission lines connecting into the existing Railbelt transmission system and an access road would also be constructed.

Transportation Access

There would be both temporary and permanent site access facilities to provide a transportation system to support construction activities, and to facilitate orderly development and maintenance of the Project. The current planning assumes restricted public access during construction for

akenergyauthority.org

813 West Northern Lights Boulevard Anchorage, Alaska 99503 T 907.771.3000 Toll Free (Alaska Only) 888.300.8534 F 907.771.3044

G0024

safety considerations. Another goal is to co-locate access roads and transmission facilities, to the extent possible, in the same corridor to minimize environmental impacts

Three possible alternatives for access roads and transmission lines have been identified for the Project (Figure 1). Two of the alternatives would accommodate east-west running transmission lines in combination with a new site access road connecting to the Anchorage-Fairbanks Intertie Transmission line and the Alaska Railroad. One of these corridors, designated as the Chulitna Corridor, would run north of the Susitna River, and extend to the Chulitna siding area. The other alternative, designated as the Gold Creek Corridor, would run south of the Susitna River, and extend to the Gold Creek area. A third corridor, designated as the Denali Corridor, would run due north, connecting the Project site to the Denali Highway by road over a distance of about 44 mi. If a transmission line is constructed along this corridor, it would be extended westward along the existing Denali Highway and connect to the Alaska Intertie near Cantwell.

If the Denali Corridor is selected the affected sections of the Denali Highway will be upgraded in order to facilitate safe construction of the Project. The Denali Highway would not be a part of the Project.

Regardless of which road is chosen, the majority of the new road will follow terrain and soil types that allow construction using side borrow techniques, resulting in a minimum of disturbance to areas away from the alignment. A berm type cross section will be formed, with the crown of the road being approximately 2 to 3 ft above the elevation of adjacent ground. To reduce the visual impact, the side slopes will be flattened and covered with excavated peat and other naturally occurring materials. A 200-foot right-of-way will be sufficient for this type of construction.

Permanent access to the Watana Dam site will connect with the existing Alaska Railroad either at Chulitna, Cantwell or Gold Creek, where at the chosen location a railhead and storage facility occupying up to 40 ac will be constructed alongside the existing passing bays. New sidings of a length up to 5,000 ft will be constructed so that off-loading and transfer of goods and materials can take place without interrupting the operations of the Alaska Railroad Corporation (ARRC). This facility will act as the transfer point from rail to road transport and as a backup or interim storage area for materials and equipment, and as an inspection and maintenance facility for trucks and their loads. Within the 40 ac would be a small residential camp for drivers trucking equipment to the construction site, for laborers and staff operating the transfer, and for support staff such as cooks and maintenance workers.

If the Denali Corridor is chosen for road access, in the community of Cantwell the pavement on the first section of the Denali Highway will be extended for a distance of approximately 4 mi to eliminate any problem with dust and flying stones. In addition, the following measures will be taken:

- Speed restrictions will be imposed along appropriate segments;

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- Improvements will be made to the intersections including pavement markings and traffic signals.

Electric Transmission Facilities

The transmission lines will begin at Watana Dam and consist of three single-circuit 230-kV lines. The same three corridors under consideration for the access road are also those under consideration to connect the Project primary transmission lines to the Alaska Intertie. Depending on which corridor is chosen, the transmission system will include a switching station in the point of tie in (either at Chulitna, Gold Creek or Cantwell). From the Watana substation, the transmission corridors are essentially co-located with the corridors for the access roads except for two specific areas:

- 1) For the northern westward route (Chulitna Corridor), only the first five mi of the twin 230-kV transmission lines will not follow the coincident road corridor. The two lines will cross the river from the switchyard (together with the line destined for the northern route) in a northerly direction for two mi, after which the two lines will turn northwesterly to cross Tsusena Creek and three mi later will intersect the Chulitna road corridor. At the extreme westerly end of the corridor, it will widen to facilitate the divergence of the road and the transmission line which will continue to a switching station on the Alaska Intertie.
- 2) For the southern westward route (Gold Creek Corridor) the transmission lines would not follow the planned road corridor, rather the transmission lines can span the rough topography running more parallel to the Susitna River. Near the westerly end of the corridor, both the transmission lines and road can be co-located into one single corridor all the way to Gold Creek where the transmission lines would terminate in a new switching station on the existing Alaska Intertie.

For the northern route, the only divergence between the road and transmission line corridor will occur at Deadman Lake, at which location the road will be aligned west of Deadman Hill, while the transmission will follow a lower elevation corridor on the east of the hill. Both corridors will rejoin some 9 mi later on the north side of the Deadman Hill. At the Denali Highway, the northern transmission corridor will turn west and continue along the Denali Highway to the Cantwell switching station.

The right-of-way for the transmission lines within the corridors will consist of a linear strip of land. The width will depend on the number of lines. The transmission rights-of-way will be 200, 300, or 400 feet, depending on whether one, two, or three lines run in parallel.

The switching and substations will occupy a total of approximately 16 ac.

Rights-of-way for permanent access to switchyard and substations will be required linking back to the permanent site access road. These rights-of-way will be 100 ft wide.

Access to the transmission line corridors will be:

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- a) Via unpaved vehicle access track from the permanent access roads at intermittent points along the corridor. The exact location of these tracks will be established in the final design phase.
- b) By helicopter, where there is no access road projected.

Within the transmission corridor itself an unpaved vehicle access track 25 ft wide will run along the entire length of the corridor, except at areas such as major river crossings and deep ravines where an access track would not be utilized for the movement of equipment and materials.

Dam and Reservoir

As currently envisioned, the Project would include a large dam with a 20,000-acre (ac) reservoir. The type and height of dam construction are still being evaluated as part of ongoing engineering feasibility studies, but early comparisons have demonstrated that it will most likely be a roller-compacted concrete structure. The dam has a nominal crest elevation at elevation (El.) 2,025 ft mean sea level (msl) corresponding with a maximum height of approximately 700 ft above the foundation and a crest length of approximately 2,700 ft. Following completion of the studies mentioned above, a nominal crest elevation up to El. 2,125 ft msl may be proposed in the license application, corresponding to a maximum dam height of up to 800 ft above the foundation.

The Watana Reservoir, at normal operating level of El. 2,000 ft msl, will be approximately 39 mi long with a maximum width of approximately 2 mi. The total water surface area at normal operating level is approximately 20,000 ac. The minimum reservoir level will be 1,850 ft msl during normal operation, resulting in a maximum drawdown of 150 ft. However, a maximum drawdown of up to 200 feet is still being considered. The reservoir will have a total capacity of 4.3 million ac-ft, of which 2.4 million ac-ft will be active storage.

Construction materials for the dam and appurtenant structures will utilize, as far as possible, rock from the structure excavations to minimize the quarry development. Stable excavations and rock cuts will be designed with suitable rock reinforcement and berms.

Thick alluvial deposits will be removed from the river bed in order to found the dam on sound bedrock.

Hydroelectric Facilities

The powerhouse will be located immediately downstream of the dam, and will house three generating units, each with a nominal capability of 200 MW unit output under average net head (which will be close to the design head) for a total plant capacity of 600 MW under average head. However, based on discussions with Railbelt utilities regarding electrical system reliability, AEA may propose four units with a nominal capacity of 150 MW and a total capacity of 600 MW. The capacity of the Project eventually proposed for licensing could extend up to

G0024

800 MW. The exact sizing and number of units may change as a result of further transmission system studies.

The average annual energy of the project will be 2,500,000 megawatt hours. The powerhouse will be designed and constructed with an extra empty generating unit bay for the potential installation of a fourth unit at some future time. Optimization studies are ongoing.

There would be two outlet works facility structures and four power intake structures (one corresponding to the extra unused powerhouse bay). The outlet works facility in conjunction with the three powerhouse units will be sized to allow discharge of a 50-year flood before flow would be discharged over the spillway.

Ancillary Facilities

Construction of the Watana Dam site development will require various facilities to support the construction activities throughout the entire construction period. Following construction, the operation of the Project will require a small permanent staff and facilities to support the permanent operation and maintenance (O&M) program.

The most significant item among the temporary site facilities will be a construction camp (Figure 2). The construction camp will be a largely self-sufficient community normally housing approximately 800 persons, but with a peak capacity of up to 1,000 people during construction of the Project. After construction, it is planned to remove most of the camp facility, leaving only those aspects that are to be used to support the smaller permanent residential and operation and maintenance facilities.

Other site facilities include contractor work areas, site power, services, and communications. Site power and fiber optic cabling will be brought either on the transmission line route, or along the side of the access road. Items such as power and communications will be required for construction operations, independent of camp operations.

Permanent facilities will include community facilities for O&M staff members and any families. Other permanent facilities will include maintenance buildings for use during operation of the power plant.

AEA plans to construct a 7000-foot long runway that would accommodate Boeing 737 aircraft (Figure 2). The runway would like be constructed on the north side of the Susitna River, east of the proposed dam site.

SUMMARY

AEA appreciates the effort put forth by the DOD in preparing the Draft EIS. AEA will be conducting detailed environmental studies within the FOX 3 MOA over the next three years in anticipation of submitting its FERC license application for the Susitna-Watana Project. We

G0024

welcome the opportunity to work with DOD to ensure that the goals of JPARC and AEA can both be met. Please contact the AEA Project Manager, Wayne Dyok, at 907-771-3955 should you require further information on the project.

Very truly yours,



Wayne M. Dyok, Project Manager

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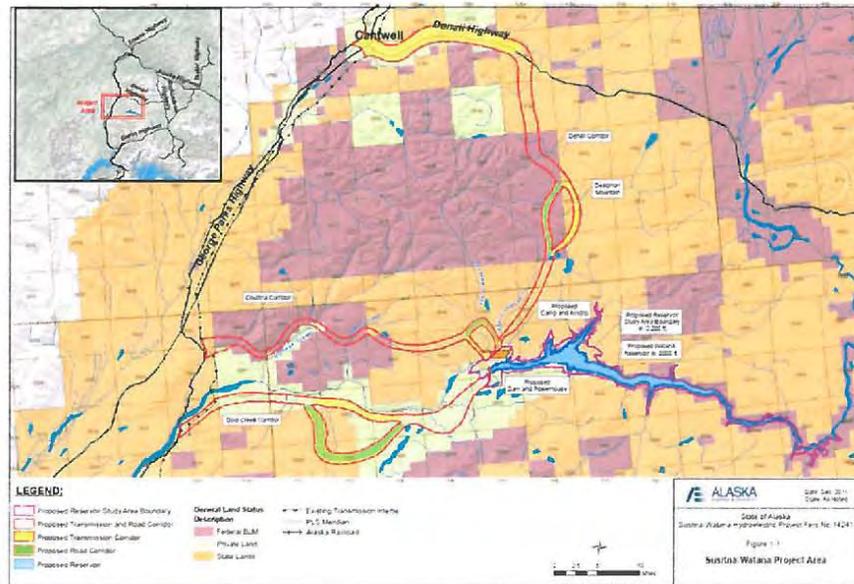


Figure 1 Susitna Watana Project Area

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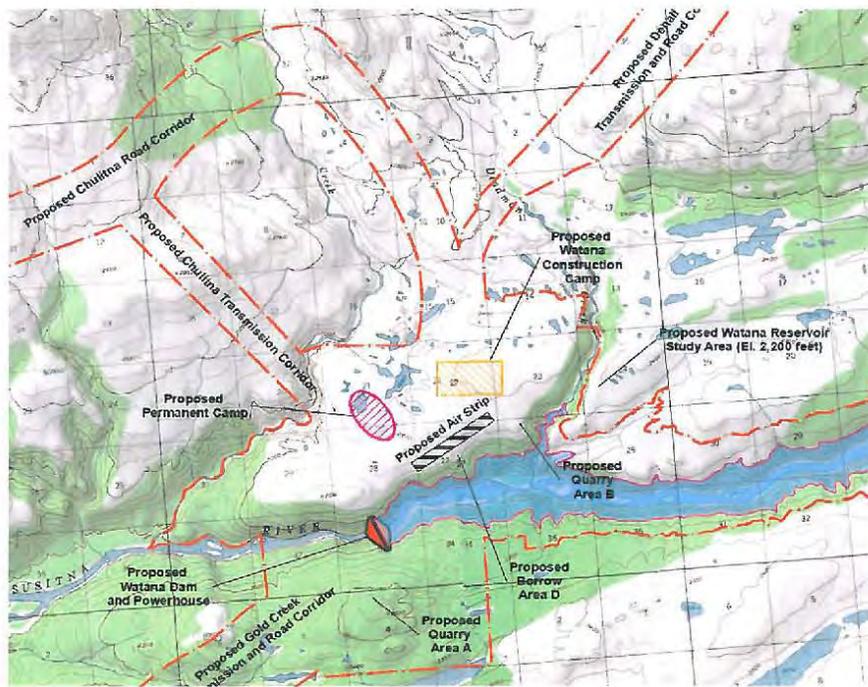


Figure 2 Project Site

G0025

[REDACTED]

From: [REDACTED]
Sent: Monday, July 09, 2012 6:15 PM
To: ALCOM J08 Admin Box
Subject: FAA - Western Service Center, Operations Support Group Response to JPARC Draft EIS
Attachments: JPARC Comment Response Matrix.docx

To Whom it May Concern,

Please find the attached response to your Draft Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace and Training Areas in the JPARC in Alaska. A paper copy with cover sheet will be delivered to the project address by mail. Thank you for the opportunity to comment.

Respectfully,

Michele Cruz

Michele L. Cruz
Contract Support (NISC III)
AJV-W2, Western Operations Support Group
LOCKHEED MARTIN CORPORATION

[REDACTED]

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Comment Response Matrix
Draft Environmental Impact Statement for the Modernization & Enhancement of Ranges, Airspace, and Training Areas in the JPARC in Alaska

#	Location		Page	Line	Section	Comment Reviewer	Response
1	2	20	21-23	2.1.3.1		The BAX (if approved) should only be usable on a daily basis from SFC to 5999 MSL. The airspace above should be with the same time parameters (if at all) as the Delta MOA. If released above 5999MSL on a daily basis, will result in a negative impact the National Airspace System as stated in the letter dated March 11, 2011.	
2		2-4		Table		Alternative "A" for the proposed FOX 3 MOA extends too far south and west. As stated in the Letter from Anchorage Center on March 11, 2011. This would have a negative impact on the National Airspace System as well as Anchorage Center. This statement applies throughout the document where the proposed FOX 2 MOA is addressed	
3	2	32		Table		Transition between R2205 and R2202 – The altitudes on this transition are unrealistic. This would be a major impact to Customers of the National Airspace system and Anchorage Center. 7000 MSL would be the highest altitude Anchorage Center could recommend.	
4	ES-1	6	7, 10			The word "mostly" is contained throughout the document. Suggest modifying the verbiage to more concise terms. Stating you will be mostly using existing targets and impact areas indicates additional impact areas will be impacted.	
5	1	1	12			The FAA is a cooperating agency based in part on the DoD FAA MOU found in Appendix 7 of FAA Order 7400.2 which state that "When the DoD proposes that the FAA establish, designate, or modify SUA, the FAA shall act as a cooperating agency for the evaluation of environmental impacts." Suggest adding verbiage referring to the MOU in both Chapter 1 and in the Executive Summary.	
6	1	32	10	1.6.1		Recommend rewording the sentence stating "FAA as a cooperating agency in accordance with its legal jurisdiction of the U.S. airways" to be in line with FAA Order 7400.2 Section 2.1-2-1 which states: "The navigable airspace is a limited national resource that Congress has charged the Federal Aviation Administration (FAA) to administer in the public interest as necessary to ensure the safety of aircraft and its efficient use."	
7	All					Suggest doing a "FIND" function and use nonparticipating instead of civilian throughout the document	

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Comment Response Matrix
 Draft Environmental Impact Statement for the Modernization & Enhancement of Ranges, Airspace, and Training Areas in the JPARC in Alaska

#	Location		Comment Reviewer	Response
	Page	Line		
8	2-5	20	Other times by NOTAM is something that should be more clearly spelled out. Especially if this has the potential for being a daily event	
9	2-6		Add "ATCAA" to Paxton in the second section	
10	2-6	8	Data is 4-6 years old now	
11	3-32	12	Believe "no fo" is a typo. The line does not make sense, please clarify.	
12	General	General	As per FAA comments given March 2011: The close proximity of the proposed Fox 3 & Paxton MOA remains a concern due to its close proximity to Anchorage Terminal Radar Approach Control's airspace.	
13	3-178	1	See comment 1 on the BAX	
14	3-190		Noise contour levels indicate that currently there are no baseline peak blast noise levels in the 130dB contour and there are several additions to that under the proposed action (pink contours). However, it is indicated in the verbiage on page 3-187 line 31 that there are no impact areas not already affected by current conditions. Please clarify.	
15	3-282.1		Currently is against FAA policy to establish or designate airspace solely for the use of UAV/UAS.	
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U.S. Department
of Transportation
Federal Aviation
Administration

Federal Aviation Administration

1601 Lind Avenue Southwest
Renton, Washington 98057

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

RE: Draft Environmental Impact Statement for the Modernization and Enhancement of Ranges,
Airspace and Training Areas in the Joint Pacific Alaska Range Complex

To Whom It May Concern:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace and Training Areas in the Joint Pacific Alaska Range Complex. Please note our ability to perform a detailed analysis of the Draft EIS is limited by the absence of an accompanying Draft Aeronautical Proposal for Modification of Special Use Airspace (SUA). Development and submittal of a Draft Aeronautical Proposal initiates an aeronautical study by the FAA to evaluate impacts to the National Airspace System (NAS), which can influence the ultimate configuration of the proposed airspace.

SUA proposals are subject to both environmental and aeronautical processing requirements. Although they are distinct and separate actions, they require closely coordinated efforts. The aeronautical study can significantly impact the environmental study, leading to unnecessary costs and delay. Similarly, the environmental study can significantly impact the aeronautical study.

We highly encourage your team to continue development of a Draft Aeronautical Proposal in coordination with Anchorage Air Route Traffic Control Center as well as Anchorage and Fairbanks Approach Controls.

Attached are comments/concerns found during the review of the EIS.

Thank you for the opportunity to comment. We look forwards to continuing the positive and long lasting relations the FAA has with the DoD.

Sincerely,

John Warner
Manager, Operations Support Group
Western Service Center

Attachment:
JPARC Comment Response Matrix

G0025

Draft Environmental Impact Statement for the Modernization & Enhancement of Ranges, Airspace, and Training Areas in the JPARC in Alaska
 Comment Response Matrix

#	Location		Comment	Reviewer	Response
	Page	Line Section			
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6	1-32	10 1.6.1	Recommend rewording the sentence stating "FAA as a cooperating agency in accordance with its legal jurisdiction of the U.S. airways" to be in line with FAA Order 7400.2 Section 2, 1-2-1 which states: "The navigable airspace is a limited national resource that Congress has charged the Federal Aviation Administration (FAA) to administer in the public interest as necessary to ensure the safety of aircraft and its efficient use."		
7	All		Suggest doing a "FIND" function and use nonparticipating instead of civilian throughout the document		

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Comment Response Matrix
Draft Environmental Impact Statement for the Modernization & Enhancement of Ranges, Airspace, and Training Areas in the JPARC in Alaska

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13	3-178	1	3.3		See comment 1 on the BAX			
14	3-190		Figure 3-26		Noise contour levels indicate that currently there are no baseline peak blast noise levels in the 130dB contour and there are several additions to that under the proposed action (pink contours). However, it is indicated in the verbiage on page 3-187 line 31 that there are no impact areas not already affected by current conditions. Please clarify.			
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[REDACTED]

From: Leaphart, Stanley E (DNR) [REDACTED]
Sent: Monday, July 09, 2012 7:52 PM
To: ALCOM J08 Admin Box
Subject: Comments on JPARC Draft EIS
Attachments: CACFA Comments JPARC DEIS.pdf

Attached please find our comments on the JPARC Draft EIS. Thank you.

*Stan Leaphart
Executive Director
Citizens' Advisory Commission
on Federal Areas
3700 Airport Way
Fairbanks, AK 99709
907.374.3737*

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STATE OF ALASKA

CITIZENS' ADVISORY COMMISSION ON FEDERAL AREAS

**SEAN PARNELL,
Governor**

**3700 AIRPORT WAY
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**PHONE: (907) 374-3737
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July 9, 2012

Lt. General Steve Hoog
Commander, Alaskan Command
9480 Pease Avenue, Suite 120
Joint Base Elmendorf-Fort Richardson, Alaska 99506

Dear Lt. General Hoog:

The Citizens' Advisory Commission on Federal Areas (CACFA) has reviewed the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Draft Environmental Impact Statement (DEIS).

The Citizens' Advisory Commission on Federal Areas is a 12 member organization established by the State of Alaska in 1981 and reauthorized in 2007. Alaska Statute (AS) 41.37.220 directs the Commission to "consider, research, and hold hearings on the consistency with federal law and congressional intent on management, operation, planning, development, and additions to federal management areas in the state [and] on the effect of federal regulations and federal management decisions on the people of the state."

We appreciate the opportunity to provide comments on the important proposals contained in the JPARC EIS. We also are thankful for the extension of the public comment period. ALCOM has made a notable effort to reach out to the affected communities across Alaska with its public meeting schedule and through the *ad hoc* Working Group meetings since public scoping began for the DEIS. Extending the comment period also demonstrates a commitment to the public process and to the affected public by allowing more time to review and analyze a lengthy and complicated document. Please accept the following comments.

The Commission recognizes the crucial role the military plays in defending our nation. We support the Department of Defense's mission and understand the need for training areas to ensure the readiness of our military forces. Commission members do, however, have concerns about the potential impacts from the proposed expansion of some of those training areas as well as other elements of the proposals outlined in the DEIS.

The Commission fully understand the vital role the military plays in Alaska's economy. At the same time, the civil aviation industry makes significant economic contributions to the state.

G0026Lt. General Steve Hoog
JPARC Draft EIS

July 9, 2012

According to the Aircraft Owners and Pilots Association, the civil aviation industry in Alaska contributes approximately \$3.5 billion to the state's economy and supports an estimated 47,000 directly and indirectly related jobs.¹ In addition, civil aircraft routinely provide the most economical and feasible means of travel for Alaskans as well providing the primary method of access for utilizing many of the resources of the state. It is essential that a balance be struck between the military's operational and training needs and those of the civilian population as they are supported by the civil aviation industry.

FOX 3 MOA Expansion and New Paxon MOA

The proposed expansion of the Fox 3 Military Operations Area (MOA) and designation of a new Paxon MOA represent a significant expansion in the amount of Alaskan airspace directly affected by military training activity. Under Alternative A the amount of airspace included within MOAs in this region of the state would more than double, increasing from 3,138,000 acres (4,903 sq. miles) to 7,531,000 acres (11,767 sq. miles). Under Alternative E, MOAs would increase in size to 6,401,000 acres (10,001 sq. miles).

The Commission has heard from members of the public who are concerned that 2/3 (67%) of the lands affected by the existing MOA and the proposed expansion areas are State owned. They find it disconcerting that with 60% of the lands in Alaska federally owned, the lands most impacted by the proposals in the DEIS are state lands. Many Alaskans believe that it would be more appropriate to designate MOAs over federal lands.

The information in Table 3-12 *Land Status* should be revised to more accurately reflect actual land status in the Fox 3 MOA and the proposed Paxon MOA. The **Notes** section for Table 3-12 defines State land as including State patented, State tentatively approved and State land disposals. State land disposals are not State lands; they are lands that have been placed in private ownership. They should be included in Table 3-12 under **Private**. Under Note 4, private lands should also include Native allotments. Also, by definition, there is no such thing as "privately owned BLM land." We assume that this category would include homesites, trade and manufacturing sites, homesteads and patented federal mining claims that have been conveyed into private ownership.

The DEIS indicates that the proposed expansion of the FOX 3 MOA and designation of a new Paxon MOA have the potential for significant adverse impacts to airspace management and use, noise levels, flight safety, land management and use, recreation and socioeconomics and that management actions or mitigations are required to avoid or reduce impacts. The Commission agrees with this assessment. In addition, should the Fox 3 MOA be expanded and/or the Paxon MOA designated, we generally support the proposed mitigations outlined in Table K-2 of Appendix K.

The public has expressed significant concern with the expansion of the FOX 3 MOA and the creation of the Paxon MOA. Of even greater concern is the proposal to lower the minimum altitude restriction for military aircraft from 5,000 feet AGL to 500 feet AGL. The area that

¹ *The Economic Contribution of the Aviation Industry to Alaska's Economy – prepared by Northern Economics, Inc., Anchorage, Alaska for the Alaska Department of Transportation, January 2009*

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would be included in the proposed expansion is used extensively by general aviation pilots, air taxi operators and transporters to support hunting camps and mining operations, conduct air tour operations, access recreational areas or make other uses of this region. Given its proximity to Fairbanks, Anchorage, the Mat Su Borough and the Copper River Basin, the airspace is heavily used by civilian aircraft throughout the year. Lowering the minimum altitude to 500 feet AGL greatly increases the collision potential with high-speed military aircraft engaged in training maneuvers in the Fox 3 MOA. Because of the heavy use of the proposed Fox 3 expansion area for access to the southern Alaska Range, the Denali Highway, the Nelchina Basin and the Talkeetna Mountains, and to minimize the risk of mid-air collision, expansion of the Fox MOA should be limited to no lower than 5,000 feet AGL, and to the smallest possible lateral extent to minimize the risk of mid-air collision.

The Commission is disappointed that there is no high altitude only alternative for the proposed Paxon MOA which covers Isabel Pass and portions of the Eastern Alaska Range. During scoping, there was considerable public concern about the potential negative impacts to civilian air operations from military aircraft operating as low as 500' AGL if this MOA is designated. Isabel Pass is a major Visual flight Rules (VFR) route for civilian aircraft. It links northern and interior Alaska with south central and southeastern Alaska. As with the proposed Fox 3 expansion area, this route is used extensively by civilian aircraft to access hunting and fishing areas, private cabins and homesites, mining operations and small airstrips on the southern flanks of the Alaska Range. We do note that the low altitude Paxon MOA would extend from 500 feet AGL up to but not including 14,000 feet MSL and the MOA would only be used during major flying exercises (MFE).

The DEIS (Appendix K, page K-9) proposes the following mitigation for the Fox 3 MOA and the proposed Paxon MOA is designated:

“Establish or expand existing VFR flyway corridors as necessary to provide VFR aircraft transit through areas that may be affected by high density military flight activities within/near the proposed airspace.”

While designation of specific VFR flyway corridors may be realistic in the Fox 3 MOA, the highly variable weather in the area of the proposed Paxon MOA makes designation of a single corridor unfeasible. It would also concentrate VFR traffic in an already limited area and increase the potential for a mid air collision between civilian and military aircraft. We strongly suggest that if the Paxon MOA is designated, it should be limited to high altitude use only.

The DEIS states there is a potential for adverse impacts on biological resources, public access, and subsistence, but that impacts are not expected to be significant and that management actions or mitigations may be required to avoid or reduce impacts. The Commission believes that the potential exists for significant adverse impacts to these three resources. We suggest the development of mitigation measures for inclusion in the final EIS and Record of Decision.

The DEIS acknowledges in the footnotes for Table 3-11 that while caribou are prevalent throughout the Fox 3 MOA, calving and breeding occur predominately in the proposed expansion area. The footnote for Dall sheep in Table 3-11 states that they are most prevalent

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in the Fox 3 expansion area and the proposed Paxon MOA, but that no “calving” (should be lambing) is identified. Table 3-11 contains similar information that habitat, including nesting habitat, for ducks, geese and trumpeter swans is also prevalent in the proposed Fox 3 expansion area and proposed Paxon MOA. There is little additional discussion of the use of the proposed Fox 3 expansion area for caribou calving and breeding in the affected environment section of the DEIS. More information should be included in the final EIS (FEIS).

In spite of the proposal to include important caribou breeding and calving habitat, waterfowl nesting areas and other wildlife concentration areas in the proposed Fox 3 MOA extension and the proposed Paxon MOA, the DEIS (Appendix K, Page K-11) proposes only the following mitigation measure:

“Continue to monitor effects of military training, including overflights on select wildlife species (especially herd animals, waterfowl, and raptors) and fisheries during critical seasons such as breeding, young-rearing, and migration. Use knowledge to develop and implement strategies to minimize disturbance to priority wildlife in existing and new SUAs. This would help natural resources and range managers to coordinate training schedules that minimize impacts on wildlife populations.”

Because of the importance of this area and its wildlife resources for a wide range of uses and user groups, the Commission submits that simply monitoring the effects of training overflights is not sufficient to protect those resources. Previous studies and surveys have established the effects of these types of activities on biological resources.

The FEIS and ROD should include specific mitigation measures for caribou and moose during calving and post-calving periods in the existing Fox 3 MOA and for the proposed expansion area, including the proposed Paxon MOA. Based on our discussions with ADF&G biologists and others, the Commission suggests that a minimum elevation of 5,000 feet AGL be maintained from May 15 through July 15 throughout the existing Fox 3 MOA, including any expansion area. This will reduce stress on the Nelchina Caribou Herd during critical calving and post-calving period.

The DEIS lists an existing mitigation measure (Reference ID 429, Appendix K, pg. K-6) for the Delta Caribou Herd calving areas which established a minimum overflight altitude of 3,000 feet AGL from May 15 to June 15. The Commission suggests modifying the mitigation by increasing the minimum altitude to 5,000 feet AGL and extending it from May 15 to July 15.

We also suggest adoption of the same May 15 to July 15 flight restriction of 5,000 feet AGL for moose in both the Fox 3 MOA and the proposed Paxon MOA. Even though moose do not have concentrated calving areas, they are susceptible to low level, high speed aircraft overflights during calving and post calving periods.

The Commission supports the proposed mitigation for the FOX MOA and the proposed Paxon MOA to allow supersonic operations only above 5,000 feet AGL or 12,000 feet MSL, whichever is higher

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Because of the high potential for adverse impacts to the resources in the MOAs, appropriate mitigation measures must be developed. In order to effectively identify, develop and implement necessary mitigation measures the Commission suggests the Alaskan Command establish a comprehensive program involving regular consultation and coordination with the Alaska Department of Fish and Game, the Alaska Department of Natural Resources, and Federal land management agencies. Consultation should also include public user groups, private property owners, and the civil aviation community. This consultation and coordination should continue through the FEIS and Record of Decision, the FAA review of the airspace proposals and the implementation of this plan as its impacts will continue to affect all parties.

Special Use Airspace Information Service

The Special Use Airspace Information Service (SUAIS) has been successful in making civilian pilots aware of planned and ongoing military aircraft activity in the JPARC airspace complex. AOPA has indicated that the SUAIS has greatly improved the situational awareness of both civil and military airspace users. However, also according to AOPA, pilots have reported that in the eastern portion of the existing complex communications are not adequate. The result has been difficulties with the mix of civil uses and military training flights.

While we understand that the SUAIS recently has been upgraded to increase radio coverage by reactivating one of the VHF radio repeaters, any further expansion of the airspace complex will only increase problems unless radio coverage, staffing and other necessary components of the SUAIS are expanded proportionally to allow civilian pilots to communicate with Range Control when MOAs are active.

The DEIS (Appendix K, page K-8) proposes the following mitigation measure:

“Pursue funding for any communications enhancements that may be needed to expand coverage within those expanded SUA areas.”

We suggest that committing only to “pursue funding” is not satisfactory. ALCOM should develop a plan to identify what is required for expansion of the SUAIS to ensure sufficient and reliable communication between civilian pilots and the military. A workable plan and funding to implement the plan should be in place before any expansion of the Fox 3 MOA or the designation of the Paxon MOA occurs.

Unmanned Aerial Vehicle Corridors

Under the proposed action in Alternative A, the DEIS proposes to establish seven FAA approved Unmanned Aerial Vehicle (UAV) corridors. Alternative B would establish the same seven UAV corridors via a Certificate of Authorization granted by the FAA. These corridors would extend from Eielson Air Force Base and Allen Army Field at Fort Wainwright to various restricted air space areas. These corridors would be located in and near the second most heavily used airspace in Alaska. The civilian aviation community has expressed

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significant concerns about the designation of restricted air airspace for operation of UAVs in this area.

The Commission recommends the adoption of Alternative B as an interim measures until such time as the FAA complies with the provisions of Public Law 112-95 the *FAA Modernization and Reform Act of 2012*. Section 334, *Public Unmanned Aircraft Systems*, directs the Secretary of Transportation to issue “guidance regarding the operation of public (military and other government agency) unmanned aircraft systems to –

- (1) expedite the issuance of a certificate of authorization process;
- (2) provide for a collaborative process with public agencies to allow for an incremental expansion of access to the national airspace system as technology matures and the necessary safety analysis and data become available, and until standards are completed and technology issues are resolved;
- (3) facilitate the capability of public agencies to develop and use test ranges, subject to operating restrictions required by the Federal Aviation Administration, to test and operate unmanned aircraft systems; and
- (4) provide guidance on a public entity's responsibility when operating an unmanned aircraft without a civil airworthiness certificate issued by the Administration.

(b) *STANDARDS FOR OPERATION AND CERTIFICATION.*—Not later than December 31, 2015, the Administrator shall develop and implement operational and certification requirements for the operation of public unmanned aircraft systems in the national airspace system.

Alternative B, designation of UAV corridors via a certificate of authorization, would still allow ALCOM to meet its mission and training requirements until such time as the Secretary of Transportation issues the necessary guidance and any necessary regulations for operating UAVs in the national airspace system. Under the provisions of Public Law, the Secretary should have already entered into an agreement with the military to simplify the process for issuing certificates of authorization. In addition, the certificate of authorization process should provide additional opportunities for public involvement before a final decision is made on designation of these corridors.

Subsistence

The Commission is concerned about the Impact Assessment Methodology used in the DEIS to assess the level of dependence on subsistence resources by communities potentially affected by the proposed Fox 3 MOA expansion and the proposed Paxon MOA. In section 3.1.13.3, Chistochina, Dot Lake and Gulkana are listed as having a high dependency and Cantwell, Gakona, Glennallen and Paxson are considered to have a medium dependency. Chickaloon is included in Table 3-24, but is assigned no ranking. We note that the 1982 harvest and use data for Chickaloon are also incorrect.

We find no basis for making different high dependency - medium dependency rankings for these communities when all pertinent factors are considered. All of these communities are on

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the road system and have similar access to alternative resources. In addition, for the eight communities listed in Table 3-24, an average of 97.25% of households participated in subsistence, with no community having less than 92.7% participation. For the seven communities for which information was available, residents harvested an average of 158 pounds of subsistence resources per capita. Harvest for Paxson, which is ranked as having a medium dependence, harvested 289 pounds per capita. This is more than the amount of per capita harvest for Dot Lake (115 pounds) and Gulkana (152 pounds). However, both of those communities were ranked by the DEIS as having a high dependence on subsistence.

A more realistic assessment of the subsistence harvest data for these communities would indicate that all of them have a high dependence on subsistence. As we did in our scoping comments, we point out that the preference for subsistence uses on Federal public lands in Alaska is provided to all rural residents, both Native and non-Native, under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Congress made that finding very clear in Section 801(4):

"in order to fulfill the policies and purposes of the Alaska Native Claims Settlement Act and as a matter of equity, it is necessary for the Congress to invoke its constitutional authority over Native affairs and its constitutional authority under the property clause and the commerce clause to protect and provide the opportunity for continued subsistence uses on the public lands by Native and non-Native rural residents;"

Ranking a community's dependency on subsistence resources on the basis of the percentage of Native or non-Native residents is inconsistent with both ANILCA Title VIII, as well as federal and state regulations. While it may be appropriate to rank an affected community's dependency, other criteria should be used. We suggest that the discussion in Section 3.1.13 and any discussion of statutory or regulatory provisions in Section B.13.2 be revised accordingly.

To avoid significant adverse impacts to hunting activities regulated under the State of Alaska's general hunting regulations in the Fox 3 MOA (existing and proposed expansion area) and the proposed Paxon MOA, we recommend that no major flying exercises be conducted in these areas from August 10 to September 30 and October 21 to November 31. This will prevent disruption of big game hunting in these areas during the peak seasons.

Fox 2 MOA and Eielson MOA

These areas are used extensively by moose hunters during the fall and winter. The fall hunt extends from August 15 to September 25, with most use occurring between September 1 and September 15. Winter hunting usually falls within two timeframes, November 15 to December 15 and January 15 to February 28. As a mitigating measure, the Commission recommends no major fly exercises during the fall and winter hunting periods and no flights below 5000 feet AGL.

Realistic Live Ordnance Delivery Area

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Li. General Steve Hoog
JPARC Draft EIS

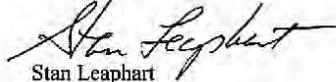
July 9, 2012

The Commission is concerned about this proposal which would affect 163,230 acres of State owned land under Alternative A and 234,600 acres of State owned land under Alternative B. As the DEIS points out, this area is located within State Game Management Unit (GMU) 20A and is extensively used for moose hunting, with over 4,000 moose permits issued annually. More than 1,100 moose were harvested from GMU 20 A over the last several years. Also harvested are brown bear, black bear, and Dall sheep. Trapping also occurs throughout the entire area. More importantly, this is a priority use area by residents from the Fairbanks area. Any reduction in use would have significant impacts on area hunters and trappers. Should this proposal be adopted under either alternative, specific mitigation measures must be developed in consultation with the Alaska Department of Natural Resources and the Alaska Department of Fish and Game.

In addition, because this proposal would require action by the Alaska Department of Natural Resources to reclassify this area, the Commission will submit to the department any recommendations it may determine appropriate and to be within the scope of its responsibilities.

We again appreciate the opportunity to comment on this project. Please maintain our contact information for future notifications, and contact our office if there are questions about our comments. Thank you.

Sincerely,


Stan Leaphart
Executive Director

Cc: Governor Sean Parnell
Commissioner Dan Sullivan – ADNR
Commissioner Cora Campbell – ADF&G

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

OFFICE OF
 ECOSYSTEMS, TRIBAL AND
 PUBLIC AFFAIRS

July 9, 2012

ALCOM Public Affairs
 9480 Pease Avenue, Suite 120
 JBER, Alaska 99506

Re: EPA comments on the Draft Environmental Impact Statement for the Alaskan Command's Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex, EPA Project #10-066-DOD.

To Whom It May Concern:

Thank you for the opportunity to review the Draft Environmental Impact Statement for the Alaskan Command's (ALCOM) Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex, Alaska (CEQ # 20120090). We have reviewed the EIS in accordance with our responsibilities under National Environmental Policy Act and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions as well as the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.

We appreciate ALCOM's effort to comprehensively evaluate all twelve actions (six projects and six programmatic actions) identified as appropriate for evaluation in the recently developed Joint Pacific Alaska Range Complex Master Plan. We believe this has added value to the consideration of cumulative impacts and provides for more complete disclosure of impacts for the decision maker as well as the public. However, we note that the complexity of multiple projects and actions without identification of preferred alternatives makes the review quite challenging.

Because preferred alternatives are not identified, and because the potential intensity of impacts varies greatly from alternative to alternative, we have rated the impacts associated each alternative individually. Please see the table below identifying our ratings and rating justification. Definitions of our ratings are attached.

Action	Rating	Justification
FOX 3 MOA Expansion and New Paxson Military Operating Area (MOA)	EO	Potentially serious impacts to noise receptors, land use, recreation and other socioeconomic resources, aviation and aviation safety; adverse impacts to air quality, biological resources, access, subsistence and environmental justice.
Realistic Live Ordnance Delivery	EO	Potentially serious impacts to noise receptors, land use, recreation and other socioeconomic resources, aviation and aviation safety.
Battle Area Complex Restricted Area	EC	Adverse impacts to aviation, noise receptors

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Expand Restricted Area R-2205	EC	Potentially moderate impacts to noise, air and land use, hazardous waste, and multiple socioeconomic resources
Night Joint Training	LO	No or minimal adverse impacts to resources
Unmanned Aerial Vehicle Access	EC	Potentially serious impacts to airspace use and aviation safety
Enhanced Ground Maneuver Space	EO	Potentially serious impacts to aquatic, physical, and biological resources
Tanana Flats Training Area Roadway Access	EO	Potentially serious impacts to aquatic, physical, and biological resources
Joint Air-Ground Integration Complex	EC	Potentially serious impacts to physical and biological resources
Intermediate Staging Bases	EC	Potentially serious impacts to physical and biological resources
Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska	LO	No or minimal adverse impacts to resources
Joint Precision Airdrop System Drop Zones	EC	Potentially serious impacts to socioeconomic resources

We have given the EIS an overall adequacy rating of “2” (Insufficient Information). Generally our impacts (alpha) rating is based on our concerns regarding potential impacts to water quality and aquatic habitats, noise receptors, air quality, subsistence, and other socioeconomic factors, such as safety and other adverse impacts to the private aviation community. Our adequacy rating is based on the concerns we have with the criteria used for the “subsistence community” analysis, additional information needed for direct and cumulative impacts analysis, and lack of use of monitoring data from previous projects (e.g. 1997 Alaska MOA EIS) to help inform this EIS.

We recognize the need for the transition to different training activities to fully meet the training and testing requirements for forces and activities in and near Alaska. We also recognize, however, that an increase and expansion of military training activities and areas will result in additional impacts to surrounding communities, users, and resources. We offer the following recommendations to avoid, minimize and mitigate adverse impacts.

Potential Impacts

We recommend that ALCOM continue to work closely with potentially impacted stakeholders (general and commercial aviation owners and groups, tribal governments, land owners, subsistence and sport hunting groups and resource managers) to identify ways to further avoid, minimize, and mitigate adverse impacts, particularly in the resource areas of aviation safety and subsistence. We also specifically recommend that ALCOM work closely with our agency, as well as the Alaska Department of Conservation, to further minimize potential impacts to physical and biological resources from air emissions and noise, the generation of hazardous wastes, and discharges into waters of the U.S.

Discharges and Hazardous Wastes

We are particularly concerned about possible discharge of live munitions into aquatic environments. Depending on the constituents of the munitions, adverse and potentially lethal impacts, such as those

G0027

seen at Joint Base Elmendorf-Richardson Eagle River Flats, could occur. We recommend that for required live firing training, every effort be made to discharge munitions that do not contain white phosphorus or other constituents that could cause increased mortality in waterfowl similar to what was occurring at Eagle River Flats. Wastewater discharges associated with construction stormwater are included in the discussions of several proposed actions. There does not appear to be discussion of the discharge of munitions, which are also regulated under the National Pollutant Discharge Elimination System. This permit program is scheduled to be transferred from the EPA to the State of Alaska on October 31, 2012, as part of the Phase IV transfer of the Alaska Pollutant Discharge Elimination System. For more information about program transfer, please see the Alaska Pollutant Discharge Elimination System website at <http://dec.alaska.gov/water/APDES/phaseIVextension.html>.

We also recommend that the final EIS include, as applicable, a discussion of Spill Prevention, Control and Countermeasure Plans and Facility Response Plans, as required by the Clean Water Act and the Oil Pollution Act of 1990. Finally, we recommend that the final EIS provide detailed information regarding the anticipated types of hazardous wastes that will be generated as part of the proposed action, how the wastes will be managed, and the plans for disposal in accordance with federal, state and local requirements. The EPA regulates hazardous wastes under Subtitle C of the Resource Conservation and Recovery Act.

Subsistence

To address impacts to subsistence, we recommend further coordination with the Alaska Department of Fish and Game Subsistence Division and Board of Fisheries as well as Federal Subsistence Board to determine if additional measures (such as timing windows, higher minimum altitude) would substantially reduce the potential impacts identified in the EIS, particularly from FOX 3 MOA Expansion, New Paxson MOA and Realistic Live Ordnance Delivery proposed actions.

Aviation

To address the potentially serious impacts to aviation and aviation safety, we encourage you to continue working with commercial and general aviation groups as well as individual owners and operators, and the Airports Divisions within ADOT and FAA to determine if additional avoidance, minimization, or mitigation measures can further reduce impacts, particularly to aviation safety. As identified in the EIS, general and small commercial aviation are critical modes of transportation for communities in rural Alaska, including those identified in the project area. For residents in these communities and in more remote locations, effective communication regarding training activities is often difficult. If information regarding the occurrence and scheduling of such activities is not received by the private operators, or is not timely, safety can be seriously compromised. Therefore, we recommend that work be done to ensure the current effectiveness of the existing Special Use Airspace Information Service that is currently used to inform civilian pilots when MOA and restricted areas are activated. If this information is currently available it should be included in the final EIS. If it is not, we recommend that a study be undertaken to determine its effectiveness. If deficiencies are identified, we recommend that improvements be implemented, preferably before the signing of the Record of Decision.

Cumulative Effects

We recommend that coordination with the Federal Energy Regulatory Commission occur to ensure that the most current proposed activities associated with the Susitna-Watana Hydroelectric Project are considered in the cumulative impacts analysis in the final EIS.

G0027**Adequacy**

To improve readability, we recommend a detailed table outlining alternatives for each proposed action and a detailed discussion regarding each alternative by resource. We recognize that such a table with “averaged” impacts is currently included in the Executive Summary, but it is important that the EIS present the “sharp contrast” between alternatives. While the narrative in the effects section does this to a certain extent, a detailed table would be helpful to readers to visually present the information.

We also expect that the final EIS will contain much greater detail regarding aspects such as the locations of facilities, access roads, numbers of aircraft, and estimated acres of impact, as well as discussion of the potential impacts associated with proposed structures and project activities. We are particularly interested in the quality, acreage and functions of waters of the U.S. that will be impacted by the discharge of dredged or fill material, and wastewater discharges. We request that for specific proposals where it is appropriate or feasible, a draft Clean Water Act 404(b)(1) analysis be drafted and included as an appendix to the final EIS. By including this analysis for project-specific EISs, permitting decisions under Section 404 can be coordinated with other agency decisions, including the consideration of whether the proposed discharge would represent the least environmentally damaging practicable alternative.

Currently the criteria being used for the subsistence community analysis appears to be based on an arbitrary racial composition, and it seems to discount the common practice of rural Alaskan residents to rely on subsistence resources. Other factors that contribute to this reliance are proximity to food stores and U.S. Post Offices. We recommend that these additional components be considered for the subsistence analysis in the final EIS. If the final EIS relies on the current criteria, we recommend that the document include a discussion of the basis for these criteria.

Mitigation and Monitoring

We appreciate the inclusion of Appendix K, Mitigations, Best Management Practices, and Standard Operating Procedures. We request that the final EIS include avoidance and mitigation measures (e.g. restrictions to avoid lambing, buffers along Wild and Scenic corridors) identified by the Bureau of Land Management, Alaska Department of Fish and Game, and other agencies responsible for the protection and conservation of public resources in previous and more recent correspondence in response to scoping and review of the draft EIS.

We also recommend that additional information be included in the final EIS to clearly distinguish between those mitigation measures that ALCOM has the authority to implement, and those which it cannot and thus, would require the involvement of other agencies to execute them. We believe this information would be consistent with CEQ’s Guidance, *Appropriate Use of Mitigation and Monitoring and Appropriate Use of Findings of No Significant Impact*, issued in January 2011 (http://ceq.hss.doe.gov/current_developments/docs/Mitigation_and_Monitoring_Guidance_14Jan2011.pdf). Finally, and also in line with the mitigation guidance, we recommend that a draft adaptive management plan be identified and included in the final EIS to monitor and ensure the success of future mitigation efforts.

G0027

Again, we appreciate the opportunity to offer comments on the draft EIS and look forward to working with ALCOM on addressing the issues we have identified for the Final EIS. Please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or curtis.jennifer@epa.gov, with any questions you have regarding our comments.

Sincerely,



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

Enclosure

G0027

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant 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.

EU – Environmentally Unsatisfactory

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 Council on Environmental Quality (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 of 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 to 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 National Environmental Policy Act 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. February, 1987.

G0028

[REDACTED]

From: Terry Mudd [REDACTED]
Sent: Thursday, July 12, 2012 1:54 PM
To: ALCOM J08 Admin Box
Subject: Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA

Please "Take No Action" and leave the MOA "as is". Flying in Alaska is hard enough with the unpredictable weather, mountains and an abundance of MOA and restricted areas.

Respectfully
Terry Asbury
Denali Borough Assembly member

N.2.2 Tribal Comments in Order by Identifier ID Number

T0001



Chickaloon Village
Traditional Council
(Nay'dini'aa Na')

May 21, 2012

Gary Harrison,
Traditional Chief

Doug Wade,
Chairman/Elder

Rick Harrison,
Vice-Chairman

Penny Westing,
Secretary/Elder

Albert Harrison,
Treasurer/Elder

Jess Lanman,
Elder Member

Burt Shaginoff,
Elder Member

Larry Wade,
Elder Member

Shawna Larson,
Member

Jennifer Harrison,
Executive Director

Dr. Jerome Montague
Native Affairs Advisor
Headquarters Alaskan Command (ALCOM)
Joint Base Elmendorf-Richardson Alaska
9480 Pease Avenue, Suite 110
Joint Base Elmendorf-Richardson, AK 99506-2101

Dear Dr. Jerome Montague,

I am writing this letter to you in order to continue the open communication that we established when we previously met in your office in February 2011. Our Tribal citizens have recently expressed concerns about the US Air Force's airplanes in our area and we have several questions:

- What are the Air Force's lateral boundaries along the river valleys? If your limit is 5,000 feet from ground level, how close are you allowed to be next to a mountain when you are flying in a valley?
- Is the Air Force allowed to fly lower than 5,000 feet if you are flying at a slower speed?
- Is the Air Force currently flying or are you planning to fly unmanned aircraft in the Matanuska Watershed area?

I look forward to your response. If you have any questions or need clarification, you can all me at 907-745-0749. I look forward to working with you.

May Creator Guide Our Footsteps,

Doug Wade
Chairman

P. O. BOX 1105 Chickaloon, Alaska 99674
e-mail: cadmin@chickaloon.org

Phone (907) 745-6707 Fax (907) 745-0709
Home Page: <http://www.chickaloon.org>

N.2.3 Non-government Comments in Order by Identifier ID Number

N0001

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0001	Carl Sieber	Vice Chairman	Alaskan Aviation Safety Foundation	NEPA Process	<p>The Alaskan Aviation Safety Foundation (AASF) respectfully requests an extension of the comment period for submitting comments on the Draft Environmental Impact Statement (DEIS) on the Joint Pacific Alaska Range Complex public noticed on March 30, 2012. We request a total comment period of 120 days from the date of the public notice. The National Environmental Policy Act (NEPA) sets forth specific guidelines and requirements for preparing environmental documents and setting time lines for the public to respond. 40 CFR (§) 1502.7 suggests a final EIS should consist of 150 pages, and proposals of unusual scope or complexity shall normally be less than 300 pages. We expect that this draft document is approximately the same length as we should anticipate for the final. The page count is defined in §1502.10. My computer tells me the JPARC DEIS is 655 pages for the pages meeting the definition in §1502.10 d through g. We also note that the total document including appendices is 1,394 pages. §1506.10 (c) says that the comment period should be not less than 45 days on draft statements, and can be extended to accommodate public comments. The AASF feels that a short extension to 120 days total is reasonable and will not adversely affect the USAF decision making process or schedule. The AASF has tried to assemble comments before the published June 7, 2012 deadline, but find that our volunteers will not be able to meet that deadline. We therefore find it necessary to request a further extension in order to provide meaningful comments. USAF staffs have already publicly acknowledged that this is a complex document, and our volunteers can concur. The Congress of Environmental Quality (CEQ) has offered informal guidance that agencies should offer the public every opportunity to provide comments in order to help agencies such as the USAF to make better decisions. The AASF sincerely hopes that the USAF decision makers concur. Thank you for your consideration, and we look forward to your favorable response.</p>

N0002

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■ [REDACTED] [REDACTED]
■ [REDACTED] [REDACTED]

3 MR. RAZO: Good evening. My name is Gregory Razo. I work
4 as a Vice President at Cook Inlet Region, Incorporated. Our
5 company calls itself CIRI. We are the regional Alaska Native
6 corporation for Southcentral Alaska headquartered here in
7 Anchorage. We also are delegated the tribal authority for the
8 Anchorage region.

9 In general our company has had an opportunity to review
10 the Joint Pacific Alaska Range Complex proposal and Draft EIS.
11 We believe that the Joint Pacific Alaska Range Complex allows
12 for unprecedented training opportunities for our war fighters
13 that are not found in any other region of the United States and
14 we encourage the development of the JPARC process.

15 We think that in terms of the work done to date with
16 regard to the six definitive proposals they have adequately
17 addressed the specificity, dependence, definition and ripeness
18 requirements of the EIS and in particular with regard to the
19 programmatic proposals we strongly support programmatic proposal
20 eight, nine and 10 which deal with the proposed Tanana Flats
21 training area roadway access, the proposed joint air ground
22 integration complex and the proposed intermediate staging bases.

23 In reviewing the anticipated environmental impacts from
24 the JPARC proposal we are happy to see that there is determined
25 to be little impact on the subsistence uses of the affected

[REDACTED]

N0002

45

1 areas. Subsistence is very important to the Alaska Native
2 people and the ability to access those resources which have been
3 the resources of our people for thousands of years should be
4 maintained and not impacted by the JPARC proposal.

5 Additionally, I think that with regard to the socio and
6 economic impacts of the JPARC proposal that the Department of
7 Defense should also consider not just the adverse impacts, but
8 the substantial positive impacts that development of
9 particularly the programmatic proposals that I mentioned
10 previously will have for job opportunity and training and
11 workforce development, particularly for our Alaska Native
12 people. Those regions that are going to be affected by the
13 JPARC development are areas of high unemployment where there is
14 little opportunity for work and the work that would be
15 associated with this proposal would be good work for our people.

16 For all of those reasons Cook Inlet Region, Incorporated,
17 supports this Draft EIS. Thank you.

18 UNIDENTIFIED MALE: Thank you.

19 [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

[REDACTED]

N0003

Joint Pacific Alaska Range Complex Modernization and Enhancement
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Written Comment Form

For more information and to submit comments online, please go to:
www.jparceis.com

Public comments are requested pursuant to the National Environmental Policy Act, 42 United States Code 4321, et seq. All written comments received during the comment period will be considered during Final EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Final EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Final EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

Name (First and Last): Kern Aiton Date: 5/18/12
Title: Legislative Liaison / Member
Organization: Delta Sportsman's Assn / ADFLG Advisory Committee
Is this a government agency (choose one): yes no
Comment submitted on behalf of (choose one):
 your organization/business/agency

[Redacted Address]

If you know, please check the boxes below that relate to your comment. This will assist us in organizing and reviewing your comment.

Comment Topic(s):

- General (to the EIS)
- NEPA Process
- Purpose/Need
- Description of Proposed Actions and Alternatives (DOPAA)
- Cumulative Impacts
- Mitigations

Resource Areas:

- All resource areas
- Airspace Management
- Noise
- Safety (Airspace)
- Safety (Ground)
- Air Quality
- Physical Resources
- Land Use
- Infrastructure and Transportation
- Water Resources
- Hazardous Materials
- Biological Resources
- Cultural Resources
- Socioeconomics
- Subsistence
- Environmental Justice

Paxson MOA Addition

Proposed Actions:

- All proposed actions
- 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxson MOA
- 2 - Realistic Live Ordnance Delivery
- 3 - Battle Area Complex Restricted Area Addition
- 4 - Expansion of R-2205 Restricted Area
- 5 - Night Joint Training
- 6 - Unmanned Aerial Vehicle Access
- 7 - Enhanced Access to Ground Maneuver Space Areas
- 8 - Tanana Flats Training Area Access Road
- 9 - Joint Air-Ground Integration Complex
- 10 - Intermediate Staging Bases
- 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska
- 12 - Joint Precision Airdrop System Drop Zones

Please provide your comment(s) on the back of this form and turn it in at a public hearing, or submit by June 7, 2012, to: ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506;
Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

N0003

Comment(s):

Facts:
I am a combat veteran that understands and appreciates the need for enhanced military training -

A half century ago, the military displaced us from our homes in the Mt Hayes Blain Lakes Game Refuge to create a bombing range.

I have experienced near-miss situations with A-10s in Towe Ridge Area -

Five 3
500 AGL
Paxon
MOA
500 AGL

~~that~~
to create a 500 AGL flight zone, especially in the Paxon MOA, with aircraft much faster than A-10s will be extremely hazardous for local pilot citizens, especially in September.

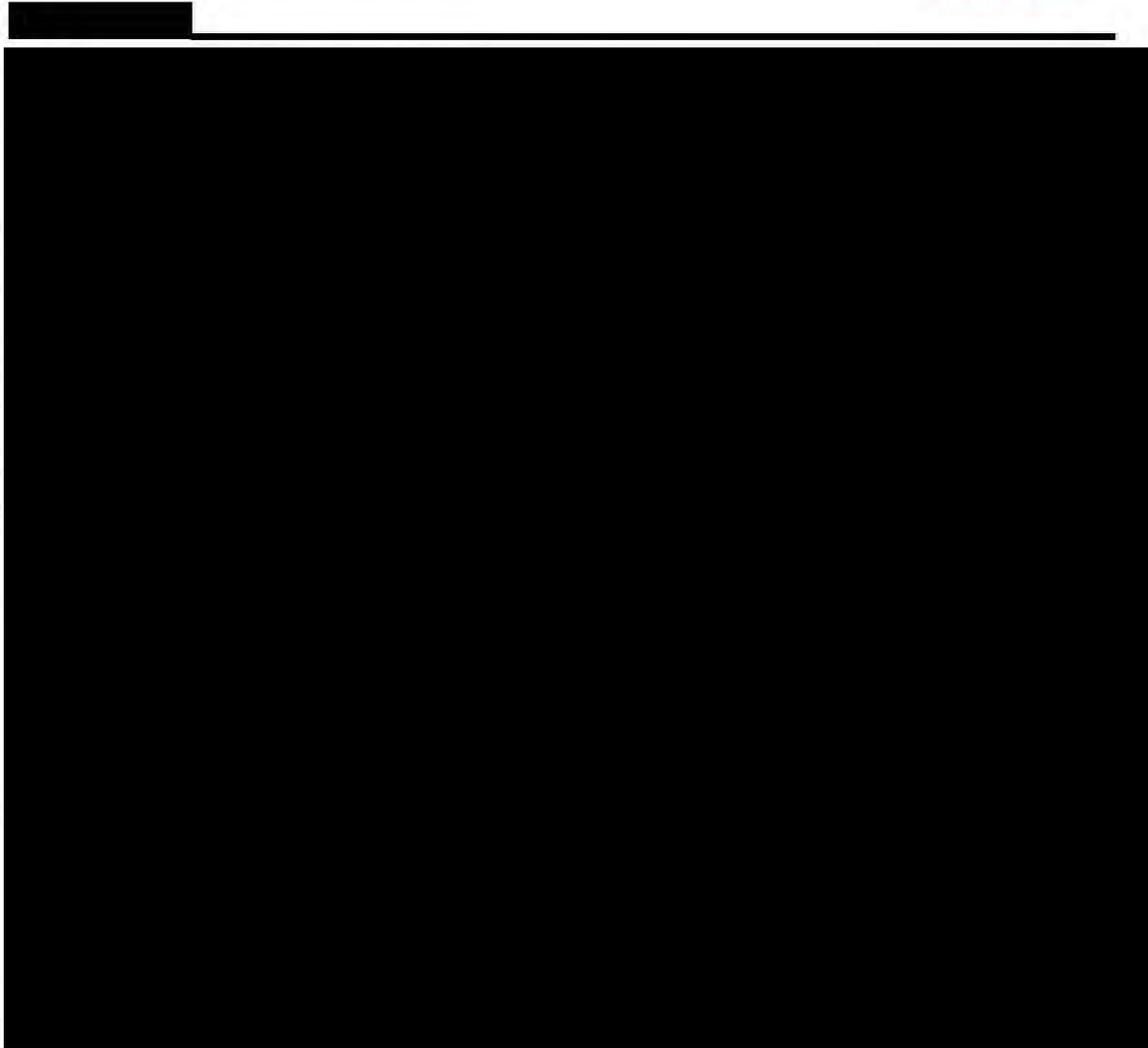
large waterfowl flocks are also an extreme hazard near Delta & Delta/Tanana Rivers -

Use additional sheets as needed.

Please turn in this form at a public hearing or submit by June 7, 2012, to:
ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506
Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

Thank you for your input.

N0004



From: Martin, Melissa [REDACTED]
Sent: Wednesday, May 23, 2012 4:59 PM
To: Tarver, Jason E.; Pearson, Karen M.
Subject: JPARCEIS Website Support

To Whom It May Concern,

My name is Melissa Martin, I work in the Air Traffic Division at Aircraft Owners and Pilots Association. I am looking to submit comments on the website, I see that there is an area for written form comments but not a way to attach a document. I have gone ahead and attached AOPAs comments to this email, please provide me with confirmation that it was received/ passed along to the correct person who can address our concerns. If there is another way to attach a document via the website please let me know. Thank you.

N0004



www.aopa.org

May 23, 2012

ALCOM Public Affairs
9480 Pease Avenue
Suite 120
JBER, AK 99506

Re: AOPA requests for extension of Comment Period for the Draft Environmental Impact Statement for the Joint Pacific Alaska Range Complex

To Whom It May Concern,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 general aviation members nationwide, requests a 60 day extension to the comment period slated to close on June 7, 2012 for the Draft Environmental Impact Statement (DEIS) for the Joint Pacific Alaska Range Complex (JPARC) comment period.

Based on AOPA's participation during recent DEIS public meetings and the complexity of concerns raised by both the aviation industry as well as local communities impacted by the JPARC proposed changes, the current 70 day comment period is inadequate to allow for a comprehensive review and public input. The sheer volume and complexity of the JPARC initiative would typically necessitate a minimum of 90 days for public comment and while recognizing the military's desire to move ahead and remain on schedule, attempting to aggressively move forward without ample public review opportunity seems to negate the true spirit of the National Environmental Policy Act (NEPA).

AOPA strongly suggests the Department of Defense offer an additional 60 days for public review of this complex and lengthy DEIS to ensure the public is offered time to provide substantive comments on the potential consequences of the proposed actions. While understanding the desire to adhere to a schedule and budget, there is no substitute for allowing an adequate and thorough public comment period - especially when the DEIS public comment meetings overlapped with a number of already scheduled community events precluding the public from participation at these public meetings.

AOPA looks forward to an extension of the comment period to allow for a thorough public review opportunity and to allow the aviation community and public to provide substantive feedback on this complex DEIS.

Sincerely,

A handwritten signature in black ink, appearing to read "Heidi J. Williams".

Heidi J. Williams
Vice President
Air Traffic Services and Modernization

AIRCRAFT OWNERS AND PILOTS ASSOCIATION

N0005

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0005	John Delaquito	Owner	Lake Louise Lodge	Description of Proposed Actions and Alternatives (DOPAA), Airspace Management, Noise, Safety (Airspace), Safety (Ground), Physical Resources, HAZMAT, Subistence, Air Quality, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	I oppose the use of the Fox 3 MOA area for a number of reasons which include the following: 1) The area being requested for the Fox 3 is used by a very large amount of people for fishing and hunting recreation, birdwatching, and residents like myself who live in this area on a full-time basis. 2) This area is easily accessible by people that reside all over the state but many live in close proximity to Anchorage and the Matanuska Valley. It is a popular area for private pilots and small commercial pilots/guides and question the necessity of the additional air space that is being requested. 3) The necessity of the additional area is questioned and it is in fact really needed for training area. The Lake Louise tri-lake area is the largest lake system in Alaska which you can drive to and should be preserved for a recreational location for all residents of the state to enjoy. It would make sense to use a more remote area for this training. Thank you for your consideration in not expanding the air space area. In summary, for the preservation of our tranquil environment, wildlife, and enjoyment of our homes, please do not expand this area for your training.

N0006

[REDACTED]

19 MR. PARMENTER: David Parmenter. I operate Copper Valley
20 Air Service here in the basin. Again, the other air taxis
21 around here aren't here so I'm kind of speaking for them. But
22 the MOA low level, we have limited time in the Basin. We got
23 tremendous winter months. We don't see why there should be low
24 level essentially say from the month of June -- or month of May
25 through October when all the revenue is being developed in that

[REDACTED]

N0006

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1 four months.

2 The expand or have a boundary say from the Denali Highway
3 north, Talkeetna, Richardson Highway, use that -- don't use that
4 in the month -- for four or five months out of the year and
5 maintain at least 5,000 feet above with your original MOA. We
6 just don't need the conflict with our revenue, tourism, three
7 major holidays and hunting season. And I do a tremendous amount
8 of flying in the Basin in that time and that's just one more
9 thing I got to watch out for. That's one of our main concerns.

10 But we got a tremendous amount of land here and, again, I
11 don't think we should be whipping around here over the top of
12 everybody's houses, homes, cabins. Call it what you like, but
13 essentially it's going to disrupt a tremendous amount of
14 revenue. Thanks.

█ [REDACTED]

N0007

[REDACTED]

17 MS. MCHENRY: Thank you. My name is Ruth McHenry. I
18 represent Copper Country Alliance which is a nonprofit
19 organization in the Copper Basin that seeks to protect our
20 natural resources and the way that people use them. This is
21 such a complicated document and I haven't had time to really go
22 through it, that these are very, very preliminary remarks that
23 I'm making tonight. I'm going to, however, come out in support
24 of the no action alternative. I'm going to limit my comments to
25 Fox 3 and to Paxson MOA.

[REDACTED]

N0007



1 As I said, I haven't looked deeply into the EIS, but where
2 I have it seems to me to be quite inadequate in spite of its
3 great length. I have the impression that the writers simply had
4 a lack of knowledge of this area and its resources. Probably it
5 was written by those who don't live here in the Basin and if
6 they are living in Alaska haven't been here for a long time and
7 probably won't be here for a long time. I -- we are used to
8 seeing environment impact statements that are written by people
9 who live and work here and they're very different.

10 I want to make an example of the cumulative impact area.
11 With regard to cumulative impacts, I haven't found any mention
12 of the Susitna Dam which would greatly affect this area and our
13 biological resources or recreation. No mention of the mineral
14 exploration and possible development around Tangle Lakes. No
15 mention of biomass harvest, climate change. I did find
16 cumulative impacts regarding the oil pipeline and the gas
17 pipeline, but not with respect to the biological resources, only
18 with respect to some of the other resources.

19 With respect to biological resources, there is a very
20 short paragraph on cumulative impacts with other non-military
21 actions. In other words, how does this proposal relate to
22 things that are going on that are non-military in terms of
23 effects on us. No substantive non-military actions have been
24 identified for the areas under the proposed expanded Fox 3 or
25 Paxson MOAs. Therefore, contributions of non-military actions



N0008

■ [REDACTED]

■ [REDACTED] [REDACTED] [REDACTED]

■ [REDACTED]

4 MR. MARTINEK: Yeah, my name is Gary Martinek, M-A-R-T-I-
5 N-E-K. I'm the hatchery manager at Gulkana hatchery, a State
6 facility started in 1973. This is the largest sockeye facility
7 in the world. It's three miles north of Paxson Lodge on a
8 series of springs. The salmon that we provide are basically
9 used for commercial fishing, subsistence, personal use and sport
10 fishery. The upper Copper River is the source of one of the
11 most valuable sockeye and king salmon resources in the state.
12 Besides the hatchery springs, there are over 10 different wild
13 sockeye stocks and at least six different stocks of wild king
14 salmon and the most northern stock of wild rainbows in the
15 United States. Like Luke Catledge mentioned, our single biggest
16 concern is during this window of incubation which is roughly --
17 can be 120 days. These eggs are extremely susceptible to any
18 type of noise or shock and can be killed with just a simple
19 sound of a gunfire in an incubator. And we definitely would
20 like you to relook at this situation. I mean this is a very,
21 very valuable resource to not just people in the state of
22 Alaska, but people world wide. So thank you.

■ [REDACTED] [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

[REDACTED]

N0009

█ [REDACTED]

8 MR. CATLEDGE: Thank you. My name is Lucas Catledge, C-A-
9 T-L-E-D-G-E. I work with the Gulkana hatchery here locally and
10 my main concern is probably the sonic booms. And working at the
11 salmon hatchery here in the fall especially when we have eggs
12 loaded in the incubators I see that as a potential threat to the
13 safety of the eggs. They're very susceptible to shock and even
14 at the 5,000 foot a sonic boom will rattle and shake things here
15 on the ground. And fortunately we haven't seen any substantial
16 loss in the past, but I see here on the scheduling for their red
17 flag training exercises that this year's proposed to be August
18 -- or scheduled to be in August and again in October. And that
19 first date, August 6th through the 17th, is when we're first
20 loading eggs into the incubators and they're very fragile until
21 they eye up. That's about two months in time. And so that
22 would extend -- and our main egg take extends into the first
23 part of October often and so the eggs are a very fragile state
24 at the -- at that point. And so like I said, even at 5,000 feet
25 a sonic boom directly over the canyon would be detrimental.

[REDACTED]

N0010

[REDACTED]

25 MR. PETERSON: My name is Tony Peterson, P-E-T-E-R-S-O-N.

[REDACTED]

N0010

1 I represent Paxson Lodge. I'm also the President of the
2 Community of Paxson. My concerns mostly are the effect on
3 tourism along with this lodge being as old as it is the sonic
4 booms, the possibility of blowing out windows and guests being
5 in the rooms. If a window was to shatter the impact on that
6 guest as well. These are single pane windows. This lodge is
7 old. It's been here forever. It's been in this area since
8 1904, this lodge has been here since 1946.

9 The hatchery is also a concern. The hatchery provides the
10 salmon not only for this area, but like Gary said, for the
11 entire northeast mar -- or northwest market and around the world
12 actually.

13 The drop in altitude to 500 feet above ground level will
14 also impact the hunting for this area as far as I am concerned
15 and it will also impact the industry that we have where we have
16 people coming to stay here and stay at this lodge and in this
17 area and provide business to not only myself but to Myers (ph)
18 Lake and to Mr. Bakewell's Denali Cabins. This area -- I am --
19 I'm for the military training and having the ability to train
20 and to provide these maneuver -- or to do these maneuvers, but I
21 do not believe that the Paxson area is an area that is
22 susceptible to these maneuvers. There's plenty of area to the
23 north. Expand the Yukon River. Yukon River there is little to
24 no inhabitants. I understand that you need the geographical
25 with the mountains and that for your training, but Pax -- the

N0011

[REDACTED]

11 MR. SCHANDELMEIER: John Schandelmeier, S-C-H-A-N-D-E-L-M-
12 E-I-E-R. I'm chair of the.....

13 UNIDENTIFIED MALE: You need to.....

14 MR. SCHANDELMEIER: Did you get it? You didn't get it?

15 UNIDENTIFIED MALE: (Indiscernible).

16 MR. SCHANDELMEIER: S-C-H-A-N-D-E-L-M-E-I-E-R. I'm a
17 Paxson resident, also a resident McClaron (ph) River, Chair of
18 the Paxson Fish and Game Advisory Committee. And my comments
19 are kind of based on this same thing everybody else is here.
20 It's -- low level training is a negative impact for this area,
21 the whole Nelchina Basin actually. It's the highest use
22 recreational area in the interior of Alaska or one of the
23 highest in southcentral I guess it would be if you want to call
24 it southcentral instead of interior. Seems like could have
25 picked a better area, a lot less impact, lot less controversy.

[REDACTED]

N0011

■

1 The solution I have if you're stuck on this area is no fly
2 zones, 10 mile radius around Paxson, Tangle Lakes, McClaron (ph)
3 River, wherever else is a concern, wherever there's people. If
4 you have the no fly areas around those it seems like that solves
5 a lot of problems as long as you can keep people out of those
6 areas. And that seems to be a concern because right now
7 Paxson's supposed to have aircraft at 18,000 feet and no lower.
8 We certainly do. We have their right on the deck at times. So
9 like to see that -- some -- the way to monitor that, again, is a
10 no fly zone at all, you don't have to worry about it, their
11 altitude. So that's the solution that I see and other than
12 moving the whole MOA out of here and putting it somewhere else
13 where there's less people that's it. Thank you.

■ [REDACTED]

[REDACTED]

N0012

[REDACTED]

15 MR. PETERSON: Tony Peterson, P-E-T-E-R-S-O-N. Again, I'd
16 like to enforce that I do support the training of our military,
17 but this area -- John Schandelmeier made a great point with a no
18 fly zone for a 10 mile radius. However, the entire Gulkana (ph)
19 River, Gakona (ph), Gulkana (ph), the entire system that is
20 supported not only by the hatchery but the wild sockeye and, as
21 they said, that they are so fragile for that 120 days out of the
22 year even in the wild stock. That loss would be a magnitude
23 that I could pretty much assume would be unimaginable. It would
24 devastate the commercial fishing, it would devastate the
25 personal fishing and it would devastate the subsistence fishing

[REDACTED]

N0013



■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]

5 MR. PETERSON: Tony Peterson. As to the expansion area of
6 MOA 3 Paxson the suggestion would be to put a three mile
7 corridor to the east of the Gakona (ph), Gulkana (ph) River and
8 three miles west of the.....

9 UNIDENTIFIED MALE: Now (indiscernible) rivers. They all
10 start (indiscernible).

11 MR. PETERSON: Gakona, Gulkana. And three miles to the
12 east as well with a ceiling of 10,000 feet -- this area would be
13 open to 10,000 feet and above for exercises. The way to
14 designate this as a no fly zone is to put this as a kill zone
15 during activity. If they drop below 10,000 feet in this area,
16 in this no fly zone, then they would be essentially terminated
17 as far as the exercise goes.

■ [REDACTED]
■ [REDACTED]

[REDACTED]

N0014

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0014	John Schandelmeier	Chair	Paxson Fish and Game Advisory	Cumulative Impacts, Cultural Resources, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxson MOA	Paxson Fish and Game Advisory Committee strongly opposes the new proposed Paxson MOA. Sonic booms will adversely affect the largest Sockeye salmon hatchery in the world in time periods when they are the most vulnerable. We urge that a 20 mile wide corridor be implemented where there is no air traffic what-so-ever. 10 miles either side of the Richardson Highway. Frequent violations of current MOA's have convinced us that the Air Force is either unable, or unwilling to monitor it's own activities. We also ask for the same restrictions along the Denali Highway corridor. thank you, John Schandelmeier, chair

N0015

■ [REDACTED]

13 MR. MULFORD: My name is Robert Mulford, M-U-L-F-O-R-D.
14 I'm a local organizer for Veterans for Peace. In the counsels
15 of government we must guard against the acquisition of
16 unwarranted influence, whether sought or unsought by the
17 military industrial complex. The potential for the disastrous
18 rise of misplaced power exists and will persist. We must never
19 let the weight of combination endanger our liberties and
20 democratic processes. We should take nothing for granted. Only
21 alert and knowledgeable citizenry can compel the proper
22 messaging of the huge industrial military machinery of defense
23 with our peaceful methods and goals so that security and liberty
24 may prosper together. President Dwight David Eisenhower in his
25 farewell address to the nation, January 17th, 1961.

[REDACTED]

N0015

■

1 I appreciate the courage of you men in uniform. I wore
2 the uniform myself. I was never in combat, but I appreciate
3 your courage. I understand -- I do understand your courage, but
4 I want to speak real briefly about the courage of another man
5 and another type of courage. Three weeks ago I attended a pre
6 court-martial hearing of a young PFC who exhibited a different
7 kind of courage. I only hope that down the road if you men
8 realize -- come to realize that the misplaced power, the
9 disastrous rise of misplaced power is not only a potential, but
10 it exists in these technologies and these policies that are
11 based on these technologies. That you find the courage within
12 yourself to do much the same thing that that brave young PFC,
13 Private Bradley Manning (ph), did and help save this country
14 from this disastrous rise of misplaced power. Thank you.

■ [REDACTED]

[REDACTED]

N0016



10 MR. MCGREGOR: Oh, okay. Dan McGregor, M-C-G-R-E-G-O-R.
11 As we reported, with Denali Air. Primarily focusing concerns on
12 areas basically out the Nenana River Valley and glaciers
13 surrounding the Mount Devera (ph) area. There are right now two
14 main operators that spend a lot of time, but there's more,
15 Atkins Flying Service in different areas, different companies
16 that fly out there with regular routine flights out that area
17 doing landings, being on the glaciers. The concern was low
18 level traffic in that area affecting that commercial status and
19 the ability to make money and of course safety concerns with
20 fast movers and very slow movers, being us, on wheel skis and
21 different things. So I just wanted to mostly go on record that
22 that was brought up in concern.

23 A lot of the areas focus more under the Fox 1 MOA, which
24 is not going to be an issue as long as that surface ceiling goes
25 down to -- or stays above 5,000 AGL. Any change to that in the



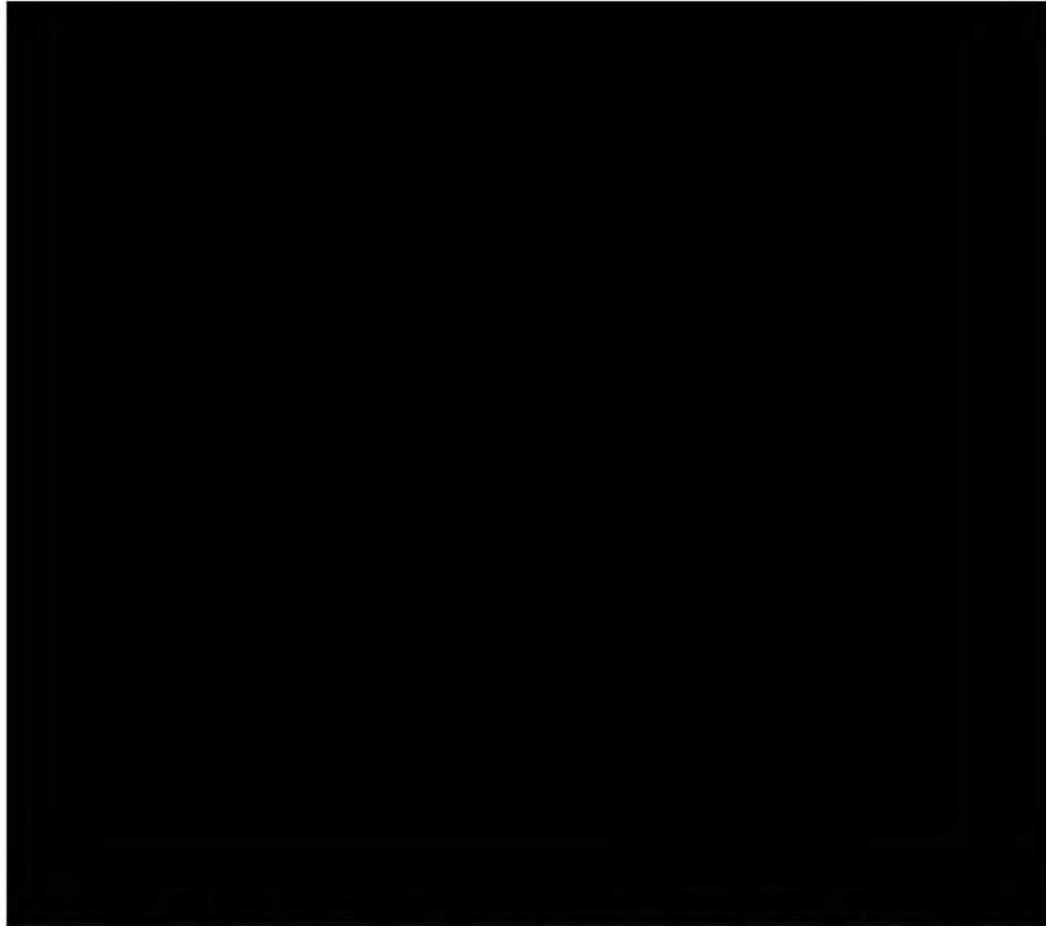
N0016

1 Fox 3, that 500 feet. I understand the need for training at
2 that low level and that's of value. It's a drastic change and
3 that's one of the things that concerns us I guess is the severe
4 change in that from 5,000 down to 500. Most of the glaciers
5 that we are flying into are going to be out of that realm, but
6 there are some and there's transit areas where we cross that --
7 through that. It's very difficult without being able to get in
8 contact and alert the MOAs. I think radio repeater -- as I
9 understand it, the radio repeater or the alert systems through
10 the radio traffic is not quite operational yet and the funding
11 is in place, but those aren't at full capacity yet I guess for
12 us to be able to update or get updates on any MOA traffic while
13 we're in the air as far as I understood and I can find out more
14 on that later.

15 But in general I just wanted to have it known that there
16 is commercial traffic out there. We do fly out there regularly
17 and if that is taken into account that would be a good thing to
18 have noted. That's it.



N0017



19 COLONEL WEISS: Thank you very much. Mr. Adam White.

20 MR. WHITE: Thank you. Name is Adam White serving as the
21 President of the Alaska Airmen's Association, last name spelled
22 W-H-I-T-E. First of all, I want to thank the military for your
23 efforts in educating the public. I've learned an awful lot
24 about the way our government operates and this whole NEPA
25 process. Appreciate your patience as you have been educating me



N0017

1 and a lot of our constituents and members and thank you for your
2 efforts and your time for that.

3 A couple of areas that I wanted to comment on tonight.
4 We, especially here north of the Alaska Range, have really
5 appreciated and enjoyed the safety and the peace of mind of
6 having access to the SUAIS Service, the Special Use Airspace
7 Information Service. That has been a tremendous help in us
8 transiting the area that you guys use for your operations. It
9 has helped de-conflict our passage through that area and from
10 what I hear from your direction back towards us you appreciate
11 having the knowledge where we are and when we're going to
12 transit that area.

13 I would like to encourage you to expand that system, and I
14 know that's been talked about, but especially with the proposal
15 for the Fox MOA expansion and the Paxson MOA. The most coverage
16 we could have down there the better and it would -- from our
17 perspective if the coverage is not there or if a certain
18 repeater may be out of service consider mitigations for not
19 using the lower level, lower strata of that airspace when the
20 communications may not be available for any given time. Because
21 we've had such great success with that service we would like to
22 see it implemented actually nationwide to be honest with you.
23 And we know that there's a couple of other areas in the U.S.
24 where they have similar type systems, but knowing the success
25 that we've had here we especially want it implemented statewide

N0017

1 and especially in these lower altitudes where the potential for
2 conflicts exist.

3 One of the things, that as the Airmen's Association we try
4 to make sure that we're up to speed and aware of what's going on
5 not just with this particular procedure and policy change, but
6 with other areas that the military's acting as well as how that
7 interacts with the FAA. And it's not an easy task, but some of
8 the things that we've talked about previously, the moving of the
9 F-16s from Eielson down to JBER and how that might affect some
10 of your proposals and want to make sure that that's at least
11 considered or talked about during some of these areas.

12 Looking at my notes here. As we brought up earlier, with
13 the UAV corridors and the lack of definition from the FAA about
14 your ability to operate these vehicles in the national airspace
15 system, want to make sure that if your proposal for the
16 realistic live ordinance does include connecting R-2211 and R-
17 2202 that you would not be limited to using that airspace for
18 what it was specifically requested for. But since that airspace
19 would potentially be there it would be better to be able to use
20 it for multiple uses, including the UAVs.

21 Question that we also have that -- not sure that it's been
22 dealt with sufficiently is the use of Fort Greely and class
23 delta airspace there with the potential for traffic to possibly
24 decline in that area and the potential for that no longer being
25 a full-time type operations, what would that do for some of the



N0017

1 transit areas through that area as far as general aviation and
2 civilian traffic. One of the things that has been brought up
3 numerous times by our members.....

4 COLONEL WEISS: Sir, you've.....

5 MR. WHITE: Okay.

6 COLONEL WEISS:you've taken up four minutes at
7 least.

8 MR. WHITE: Okay.

9 COLONEL WEISS: (Indiscernible).

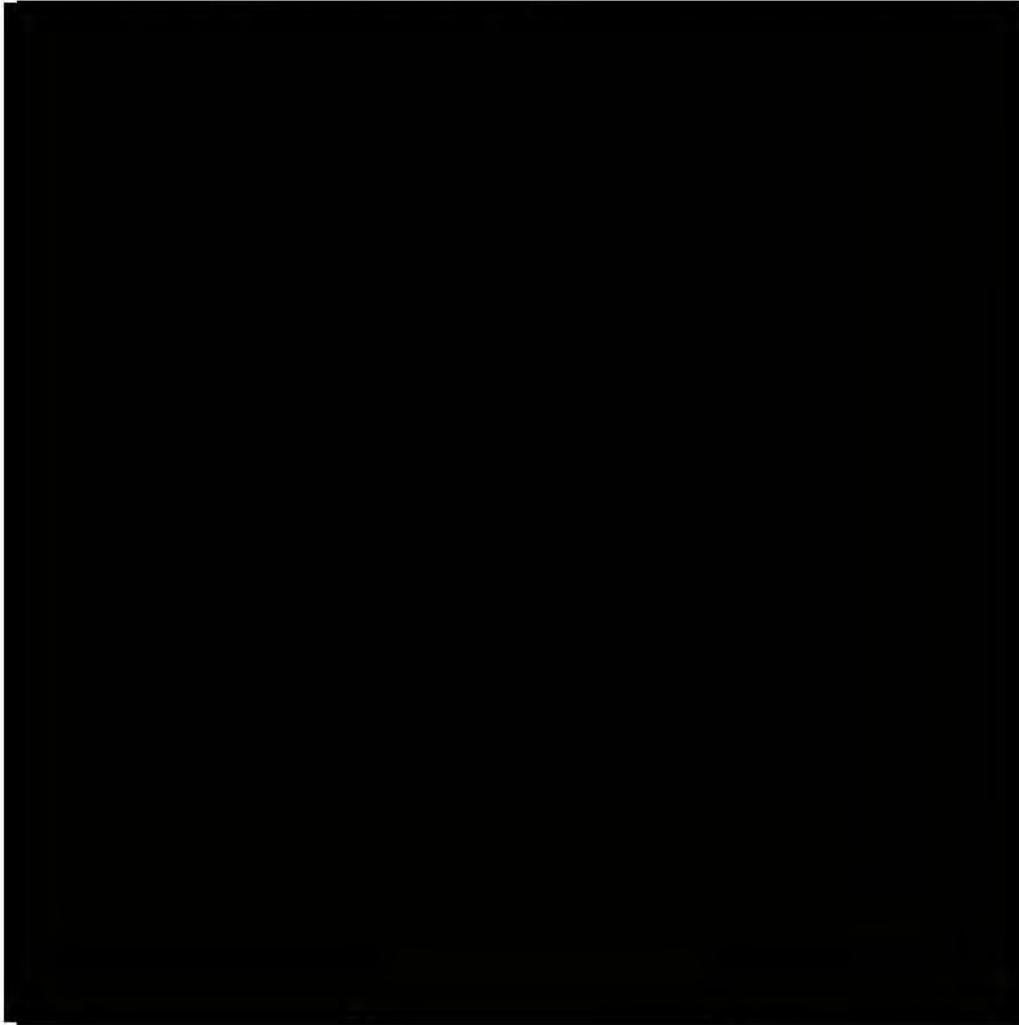
10 MR. WHITE: Sorry about that. One of the things that's
11 been brought up by our members is the narrow slot that would be
12 available to transit up the Richardson Highway and the
13 possibility of possibly shaving some of the eastern boundary of
14 2202 if the restricted area is approved over the battle area
15 complex to give us a little more breathing room to transit that
16 area and de-conflict with opposite traffic. That is a heavily
17 traveled area, especially in low weather, because we tend to
18 follow low terrain and we need as much room as we can. Also
19 understanding that if it's bad weather chances of you having
20 live weapons release from an aerial platform in the battle area
21 complex is probably pretty limited.

22 But here again, we're dealing with an education issue of
23 our constituents. They see an area on a map. Unfortunately
24 they don't always research it to the point to realize that it's
25 only activated during certain times and that's an education

N0017

1 issue that we constantly struggle and deal with and ask for your
2 patience on especially.

3 And I guess that concludes my oral statements and
4 encourage you to look for a written statement before the
5 deadline of June 7th. So thank you.



N0018



421 Aviation Way
Frederick, Maryland 21701

T. 301-695-2000
F. 301-695-2375

www.aopa.org

May 23, 2012

ALCOM Public Affairs
9480 Pease Avenue
Suite 120
JBER, AK 99506

Re: AOPA requests for extension of Comment Period for the Draft Environmental Impact Statement for the Joint Pacific Alaska Range Complex

To Whom It May Concern,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 general aviation members nationwide, requests a 60 day extension to the comment period slated to close on June 7, 2012 for the Draft Environmental Impact Statement (DEIS) for the Joint Pacific Alaska Range Complex (JPARC) comment period.

Based on AOPA's participation during recent DEIS public meetings and the complexity of concerns raised by both the aviation industry as well as local communities impacted by the JPARC proposed changes, the current 70 day comment period is inadequate to allow for a comprehensive review and public input. The sheer volume and complexity of the JPARC initiative would typically necessitate a minimum of 90 days for public comment and while recognizing the military's desire to move ahead and remain on schedule, attempting to aggressively move forward without ample public review opportunity seems to negate the true spirit of the National Environmental Policy Act (NEPA).

AOPA strongly suggests the Department of Defense offer an additional 60 days for public review of this complex and lengthy DEIS to ensure the public is offered time to provide substantive comments on the potential consequences of the proposed actions. While understanding the desire to adhere to a schedule and budget, there is no substitute for allowing an adequate and thorough public comment period - especially when the DEIS public comment meetings overlapped with a number of already scheduled community events precluding the public from participation at these public meetings.

AOPA looks forward to an extension of the comment period to allow for a thorough public review opportunity and to allow the aviation community and public to provide substantive feedback on this complex DEIS.

Sincerely,

Heidi J. Williams
Vice President
Air Traffic Services and Modernization

AIRCRAFT OWNERS AND PILOTS ASSOCIATION



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100 Cushman St., Suite 102 | Fairbanks, Alaska 99701-4665
ph (907) 452-1105 | fax (907) 456-6968 | www.FairbanksChamber.org

N0019

May 10, 2012

Lieutenant General Stephen L. Hoog
Commander, Alaskan Command
9480 Pease Avenue, Suite 110
JBER, AK 99506-2101

Dear Sir:

The Greater Fairbanks Chamber of Commerce (GFCC) would like to respectfully request the extension of the comment period for the Joint Alaska Pacific Range Complex (JPARC) draft Environmental Impact Statement (EIS). We would like to recommend an additional 60 days which will allow for further comments and analysis based on recent USAF proposals and basing decisions at Alaskan installations.

The Air Force, by its force restructuring action, which is not considered in the current EIS draft, of shifting the Eielson F-16s, associated military, and civilian personnel to JBER has created undetermined impacts on Alaskan air space and Alaska's population. These changes are more than sufficient to warrant an extended period for analysis and comment by the local governments, businesses, organizations and individuals potentially affected by, as yet, unidentified impacts on Alaska's land, water and air space.

The GFCC has a longstanding relationship with the military in Alaska and supports the military's involvement in the Interior in several ways. In 2012 the Chamber's Board of Directors and Military Affairs Committee adopted "Continue to Strengthen the Military Presence in Interior Alaska" as one of its most important priorities. We understand the importance and strategic advantage that JPARC offers for a variety of military training opportunities. However, for the reasons stated above we believe this 60 day extension is warranted.

Sincerely,

Lorna Shaw
Chair, Board of Directors

Steve Lundgren
Chair, Military Affairs Committee

Lisa Herbert
Executive Director

INVESTORS

DIAMOND

BP Exploration
ConocoPhillips
ExxonMobil
Fairbanks Daily News-Miner
Fairbanks Memorial Hospital &
Denali Center
Flint Hills Resources Alaska
Mt. McKinley Bank
Santina's Flowers & Gifts

PLATINUM

Alaska Pipeline Service Co.
Carlson Center
Doyon, Limited
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GCI
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Northrim Bank
Sumitomo Metal Mining Pogo LLC
Usbelli Coal Mine

SILVER

ACS
Alaska Airlines
Alaska Railroad
Alaska USA
Dr. Christopher Henry – Henry
Orthodontics
Everts Air Cargo, Everts Air AK
Exclusive Paving/Univ. Redi-Mix
Fairbanks Natural Gas
Flowline Alaska
Fountainhead Hotels
General Teamsters Local 959
GVEA
Hale & Associates, Inc.
JL Properties, Inc.
Key Bank
Personnel Plus
Shell Exploration & Production Co.
Sprint of Alaska FCU
Tanana Valley Clinic
TDL Staffing
Totem Ocean Trailer Express, Inc.
Tower Hill Mines-Livengood Gold
Project
University of Alaska Fairbanks
Verizon Wireless
WAL-MART Stores, Inc.
Yukon Title Company



N0020

[REDACTED]

From: Corky [REDACTED]
Sent: Wednesday, May 30, 2012 8:24 PM
To: ALCOM J08 Admin Box
Subject: JPARC
Attachments: MOA LLCNPC.docx; MOA Letter Matthews 2.docx

N0020

LAKE LOUISE COMMUNITY
NON-PROFIT CORPORATION

May 30, 2012

To: ALCOM Public Affairs
Subject: MOA Expansion

The Lake Louise Non-Profit Corp. (LLCNPC) represents the 245 homes and cabins in the Tri-Lakes area. With the exception of a few owners, the Community is opposed to the expansion of the FOX 3 and Paxson MOA.

Residents have expressed many different reasons for their opposition: low level military aircraft pose a hazard to civil aircraft, disturbance of nesting birds and waterfowl, disturbance of caribou calving, excess noise, fire hazard, use of State lands when the majority of Alaska land is held by the Federal Government.

The Lake Louise area has been chosen by residents because of its beauty, quiet, clean water, and wildlife. Had they wanted air traffic, their property would have been selected next to an airport.

Five hundred AGL operations are totally unacceptable and the LLCNPC wants to go on record as strongly opposed.

Sincerely;

Beverly Matthews, President

HC 01 Box 1684b
Lake Louise Road
Glennallen, Alaska 99588

N0021

From: Barney Lowe [REDACTED]
Sent: Friday, June 01, 2012 6:30 AM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex (JPARC) proposed changes

As a former military aviator and currently a civil aviation user I feel this is a good example wasted federal dollars and valuable military assets. This whole project is not needed. It appears to be an EMPIRE BUILDING PROJECT which I oppose.

Thank You
Barney Lowe Mgr
Pico Aviation
Del Rio, Tx

N0022

1

ALCOM PA,
9480 Pease Ave.
Suite 120
JBER, AK 99506
June, 6, 2012

Dana L. Olson

RE: Moderation and Enhancement of Ranges, Airspace, and Training Areas

On behalf of the AmberLake North Homeowner's Association, who won, material sites, for the prosperity of its creation by the DNR, the position is that we object.

We were created for public purpose and mission. We have had past experiences, of being excluded from consistencies reviews in coastal consistencies, due to re-drawn boundaries. We have had plane crashes, not addressed by the DNR, to the satisfaction needed. We can not be subject to political whim, because there is a record establishing the objectionable nature is ruled under a recreational standard, such as when opposing the loss of Oil Well Road, for keeping animals protected in the corridor called Alaska Wild Rivers; before the Alaska legislature (by testimony).

The State has a whistle blower statue, but only for state employees. This makes the EIS deficient on its face, because there are unsettled land claims in our area. If the State has not reconciled, the tentatively transferred federal land to the state, and notices have been ignored because of the whistleblower statue and employees, who do not have confidence in their job security.....the region known as Amberlake/ Amberlake North; humbly respects removal, from your consideration.

Creating titles on non recognized parties, before claims are settled, makes this region unsuitable for your or the nation's needs.

Peer review is deficient under an engineering standard, because this past semester, peer review demonstrated that buildings do not implode by fire intensity, because the quantum physics properties recognize the second property of thermodynamics. That property has fire reversing on its self, and is seen. The necessity does not call for an EIS.

The idea that you can use quantum physics, and I can get academically punished, is ground, to file a complaint. Who am I going to complain to?

When a student desires to know the truth and the truth is structured to support social sciences only, I object under science.

Until the President of the United States decides the land Claim issues, decisions concerning who owns what, will cloud your efforts. I applaud your science, but I am

N0022

2

bound to a rock geology standard, that is suppose to give the prevailing notice or approval. While those who seek to discredit me, my work is on Eimendorf, and Eielson ABF.

Sincerely in objection,
The folks and dissents in the AmberLake/ AmberLake North region
Dana L. Olson



Dana L Olson
June 6, 2012
by fox and mail (hard copy)

N0023

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0023	Dwayne King	Director	Kingdom Air Corps	1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>We at Kingdom Air Corps, mile 81 on the Glenn Highway are grateful for the opportunity to make comments to the Alaskan Command. We appreciate your desire to get public input, and we hope and pray that you take us very very seriously. I have over 15000 hours, and 45 years experience as a commercial pilot and flight instructor in this area of Alaska. Training dozens of people in the Glennallen, Chickaloon, Tok, and Bettles area. We make numerous flights to Fairbanks from our base at AK-59 King Ranch, operating 14 aircraft, 3 turbine helicopters, from our base north toward Fairbanks, Talkeetna and Paxson. My son, David King operates in the Alaska Range, especially in the Tangle Lakes area, with three helicopters, in mining operations. We oppose the expansion of the FOX MOA, because it endangers our people, our business, and our lifestyle. We have managed all of these years to be accident free, but an expansion of the MOAs, puts a greater risk on all of us. We're not authorities in military operations, how can we be experts in military operations? But we think it will be more risky for all of us. And for sure it will change the freedom that we have had all of our lives, hunting, mining, working, and flying in these areas that are proposed to become Military Operations areas. We fought the expansions of Federal lands for Parks, and have seen the encroachment of Federal rules upon us through the years. When we lived in Bettles, we opposed the massive Parks acquisition of The Gates of the Arctic; sitting in meetings and voicing our opinions. The same thing happened to us when we lived in Glennallen for eight years; just at the time the Wrangle-St Elias Park was established. We voiced our opinions and we never really got any good answers. They said it wouldn't effect public flying, but then we began to hear that they complained that we flew below 2000 feet above Park lands. We are the kind of people that are very supportive of our military. We really like the free lifestyle of Alaska. We like our guns, our hunting, flying low, gravel bar-hopping, and flying around the peaks. We take about 300+ people sightseeing at all different altitudes, in the Talkeetna and Chugach Mountains. I can't ever remember getting a response from these comment sections that we fill out. Does it really do any good to fill these out. We know our voices are being heard, but does it make any difference? Please respond. We are people who are seriously impacted by the expansion of military operations. Thank-you for listening, Dwayne King Director Kingdom Air Corps.</p>

N0024



*Executive Office
Telephone: (907) 265-2498
Facsimile: (907) 265-2312*

June 11, 2012

Lt. General Stephen Hoog
Alaskan Command & Joint Task Force Alaska
9480 Pease Avenue, Suite 107
JBER, AK 99506-2100

Dear Lt. General Hoog:

On behalf of the Alaska Railroad Board of Directors and our employees, I would like to express our support for the continued development and investment in the Joint Pacific Alaska Range Complex (JPARC). The JPARC Draft Environmental Impact Statement (DEIS) is a welcomed next step in a process that we hope will result in enhanced training opportunities for our United States Armed Forces.

As a state-owned corporation, part of the Alaska Railroad's charter is to support economic development and provide critical support services to our military operations. Our current project to build a bridge across the Tanana River near Salcha meets both requirements. This project is phase one of a multi-phased project called the Northern Rail Extension that will eventually build rail to Delta Junction. This will support future resource development, passenger service options for civilians and military personnel, and will connect the Fort Greely Army Installation by rail to all other major military installations and strategic port facilities in Alaska. In the short term, the Tanana Bridge will provide an important year-round transportation land link to the vast military training grounds encompassed in the JPARC area.

We are proud to be constructing a project that represents an important first step in modernizing and enhancing JPARC and we encourage the adoption of alternatives that continue building on this investment. JPARC is the largest military training range in the United States and is critical to securing and defending our nation.

The Alaska Railroad will continue to work with the State of Alaska, the Federal Government, the U.S. Military and the local community to help ensure we are providing the best support possible to the courageous men and women who defend our nation.

Warm Regards,

A handwritten signature in blue ink that reads "Linda Leary".

Linda Leary, Chair
Alaska Railroad Board of Directors

327 W. Ship Creek Avenue
Anchorage, Alaska 99501

MAILING ADDRESS
P.O. Box 107500 Anchorage, Alaska, 99510-7500

TEL 907 265 2300 FAX 907 265 2416
AlaskaRailroad.com

N0025

ALCOM Public Affairs
9480 Pease Ave, Suite 120
JBER, AK 99506

6/14/12

Dear JPARC Planning Team.

The following comments are submitted by the Alaska Quiet Rights Coalition (AQRC) as testimony concerning the Joint Pacific Alaska Range Complex Modernization and Enhancement Draft EIS, published March 2012.

As stated in the AQRC scoping comment letter of 1/31/11, AQRC is a statewide non-profit organization dedicated to protecting the important resource of natural quiet on our public lands for the benefit of all Alaskans, visitors, wildlife, and future generations. State surveys have shown that the majority of Alaskans cherish the beauty, peace and quiet of wild places, and consider that peace and quiet necessary and important to their lives. Natural Quiet is a natural resource that is an essential ingredient of wild areas.

AQRC reluctantly supports the no-action alternative, but has a strong preference for an alternative that would reduce the size of the existing MOAs, not leave them as they are or increase them. While AQRC is appreciative of the role of the military and the need for training to stay current, the proposal to, once again, expand the already enormous areas of MOAs and increase the training exercises with their accompanying noise, safety, and environmental degradation issues, sacrifices the quality of life that Alaskans cherish. It is also a major threat to wildlife resources.

Human effects:

Low altitudes to 500 feet are not compatible with acceptable civilian quality of life. Both Alternatives A and E include this level which was rejected in the past by both military and civilian reviewers and should be rejected now.

Noise created by military aircraft adversely affects rural and backcountry users. There are all kinds of recreationists along the Richardson and Denali Highways, cabin owners in the Lake Louise area, backpackers in the Talkeetna Mountains and near the Denali Highway, and hunters and fishers throughout the expanded areas being proposed. The mitigation suggestion of publishing times of training missions, as proposed, will not be sufficient to meet their many and varied interests and needs. Further, there are many homes and growing communities along the Glenn and Richardson Highways, and elsewhere in the Copper River Basin that would be negatively affected by either Alternative A or E.

The Draft EIS quotes various standard noise measurements such as the day-night average noise level and the FAA and EPA standards for noise safety. The FAA mission is airplane safety. The EPA standards address noise as it effects physical health. None of this is relevant. As is admitted in Chapter 3, noise is not experienced as an average and noise increase in quiet areas has greater impact than in less quiet areas. The impact of machine or ordnance noise is to remove peace and quiet. The Draft EIS Alternative A indicates that sonic booms would become much more frequent in Fox 3 and "would be expected to be considered significant." (3.1.2) According to the Draft EIS, in Alternative A subsonic noise under the Fox 3 expansion and new Paxson MOA would result in problems. "Overall, the relative (noise)change

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is high, and in quiet settings, these increases would be highly noticeable and cause potentially significant impacts on communities.” (3-79)

The Draft EIS describes the expanded Fox 3 and the new Paxson MOA as being over rural and sparsely populated areas, as if that made noise less of a concern. The opposite is true. The very value of those areas are that they are rural and sparsely populated and therefore a resource to be enjoyed and treasured. If the military judges the effect of its actions by the number of people adversely affected, then the judgement being made is that cities are to be saved and wild areas are appropriate sacrifice zones. Many Alaskan civilians see it the other way around. Cities and noise are expanding. Wild areas and natural quiet are shrinking and becoming progressively more valuable. Alaskans live here in this cold dark place because we value the wild and the peace and quiet above all.

Wildlife effects.

As AQRC has stated in the scoping letter, mammal mating, birthing, feeding, resting, and migrating have been shown to be sensitive to stress in different species at different times. Similarly bird mating, nesting, feeding their young, fledging, food storing for migration or winter, migrating or wintering have been shown to be sensitive to stress in different species at different times. Few, if any, windows of opportunity are available when air noise and/or ordnance will not have negative effects on wildlife. The Alaska Department of Fish and Game has written to you with concerns that both the low level flights and the large scale training could disturb all species. (March 1, 2011)

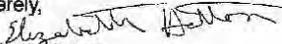
The Draft EIS Alternative maps show extensive overlay of Dall Sheep, Caribou calving, and Trumpeter Swan nesting areas. The EIS claims that effects would be short term based on a few studies in other areas. No reference adequately supports the claim that Alternative A with mitigation would have “moderate effects on wildlife and would not be measurable at the population level and not significant.”(3.1.8) No MOA expansion or decrease in flight altitude should occur before specific studies on the effect of various kinds of military noise on moose browsing, Dall sheep lambing in both the Alaska Range and Talkeetna Mountains, caribou calving in the northern Talkeetna Mountains, migration, nesting and fledging of water fowl, including Trumpeter Swan, are done.

For the above reasons, AQRC supports:

- No action alternative.
- No reduction in flight altitude levels.
- No increase in ordnance and training areas.

The perceived need to keep expanding air and training space to keep up with technology never ends. However, our land is finite. When will enough be enough? What volume of civilian outrage is sufficient to stem this inexorable take-over by the military asking itself if it should have more space and answering “More More More.”

Sincerely,


Elizabeth Hatton
Alaska Quiet Rights Coalition



N0026

[REDACTED]

From: McCaffrey, Melissa [REDACTED]
Sent: Wednesday, June 27, 2012 3:27 PM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS
Attachments: JPARC Comments 6-26-12 Final (1).pdf

To whom it may concern,

I am submitting the Aircraft Owners and Pilots Association's formal comments regarding the DEIS for the JPARC, a confirmation of the receipt of our comments would be greatly appreciated. Please feel free to contact me with any questions directly, thank you.



Melissa McCaffrey
Senior Government Analyst, Air Traffic Services
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June 26, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

Re: Draft Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace and Training areas in the Joint Pacific Alaska Range Complex

To Whom It May Concern:

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the Draft Environmental Impact Statement (DEIS) for the modernization and enhancement of ranges, airspace and training areas in the Joint Pacific Alaska Range Complex (JPARC). The U.S. Department of Defense (DoD) has proposed a significant expansion to the Joint Pacific Alaska Range Complex (JPARC) in support of military training. This complex, already the largest military airspace complex in the country occupies some 65,000 square miles of airspace over land, and 42,000 nautical square miles of airspace over the Gulf of Alaska. A series of proposals are included in the DEIS that would further expand this complex. It is imperative that aviation safety and access be preserved for civil users of the complex, given the importance of aviation for basic transportation in the state of Alaska.

Economic impact of civil aviation in Alaska

According to *The Economic Contribution of the Alaska Aviation Industry to Alaska's Economy*, by Northern Economics, Inc., the aviation industry in Alaska contributes \$3.5 billion, or approximately 8% of the gross state product. The fact that this is proportionately almost 40% greater than the industry's role in the national economy demonstrates the importance of the aviation industry to Alaska's economy. An estimated 47,000 jobs are directly and indirectly related to aviation in the state of Alaska. Given the importance of aviation to the state's economy, it is important that the proposed changes to the airspace do not harm this industry, or significantly limit access to resources in the state.

Proposed MOA Expansion

The proposed expansion of the Fox 3 Military Operations Area (MOA) is a significant increase both in lateral and vertical dimensions, lowering the floor from 5,000 feet above ground level (agl) to 500 feet agl. The area encompassed in the proposed expansion is frequently used by

AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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general aviation pilots and air taxi operators to support hunting camps and mining operations, conduct air tour operations, access recreational areas or make other uses of this region. Due to its proximity to the population centers of Anchorage, the Mat Su Borough and Fairbanks, where the airspace is heavily used by civil aviation, there would be an increased collision potential with high-speed military aircraft executing training maneuvers in the Fox 3 MOA airspace. Due to the importance of the proposed airspace area for access to the southern Alaska Range, Denali Highway and Talkeetna Mountains, and to minimize the risk of mid-air collision, expansion of the Fox MOA should be limited to no lower than 5,000 feet agl, and to the smallest possible lateral extent to minimize the risk of mid-air collision.

The DEIS includes the proposed Paxson MOA, which covers Isabel Pass and portions of the eastern Alaska Range. The pass is a major Visual Flight Rules (VFR) route which links northern Alaska with south central and south east regions of the state. Along the southern flanks of the Alaska Range are mining operations, recreational cabins, airstrips and lakes which experience high levels of use and are not compatible with high speed, low level military aircraft. While the concept of VFR corridors has been discussed, the variable weather in this area is not conducive to identifying a single corridor which tends to concentrate VFR traffic and increases additional potential for a mid-air collision risk. The proposed Paxson MOA should be limited to high altitude usage only, recognizing the importance of Isabel Pass, and the air traffic routes extending from the interior south to Gulkana and beyond for civil aviation.

Special Use Airspace Information Service Coordination

The creation of the Special Use Airspace Information Service (SUAIS) in the 1990's for portions of the JPARC has had a positive impact on VFR usage of the current airspace complex that extends across an area over 300 miles wide. In areas where there is adequate communication and surveillance, this has greatly improved the situational awareness for both civil and military airspace users. Pilots have reported that in the eastern portions of the complex, communications are not adequate and they are experiencing difficulties with the mix of civil uses and military training activities.

Any expansion of MOA airspace must have accompanying radio coverage, staffing and other elements of the SUAIS infrastructure to allow civil pilots to communicate with Range Control during times that MOAs are active. It is also essential that the tape recorded message broadcast during hours when Range Control is unmanned, be more uniformly broadcast across the JPARC complex. While the current language in the DEIS indicates that "funding will be pursued," given that we still do not have adequate communication in the existing airspace this is not ample assurance that infrastructure will be provided. It is essential that funding be allocated for the addition of radio repeaters, staffing or other infrastructure costs to provide sufficient coverage for any expanded airspace. This infrastructure should be installed and operational before any additional airspace is approved.

IFR Access to MOA airspace

Instrument Flight Rules (IFR) access is essential to improving access and aviation safety between Alaska's communities, including those that are under the MOA airspace already contained within the JPARC. Expansion of T-Routes and WAAS approaches are providing this

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access under a wider range of weather conditions, adding to the benefits of the IFR system. Those benefits are seriously degraded by expansions of MOAs that preclude IFR access for all but emergency or Lifeguard flights. AOPA requests that no additional MOA airspace be added to this complex until provisions are made to provide real-time IFR access through active MOAs. While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities both inside and adjacent to MOA airspace given the critical role aviation plays in the Alaskan transportation system. For example, an aircraft needing to fly from Fairbanks to Tok would normally make a relatively direct 158 nautical mile flight along the airways. When the Delta MOAs are active, aircraft are re-routed, increasing the distance around the airspace to 450 nautical miles, a 2.8 times increase in distance. Due to the huge size of this MOA complex, lacking the ability to cross them using the protections of the IFR system is a significant safety as well as economic impact on the aircraft operators, and the customers that pay for the increased operational cost.

The relatively low volumes of IFR operations suggest that the impact to military training of supporting IFR access would be minimal. As more military actions across the globe are conducted around civil flight operations, learning how to dynamically allocate airspace will also help the military “train like they fight.” The JPARC provides an ideal test bed to develop this capability, which will require cooperation with the FAA and military agencies.

Proposed Battle Area Complex Restricted Area

The proposal to establish restricted airspace over the Battle Area Complex southeast of Delta Junction is of particular concern to the civil aviation community. Existing Restricted Area 2202 to the west already forces civil traffic out of the most desirable terrain route to and from Isabel Pass, a major VFR corridor connecting the northern half of the state to south central and south eastern Alaska. Winds and highly variable weather associated with the Alaska Range and the mountain pass make it impractical to confine civil traffic to a single, narrow corridor in this area.

AOPA opposes the addition of restricted airspace as proposed in this area, given the need to access the mountain pass, unique weather and terrain, and presence of existing restricted airspace. We suggest the military seek other means to allow training to take place, such as the controlled firing area used today, where firing is halted when a civil aircraft enters the area.

Realistic Live Ordinance Delivery

The proposals to establish restricted airspace for live ordinance delivery impact access between Fairbanks, Delta, the Richardson Highway corridor and the recreational and mineralized areas in the Alaska Range to the south. Existing Restricted Areas R2211 and R-2202 already inhibit air traffic attempting to transit the airspace. Connecting these two restricted areas would create an overall barrier to access in this area; AOPA would like to see effective mitigation to address these concerns.

Remotely Piloted Aircraft/Unmanned Aerial Vehicle corridors

The DEIS proposes establishing restricted airspace corridors for the purpose of navigating Remotely Piloted Aircraft (RPA)/Unmanned Aerial Vehicles (UAV) from military airfields into various restricted airspace areas. There is no doubt that unmanned aerial vehicles play an

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important role in today's military, and that training is required. Integrating these vehicles into the National Airspace System is currently a topic of discussion at the national level. Restricting civil airspace to accommodate UAV transits next to the second largest air transportation hub in the state is a concern for the civil aviation community.

The FAA has consistently denied the addition of new restricted airspace areas for the sole purpose of RPA/UAV operations or for anything other than hazardous activity since Restricted airspace is for containment of hazardous operations. En-route RPA/UAV flights transitioning between the Eielson Air Force base and existing restricted airspace is not a hazardous operation. The proposed establishment of restricted airspace corridors for this purpose is an attempt to circumnavigate the RPAs/UAVs inability to see-and-avoid participating traffic. While awaiting development of a true sense-and-avoid capability that will allow full integration of unmanned aerial vehicles into the National Airspace System, we must rely on other means to separate unmanned from manned aircraft without segregated airspace. The corridors that are proposed would clearly interfere with the safe and efficient access between Fairbanks, the Richardson Highway Corridor and the Alaska Range.

F-16 Relocation Proposal

While not identified in the JPARC Draft EIS, announcements in the press have communicated an Air Force plan to relocate the F-16 squadron, currently based at Eielson Air Force Base in support of military training activities, to Joint Base Elmendorf Richardson (JBER). The stated purpose of the proposed move is to reduce operating costs. Statements in the Draft EIS indicate that part of the justification for expanding the FOX MOA airspace to the south, is to reduce operational costs of training exercises, by lowering the amount of fuel required to reach the training airspace from JBER. These two statements seem to be in conflict with one another. It is also not clear what the impact of relocation of the F-16 squadron might have on airspace and the corresponding civil facilities in Anchorage, including Anchorage International Airport.

Given the conflicting nature of these two military proposals, it appears that the F-16 relocation cannot help but influence the cumulative impact of the overall JPARC proposal. More analysis of this plan by the military with presentation to the public is required to understand the true impact on this development to allow informed public comment.

Fifth Generation Fighter Jet Statement Inconsistent

AOPA has concerns with a portion of the JPARC document "description of proposed action and alternatives", Section 2.0, 2.1.1 Fox 3 MOA Expansion and New Paxson MOA which states, "...as the fifth generation of U.S. fighters (F-22 and F-35 aircraft) are developed, fielded and deployed in combat, pilots will need to train in the skills and tactics appropriate for these aircraft within an airspace best configured for such training." This statement is in direct contrast with the United States Air Force (USAF) F35A Training Basing EIS, Airspace and Range Use, F-35A, which states, "...flight activities would take place in existing airspace; no airspace modifications would be required for any of the scenarios."

It remains unclear whether the USAF is stating that the addition of fifth generation type fighters require additional airspace accommodations or they will be contained in existing airspace.

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AOPA would welcome clarification on this issue as these two USAF documents appear to be in conflict with one another. With the national implications inherent in this debate, AOPA opposes the creation of additional Special Use Airspace to accommodate new aircraft without further consideration of a “giveback” of airspace no longer needed.

Evaluation of other Alaska MOAs

While the DEIS proposals focus on expansion of the airspace in the core area centered on Eielson AFB, there are historical MOAs in other parts of the state that are defined as elements of the JPARC. Given the emphasis on reduction of operating costs, this is an appropriate time to evaluate the present uses of the Stony, Naknek, Susitna and Galena MOAs to determine if they are still required to meet modern training needs. No data was found in the DEIS on uses of these MOAs other than limited use data on the Stony MOA.

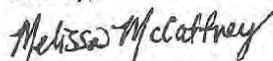
AOPA would ask the DoD to perform an analysis of existing and future uses of Stony, Naknek, Susitna, and Galena MOAs as part of JPARC to establish their continued need given the changes in training requirements, and need for operational efficiency described in these proposals. Results should be included in the final JPARC Environmental Impact Statement and shared with the public with an opportunity for comment.

Summary

AOPA appreciates the opportunity to submit comments on the DEIS for the JPARC and looks forward to working with the DoD on solutions that equitably accommodate both the military’s need for realistic training, and the needs of the civil aviation community.

We urge the military to work collaboratively with the aviation community on plans that incorporate more effective IFR coordination for transit through active MOAs and more reliable SUAIS implementation. Finally, we implore you to keep in mind that airspace, especially in the Alaskan Frontier, is the lynchpin that enables many small communities to exist. Any alteration to this vital resource must be approached with the utmost caution. Thank you and please contact me with questions you may have.

Sincerely,



Melissa McCaffrey
Senior Government Analyst
Air Traffic

N0027

[REDACTED]

From: b. long [REDACTED]
Sent: Thursday, July 05, 2012 3:27 PM
To: ALCOM J08 Admin Box
Subject: JPARC DRAFT EIS COMMENTS
Attachments: JPARC.doc

Attached here are the comments of the group Alaska Survival regarding the JPARC draft EIS Enhancement and Modernization.

Request that you acknowledge receipt of these comments.

Thanks,
Becky Long

N0027

PUBLIC COMMENT
MODERNIZATION AND ENHANCEMENT
DRAFT ENVIRONMENTAL IMPACT STATEMENT
JOINT PACIFIC ALASKA RANGE COMPLEX

7/4/12

BOARD OF DIRECTORS
ALASKA SURVIVAL
[REDACTED]

Alaska Survival is a Talkeetna-based nonprofit Alaskan corporation that seeks to protect the health of both people and the natural ecosystem by endeavoring to maintain the integrity of Alaska's land, air, and waters.

THE NO ACTION ALTERNATIVE: THE ONLY REASONABLE ALTERNATIVE

The JPARC military representatives have said that they cannot consider the No Action Alternative. Page 6 of the DEIS says that the status quo is not good enough for the modern and emerging weapons. There is no proof for this assumption beyond what JPARC says.

At the Talkeetna public meeting, we were told that if this expansion is accepted that there would be 2 supersonic sorties a day, 5 days a week with the potential for increased supersonic flights during training periods with other military from other countries. This will irrevocably change the public lands, the environment and the quality of life for those areas. People outside the areas will hear the sonic booms.

The April, 1997, Record of Decision for the final EIS for the Alaska Military Operations Areas diminished the Fox MOA by 910 square miles to its present location and raised the proposed minimum flight altitude from 3000 feet AGL to 5000 feet AGL due to undesirable noise impacts and to preclude the potential for direct over flight of sensitive resources. These were sensible decisions and should be retained as the status quo.

Much of the existing Fox 3 and proposed expansion is within the Mat Su Borough (MSB). The MSB is the fastest growing area in Alaska with the population expecting to double in the next 20-25 years. The expansion of Fox 3 and the creation of Paxson MOA would expand military operations southerly including the Talkeetna Mountains which are adjacent to the growing communities of Lake Louise, Wasilla, Palmer, Sutton, Chickaloon, and Glacier View. The Lake Louise area has approximately 80 year round residents with about 500 private

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property parcels. To do good planning, it must be assumed that these parcels will be occupied year round in the future.

We support the Lake Louise Community Non Profit Corporation and the Talkeetna Community Council in their concerns of the noise impacts on the local economy, lifestyle, wildlife, recreational use, and civilian aviation.

In the 15 years since the last EIS, the civilian use of the air and ground space in the Fox 3 and Paxson MOAs has significantly increased. There is more public use of the air space and the military must take this into consideration. These 2 areas are the breadbasket of Alaska, the heart of valuable natural resources that make Alaska what it is. Pristine public land, fish and wildlife resources, remote wilderness lifestyles, hunting, fishing, recreating, subsistence uses. This is what makes Alaska what it is. This is threatened by anything than the No Action Alternative.

SUPPORT MSB RESOLUTION 12-076

This Resolution was passed unanimously by the Borough Assembly 6/28/12, and it states our concerns succinctly.

Many MSB residents and visitors depend upon the airspace within the proposed expanded airspace for accessing the natural resource rich lands and waters below, for accessing private and public lands via aircraft, for commercial enterprise such as air taxi operations, outfitting, hunter/hiker guiding, operating lodges, operating mines, and for various non-commercial, recreation, and subsistence activities, such as hunting, hiking, food gathering, sightseeing.

The proposed airspace expansion would cover the Nelchina caribou herd calving grounds located within the MSB and the important Dall sheep lambing area/important ewe/lamb habitat in the Black Rapids Glacier and Mountain areas.

The proposed lateral and vertical expansions would increase the probability of conflict between civilian and military aircraft. The potential for near misses or midair collisions is significant and will impact general aviation pilots, air taxi pilots, and air charter pilots who use these areas for hunting, fishing and other recreational and subsistence activities traveling at low altitudes under Visual Flight Rules.

General aviation, air taxi, and air charter pilots flying under Instrument Flight Rules conditions would be prohibited from travel through an active MOA. The Richardson Highway is a major aviation transportation corridor for civil aviation traveling north-south.

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We agree with the MSB Assembly that the minimum flight training altitude should NOT be lowered to 500 feet for the Fox 3/Paxson MOA's due to potential impacts on wildlife, civilian aircraft traffic and recreational uses. In these MOA's, the Air Force must conduct all supersonic operations at or above 5,000 feet AGL or 12,000 feet MSL whichever is higher in order to reduce sonic boom intensity and its effects on the surface.

The Department of Defense must delineate and establish seasonal flight avoidance areas and overflight/operational restrictions over wildlife areas underlying any new or expanded MOAs consistent with the current restriction identified in the 1997 Alaska MOA EIS. These restrictions would include, but not be limited to, minimum overflight altitudes over wildlife areas, including waterfowl, raptor and other migratory bird nesting/breeding/concentration areas, Dall sheep lambing areas, caribou and moose critical season habitat areas. These should be reviewed, identified and expanded if necessary with the assistance of the Alaska Department of Fish and Game and the US Fish and Wildlife Service.

Time and area restrictions must be evaluated and established to ensure the public's use of the area and the sustainability of the natural resources. There should be NO Major Flying Exercises and overflight of popular subsistence areas, hunting, areas, campgrounds and trails (5000 feet AGL and half-mile lateral distance) during peak use periods between June 27-July 11, mid-August through September, and during other important hunting seasons determined by the Alaska Department of Fish and Game.

There must be detailed maps, aeronautical charts and information to the public especially in the communities near Fox 3 and Paxson MOA's that identifies flight corridors, restricted or closure areas and dates of training use.

CUMULATIVE IMPACTS

We disagree with the statement on page 13 of DEIS that the cumulative noise impacts that would occur where the twelve JPARC proposed action overlap would not be significant and would not create disproportionately high and adverse environmental or health effects. There is no data supporting this statement. We disagree with the statement on page 14 that no significant restriction to subsistence resources are expected from the cumulative effects of the JPARC proposed action, other DoD actions, and non-DoD actions.

There are 3 current and proposed actions and 1 legislatively designated area that did not make it to your list of cumulative impacts in the DEIS and must be considered.

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Proposed Susitna-Watana Hydroelectric Project

This is a megaproject that would develop a large footprint in the Fox 3 MOA. It is proposed to build a 700 to 880 foot dam at River Mile 184 of the Susitna River. There would be a permanent airport and a permanent road built. During the construction of the proposed project, there would be many airplane flights bringing workers and equipment into the area. In the next three years, there will be over 50 studies done in the area as part of the Federal Energy Regulatory Commission Licensing process and the NEPA process. The reservoir will be approximately 40 miles long by 2 miles wide and will be a focal point for increased human presence in the project area.

Mineral Exploration/Production in Fox 3 and Paxson MOA

There is active mineral exploration on claims by the company Pure Nickel's Man Alaska Project (2009-2014). These are 240 miles of claims on state land called the Denali Block as well as some on the federal Bureau of Land Management land. The production could be open pit or underground mining. Both methods involve waste rock dumps, tailing stacks and ponds, toxic dust from ore trucks, mine drainage, transmission lines, and access roads. This mineral exploration affects the same migratory wildlife, and the same recreational and subsistence resources of the JPARC expansion DEIS and has its own air and noise pollution negative impacts.

Denali Air Special Recreational Use Permit

Denali Air is requesting to be able to conduct scenic glacier landings by fixed-wing aircraft near Mt. Deborah on portions of the Yanert and Gillian Glaciers, with up to three departures daily from May 10 to October 10. Currently, BLM is conducting an Environmental Assessment.

Nelchina Public Use Area (NPUA)

The NPUA encompasses 2.5 million acres of state land in the Talkeetna Mountains and was established by the state legislature in 1985. AS 41.23.010 states that the mandate is to protect, perpetuate, and enhance the fish and wildlife habitat and the public enjoyment of such habitat by the activities of fishing, hunting, trapping, recreation, and additional public uses. In particular, the Nelchina Caribou calving grounds, trumpeter swan nesting areas, and habitats for Dall sheep and brown bear are to be protected. Under AS 41.23.020, the Alaska Department of Natural Resources is directed to adopt a management plan, but this has never been done. It has been managed for

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multiple-use under the guidelines of the 1985 Susitna Area Plan and now under the 2010 Susitna Matanuska Area Plan, currently under appeal.

Not enough attention is being given to the proposed JPARC expansion on this this legislatively designated area, which is vulnerable to project impacts because there is no specific management plan. This needs to be considered.

CONCLUSION

For all of the above reasons, we support the No Action Alternative, the status quo with the caveats discussed in these comments. We do NOT want Alaskan lives and lands to become a live-virtual-constructive range. This expansion creates a war zone type atmosphere in a state that treasures the pristine and spectacular public lands that underlie the expanded Fox 3 MOA and the creation of a new Paxson MOA.

Becky Long
Board of Directors

N0028

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0028	paul roderick	president	talkeetna air taxi	General (to the EIS), Airspace Management, Noise, Safety (Airspace), Safety (Ground), Land Use, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxson MOA	test not sure if these comments are submitting.

N0029

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0029	Arthur Hussey	President	General Aviation Association of Fairbanks International Airport	General (to the EIS), Airspace Management, Safety (Airspace), Infrastructure and Transportation, All proposed actions	<p>The General Aviation Association of Fairbanks International Airport works with approximately sixty pilots and businesses in promotion of general aviation in and around the Fairbanks International Airport area. In this context, we are pleased to submit comments on the proposed JPARC expansion. Key points of concern to our membership include: a) in light of the proposed relocation of fighters from Eielson to JBER, the expansion should be re-evaluated. It is likely that training requirements for Eielson based aircraft and airmen would substantially change if the relocation were to occur. b) The EIS should strongly re-examine the possibility of expanded SUAIS. This is needed because of the increased low level traffic the JPARC envisions, combined with frequent slow-moving VFR traffic in the area. c) The floors for the Fox MOAs should be re-examined and lifted from the 500 feet proposed to at least 2,000 feet. It should be noted that flight, even VFR flight, at less than 500 feet, as would be needed to remain away from active military operations, is hazardous and in some cases could be deemed illegal. d) UAV Corridors, while understandable for increasingly common UAVs, should not be constructed in such a manner as to significantly restrict access of general aviation aircraft, both VFR and IFR, to Fairbanks airport. It should be noted that there is significant General Aviation traffic on the east-west axis and that the UAV corridors, as proposed, would restrict that, placing higher requirements on fuel to be carried (due to more circuitous routings) or potentially reducing safety margins. e) Finally, the proposed Battle Area Restricted Area is of significant concern. As anyone familiar with the area knows, this Restricted Area would occur in a region of potentially high winds and varying visibilities. To confine the general aviation community to a single north south corridor could easily compromise safety. We ask that this new Restricted Area be dropped from consideration. In closing, the General Aviation Community appreciates the opportunity to comment on the EIS and looks forward to continued partnership with the military and other parties involved in this important discussion. Sincerely, Arthur Hussey President General Aviation Association of Fairbanks International Airport</p>

N0030

[REDACTED]

From: Megan Reilly [REDACTED]
Sent: Monday, July 09, 2012 6:40 PM
To: ALCOM J08 Admin Box
Cc: Deantha Crockett; Edward Hild; Jim Palmer - Staff to Murkowski ; McKie Campbell ; Tara Shaw; David Ramseur; Susanne Fleek; Chad Padgett; 'Erik Elam'; Governor Sean Parnell; Joe Balash; Kip Knudson; Randall Ruaro
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission
Attachments: AMA JPARC 07-09-2012.pdf

To Whom It May Concern,

Per Deantha Crockett, Executive Director – Alaska Miners Association, please see the attached comment response concerning the Joint Pacific Alaska Range Complex EIS.

Should you have any questions, Deantha Crockett can be reached at Deantha@alaskaminers.org or at 1-907-563-9229.

Kind Regards,

Megan Reilly
Office Manager
Alaska Miners Association
3305 Arctic Blvd., Ste. 105
Anchorage, AK 99503

[REDACTED]
www.alaskaminers.org

Cc:
Senator Lisa Murkowski
Senator Mark Begich
Congressman Don Young
Governor Sean Parnell

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ALASKA MINERS ASSOCIATION, INC.

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July 9, 2012

ALCOM PA
9480 Pease Avenue, Suite 120
JBER, AK 99506
www.jparceis.com

RE: Comments on Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement
– Draft Environmental Impact Statement

To Whom It May Concern:

Thank you for the opportunity to comment on this important proposal to expand the Joint Pacific Alaska Range Complex (JPARC). The members of the Alaska Miners Association will be severely impacted by this proposal.

The Alaska Miners Association is a non-profit membership organization established in 1939 to represent the mining industry in Alaska. The AMA is composed of more than 1400 individual prospectors, geologists and engineers, vendors, suction dredge miners, small family mines, junior mining companies, and major mining companies. Our members look for and produce gold, silver, platinum, molybdenum, diamonds, lead, zinc, copper, coal, limestone, sand and gravel, crushed stone, armor rock, and other materials. Our members live and work throughout the state including much of the area covered by the proposed expansion of JPARC.

We are pleased with some of the changes that have been made over previous alternatives but the current proposals DO NOT address the concerns expressed in AMA's letter of March 4, 2011 submitted during the scoping period for the DEIS. AMA noted that "Expansion of restricted airspace will greatly complicate the ability to develop mineral resources on state, borough, federal, and private lands, including Native owned lands. Much of the region covered by JPARC alternatives is remote and is accessible only by air." With the current DEIS proposal this statement should be changed to read "...will effectively close some State of Alaska lands to any use, including exploration and mining." Also, the DEIS does not adequately recognize the conflicts between low-level high speed military aircraft and helicopters and fixed wing aircraft used to access remote exploration and mining properties. The proposed changes in the DEIS will result in significant conflicts regarding access to and use of mineral lands. The DEIS significantly underestimates the potential conflicts and the impact on mining.

Specific comments and recommendations:

1. **Maximize the use of airspace above the 60% of Alaska that is federal land.** This recommendation was made in the AMA March 4, 2011 letter but we can discern no attempt to consider this approach. Most of the land under the proposed new and expanded MOAs is state owned and currently available for mineral exploration and development and much of this land has mineral potential and/or active mineral exploration and development.

The Alaska Statehood Act promised the State it could select and receive title to approximately 104 million acres out of the 365 million total acres in the State. However, before the State could complete its selections, Congress passed the Alaska National Interest Lands Conservation Act (ANILCA) which placed more than 100 million acres in federal Conservation System Units (CSUs) which included parks, preserves, refuges, monuments, "Wildernesses", wild and scenic rivers, etc. This Act removed these lands from the opportunity for selection by the state and removed them from all commercial development, including resource development. Much of

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these lands were highly prospective for mineral development. The current JAPARC DEIS would eliminate mineral development on portions of the now State-owned land that was not taken by ANILCA.

MOAs could readily be defined to overlay non-multiple use federal lands that are now in federal CSUs and this should be the very first step prior to expansion of any MOA or Restricted airspace.

2. Use a minimum 3,000 feet AGL base for military aircraft operating in Military Operations Areas (MOAs). The proposed 500 feet AGL would be unsafe and such restrictions would nearly eliminate the ability for exploration or for mining companies to access their claims or conduct mineral exploration using aircraft. Generally, mining companies operate their aircraft above 1000 feet AGL for safety and to minimize impacts on wildlife and other users. A 3000 foot AGL lower limit for military aircraft would provide a separation safety zone and reduce impacts on wildlife and other users.

Expansion of Fox 3 MOA to include a larger area and much lower altitudes would be a huge problem for the mineral industry. The current Fox 3 MOA primarily overlays the Alaska Range and Denali Highway from west of Tangle Lakes to near Cantwell and has a base of 5,000 feet AGL. The proposed geographic expansion would extend south to include much of the Talkeetna Mountains and east to encompass an area east of Tangle Lakes. The proposal would lower the entire expanded MOA to include the airspace down to 500 feet AGL. The expansion would encompass areas with previous mining and much of the 260 sqmi of mining claims that makeup the M.A.N. project. This project north and west of Paxson has received several \$10s of millions of exploration investment over the past 15 years and drilling continues today as this letter is being written.

The New Paxson MOA would extend east from the expanded Fox MOA to include the Richardson Highway corridor (including Isabel Pass) down to 500 feet AGL. This MOA includes much of the Alaska Range East of the Richardson Highway to approximately Mt. Kimball, including the Slate Creek (Upper Chistochina) mineral district. There is past mining in this area and there are currently several major exploration projects working here. To impose an MOA with a 500 foot AGL base would be a significant hardship for exploration and development.

The only feasible and environmentally acceptable access to most of the Fox 3 MOA and the Paxson MOA for exploration work is by helicopter and fixed wing aircraft.

3. The Special Use Airspace Information System (SUAIS) should be expanded to include the Fox 3 and proposed Paxson MOA and all other MOAs in the state.

4. Expansion of Realistic Live Ordnance Delivery (RLOD) must not be over State-owned lands. Currently these activities occur on and over federal land controlled by Department of Defense (DoD). The proposals include expanding RLOD areas onto a considerable acreage of state lands and some BLM lands not currently under DoD control. These lands are open to mining and under Alternative A include a small, active mining in the Portage Creek area in Little Delta River drainage. RLOD requires that lands included "safety controls necessary to exclude nonparticipating persons and aircraft from the WDZ when ordnance delivery training is taking place in the range training area and the associated air and ground surface areas are active". The areas would be used and the restrictions would be in place for "90 to 150" days (see page 2-10).

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Under DEIS Alternative A, the area of state lands subject to these restrictions is 163,000 acres (page 3-144) located Northwest of the Oklahoma Impact Area in the Donnelly Training Area (described in the DEIS as the expansion of Restricted Area 2202 to include underlying lands). As noted above, this area includes a number of state mining claims. Under Alternative B, 234,600 acres of state land are subject to restrictions, including an almost continuous strip of state land between the Tanana Flats Training Area (R-2211) and the Donnelly Training Area Fort Greeley (R-2202). If these restrictions were in place for 90 – 150 days, they would effectively eliminate other uses of these state lands, and specifically mineral exploration and mining. If the area was closed 150 days of the year, it would be impossible to conduct exploration or mining on the claims. If a mining operation did operate in this area, it would repeatedly be forced to suspend operations and evacuate workers which would be totally impractical. The Environmental Consequences section of the DEIS (Section 3.2) does not address this impact on mining. The proposal would preclude current mining and no new mining operations would be possible on this state land. This should have been assessed in Section 3.2.10.3.1.

5. Restricted airspace corridors for Unmanned Aerial Vehicles (UAV) must not extend lower than 3,000 feet AGL. The DEIS proposes to establish corridors where non-military aircraft would be prohibited (Restricted Airspace) when they are being used for UAVs. Several of these corridors bisect, and therefore would block, corridors commonly used by small aircraft, such as a corridor between Eielson AFB and the Tanana Flats Training Area (R-2211), Fort Wainwright to R-2211, and from R-2205 (Yukon Training Area) to R-2002 (Donnelly Training Area), all of which cross both the Richardson Highway and the Tanana River southeast of Fairbanks. The Corridors from Fort Wainwright to the Yukon Training Area (R-2205) and from R-2211 to R-2202 would also impact small aircraft traveling east and southeast of Fairbanks. According to Table 2-15, the corridors would be used approximately 238 days annually (2/3 of the year) and generally between 7 AM and 7 PM, Monday through Friday. The corridors are proposed to be 5 or 8 miles wide and from 1,200 feet AGL to 17,999 feet MSL.

These corridors would directly impact mining operations such as flights from Fairbanks to the Pogo Mine and flights from Fairbanks to the Fortymile Mining District. These Restricted Areas, when active, could result in very lengthy detours, at a minimum adding significant time and costs, and in marginal weather, creating a safety hazard by forcing pilots to deviate significantly from the most direct routes and often to fly over more remote areas and higher terrain to reach their destinations.

6. The Governor of Alaska, the Alaska Congressional Delegation and the Millennium Safety Foundation should be petitioned to get the Federal Aviation Administration (FAA) to formally define "see and avoid". A definition for what is meant by this term would eliminate the need for Restrictive airspace corridors for UAV operations. This is clearly the simplest solution for this problem.

7. Establish a 3,000 feet AGL base for the expansion of R-2205 (Yukon Training Area). This proposed expansion would establish restricted airspace from Eielson AFB to the existing restricted area R-2205 that overlies part of the Yukon Training Area. This alone would be a major problem, even if the UAV corridors were not established. The cumulative impact of the expansion of R-2205 and the proposed UAV corridors would be to restrict aircraft from traveling up and down the Tanana Valley.

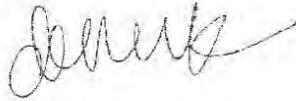
8. The restricted area proposed between the training area and Fort Greeley must have a base of or not lower than 3,000 feet AGL. General aviation must have the ability to fly the road system from the Glennallen north through the Delta Junction area and on to Fairbanks without

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encountering a restricted area. Inclement weather is often present in this area, especially between Glennallen and Delta Junction and not allow pilots to fly this route is guaranteed to result in the deaths of many Alaskans when they must fly other more dangerous routes.

Thank you for the opportunity to comment on this important issue. The Alaska Miners Association supports our military (a large percentage of our members are military veterans) and recognizes the need for realistic training but this training can be accomplished as we have recommended without compromising the limited areas of this state that are still open to mineral development.

Sincerely,



Deantha Crockett
Executive Director

Cc: Senator Lisa Murkowski
Senator Mark Begich
Congressman Don Young
Governor Sean Parnell

N0031

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0031	Rodney Arno	Executive Director	Alaska Outdoor Council	General (to the EIS), Subsistence, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>ALASKA OUTDOOR COUNCIL and Alaska Fish & Wildlife Conservation Fund 310 K Street, Suite 200 Anchorage, Alaska 99501 (907) 264-6645 aoc@alaskaoutdoorcouncil.com</p> <p>July 9, 2012</p> <p>Lt. General Stephen L. Hoog Commander, Alaska Command 9480 Pease Avenue, Suite 110 JBER, AK 99506-2101</p> <p>SUBJECT: Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement DRAFT Environmental Impact Statement (DEIS)</p> <p>RE: Alaska Outdoor Council (AOC) comments on (JPARC) Modernization and Enhancement (DEIS) Dear</p> <p>Lt. General Hoog:</p> <p>As Executive Director of the Alaska Outdoor Council (AOC) I have reviewed the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement DRAFT Environmental Impact Statement (DEIS) and attended a number of public and an individual meeting hosted by very knowledgeable JPARC staff. The Alaska Outdoor Council (AOC) is a statewide organization made up of individual members and clubs that hunt, trap, fish, and recreate outdoors primarily on public lands and waters. AOC represents over 10,000 Alaskans in the regulatory process regarding access to public lands, waters, and renewable resources that they depend on. AOC, and its parent organizations, has advocated for equal access by the public to public resources in Alaska since before Alaskan Statehood was approved by the US Congress and signed into law. In the past AOC has worked cooperatively with the military regarding access within and over Military Operation Areas and weapons transfer across military lands. During the JPARC DEIS public process, AOC found the military staff involved with this project to be genuinely interested in informing the public. The willingness to extend the original comment period deadline is an example of how JPARC was making sure all Alaskans who may feel they could be impacted by the expansion of military training operations could have their concerns addressed. AOC thanks you for the extra time to comments and the additional information we received on the DEIS.</p>

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AOC offers the following comments regarding Subsistence Resources as they relate to proposed action #1, Fox 3 MOA Expansion and New Paxson MOA:

- The DEIS violates Title VIII of ANILCA by using race as a factor to determine dependence of federally qualified communities who hunt, trap, fish, and gather vegetation within the Fox 3 MOA and newly proposed Paxson MOA. The history of ANILCA clearly states a position of race neutrality regarding a priority to public resources. An evaluation of possible restrictions on subsistence uses by all federally qualified communities is required by ANILCA 810(a), not just the villages selected in Table 3-24.

- The DEIS fails to consider adverse impacts on subsistence uses of thousands of Alaskans (average 3,500 licensed hunters annually) who qualify under AS 16.05.258 as subsistence users on State and private lands in the Fox 3 MOA (GMU 13B - 1,428,519 acres of State land, 28,917 acres of private lands. GMU 13A - 2,519,061 acres of State land, 152,282 acres of private land) and newly proposed Paxson MOA (788,082 acres of State land, 330,927 acres of private lands). State and private lands are by far the major land owners under the Fox 3 MOA and proposed Paxson MOA.

- The DEIS fails to report Alaskan resident hunter participation in GMU 13: 5,015 hunters reported hunting moose in GMU 13 in 2010. 4,887 hunters reported hunting Nelchina caribou in 2010, ADF&G harvest data. The population of individual Alaskans living in subsistence communities in the vicinity of the proposed expansion of MOA (Table 3-24, JPARC DEIS) total 1,506 Alaskan residents. The final ROD on the JPARC Modernization and Enhancement should account for impacts to all subsistence users under both federal, ANILCA Title VIII and State subsistence laws, AS 16.05.258, not just the 1,506 subsistence users listed in JPARC DEIS Table 3-24. AOC offers the following comments regarding Biological Resources as they relate to proposed action #1, Fox 3 MOA Expansion and New Paxson MOA:

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<p>N0031</p>	<p> <ul style="list-style-type: none"> • Biological resources are currently being managed for an abundant harvestable surplus of moose and caribou by ADF&G. The availability of moose and caribou directly impacts thousands of Alaskan families who choose to make gathering a wildfood harvest part of their sustenance. Fox 3 MOA and the proposed expansion plus the newly created Paxson MOA is airspace over one of the few areas in Alaska where predator/prey management under State law, AS 16.05.255(e) – (g), can be successfully conducted. The final ROD on the JPARC Modernization and Enhancement proposed action #1, Fox 3 MOA Expansion and New Paxson MOA should take into consideration the fact that biological resource enhancement programs are not allowed by federal land managers in the vicinity of the proposed action. Federal land managers continue to reduce the areas where the State may conduct predator/prey management, which makes any adverse impact on biological resources where the state can still manage for abundant harvest that much more of value to Alaskans. <p> The expansion of Fox 3 MOA and the addition of the proposed Paxson MOA in combination with the lowering of the AGL down to 500 feet has the potential to negatively impact a large number of Alaskans who hunt, trap, fish, and recreate via snowmachine, ATV, boat, or aircraft throughout the year in the proposed area. AOC does not want to see folk's use of public resources on public lands underlying this proposed action diminished by proposed military activities. AOC strongly supports the militaries presents in Alaska and hopes to work toward continuing our public access to lands under MOAs. </p> <p> Sincerely, Rod Arno Executive Director, Alaska Outdoor Council (907) 841-6849 </p> </p>

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ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

July 3, 2012

Dear Madam or Sir:

The Fairbanks International Airport Operators Council (AOC) is comprised of managers, directors, and owners of businesses and organizations conducting business at Fairbanks International Airport and in the Fairbanks aviation community. The AOC consortium includes representatives from airline and regional air carriers, ground handling services, commuter and air taxi services, local tour companies and advocates for interests in the private aviation community. We have participated in the JPARC public meetings held in Fairbanks, and based on our analysis of the Draft EIS document, would like to comments concerning the proposals.

Economic impact of the airport on Fairbanks and Fairbanks North Star Borough is significant. As second busiest passenger airport in the state, the airport serves as a hub for more than 50 communities in northern Alaska, with an estimated expenditure of \$261 million annually in wages, capital and operating expenses. It is an economic engine for the community and the state, resulting in over 2,000 jobs, primarily in the Fairbanks North Star Borough, according to a State of Alaska study conducted by Northern Economics. The ability to maintain, or grow this engine, is directly impacted by the ability of air traffic to reach the airport thorough surrounding airspace. Given this back ground, several proposed changes to airspace described in the JPARC Draft EIS are of concern.

IFR Access to MOAs

The FAA is working to expand and enhance the IFR infrastructure in Alaska. GPS based IFR routes are being developed, and access to rural communities is being enhanced with the addition of WAAS approaches. We have already seen impacts with the recent implementation of the Delta MOAs, which block V-444 between Fairbanks, Delta Junction and communities to the south and east. Additions to MOA airspace, specifically by the proposed Paxson MOA, would further limit IFR access, when active. This is directly in conflict with the efforts to improve safety and access thorough expanding IFR infrastructure. It is essential to develop procedures between the FAA and the military, to provide real-time IFR access to MOAs, at least for limited flight altitudes, to assure routine IFR access between Fairbanks and the surrounding communities. This not only impacts the air taxi or small commuter operators that provide service, but it also impacts the larger air carriers that those commuter flights need to connect with to efficiently move passengers and cargo to more distant locations inside and outside the state. No additional MOA airspace should be established without provisions for real-time IFR access.

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UAV Corridors

The JPARC proposes establishment of corridors for UAV access to restricted areas south and east of Fairbanks, including the use of Restricted Airspace to establish these corridors. Restricting airspace across important civil traffic corridors (including IFR airways), has a direct negative impact on access to Fairbanks International Airport. Other means that do not include segregated airspace must be found that do not restrict access, or compromise safety, with civil aviation arriving or departing from Fairbanks International Airport.

Restricted Areas

Several proposals seek to add restricted airspace south and east of Fairbanks. The Realistic Live Ordinance Delivery has an alternative that would link the existing Restricted Areas 2211 and 2202, forming a barrier to civil traffic headed into the Alaska Range from Fairbanks, Delta Junction and the Richardson Highway corridor. We opposed restricting that access to mining, hunting and recreational areas in the Alaska Range. Similarly, the proposal to establish restricted airspace over the Battle Area Complex near Delta Junction also impacts access to Isabel Pass, a major civil aviation corridor between the interior and south central Alaska. Restricting access to these areas again has an impact as many of these flights either depart from or arrive at Fairbanks International Airport.

F-16 Relocation

Not addressed in the JPARC Draft EIS is the recently proposed relocation of the F-16 aircraft based at Eielson to Joint Base Elmendorf Richardson (JBER). This change would undoubtedly impact the already very busy airspace in the Anchorage area, including Anchorage International Airport. Fairbanks and Anchorage airports are part of a system. We would like to see an analysis of this proposal, to understand the potential impacts of the planned F-16 move on the JPARC proposals.

We recognize the value of military training, and understand these activities can have a positive impact on the Fairbanks area. Our interest is in working with the military and FAA to identify mitigations that allow this training to continue, without negatively impacting the activities at Fairbanks International Airport.

Sincerely,



Cory Christian, President
FAI Airport Operators Council



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June 7, 2012

ALCOM Public Affairs

9480 Pease Avenue, Suite 120

JBER, AK 99506

To Whom it May Concern,

Ahtna Incorporated is supportive of the military's effort to enhance and upgrade the military's technological capabilities and weaponry for combat preparation. We appreciate and honor all of the servicemen and women who serve our country. Our Ahtna People have and continue to proudly serve in the military. We are proud of our armed forces, and indebted to them. Unfortunately, Ahtna Incorporated has some concerns with the preliminary JPARC Environmental Impact Statement.

Section 3.1.9 Cultural Resources page 3-53: In Appendix B Definition of the Resources and Regulatory Setting, section B.9 the definition is given as follows: Cultural resources are prehistoric and historic sites, buildings, districts, or objects that are important to a culture or community for scientific, traditional, religious, or other purposes. Cultural resources are generally divided into six categories: archeological resources, architectural resources, traditional cultural properties, cultural landscapes, National Historic Landmarks, and National Monuments.

Traditional cultural properties are properties, sites, or other resources associated with the cultural practices and beliefs of a living community that link the community to the past and help maintain its cultural identity and are listed or eligible for listing on the National Register. Traditional cultural resources are areas associated with the cultural practices and beliefs of a living community that link the community to its past and help maintain its cultural identity that have not been evaluated for National Register eligibility. Sacred sites are well-known areas associated with cultural practices or beliefs of a living community. Most traditional cultural properties, resources, or sacred sites in Alaska are associated with Alaska Natives. Traditional cultural properties or resources can include archeological resources, locations of prehistoric or historic events, sacred areas, sources of raw materials used in manufacture of tools and sacred objects, certain plants, or traditional hunting and gathering areas. Both historic properties and significant traditional resources identified by Alaska Natives are evaluated for potential adverse impacts of action.

On page 3-50, under the title Traditional Cultural Properties and Alaska Native Concern, there is the following statement: **There are no Alaska Native tribes within this area**, but there



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are scattered remote residences. **There are no properties of traditional religious and cultural importance known to be located within the area. This needs to be corrected.**

Ahtna Incorporated is one of the 13 Alaskan regional Native corporations. The Ahtna traditional territory stretches from Cantwell across the Alaska Range through Paxson to the Mentasta Mountains. The territory continues south through the Susitna River headwaters to the Chugiak Mountains, east to the Wrangell Mountains, and west to the Talkeetna Mountains. The territory encompasses the entire length to the Copper River from the headwaters to Woods Canyon south of Chitina (Attachment A). The Ahtna people have used and occupied this land for 5000 to 7000 years (USDA –NRCS 1999). **Department of Defense Instruction number 4710.02 Enclosure 2 section E2.1 states “As tribal boundaries have shifted and tribes have migrated, tribes that seem far removed geographically may have a traditional interest in assets and action at specific, present day installations.”** The entire proposed Fox 3 MOA expansion lies entirely within the Ahtna people’s traditional territory. The majority of the proposed Paxson MOA lies within this territory as well (Kari 2010).

Ahtna Incorporated is comprised of eight villages: Cantwell, Chistochina, Chitina, Copper Center, Gakona, Gulkana, Mentasta and Tazlina. Each of these villages has a village council which is recognized as its own tribe by the United States government. Each of these villages was contacted by letter, by the United States Air force through the Alaska Command (ALCOM) concerning the JPARC proposal. The ALCOM has also had two meetings with Ahtna Incorporated in regards to the JPARC proposal.

Paragraph 4 section 3.1.9.31 Environmental Consequences Alternative A states: In compliance with Section 106 of the National Historic Preservation Act (NHPA), ALCOM, on behalf of the Air Force, has completed consultation with the Alaska State Historic Preservation Office (SHPO) and determined that no historic properties will be affected by implementation of the proposed action. Consultation with potentially affected Alaska Native tribes, Alaska Native Claims Settlement Act (ANSCA) corporations, and Tribal government entities regarding ALCOM’s finding of no historic properties affected is ongoing. In accordance with AFI 32-7065, all NHPA Section 106 consultation will be completed, unless circumstances prevent it, prior to finalizing the EIS and signing the ROD. **By your own words and actions in this section you acknowledge the Ahtna tribes in the region.**

Under ANSCA section 14 (h) (1) Regional Native Corporations have the right to receive title from the federal government to existing cemetery sites and historical places. Currently, Ahtna has on file with BLM ten applications for 14 (h) (1) sites within the Fox 3 MOA expansion area. All ten sites have been examined by a Bureau of Indian Affairs (BIA) archeologist and each site received a Certificate of Eligibility. Ahtna Incorporated hopes the protection of the Tangle Lakes Archeological District (VanderHock 2011) is also taken into account. It appears to be a logical conclusion that air traffic and sonic booms should not have a significant impact on these sites. **The fact remains that these sites need to be acknowledged in your report.**

Section 3.1.8 Biological Resources page 3-38: Under section 3.1.8.1 Affected Environment, the vegetation cover is described as: shrub communities of willow (*salix* spp.), birch (*Betula* spp.), and alder (*Alnus* spp.) occupy lower slopes and valley bottoms. Forests are rare and

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confined to low-elevation drainages (Nowacki 1995). The Copper River Basin ecoregion, which underlies the southwestern portion of the expanded Fox 3 MOA and proposed Paxson MOA, is a large wetland complex underlain by thin to moderate thick permafrost and pockmarked with thaw lakes and ponds. A mix of low shrubs and black spruce (*Picea mariana*) forests and woodlands grows in the wet organic soils. Cottonwood (*Populus* spp.), willow, and alder line rivers and streams as they braid or meander across the basin.

The paper cited in this paragraph by Nowacki is not listed in your references. A Google search of the authors name provided contact information at the USDA Forest Service. Personal correspondence with Mr. Nowacki revealed that the paper cited was an earlier version of an effort to map the ecosystems of Alaska. The newest version was published in 2003. It is a combined effort of the National Park Service, USDA Forest Service, U.S. Geological Survey, and Alaska Biological Research, Inc.

According to this paper, the Fox 3 MOA, the Fox 3 MOA expansion, and the proposed Paxson MOA lie within the Alaska Range Transitional Division (Spencer *et al*, 2003). The description given of this area is "boreal forests distributed in the valleys and lowlands of the division, but wildfire and permafrost have much influence on vegetation. Soils in the mountainous units of the Alaska Range and Lime Hills are generally thin, rocky, and cold, with scattered pockets of permafrost. The Copper Basin floor is formed of interleaved lacustrine deposits, glacial material, and volcanic debris that form fine-grained saturated soils with ice-rich permafrost. The basin support Boreal vegetation patterns, with white spruce and birch on higher ground and black spruce, low shrubs, sedges and mosses growing in wetlands. White spruce and balsam poplar form successional stands along the rivers. The lower slopes of the Talkeetna Mountains are cover with dense thickets of alder that transition to low shrubs in the sub-alpine and blueberry rich alpine tundra. Vegetation of all types succumbs to the harsh conditions at about 4000 feet, leaving the higher area to bare rock, talus (broken loose bedrock), and ice."

The soil surveys for the Copper River area, the Gulkana River describe the cover type as boreal forest. Species composition in boreal forest is determined by wildfire frequency. Wildfire frequency, intensity, and distribution create a mosaic of species across the landscape (USDA 1991). The Soils of the Gulkana Area list 47 different forest cover types (Clark and Kautz 1999). The Soils of the Copper River Area list five forest cover types: black spruce, white spruce-quaking aspen, white spruce-paper birch, white spruce-quaking aspen-balsam poplar, and white spruce-black spruce (USDA 1999). White spruce, aspen, and balsam poplar grow on soils with no permafrost (National Park Service 2012). **The area of the Fox 3 MOA expansion and the new Paxson MOA is an incredibly rich and varied ecosystem and not just black spruce and wetlands. This ecosystem supports Ahtna's year round subsistence resources.**

Boreal forests are a wildfire ecosystem. The largest wildfires in acreage are cause by lightning strikes, while most small acreage fires are human caused. Wildfires create a mosaic of vegetation types across the landscape of different stages of succession (Johnson *et al*. 2001). Fuel moisture and fuel load are the two largest factors determining fire intensity (Ross *et al*. 2001). The boreal forest contained in the proposed Fox 3 MOA expansion and Paxson MOA are particularly prone to intense wildfires. In the 1990's there was an intense spruce beetle, *Dendroctonus rufipennus*, infestation. Several million acres of spruce trees were killed in this

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decade long outbreak. The Copper River Basin was one of the areas heavily impacted by this infestation. There are still many tens of thousands of beetle killed, standing dead trees within the Copper River Basin (USDA 1997). These standing dead trees are susceptible to torching, where the fire quickly travels up the stem of the tree to the crown. If the wind is blowing the fire can quickly spread to neighboring live trees (USDA 2001).

Much of the proposed areas have forest cover types of 1) white spruce, *Picea glauca*, 2) mixed white spruce/ black spruce, *Picea mariana*, and 3) black spruce cover type (USDA 1999). These forest types are especially vulnerable to wildfire. This is because of the low moisture content of the leaves compared to deciduous tree, and the presence of dead retained lower branches that is conducive to torching. Black spruce is particularly highly flammable (Chapin *et al.* 2008).

Finally, heavy wildfire suppression since the 1950 has resulted to excessive fuel loads in the boreal forest. Fire suppression has increased landscape flammability. This is of particular concern because of climate shift in the last decade due to global warming. This volatility is of great concern around local communities (Chapin *et al.* 2008).

The use of the Chaff & Flare defensive flares over the boreal forest is a great concern to Ahtna Incorporated. In **Chapter 3.0 Affected Environment and Environmental Consequence** it is stated that 1) there will be altitude restrictions of 5000 feet AGL from June through September, and 2000 feet AGL for the rest of the year. 2) It also states that the defensive flare is composed of small pellets of highly flammable material that burn rapidly at extremely high temperatures. It burns completely within approximately 3.5 seconds, or approximately 400 to 500 feet from the release point. **There are no independent studies to measure the chance of igniting a wildfire in this highly flammable landscape. What measures will the Air force take to ensure that a wild fire will not be ignited? What measures will the Air Force take if they do ignite a wildfire? Who will be responsible for putting the wildfire out? State and Federal agencies will not suppress fires in areas with possible live ordinance present. One of the papers in your references section (Air Force 1997) Use of flares will be suspended when warranted by the fire condition code. Who determines the fire conditions?**

In the **environmental consequences section 3.1.8.3.1** there is a discussion on chaff and flare use. It says "extensive studies of chaff particles and defensive flare constituents have found no negative impacts on biological resources. There is nothing cited here. You can't make a statement like that and not back it up. A study was located in the references (Air Force 1997). The Air Force study says that fire danger assessment will be addressed by using BEHAVE, a predictive fire model. Then the paper goes on to say "Although the study examined fire history data from various locations for correlations between level of flare use, method of flare employment, environmental conditions, and fire occurrence, no correlation could be derived at a statistically valid level." **In short, the Air Force has no idea how chaff and flare will affect the probability of starting a wild fire. There are no independent studies of chaff and flare devices cited.**

The **Environmental Effects of Self-Protection Chaff and Flare Final Report** states "information from range personnel and investigative reports for specific fires indicates that fire

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from flares have occurred, even in areas where minimum release altitude is 5000 feet AGL. Specifically, one fire in Meadow Valley, which burned 21,600 acres in 1993, was attributed to flare use according to a BLM fire investigator."

The Alaska Interagency Fire Management plan (1987) provides for a natural fire regime in unit 13 for the purpose of wildlife habitat enhancement. This plan provides for small scale fires in the area. Caribou will not return to a burn area for 50 years. It is important to create a mosaic of landscape types for optimum wildlife habitat (Schwanke 2010). Ahtna Incorporated feels that the possibility of chaff & flare cause wild fires will disrupt this management plan. The Air Force's own report supports the fact that chaff and flare can trigger large acreage fires.

Section 3.1.8.1 Continued. The EIS acknowledges the fact that "caribou habitat underlies most of the airspace, with summer range and calving habitat underlying the central and western parts of the airspace and winter habitat under both the eastern and western portions." **This is not just "caribou habitat". This is the Nelchina Caribou Herd range.**

The Nelchina Caribou herd (NCH) population fluctuates between 35,000 to 40,000 animals. It has a migratory range that stretches from north of Tok on the Eagle highway to their calving grounds north of Eureka and west of Lake Louise. After the calving season they disperse throughout Unit 13, and conversely throughout most of the proposed Fox 3 MOA expansion, and the proposed Paxson MOA. This is the most road and off road vehicle accessible caribou herd in Alaska. People from Kenai, Soldotna, Anchorage, Wasilla, Palmer, Chickaloon, Sutton, Eureka, Mendotna, Tolsona, Glenallen, Valdez, Chitina, McCarthy, Copper Center, Tazlina, Glennallen, Gulkana, Gakona, Sourdough, Paxson, Delta, Chistochina, Mentasta, Tok, Tetlin, Dot Lake, Healy Lake and Tanacross depend on this herd for sustenance (Alaska Division of Fish & Game (ADFG), 2008). Harvest records from 1998 to 2010 show an average of 3,023 animals are harvested from this herd annually. There are four years that the harvest was between 4,500 and 5,800 caribou harvested (Schwanke, 2010). ADFG manages the herd to supply from 2000 to 4000 animals a year (ADFG 2008). **In 1997 there were 13,612 hunters registered for the Tier 1 hunt of the NCH. In 1996 there were 19,397 registered hunters (Fall & Simeone 2010). Though these numbers reflect the peak number of hunters since 1990, they do demonstrate the intense hunting pressures the NCH is under.**

The NCH has been intensely managed by ADFG since the 1950's. The management objective is to maintain the herd population from 35,000 to 40,000 animals. The ratio between bull to cow management objective is 40 bulls to 100 cows. The tools that ADFG use to manage for these objectives are 1) annual population counts by fixed wing aircraft and helicopter, 2) an active wolf control program, and 3) harvest quotas from several state and federal hunts, and the Ahtna Community Hunt (ADFG 2008). Limiting the flights into game unit 13 will reduce the ability to accurately assess population numbers of the NCH. **This will lower the available caribou for annual harvest, as ADFG will have to be more conservative in order to ensure management objectives (Schwanke 2012).**

Section 3.1.8.3.1 Environmental Consequences Alternative A: In this section it is stated that: Wildlife species would be exposed to over flight by military aircraft flying as low as 500 feet above ground level (AGL), potentially causing altered behavior or metabolic effects. Additionally,

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high speed maneuvers within the proposed air space would create sonic booms, and training would incorporate use of chaff & flares, as defensive measures. Behavioral responses to over flights of 500 feet AGL and above are generally characterized for wildlife species, including various ungulate species, as minor and include individuals assuming an alert posture, rising, walking, or running short distances. Few studies have evaluated the effect of military over flights on moose; several have studied the effect on caribou.”

The paper cited as to behavioral responses to over flights (Lawler *et al.* 2005) only studies the short term effect on caribou by over flights and sonic booms of A-10, F-15, and F-16 aircraft. **There is no study cited about over flights and sonic booms of the F-22 and F-35 aircrafts.** Additionally, another paper cited about the short term effects on caribou (Manci *et al.* 1988) states that “escape and strong panic reactions were observed in 65 to 75% of all groups to over flights of fixed wing aircraft up to 500 feet AGL. Groups consisting primarily of cows, calves and yearlings tended to show a stronger response to the aircraft than groups of bulls.” The paper goes on to state that “**Little is known of the long term effect of noise on the physiology of wild ungulates.**”

Other studies have been undertaken to understand caribou responses to human disturbances. Wolfe *et al.* in 2000 reports that “**individuals and groups of caribou move away from point sources of disturbance, increase activity and energy expenditure near disturbance, and shift away from areas of extensive and intensive development.**” Cameron *et al.* in 1992 report that **caribou herds on the North Slope of Alaska shifted their calving grounds in response to oil field development.** Initially the caribou chose to calf near the coast where predators were few. As development increased they shifted the calving ground away from the development. The area the caribou now calf in has increased predation pressure on the calves. Whitten 2001 reported to the House Committee on Resources that **caribou calving areas are considered to be critical habitats.** Oil development of the Arctic National Wildlife Refuge was halted because the primary area sought for development lay within the calving grounds of the Porcupine Caribou herd. “This large, migratory herd moves between the U.S. and Canada and is **vital to the traditional subsistence cultures of numerous Native villages in both countries.**” ADFG 2008 reported that the **Delta Caribou herd moved their calving grounds from north of the Alaska Range (pre-Fox 3 MOA) to south of the Alaska Range (post-Fox 3 MOA).** “**No information was found in the literature describing startle effects of chaff on wildlife**” (Air Force 1997).

Discussion of the noise levels created by the sonic booms is addressed in **Section 3.1.2.3.1 Noise Environment Consequences Alternative A:** All subdivisions of the proposed Fox 3 MOA as well as the new Paxson MOA would have an established minimum flight altitude at 500 feet AGL. Subsonic aircraft noise levels beneath the Paxson MOA/ATCCAA would increase from 37 to 54 dB Ldnmr. Noise levels beneath all subunits of the expanded Fox 3 MOA would increase from 39 dB Ldnmr to 54 dB Ldnmr. Air craft would fly at lower altitudes as a result of “**floor: altitude decrease.** Decreasing altitudes would result in increased individual over flight noise events.”

The definition of what dB Ldnmr is lacking in this draft EIS. Consulting the Eglin Air Force Base EIS (Appendix E Noise) gives this definition: **Onset-rate Adjusted Monthly Day-Night Average Sound Level.** This average decibel calculation is worthless when taking into account 500 foot AGL over flights with accompanying sonic booms. Caribou do not care about averages. The

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in the moment experience is what will cause the startle reaction in caribou. An F-15 aircraft creates a sonic boom of 3.92 pounds per square foot and 139.6 decibels at 100 feet AGL (Hamby 2004). An internet search of various blog sites from around Air Force bases deploying F-35s say that its sonic boom is much, much louder than an F-15. They all ask the same question: What is the decibel level of the sonic boom for an F-22 and F-35? The Air Force has not published what the sonic boom decibel level for F-22 and F-35 aircraft is. **Ahtna Incorporated would like to know what the decibel levels of the sonic booms created by these aircraft at 500 feet AGL, at 1000 feet AGL, at 2000 feet AGL, and at 5000 feet AGL.**

Section 3.1.13.2 Subsistence Impact Assessment Methodology: Your assessment methodology is inadequate in at least 3 ways. **First, limiting the subsistence analysis to the eight communities within 20 nautical miles of the MOAs does not accurately represent patterns of resource use and distribution in the Nelchina Basin/Copper Basin area.** Many communities beyond those addressed in the analysis rely on resources in the impacted areas and consequently will be negatively impacted by the proposed actions. Resources are spread across the landscape, and local residents go to where the resources are. Sometimes that means driving substantial distances in order to put food on the table and fill the freezer. The analysis should be expanded to incorporate the Alaska Board of Game Findings (Attachment B) along with those communities with a positive Customary and Traditional (C & T) use determination under the Federal Subsistence Program for moose, caribou or both on lands within the proposed Fox 3 expansion and Paxson MOA as discussed in the EIS. Both the Board of Game Findings and the C & T determinations are based on analysis of all available data regarding patterns of resource use, and provide a more realistic basis for identifying impacted communities than the 20 nautical mile rule.

Second, 20-plus year old community harvest data is woefully inadequate for making decisions that affect people's livelihoods. For example, in the 1980s, when many of those studies were done, Copper Basin residents could harvest caribou in Unit 11. That area is now closed to the harvest of caribou, due to conservation concerns. There is increased reliance on caribou hunting opportunities in Unit 13, which underlies the proposed Fox 3MOA expansion and Paxson MOA. To people familiar with this data, the "most representative year" referred to in the analysis is identifiable as the most recent year for which a comprehensive subsistence survey data are available. JPARC should follow the lead of the Alaska Gas Line Pipeline Project and base its analysis on updated comprehensive community subsistence data, providing funding to support updated surveys as needed.

As a first step, the list of potentially affected communities (as discussed above) should be examined in terms of when the most recent comprehensive harvest survey took place and whether an update is scheduled in the next year or two. For those potentially affected communities that are five or more years out from the most recent update and are not on the list for an update, funding should go to the Alaska Department of Fish & Game Subsistence Division, or a similarly qualified independent organization to collect this information. **A decision on the project should be delayed until up to date subsistence information for the potentially affected communities can be incorporated into the subsistence impact assessment.**

Third, limiting the communities with high dependence on subsistence to only those with a majority (>50%) Alaska Native population fails to recognize patterns of residence by the Ahtna

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people in the Copper Basin communities, or the importance of subsistence to other local residents. While it is appropriate for predominantly Alaska Native communities to fall in the “high dependence” category, there are other rural communities in the area that should also be classified as such. Indeed, some of the Ahtna villages with federally recognized tribal governments were excluded from the “high dependence” category because the percentage of Alaska Native residents, while significant, does not reach the 50% level. Once up to date information is obtained regarding harvest and use of subsistence resources (as described in the previous paragraph), this question should be revisited for all potentially affected communities. **Communities in which 80% or more of households reporting using subsistence resources should be classified as “high dependence” regardless of community composition.**

ADFG Board of Game Findings #2006-170-BOG has established Ahtna’s Customary and Traditional Use rights in Game Management 13 for Moose and Caribou regardless of village affiliation or proximity to a money economy. Customary and Tradition uses of moose and caribou in Game Management Units 11, 12, and 13 are administered the ADFG Community Hunt (Attachments C & D). **This entire section needs to be re-examined using the correct sources for your assessment.**

Although the ANILCA section 810 analysis is mentioned, it is not completed. Issues that need to be addressed are **1) The effect of use, occupancy, or disposition on subsistence uses and needs, 2) The availability of other lands for the purpose sought to be achieved, 3) Cumulative effects resulting in reductions in the availability of resources used in subsistence purposes, caused by alteration of their normal locations, migration, and distribution patterns. Please refer to comments on sections 3.1.8.3.1 and 3.1.2.3.1 when completing the 810 analysis. A new section that systematically analyses the impact of the proposed actions regarding the expanded Fox 3 MOA & Paxson MOA on subsistence resources needs to be added to the EIS.**

Ahtna Incorporated feels strongly that the proposed Fox 3 MOA expansion and proposed new Paxson MOA would have adverse effects on our Customary and Traditional Subsistence uses in these areas. Ahtna feels the proposed mitigation measures in the EIS are inadequate.

Government to Government Consultation: Executive Order (EO) 13175 November 9, 2000: There several mandates in this EO that have not been adequately addressed.

- 1) Section 1 Definitions (a): ‘Policies that have tribal implications’ refers to regulations, legislative comments or proposed legislation, and other policy statements or actions **that have substantial direct effects on one or more Indian Tribes.**
- 2) Section 1 Definitions (b): ‘Indian Tribe’ means an Indian of Alaska Native Tribe, band, nation, pueblo, village, or community that the Secretary of the Interior acknowledges to exist as an Indian tribe pursuant to the **Federally Recognized Tribe List Act of 1994. 25 U.S.C. 479a.**
- 3) Section 2 Fundamental Principles (a): The United States has **a unique legal relationship with Indian tribe governments as set forth in the Constitution or the United States, treaties, statutes, Executive Orders, and court decisions. Since the formation of the Union, the United States has recognized Indian Tribes as domestic dependent nations**

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under its protection. The Federal Government has enacted numerous statutes and promulgated regulations that establish a trust relationship with Indian tribes.

- 4) Section 2 Fundamental Principles (b): **Indian tribes exercise inherent sovereign powers over their member and territories.**
- 5) Section 3 Policy Making Criteria (a): **Agencies shall respect Indian tribal self-government and sovereignty, honor tribal treaty and other rights; and strive to meet responsibilities that arise from the unique legal relationship between the Federal Government and Indian tribal governments.**
- 6) Section 5 Consultation (a): **Each agency shall have an accountable process to ensure meaningful and timely input by tribal officials in the development of regulatory policies that have tribal implications.**
- 7) Section 5 Consultation (b)(2)(B): To the extent practicable and permitted by law, no agency shall promulgate any regulation that has tribal implications and that preempts tribal law unless the agency, prior to formal promulgation of the regulation,
 - a. **consulted with tribal officials early in the process of developing the proposed regulation.**
 - b. In a separately identified portion of the preamble to the regulation as it is to be issued in the Federal Register, **provides the Director of the OMB a tribal summary impact statement, which consists of a description of the extent of the agencies prior consultation with tribal officials, a summary of the nature of their concerns and the agency's position supporting the need to issue the regulation, and a statement of the extent to which the concerns of the tribal officials have been met.**

To date, the only contact from the Department of Defense to the tribes of Cantwell, Chistochina, Chitina, Copper Center, Gakona, Gulkana, Mentasta and Tazlina has been a form letter to only some of these tribes. There were also two meetings with Ahtna Incorporated. The first meeting was approximately forty five minutes long. The second meeting was approximately one and a half hours in length. **Ahtna Incorporated feels that there is a long way to go in meeting the obligations set forth in Executive Order 13175 in regards to Government to Government Consultation. Where is the tribal summary impact statement?**

Department of Defense Instruction Number 4710.02 DoD Interactions with Federally Recognized Tribes: There are several instructions set forth in this document that Ahtna Incorporated believes have not been adequately addressed.

- 1) Section 6.1 Procedures: The DoD Components shall consult with tribes whenever proposing an action **that may have the potential to significantly affect protected tribal resources, tribal rights or tribal lands.**
- 2) Section 6.3 Procedures: Consultation required by paragraphs 6.1 and 6.2 shall apply to proposed actions **that may have the potential to significantly affect tribes, including, but not limited to: land disturbing activities, construction, training, over-flights, management of properties of traditional religious and cultural importance, protection of sacred sites from vandalism and other damage, access to sacred sites, access to treaty**

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reserved resources, disposition of cultural items in accordance with reference (k), and land use decisions.

- 3) Section 6.4 Procedures: The DoD Components shall afford tribes that have a cultural or historical affiliation with the lands encompassed by the installation an opportunity to consult on the development of the Integrated Cultural Resources Management Plan (ICRMP), and where tribal treaty rights or other rights to natural resources potentially may be affected, Integrated Natural Resources Management Plans (INRMPs).
- 4) The DoD Components shall involve tribal governments early in the planning process for proposed actions that may have the potential to affect protected tribal rights, land, or resources, and shall endeavor to complete consultations prior to implementation of the proposed action. Early involvement means that the tribal government is given an opportunity to comment on a proposed action in time for the tribal government to provide meaningful comments that may affect the decision. Installations should take advantage of the processes put forth in 40 CFR parts 1500-1508 to involve tribes in early planning.

Where is the INRMP? A form letter to some of the affected tribes, and two short meetings with the Regional Native Corporation does not constitute Government to Government consultation.

In summary, Ahtna cannot support the proposed Fox 3 MOA expansion and proposed Paxson MOA for both alternative A and B. **Ahtna Incorporated can only support the No Action Alternative.** Ahtna Incorporated feels that there was a minimal amount of effort put towards the completion of this EIS.

- 1) The areas encompassed by the proposed action contain the traditional territories of the Ahtna Peoples.
- 2) This area is an incredibly rich ecosystem that supports the year round Customary and Traditional use of subsistence resources.
- 3) There are no studies completed concerning the possibility of wild fire ignition by the use of chaff and flare.
- 4) There is no plan in place to deal with a wildfire ignited by chaff & flare.
- 5) Caribou will not return to a burned area for 50 years.
- 6) The areas contained in the proposed Fox 3 MOA expansion and the proposed Paxson MOA contain the summer and fall ranges of the Nelchina Caribou Herd (NCH). This includes the calving ground of the NCH. Calving grounds are considered critical habitat. Ahtna feels that the Air Force has not dealt with this issue adequately.
- 7) The literature cited in this EIS concerning the effect of caribou to over flights, sonic booms, and chaff and flare deployment is lacking and incomplete. Ahtna feels that only literature supporting the proposed action is cited. The Air Force has reported that there is no literature on the effects of chaff & flare on wildlife. A complete literature review needs to be included in this EIS. Several studies of other caribou herds in Alaska show that caribou will choose avoidance when faced with development or human interaction. Ahtna feels the NCH will also choose avoidance in response to the proposed action. This will severely impact the Customary and Traditional Subsistence uses in these areas.

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- 8) The NCH already faces incredible hunting pressure. ADFG has intensely managed this herd for over 50 years to provide an annual harvest of up to 3000 animals. Air space restrictions will inhibit ADFG's ability to accurately assess herd populations. This will result in smaller harvest quotas, as ADFG will have to be more conservative to meet management objectives.
- 9) Startle response of caribou has been discussed. The decibel of the sonic boom of the F-22 and F-35 has not been discussed. The averaging of day and night sound levels is not adequate to describe what the caribou will experience when the F-22s and F-35s fly over them at 500 feet AGL. Ahtna specifically wants to know what the sonic boom decibel level will be at 500 feet AGL, 1000 feet AGL, 2000 feet AGL and 5000 feet AGL for all aircraft type proposed to use this airspace.
- 10) The extensive studies of chaff particles and defensive flare constituents need to be disclosed. The studies were mentioned in the EIS but nothing was cited. Only one paper was in the reference section.
- 11) The Subsistence Assessment Section needs to be totally rewritten using relevant source documents, specifically the ADFG Board of Game Findings #2006-170 BOG. The Federal Subsistence Program customary and traditional use determinations, and ADFG BOG Findings #2006-170-BOG have already set the criteria for subsistence uses in the Copper River Basin. The Air Force has no right to create their own criteria, and then state that there will be no substantial impact to subsistence uses.
- 12) An 810 analysis has not been completed. . Issues that need to be addressed are 1) The effect of use, occupancy, or disposition on subsistence uses and needs, 2) The availability of other lands for the purpose sought to be achieved, 3) Cumulative effects resulting in reductions in the availability of resources used in subsistence purposes, caused by alteration of their normal locations, migration, and distribution patterns.
- 13) Ahtna Incorporated feels the Air Force has not completed their obligation of Government to Government consultation in this matter as mandated by Executive Order 13175 and the Department of Defense Instruction number 4710.02. Ahtna also feels that the two meetings with Ahtna will be used to show that they accomplished this obligation. Ahtna Incorporated is the Regional Native Corporation, not a tribal entity. The Air Force needs to implement face to face meetings with all eight Ahtna villages to satisfy this obligation. Sending a form letter, and stating there was no reply, does not satisfy the obligations.
- 14) There is no Integrated Natural Resource Management Plan as required by Department of Defense Instruction number 4710.02.

Ahtna Incorporated feels that there are not enough studies done on long term effects of over flights, sonic booms, and chaff & flare deployment to ensure that unfavorable impact to subsistence uses in the Ahtna Region does not occur. The Air Force has not included other areas in Alaska where the proposed maneuvers can take place in the EIS. Ahtna Incorporated feels that these maneuvers should be done somewhere else where the impacts can be studied long term. Only after long term studies can be accessed could Ahtna Incorporated approve of these new and expanded MOAs.

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Thank You,



Kathryn Martin

Vice President of Land & Resources

Ahtna Incorporated

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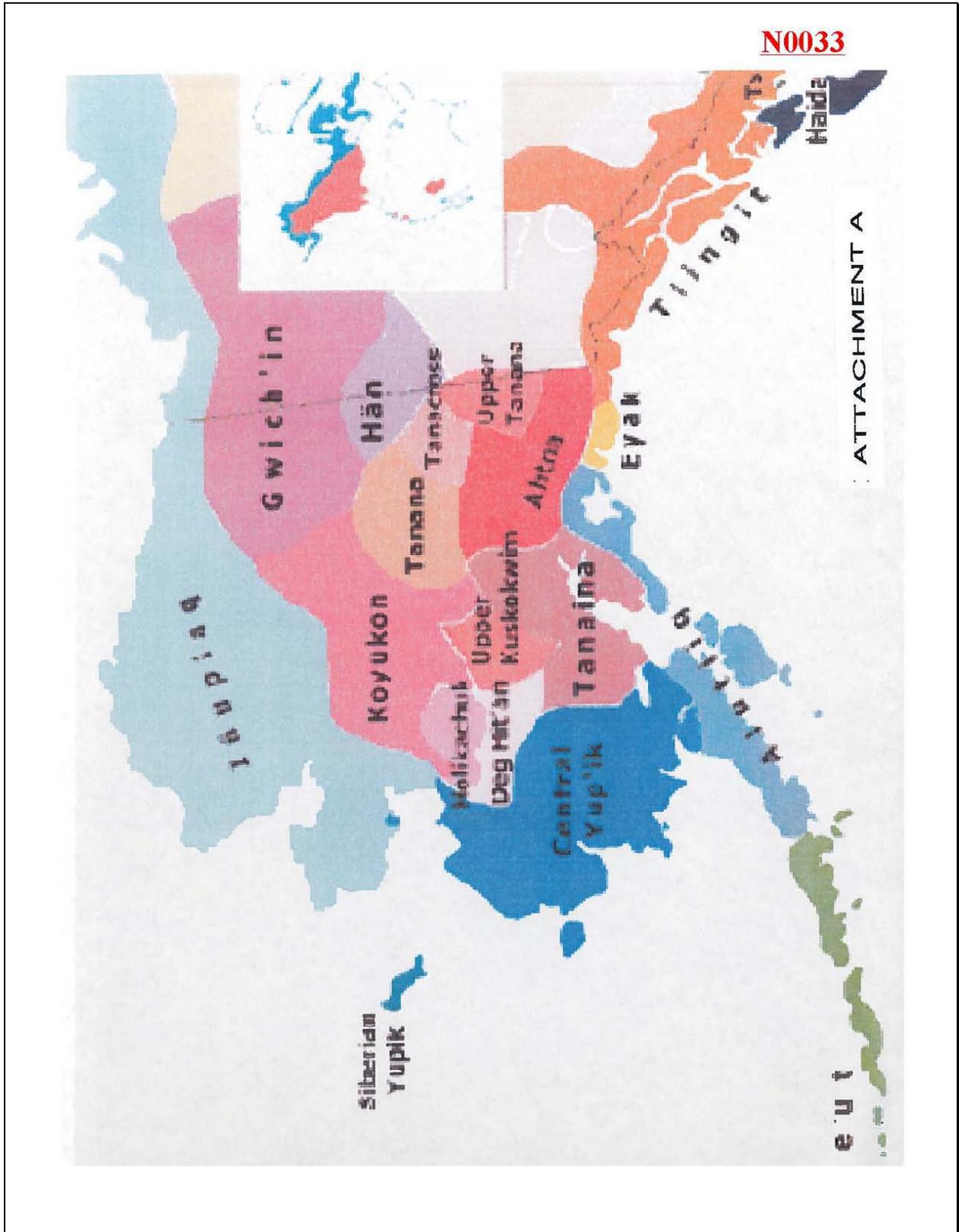
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N0033**ATTACHMENT B****Findings for the Alaska Board of Game
#2006 – 170 - BOG****Game Management Unit 13
Caribou and Moose Subsistence Uses****Background**

Virtually since its inception, the Tier II subsistence permit system has been plagued with public complaints about inequities, unfairness, and false applications. Over the years, the Alaska Board of Game (Board) has amended its regulations numerous times to try to address management and legal problems, but the controversy continues and the system remains rife with problems. Public complaints have been primarily directed at the Tier II permitting system—particularly those near urban areas like the Minto moose hunt and the Nelchina Tier II caribou hunt.

The Board has primarily focused on the Nelchina basin caribou and moose hunts because these have generated the vast majority of the interest and complaints from the general public. In addition, Board members are concerned the hunting patterns no longer meet the Board's intent when these subsistence hunts were originally established in regulation. A review of these hunts question whether the current hunts are consistent with the Board's customary and traditional use findings based on the eight criteria the Joint Boards of Fish and Game established (5 AAC 99.010) for implementing the state subsistence law (AS 16.05.258(a)).

Statistics associated with the Nelchina caribou hunt illustrate some troubling trends. Permits have been slowly shifting away from local Alaskan residents the Board identified as the most dependent on the wildlife resources in the region and towards less subsistence dependent urban residents. Testimony from some local residents of Unit 13 indicated they no longer participated in the state subsistence program. The present Tier II scoring and permit allocation system has made it more difficult for long-time, resource-dependent residents of the area to compete for permits, forcing them to rely more heavily on the federal system to provide for subsistence opportunities. The system also makes it almost impossible for area newcomers and younger Alaskans to ever qualify for the limited permits despite their subsistence dependence on wildlife resources for food. In addition, many of the traditions associated with a subsistence way of life are being sidestepped and avoided, such as the traditional teaching of the art of hunting, fishing and trapping to younger generations; and the processing, utilization, and other long-term social and cultural relationships to the resources being harvested and to the land that produces those resources.

The Board's long-term goal is to design a system to accommodate subsistence-dependent users in such a manner that permits can be virtually guaranteed from year to year. The reliability of available hunting opportunities is critical to the maintenance of the subsistence way of life. This could be similar and complementary to the federal subsistence permit system. The federal program allows any Alaska resident living in the Copper Basin and several communities outside

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of GMU 13 to harvest two caribou and one moose per year, there is no limit per household except in Unit 13(E) for moose, harvest of caribou by gender is also generally unrestricted in units 13(A) and 13(B), and moose hunters may only take any antlered bull under the federal system.

Bag limits may not be accumulated across both state and federal systems, so hunters can take a total of only one moose and two caribou for the year. State regulations allow all Alaskan residents to harvest a bull moose with spike-fork or 50-inch antlers or antlers with 4 brow tines on at least one side from September 1 – 20. In addition, up to 150 Tier II permits are issued for any bull moose, August 15 – 31, with only one permit being allowed per household. The moose seasons for federally qualified users on federally-managed lands are much longer from August 1 – September 20.

Under the state system, all caribou permits are issued under Tier II regulations and were limited to 3 per household. The Board recently changed the limit to 2 per household. The bag limit is one caribou, although in recent years, harvest under state regulation has been limited to bulls only. The caribou season for federally qualified users on federal land is 10 days longer in the fall, ending September 30 rather than September 20.

State regulations do not jeopardize a qualified federal subsistence hunter from hunting under a federal permit. However, if there are too many state applicants, controlling statutes mandate that permits be issued under the Tier II criteria, with all of its attendant problems.

The Board intends to explore subsistence hunt provisions that reflect and accommodate the customary and traditional use patterns of Nelchina caribou and moose in Game Management Unit (GMU) 13, while distinguishing those uses from other uses.

In accordance with the Joint Boards of Fisheries and Game eight criteria for implementing the state subsistence law, the following findings are made:

Findings

When the Board originally determined there were customary and traditional uses of the Nelchina Caribou Herd and moose in GMU 13, it recognized these subsistence uses were established by Ahtna Athabascan communities within the Copper River basin, and were later adopted by other Alaska residents. Due to the importance of, and high level of competition for subsistence permits in this area, the Board has undertaken, as precisely as possible, the task to identify the particular characteristics of these customary and traditional use patterns. Although they have changed over time due to limited access associated with demographic, economic, and technological factors, the patterns are characterized by traditional fall and winter hunting seasons, efficient methods and means, thorough use of most of the harvested animal, harvest areas traditionally associated with local communities, traditions about harvesting and uses that are passed between generations orally and through practice, and reliance on other subsistence resources from within these same traditional harvest areas

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Criterion 1. A long-term consistent pattern of noncommercial taking, use, and reliance on the fish stock or game population that has been established over a reasonable period of time of not less than one generation, excluding interruption by circumstances beyond the user's control, such as unavailability of the fish or game caused by migratory patterns.

This criterion presupposes that an identifiable, consistent "pattern" of noncommercial taking, use, and reliance is characteristic of subsistence use. The Board finds, even though there are many similarities among all users of the moose and caribou resources in the area, there continue to be identifiable distinctions, constituting a unique pattern of subsistence use, that is traceable in direct line back to the original Ahtna Athabascan and later non-native customary and traditional use.

The Board has concluded that the pattern of moose and caribou subsistence use for this region was originally defined by the Ahtna Athabascan residents and then adopted and modified by other local settlers in the early 20th century. This pattern of use was established over many generations and focused on the total aggregate of fish, wildlife, and plant resources locally available to the area residents.

The greatest dependency on subsistence resources occurred prior to the completion of the existing road system in the 1940s. After about 1950, historical use patterns changed rapidly, especially with the introduction of more mechanized access methods. The mobility of the subsistence and non-subsistence users, the availability of seasonal and part-time employment, increased human populations, increasing competition for wildlife resources, and fluctuating game populations (particularly moose and caribou) caused major shifts in subsistence dependency of people within and adjacent to the region. Nevertheless, aspects of the traditional Ahtna Athabascan use pattern are present today, but subsistence-dependent families engaged in that pattern now account for a smaller percentage of all users than a half-century ago.

Most of the long-term subsistence patterns in this area are community-based. The area's communities tend to be long-established, by Alaskan standards, and the residents of these communities tend to be long-term residents, descending from multi-generational families with long ties to the area. These communities tend to exhibit a use of local resources that stretches back to well before Euroamerican contact. In contrast, the use pattern based out of nearby urban areas tends to involve much more recently established communities, a high degree of turnover among residents, short-term residency and, generally, a relatively brief history of use.

Criterion 2. A pattern of taking or use recurring in specific seasons of each year.

Local communities established a tradition of hunting caribou, moose, and other big game species in the late summer and early fall following subsistence fishing, and again hunting in the winter as fresh meat was needed and game was available. Winter hunts have always been critical to subsistence users, as very few other subsistence resources are available during this time. This need for, and use of, winter hunting opportunities is different from use patterns developed by residents of Alaska's more developed and urban areas, where almost all big game hunting takes place exclusively in the fall and is controlled largely by regulations. Thus, as late as 1984, over 60% of the caribou harvest taken by local residents was taken during the winter. Recent changes in that pattern can be largely attributed to regulatory changes, competition from non-local

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hunters and shifting migratory patterns of the caribou herd. The seasonal use pattern was based on the traditional Ahtna seasonal movements and the general availability of game. For example, the fall hunt traditionally followed the salmon harvest, whereas the winter hunt took place whenever meat was needed and game was available.

Criterion 3. A pattern of taking or use consisting of methods and means of harvest that are characterized by efficiency and economy of effort and cost.

Before the mid-20th century, Ahtna Athabascan hunters tended to rely on boat access along the area's major waterways in fall, on foot along established trails, and by dog team along winter trails after freeze-up. With the opening up of the Nelchina basin to highway access, and the introduction of off-road vehicles, snowmachines, four-wheelers, and other transportation innovations, a shift in the use pattern occurred. Now, local residents tend to utilize roads as hunting corridors in place of rivers in the fall, and use snowmachines to access the backcountry in winter. Recently, expensive off-road vehicles have been purchased and used by many non-local users and a few more affluent local residents in an attempt to compete with non-local hunters and to increase their opportunity for success. The use of all terrain vehicles may create their own hunting efficiencies as hunting effort and transportation take advantage of labor-saving devices. Hunting methods have changed over the last 75 years. Automobiles, snowmachines, and less expensive all terrain vehicles may make hunting more effective because local and non-local residents can now cover larger areas when hunting caribou or moose. Local hunters can, when animals are available, make relatively short trips that fit into a contemporary work schedule. On the other hand, the use of highway, off-road, and similar vehicles has promoted more frequent short trips with considerable transportation costs for depreciation, fuel, and maintenance. What are being lost are the multi-resource harvest efficiencies associated with long subsistence-oriented summer and fall camping trips traditionally engaged in by Ahtna communities. Thus, recent transportation improvements and fuel prices may have changed traditional subsistence activities to the point where it is unlikely that there is a positive cost/benefit (from an economic standpoint) associated with some of the hunting techniques, especially in cases involving the use of expensive recreational motor vehicles. Overall, the use of some motorized vehicles such as ATVs has blurred the distinction between true customary and traditional patterns and recreational activities.

Residents of local communities—those with the longest histories of use of moose and caribou in the region—have traditionally traveled shorter distances to hunt than do non-local participants; and generally utilize less technology in doing so. Most Ahtna elders testified they still prefer to walk in to hunting areas and maintain permanent camps, whenever possible, in accordance with longstanding means and methods. On the other hand, most non-local users must travel at least 125 miles just to get to the area and have tended to be reliant on all-terrain vehicles (ATVs), aircraft and other expensive off-road and recreational vehicles.

As late as 1984, Copper Basin residents utilized only highway vehicles for hunting access over 65% of the time. It is the Board's conclusion that many of these newer technologies have been adopted based on a perceived need to compete with technologically-oriented recreational hunters from Alaska's urban areas. This may be a direct effect of the 1984 regulations.

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Historically, much of the taking of caribou, moose, and small game was done as part of a seasonal round of subsistence activities throughout defined areas used by the community. Family dependence on these resources required a commitment of considerable time and effort to accumulate adequate subsistence resources to meet annual protein requirements and other customary and traditional uses.

Another example of subsistence efficiency in the customary and traditional use pattern has been that specialized hunters tend to provide for the community at large, sometimes or often taking more than necessary for their own family's use in their capacities as community providers, and to fulfill social and cultural obligations. Community subsistence activities are then divided among members and further introduced into traditional patterns of barter and exchange. Thus, some harvest and others process, distribute, receive and utilize the results of the harvest. Each member of the community has a defined role and specialty.

A third example of subsistence efficiency, historically, has been the effort to keep hunting as close to home as reasonably possible, minimizing cost and effort necessary to obtain the wild food resources needed by families and communities. The Board believes that, if competition among users can be reduced, this efficiency is likely to be easier for subsistence users to realize.

In these community efforts, special emphasis has been placed on allowing the maximum opportunity to harvest as many animals and the widest variety of useable species as efficiently as possible. Emphasis was also placed on food gathering activities and other traditions associated with Ahtna Athabascan communities.

Criterion 4. The area in which the noncommercial long-term, and consistent pattern of taking, use, and reliance upon the fish stock or game population has been established.

The Board is examining the area where the subsistence hunting of big and small game occurred prior to the significant change in uses and activities that occurred after approximately 1950 in Game Management Unit 13.

Subsistence uses involve an intimate and exclusive relationship between the user and a very particular set of places generally in close proximity to the hunter's residence. The user is tied to the land. Other types of uses do not exhibit these close, long-term, multi-generational ties to a particularly locality. Even as late as 1981, hunters from Copper Basin communities did not report traveling out of the basin to hunt, while urban-based hunters named alternative areas if they could not hunt Nelchina caribou and moose. Testimony from Ahtna elders emphasized their reliance on local fish and game, and their reluctance, for practical and cultural reasons, to travel outside of their traditional areas for subsistence purposes. Likewise, they described the longstanding family and community use histories and patterns for such areas. Consistently, lifelong residents of the local areas did not share the attitude of utilizing other areas. When Nelchina caribou were not available to them they either added emphasis on moose, and/or use of the Mentasta caribou herd. Resident lake fish species and small game were other alternatives commonly mentioned as alternative and supplemental wild food resources. Families in the range of the Nelchina caribou who harvested little or no wild game mentioned receiving donated meat as an alternative. This differs markedly from the use patterns found in Alaska's urban areas,

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where traveling to, and exploring, new game country is deemed a virtue and an essential part of many outdoor experiences.

The Ahtna pattern exhibits a familiarity with terrain and landscape including the associated history of the region transmitted through oral traditions and Ahtna geographic placenames.

Criterion 5. A means of handling, preparing, preserving, and storing fish or game that has been traditionally used by past generations, but not excluding recent technological advances where appropriate.

The traditional pattern has been to salvage and use all parts of the harvested animal, in conformance with traditions prohibiting waste. Lifelong residents of the Copper Basin testified they still practice their traditional methods of harvest by retrieving the entire carcass and all bones, hide, head, heart, liver, kidneys, stomach, and fat. Only the antlers were often left behind. This also differs from patterns based out of urban areas, where hunters tend to focus on the meat and antlers, usually leaving most organs, bones, and the hide in the field.

Ahtna elders also emphasized that preparation and storage are viewed as essential components of their overall use. Women traditionally look forward to practicing their roles as preparers and preservers of harvested game every bit as much as men looking forward to harvesting and providing the game. These traditions and roles are passed on by older relatives to younger family members through in-the-field training and a system of *engi* (rules of appropriate behavior or taboos) that teach traditional means of harvest, handling, and preparation. These “engiis” emphasize traditional Ahtna views of the human place within the natural world and a respectful treatment of animals.

Criterion 6. A pattern of taking or use that includes the handing down of knowledge of fishing or hunting skills, values, and lore from generation to generation.

The Board has concluded that the subsistence traditions of handing down the hunting and fishing knowledge, values and skills through family oriented experiences are an important aspect of the subsistence way of life in this region. Providing the opportunities for the young and old to participate in subsistence activities is critical to the perpetuation of traditional knowledge about hunting locations, hunting methods, methods of handling harvests, and respectful treatment of wildlife. To increase hunting opportunities for youth, a recent provision adopted by the Board allows a resident hunter between the ages of 10 and 17 to hunt on behalf of a resident permit holder. The youth hunter must have completed a certified Basic Hunter Education course and be in direct supervision of the permit holder, who is responsible for ensuring all legal requirements are met.

Ahtna elders have passed this knowledge on to the next generation in the context of community-based traditions that included relatively long summer and fall camping trips described above. As mentioned previously, teaching roles and lessons tend to be more formalized through the system of “engiis” than is the case for uses based out of the urban areas. Skills emphasized included not only those needed to harvest each species, but also the art of field preparation and care for a wide

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variety of species and the utilization, preparation, and distribution of game. Most local users learned how to hunt in the local area from other family members in the local area. Most older, local users have also taught other family members. On the other hand, most non-local users learn about hunting in the area by personal experience or from fellow non-local, unrelated hunters. Also, non-local users tend to be controlled primarily by applicable statutes and regulations rather than long-term oral traditions and community-based values.

The Board considers it extremely important to stress the need to pass on skills and knowledge associated with utilization of all parts of the animal taken, as well as preservation of the traditional, cultural rules and family values associated with these subsistence users in this area. Field skills need to be perpetuated for handling not only the meat but the hides, internal organs, stomach, and intestines. This is consistent with the customary practice of maximizing the use of animals taken characteristic of subsistence uses.

Criterion 7. A pattern of taking, use, and reliance where the harvest effort or products of that harvest are distributed or shared, including customary trade, barter, and gift-giving.

Widespread community-wide sharing is customary in local communities, involving all family members, elders, others in need, and taking place in formal settings such as during ceremonial potlatches. As such, sharing has associated social, cultural, and economic roles in the community. Sharing is expected and follows well-understood community standards that are structured on kinship relations and obligations. As an example, young hunters are required by Athabaskan tradition to give all or most of their first harvested animal to elders and others in need. Also, traditional barter and exchange follow these standards. Successful Ahtna harvesters traditionally share some of their moose and caribou meat with other families and communities to meet their social obligations and for ceremonial purposes. This, again, is in contrast to the uses arising out of the urban areas where hunters are completely free to share, or not share, as they see fit and there is not a system of sharing, barter, and exchange. In addition to the key social and cultural roles of sharing in the local rural community, sharing of subsistence resources plays a key economic role in distributing essential food supplies throughout the community. The Board has concluded it is imperative to accommodate the customary and traditional family and community harvest sharing practices as part of the subsistence way of life to the maximum extent possible.

Use of the state authorized proxy system has provided a limited opportunity for individuals to harvest for permittees who are personally incapable of participating in the field but who have a personal history of subsistence use. Proxy hunters are not required to fully accommodate the customary and traditional practices. Non-local users, on the other hand, tend to have few established rules or traditions requiring sharing, and seldom share outside of their own households. External sharing, when it occurs, is usually with friends and co-workers, and extensive kinship networks are absent. There are no non-local traditions of community-wide meat distribution.

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Criterion 8. A pattern that includes taking, use, and reliance for subsistence purposes upon a wide diversity of the fish and game resources and that provides substantial economic, cultural, social, and nutritional elements of the subsistence way of life.

The Board has concluded it is critical to emphasize the values associated with the reliance and dependence on a wide variety of fish and wildlife resources as an important element of the subsistence way of life for this region. Subsistence use patterns historically required a significant dedication of time and effort towards the harvesting of adequate fish and game resources to meet the protein and nutritional requirements of the subsistence harvesters, their families, and their communities.

This differs markedly from the more recreational type of uses arising out of the Alaska's more urban areas, where a single, focused effort to harvest only one resource in any given location, and then salvage only what is legally required from that resource, tends to be a predominant characteristic. To the extent that other foodstuffs are harvested, they are often harvested in completely separate areas, far removed from the fall hunting area. Also, different hunting areas are explored in different years. This separation of the interconnected diversity of resource uses also seriously undermines the principles reflected in Criterion 3. As more and more emphasis is placed on single species harvesting patterns, cost is increased, and efficiency is reduced. Such practices do not reflect the customary and traditional use pattern.

Reliance on most, or all, locally available sources of wild food is characteristic of a traditional subsistence way of life where maximum economic and nutritional benefits typically must be derived from the hunt and harvests. The local harvest of salmon has historically been the most important wildlife resource in terms of useable pounds per subsistence-dependent family in Unit 13. Alaska residents are allowed to use a fish wheel in the Copper River between Slana and the Copper River bridge at Chitina to harvest salmon—permits are issued free of charge. The limit is 500 total salmon for a household with two or more members and 200 for a household with one member, with no limit on the number of Chinook salmon in the total harvest by fish wheel. The salmon run in the Copper River is primarily comprised of sockeye and Chinook salmon.

Use of moose and caribou by local communities is embedded in a wide range of other fish and wildlife uses. It is also embedded in a mixed, subsistence-cash economy characterized by seasonal employment and relatively low cash incomes. A wide variety of subsistence foods are still critically important in these local economies. Almost all hunting, fishing, and gathering takes place locally and the majority of meat and fish consumed tends to come from local sources.

Big game species are taken for food and not for their trophy value by families engaged in subsistence uses. The Board may undertake efforts to reduce or eliminate the trophy values of the resources taken to focus entirely on the inherent subsistence values.

Vote: 6/0
November 12, 2006
Anchorage, Alaska

Ron Somerville, Chairman
Alaska Board of Game

N0033**ATTACHMENT C**

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ALASKA DEPARTMENT OF FISH AND GAME
Copper Basin MOOSE
Community Subsistence Harvest Permit
PROGRAM 2012-2013

**HUNT ADMINISTRATION**

Community Subsistence Harvest (CSH) Hunt administration will be in accordance with the Alaska Department of Fish and Game's statutory and regulatory authority, including managing this common use resource for sustained yield while adhering to laws regarding the subsistence preference passed by the Alaska State Legislature.

COPPER BASIN MOOSE CSH PERMIT

According to regulations found at 5 AAC 92.072 *Community Subsistence Harvest Hunt Area* and at 5 AAC 92.052 *Discretionary Permit Hunt Conditions and Procedures*, ADF&G may issue community-based subsistence harvest permits for big game species where the Alaska Board of Game has established a community harvest hunt area. The board established the Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti-Kaah (Copper Center) Community Harvest Area for moose and caribou in 2009 (5 AAC 92.074(d) *Community Subsistence Harvest Areas*), hereafter referred to as the Copper Basin CSH area.

The CSH permit program allows communities or groups of 25 or more to apply annually for a CSH permit for an established CSH area. A group can choose to apply for a Copper Basin moose CSH permit, a Copper Basin caribou CSH permit, or both. These groups may select, from their group members, individual harvesters who may possess particular expertise in hunting to harvest wildlife resources on behalf of the community or group.

The hunt conditions in this Copper Basin Moose CSH permit program are made for the purposes of notifying the community/group of users of how to use the moose in a manner consistent with the customary and traditional use pattern described in the board's 2006 and 2011 findings *Game Management Unit 13 Caribou and Moose Subsistence Uses* (2006-170-BOG and 2011-184-BOG), as well as to ensure an orderly administration of the CSH permit program and hunt (CM300).

A community or group may possess only one (1) Copper Basin Moose CSH permit at any given time and group members may subscribe to only one (1) Copper Basin Moose CSH group per regulatory year. The Copper Basin Moose CSH permit expires at the end of the regulatory year for which it was issued. Renewal of a Copper Basin Moose CSH permit is the responsibility of the community or group coordinator.

APPLICATION PROCESS**THE COMMUNITY OR GROUP COORDINATOR**

In addition to permit hunt conditions and procedures found in 5 AAC 92.050 and 5 AAC 92.072, the community or group applying for a Copper Basin Moose CSH permit must designate a coordinator as part of the application process. The coordinator certifies that the information presented in a Copper Basin Moose CSH permit application is true and correct to the best of the coordinator's ability; monitors and reports on compliance with the conditions of a Copper Basin Moose CSH permit; and serves as the primary point of contact, among other duties. ADF&G will issue one (1) Copper Basin Community Moose Harvest Permit to each coordinator.

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For 2012-2013, the group application period will be November 1 – December 31, 2011. Group Applications must be postmarked by December 31 and received by January 15. Groups will not be formally approved until:

- 1) at least 25 eligible group members have applied (including the group coordinator), and
- 2) all moose CSH permit reporting requirements from the previous regulatory year have been met (not applicable to first-time CSH groups).

Once Group Applications have been submitted, individual/household Participant Applications will be accepted through July 1, 2012 by 5 p.m. (AST). Participant Applications must be submitted to a group coordinator for approval. Group coordinators must then submit approved Participant Applications to ADF&G; applications must be postmarked by June 15 and received by July 1. Incomplete applications will be void per 5 AAC 92.050 *Required Permit Hunt Conditions and Procedures*. Send completed applications to your local ADF&G office, or to the Anchorage ADF&G office (see "For More Information," below).

There is no limit to the number of communities or groups that may apply for a Copper Basin Moose CSH permit and there is no limit to the number of participants who may subscribe to a community or group, except that there must be 25 or more verified members in each group.

INDIVIDUALS/HOUSEHOLDS

Each household must submit one (1) completed Participant Application to a group coordinator for approval. All members of the household age 10 and up must be listed on the application and are subject to all CSH hunt eligibility requirements and conditions. The coordinator must ensure that group members understand the terms and conditions of the CSH permit hunt. Group coordinators may submit approved Participant Applications to ADF&G through July 1.

A "household" means that group of people domiciled in the same residence per 5 AAC 92.990 (23) *Definitions*.

By submitting a completed Participant Application, all household members are certifying they have read, understand, and will comply with the hunt conditions as well as the applicable Board of Game findings (*Game Management Unit 13 Caribou and Moose Subsistence Uses*).

ADF&G will issue one (1) Copper Basin CSH moose harvest ticket/report to each household member listed on the application (the bag limit is 1 bull / person; see "Open Seasons, Bag Limits, and Antler Restrictions," below).

Hunters must abide by all applicable state hunting regulations and statute requirements including licensing, hunter education, and reporting requirements. Similar to other state hunts, CSH harvest ticket numbers must appear on the back of the hunter's license, CSH harvest tickets must be carried in the field while hunting, they must be validated immediately upon killing an animal and before leaving the kill site, and must remain in the hunter's possession until the animal has been delivered to the location of processing for human consumption.

Copper Basin CSH harvest reports must be mailed or delivered to ADF&G within 5 days of taking the bag limit, or within 15 days of the close of the final season, even if the hunter did not hunt or did not take an animal. Hunters may also report online.

PARTICIPANT ELIGIBILITY

All household members subscribing to the Copper Basin Moose CSH hunt must meet the following eligibility requirements. The requirements apply to the same regulatory year as the CSH Participant Application (2012-2013).

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no collective limit to the number of moose meeting general season antler restrictions (see below) that can be taken under the Copper Basin Moose CSH permit.

The bag limit is one (1) bull moose per person in Unit 11 and 13 and one (1) bull moose with spike/fork, or 50" antlers, or 4 or more brow tines in the open portion of Unit 12, unless modified by ADF&G emergency order.

If the number of "any-bulls" reported taken for any one geographic area reaches or exceeds established conservation limits (announced prior to hunting season), the area will remain open to CSH hunters, although the bag limit will change by emergency order to reflect the general season antler restriction for the area.

The Copper Basin Moose CSH hunt season dates and general season antler restrictions are listed below:

Area	CSH Season Dates	General Season Antler Restrictions
Unit 11	August 10–September 20	Spike/fork, or 50" antlers, or 3 or more brow tines.
Unit 13	August 10–September 20	Spike/fork, or 50" antlers, or 4 or more brow tines.
Portion of Unit 12	August 24–August 28 and September 8–September 17	Spike/fork, or 50" antlers, or 4 or more brow tines.

DESIGNATED HUNTERS

The CSH program allows a community or group to designate members (from within the group) who may possess particular expertise in hunting to harvest wildlife resources on behalf of the members of the community or group. To take a moose on behalf of another CSH harvest ticket holder (beneficiary), a hunter must carry both the beneficiary's and their own CSH moose harvest ticket in the field while hunting. The harvested moose must be delivered to the beneficiary. The beneficiary is responsible for all reporting requirements.

HUNT TERMS AND CONDITIONS

Customary and traditional uses of Unit 13 moose are thoroughly described in 2006-170-BOG and 2011-184-BOG. The Board of Game found that the subsistence pattern in the Copper Basin is characterized by thorough use of most of the harvested animal. Therefore, all participants in the Copper Basin Moose CSH hunt must salvage for human consumption:

1. All edible meat from the frontquarters, hindquarters, ribs, neck, and backbone, as well as the head, heart, liver, kidneys, stomach, and hide; and
2. Meat of the head, frontquarters, hindquarters, and ribs must remain naturally attached to the bones until delivered to the place where it is processed for human consumption.

The board also found that the subsistence pattern is characterized by meaningful communal sharing. At least one communal sharing event featuring moose harvested under the terms of a Copper Basin CSH hunt must be held. A complete description of the event (date, location, number of participants, amount of meat shared, and so forth) must be included in the final hunt report, to be submitted by the group / community coordinator.

CUSTOMARY AND TRADITIONAL USE PATTERN

The edible products of moose taken under the terms of a Copper Basin Moose CSH hunt must be used for human consumption and may not be sold or offered for sale. In order to comply with 5 AAC 92.072 (c) (1) (F), the department must ensure that the applicable customary and traditional use patterns described in board findings are observed by subscribers, including meat sharing. Subscribers need not have already

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established the pattern of community use summarized below; however, by applying, subscribers will be certifying that they have read, understood, and will voluntarily attempt to participate in and establish the pattern of subsistence use described in the Unit 13 board findings summarized below:

1. Participation in the consistent pattern of noncommercial taking, use, and reliance on Nelchina caribou, Copper Basin moose and other local wild foods. The existing pattern of use has been established over many generations and is focused on the total aggregate of fish, wildlife, and plant resources in the Copper Basin CSH area.
2. Participation in the pattern of taking or use of wild resources from the Copper Basin CSH area that follows a seasonal use pattern of year-round harvest effort in the area, with harvests of moose and caribou by community members in both the fall and winter hunts, when legally permissible.
3. Participation in the pattern of taking or use of wild resources in the Copper Basin CSH area that includes methods and means of harvest characterized by efficiency and economy of effort and cost, especially taking advantage of the maximum opportunity to harvest, as efficiently as possible, a variety of usable species in the Copper Basin CSH area.
4. Participation in the pattern of taking or use of wild resources that occurs in the Copper Basin CSH area due to close ties to the area and a familiarity with the terrain and associated history of the Copper Basin CSH area.
5. Use of means of processing and preserving wild resources from the Copper Basin CSH area that have traditionally been used by past generations, including use of all of the parts required to be removed from the field under the terms of a Copper Basin Moose CSH permit.
6. Participation in the pattern of taking or use of wild resources from the Copper Basin CSH area that includes the handing down of knowledge of hunting skills, values, and lore about the Copper Basin CSH area from generation to generation. The board considered it critical to the perpetuation of the customary and traditional use pattern to provide opportunities for the young and old to participate in subsistence activities; the board also found it extremely important to stress the need to pass on skills and knowledge associated with use of all parts of the harvested animal.
7. Participation in the pattern of taking wild resources from the Copper Basin CSH area in which the harvest is shared throughout the community, including customary trade, barter, and gift-giving.

In order to observe this pattern, a portion of the edible products of moose taken under the terms of a Copper Basin Moose CSH hunt should be primarily shared, in a meaningful way, with other members of the community or group. Hunters should also demonstrate a pattern of meaningful communal sharing that provides first for the needs of the community or group elders and disabled, as identified by the community or group. In addition, hunters who have harvested their first moose should give a portion to other members of the community or group.

8. Participation in the pattern that includes taking, use, and reliance for subsistence purposes not only on Nelchina caribou and moose, but also on a wide variety of wild resources in the Copper Basin area.

REPORTING

Harvest ticket holders must mail or deliver Copper Basin CSH harvest reports to ADF&G within 5 days of taking the bag limit, or within 15 days of the close of the season, even if the hunter did not hunt or did not take an animal. Hunters may also report online.

Failure to report may jeopardize sustained yield management of Copper Basin moose and the future of the CSH hunt; therefore, failure to report according to this schedule may result in citation and/or placement of harvest ticket holders on the state Failure to Report (FTR) list.

To better address the subsistence needs of Copper Basin Moose CSH participants, the board requested that all moose harvested by CSH participants within the CSH area be accounted for, regardless of whether

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taken under federal or state regulations. All moose taken (that do not meet general antler restrictions) by Copper Basin Moose CSH participants within the CSH area will count against the up to 70 any-bull moose allowed for the CSH hunt.

In order for the department to ensure that permittees have complied with all regulations addressing the terms and conditions of their Copper Basin Moose CSH permit, as well as the customary and traditional use pattern described in 2006-170-BOG and 2011-184-BOG, and in order to gather additional data on subsistence uses, the community or group coordinator must submit an annual written report, which summarizes the group's member households' required reporting information as well as a description of the communal pattern observed by participants. The report must be postmarked by October 20. Additional supplemental reports can be submitted after October 20, prior to the deadline for Participant Applications (July 1). However, subsequent Copper Basin Moose CSH group applications will not be approved until all reporting requirements are met. If no report or an incomplete report is received, the group will be ineligible to participate in subsequent Copper Basin Moose CSH hunts. Group coordinators are encouraged to submit a complete written report as soon as possible to ensure adequate notice for subsequent group approval.

The written report must include, at a minimum:

1. A list of the names and harvest ticket numbers for those individuals whose bag limits were filled under the terms of a Copper Basin Moose CSH permit; and
2. A list of the names and harvest ticket numbers of the beneficiaries whose bag limits were filled by a designated hunter under the terms of a Copper Basin Moose CSH permit; and
3. The number of moose taken in federal subsistence hunts by those hunters also participating in the Copper Basin Moose CSH hunt; and
4. A specific description of how the community or group observed the customary and traditional use pattern described in 2006-170-BOG and 2011-184-BOG. The department will provide a reporting form to assist with this section of the report; however, a summary narrative is also required that includes a description of at least one meaningful communal sharing event.

Some information in these reports may be subject to state confidentiality laws.

Deliver or mail reports to: ADF&G Copper Basin CSH
P.O. Box 47
Glennallen, AK 99588

FOR MORE INFORMATION

Visit www.adfg.alaska.gov for more information, or contact Glennallen ADF&G 822-3461.

Send completed applications to your local ADF&G office, or:
ADF&G Copper Basin Community Subsistence Hunt
333 Raspberry Road
Anchorage, AK 99518

The Alaska Department of Fish and Game (ADF&G) administers all programs and activities free from discrimination based on race, color, national origin, age, sex, religion, marital status, pregnancy, parenthood, or disability. The department administers all programs and activities in compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, and Title IX of the Education Amendments of 1972.

If you believe you have been discriminated against in any program, activity, or facility please write: ADF&G ADA Coordinator, P.O. Box 115526, Juneau, AK 99811-5526; U.S. Fish and Wildlife Service, 4401 N Fairfax Drive, MS 2042, Arlington, VA 22203; Office of Equal Opportunity, U.S. Department of the Interior, 1849 C Street NW MS 5230, Washington DC 20240.

The department's ADA Coordinator can be reached via phone at the following numbers. (VOICE) 907-465-6077. (Statewide Telecommunication Device for the Deaf) 1-800-478-3648; (Juneau TDD) 907-465-3646; (FAX) 907-465-6078; For information on alternative formats and questions on this publication, please contact the ADF&G Division of Wildlife Conservation at P.O. Box 115526, Juneau, AK, 99811-5526 or (907) 465-4176.

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Additional Household Members Age 10 and Older

FIRST NAME MI LAST NAME MM DATE OF BIRTH DD YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID



SIGNATURE DATE

FIRST NAME MI LAST NAME MM DATE OF BIRTH DD YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID



SIGNATURE DATE

FIRST NAME MI LAST NAME MM DATE OF BIRTH DD YYYY

ALASKA DRIVERS LICENSE (DL) NUMBER or STATE ID



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SIGNATURE DATE

When you have completed this form return it to:

_____ Group Coordinator

Revised 20116308

N0033

ATTACHMENT D

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ALASKA DEPARTMENT OF FISH AND GAME
Copper Basin CARIBOU
Community Subsistence Harvest Permit
PROGRAM 2012-2013



HUNT ADMINISTRATION

Community Subsistence Harvest (CSH) Hunt administration will be in accordance with the Alaska Department of Fish and Game's statutory and regulatory authority, including managing this common use resource for sustained yield while adhering to laws regarding the subsistence preference passed by the Alaska State Legislature.

COPPER BASIN CARIBOU CSH PERMIT

According to regulations found at 5 AAC 92.072 *Community Subsistence Harvest Hunt Area* and at 5 AAC 92.052 *Discretionary Permit Hunt Conditions and Procedures*, ADF&G may issue community-based subsistence harvest permits for big game species where the Alaska Board of Game has established a community harvest hunt area. The board established the Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti-Kaah (Copper Center) Community Harvest Area for moose and caribou in 2009 (5 AAC 92.074(d) *Community Subsistence Harvest Areas*), hereafter referred to as the Copper Basin CSH area.

The CSH permit program allows communities or groups of 25 or more to apply annually for a CSH permit for an established CSH area. A group can choose to apply for a Copper Basin caribou CSH permit, a Copper Basin moose CSH permit, or both. These groups may select, from their group members, individual harvesters who may possess particular expertise in hunting to harvest wildlife resources on behalf of the community or group.

The hunt conditions in this Copper Basin Caribou CSH permit program are made for the purposes of notifying the community/group of users of how to use caribou in a manner consistent with the customary and traditional use pattern described in the board's 2006 and 2011 findings *Game Management Unit 13 Caribou and Moose Subsistence Uses* (2006-170-BOG and 2011-184-BOG), as well as to ensure an orderly administration of the CSH permit program and hunt (CC001).

A community or group may possess only one (1) Copper Basin Caribou CSH permit at any given time and group members may subscribe to only one (1) Copper Basin Caribou CSH group per regulatory year. The Copper Basin Caribou CSH permit expires at the end of the regulatory year for which it was issued. Renewal of a Copper Basin Caribou CSH permit is the responsibility of the community or group coordinator.

APPLICATION PROCESS

THE COMMUNITY OR GROUP COORDINATOR

In addition to permit hunt conditions and procedures found in 5 AAC 92.050 and 5 AAC 92.072, the community or group applying for a Copper Basin Caribou CSH permit must designate a coordinator as part of the application process. The coordinator certifies that the information presented in a Copper Basin Caribou CSH permit application is true and correct to the best of the coordinator's ability; monitors and reports on compliance with the conditions of a Copper Basin Caribou CSH permit; and serves as the primary point of contact, among other duties. ADF&G will issue one (1) Copper Basin Community Caribou Harvest Permit to each coordinator.

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2012-2013 Hunt conditions: Copper Basin CARIBOU CSH

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For 2012-2013, the group application period will be November 1 – December 31, 2011. Group Applications must be postmarked by December 31 and received by January 15. Groups will not be formally approved until:

- 1) at least 25 eligible group members have applied (including the group coordinator), and
- 2) all caribou CSH permit reporting requirements from the previous regulatory year have been met (not applicable to first time CSH groups).

Once Group Applications have been submitted, individual/household Participant Applications will be accepted through July 1, 2012 by 5 p.m. (AST). Participant Applications must be submitted to a group coordinator for approval. Group coordinators must then submit approved Participant Applications to ADF&G; applications must be postmarked by June 15 and received by July 1. Incomplete applications will be void per 5 AAC 92.050 *Required Permit Hunt Conditions and Procedures*. Send completed applications to your local ADF&G office, or to the Anchorage ADF&G office (see "For More Information," below).

There is no limit to the number of communities or groups that may apply for a Copper Basin Caribou CSH permit and there is no limit to the number of participants who may subscribe to a community or group, except that there must be 25 or more verified members in each group.

INDIVIDUALS/HOUSEHOLDS

Each household must submit one (1) completed Participant Application to a group coordinator for approval. All members of the household age 10 and up must be listed on the application and are subject to all CSH hunt eligibility requirements and conditions. The coordinator must ensure that group members understand the terms and conditions of the CSH permit hunt. Group coordinators may submit approved Participant Applications to ADF&G through July 1.

A "household" means that group of people domiciled in the same residence per 5 AAC 92.990 (23) *Definitions*.

By submitting a completed Participant Application, all household members are certifying they have read, understand, and will comply with the hunt conditions as well as the applicable Board of Game findings (*Game Management Unit 13 Caribou and Moose Subsistence Uses*).

ADF&G will issue one (1) Copper Basin CSH caribou harvest ticket/report to each household (the bag limit is 1 caribou / household).

Hunters must abide by all applicable state hunting regulations and statute requirements including licensing, hunter education, and reporting requirements. Similar to other state hunts, CSH harvest ticket numbers must appear on the back of the hunter's license, CSH harvest tickets must be carried in the field while hunting, they must be validated immediately upon killing an animal and before leaving the kill site, and must remain in the hunter's possession until the animal has been delivered to the location of processing for human consumption.

Copper Basin CSH harvest reports must be mailed or delivered to ADF&G within 5 days of taking the bag limit, or within 15 days of the close of the final season, even if the hunter did not hunt or did not take an animal. This hunt may close early; it is the hunter's responsibility to check for Emergency Closures. Hunters may also report online.

PARTICIPANT ELIGIBILITY

All household members subscribing to the Copper Basin Caribou CSH hunt must meet the following eligibility requirements. The requirements apply to the same regulatory year as the CSH Participant Application (2012-2013).

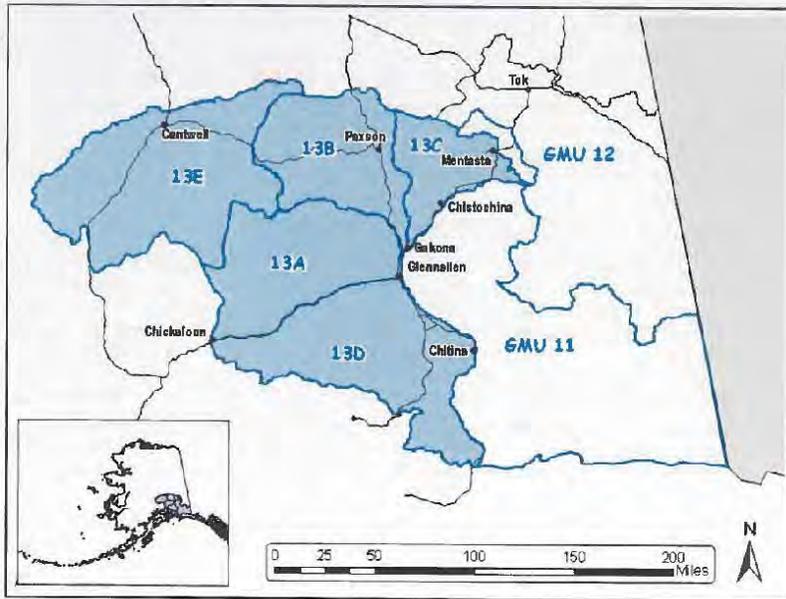
November 8, 2011

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- No member of the household can apply for any drawing/Tier I/Tier II/registration caribou hunts, or hold general season caribou harvest tickets (unless the hunt occurs after the close of the CSH hunt and the bag limit is higher).
- No member of the household can apply for drawing/Tier I/Tier II/registration moose hunts outside the Copper Basin CSH hunt area.
- All household members agree to hunt moose and caribou only within the Copper Basin CSH hunt area.
- No member of the household can be on the Failure to Report (FTR) list.

COPPER BASIN CSH PERMIT HUNT AREA, AND AREA OPEN TO CARIBOU HUNTING

The Copper Basin CSH permit hunt area includes all of Unit 11, Unit 13, and a portion of Unit 12 (southwest of the Tok River where it crosses the Glenn Highway Tok Cut-Off) per 5 AAC 92.074 (d). Due to conservation concerns for adjacent caribou herds, only Unit 13 is open to caribou hunting under the terms of a Copper Basin Caribou CSH permit.



OPEN SEASONS AND BAG LIMITS

The Copper Basin Caribou CSH season is: August 10 – September 20, and October 21 – March 31. The bag limit is one (1) caribou per household. For conservation reasons, the season and bag limit may be

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2012-2013 Hunt conditions: Copper Basin CARIBOU CSH

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modified by ADF&G emergency order. Up to 300 caribou can be taken under the Copper Basin Caribou CSH permit program (applies to all groups collectively).

DESIGNATED HUNTERS

The CSH program allows a community or group to designate members (from within the group) who may possess particular expertise in hunting to harvest wildlife resources on behalf of the members of the community or group. To take a caribou on behalf of another household (beneficiary), a hunter must carry both the beneficiary's and their own CSH caribou harvest ticket in the field while hunting. The harvested caribou must be delivered to the beneficiary. The beneficiary is responsible for all reporting requirements.

HUNT TERMS AND CONDITIONS

Customary and traditional uses of Nelchina caribou are thoroughly described in 2006-170-BOG and 2011-184-BOG. The Board of Game found that the subsistence pattern in the Copper Basin is characterized by thorough use of most of the harvested animal. Therefore, all participants in the Copper Basin Caribou CSH hunt must salvage for human consumption:

1. All edible meat from the frontquarters, hindquarters, ribs, neck, and backbone, as well as the heart, liver, kidneys, and fat; and
2. Prior to October 1, meat of the frontquarters, hindquarters, and ribs must remain naturally attached to the bones until delivered to the place where it is processed for human consumption.

The board also found that the subsistence pattern is characterized by meaningful communal sharing. At least one communal sharing event featuring caribou harvested under the terms of a Copper Basin CSH hunt must be held. A complete description of the event (date, location, number of participants, amount of meat shared, and so forth) must be included in the final hunt report, to be submitted by the group / community coordinator.

CUSTOMARY AND TRADITIONAL USE PATTERN

The edible products of caribou taken under the terms of a Copper Basin Caribou CSH hunt must be used for human consumption and may not be sold or offered for sale. In order to comply with 5 AAC 92.072 (c) (1) (F), the department must ensure that the applicable customary and traditional use patterns described in board findings are observed by subscribers, including meat sharing. Subscribers need not have already established the pattern of community use summarized below; however, by applying, subscribers will be certifying that they have read, understood, and will voluntarily attempt to participate in and establish the pattern of subsistence use described in the Unit 13 board findings summarized below:

1. Participation in the consistent pattern of noncommercial taking, use, and reliance on Nelchina caribou, Copper Basin moose and other local wild foods. The existing pattern of use has been established over many generations and is focused on the total aggregate of fish, wildlife, and plant resources in the Copper Basin CSH area.
2. Participation in the pattern of taking or use of wild resources from the Copper Basin CSH area that follows a seasonal use pattern of year-round harvest effort in the area, with harvests of moose and caribou by community members in both the fall and winter hunts, when legally permissible.
3. Participation in the pattern of taking or use of wild resources in the Copper Basin CSH area that includes methods and means of harvest characterized by efficiency and economy of effort and cost, especially taking advantage of the maximum opportunity to harvest, as efficiently as possible, a variety of usable species in the Copper Basin CSH area.

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4. Participation in the pattern of taking or use of wild resources that occurs in the Copper Basin CSH area due to close ties to the area and a familiarity with the terrain and associated history of the Copper Basin CSH area.
5. Use of means of processing and preserving wild resources from the Copper Basin CSH area that have traditionally been used by past generations, including use of all of the parts required to be removed from the field under the terms of a Copper Basin Caribou CSH permit.
6. Participation in the pattern of taking or use of wild resources from the Copper Basin CSH area that includes the handing down of knowledge of hunting skills, values, and lore about the Copper Basin CSH area from generation to generation. The board considered it critical to the perpetuation of the customary and traditional use pattern to provide opportunities for the young and old to participate in subsistence activities; the board also found it extremely important to stress the need to pass on skills and knowledge associated with use of all parts of the harvested animal.
7. Participation in the pattern of taking wild resources from the Copper Basin CSH area in which the harvest is shared throughout the community, including customary trade, barter, and gift-giving.

In order to observe this pattern, a portion of the edible products of caribou taken under the terms of a Copper Basin Caribou CSH hunt should be primarily shared, in a meaningful way, with other members of the community or group. Hunters should also demonstrate a pattern of meaningful communal sharing that provides first for the needs of the community or group elders and disabled, as identified by the community or group. In addition, hunters who have harvested their first caribou should give a portion to other members of the community or group.

8. Participation in the pattern that includes taking, use, and reliance for subsistence purposes not only on Nelchina caribou and moose, but also on a wide variety of wild resources in the Copper Basin area.

REPORTING

Harvest ticket holders must mail or deliver Copper Basin CSH harvest reports to ADF&G within 5 days of taking the bag limit, or within 15 days of the close of the season, even if the hunter did not hunt or did not take an animal. If the season is closed early by emergency order, unsuccessful (and did not hunt) reports must be returned within 15 days of the closure. Hunters may also report online.

Failure to report may jeopardize sustained yield management of the Nelchina caribou herd and the future of the CSH hunt; therefore, failure to report according to this schedule may result in citation and/or placement of harvest ticket holders on the state Failure to Report (FTR) list.

To better address the subsistence needs of Copper Basin Caribou CSH participants, the board requested that all caribou harvested by CSH participants within the CSH area be accounted for, regardless of whether taken under federal or state regulations. All caribou taken by Copper Basin Caribou CSH participants within the CSH area will count against the up to 300 caribou allowed for the CSH hunt.

In order for the department to ensure that permittees have complied with all regulations addressing the terms and conditions of their Copper Basin Caribou CSH permit, as well as the customary and traditional use pattern described in 2006-170-BOG and 2011-184-BOG, and in order to gather additional data on subsistence uses, the community or group coordinator must submit an annual written report, which summarizes the group's member households' required reporting information as well as a description of the communal pattern observed by participants. The report must be postmarked by April 30. Additional supplemental reports can be submitted after April 30, prior to the deadline for Participant Applications (July 1). However, subsequent Copper Basin Caribou CSH group applications will not be approved until all reporting requirements are met. If no report or an incomplete report is received, the group will be ineligible to participate in subsequent Copper Basin Caribou CSH hunts. Group coordinators are

November 8, 2011

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Additional Household Members Age 10 and Older

FIRST NAME MI LAST NAME MM DATE OF BIRTH DD YYYY

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Grass Coordinator

Revised 20110308

N0034

Submittal ID	Commenter	Title	Organization	Topic List	Comment
N0034	paul roderick	president	talkeetna air taxi	General (to the EIS), 1 – Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>This comment is submitted by Talkeetna Air Taxi (TAT) a FAR part 135 air taxi headquartered in Talkeetna, Alaska. TAT owns and operates 8 aircraft and is one of the largest air services in the area. The comments will concentrate on the proposed expansion of the Fox 3 MOA. Most of the clients we fly into the mountains and rivers in the Talkeetna area including the Talkeetna Mountains expect a natural pristine environment that is relatively free of pollution and noise. The user groups that frequent the Talkeetna Mountains are as follows: rafters on the Talkeetna River, climbers and skiers on the glaciers and high peaks in the Mount Sovereign area, hikers in the lower tundra mountains, hunters, and photographers. These user groups are very concerned with the expansion of the Fox MOA and feel this will potentially ruin their experience in the mountains. The central theme stems from both the low level flight potential (500ft) and the expansion of it. One of the great draws of the Talkeetna Mountains is that is is far from any large groups, a quiet environment, and relatively close to Talkeetna. It offers a Brooks Range type experience that is a fraction of the cost. We as an air service feel a need to protect this type of environment for there are few left. Once word gets out that it is in a hot MOA that is approved for low level ops with military aircraft its reputation could be ruined in short order. The next concern is potential conflict with our aircraft and the low level operations. We operate with military aircraft in the Susitna MOA and the Denali area. We have had conflict with fighters straying from the MOA and entering Denali Park. The concerning aspect is the aircraft are not tuned to the common frequency. We have complained over the years but there has not been any acknowledgement. We feel operations in the expanded FOX MOA will increase the risk of a potential mid-air and our pilots are very concerned. Hunters in town of Talkeetna have voiced concern about the low level operations by military aircraft. They feel this could disrupt caribou migration, breeding and even the hunt. Climbers and skiers are concerned about potentially being avalanched by the effects of low flying aircraft and sonic booms. As a pilot looking at an aviation map I am amazed there needs to be expansion to the MOAs.</p> <p>Galena, Stony, Susitna, Fox, Delta....all consume hundreds of square miles! The proposed susitna Dam has increased air traffic and should be addressed in your study. In closing we feel very strongly that the no action alternative should be chosen. Thanks.</p>

N0035

[REDACTED]
From: Ruth McHenry [REDACTED]
Sent: Monday, July 09, 2012 11:54 AM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS

July 9, 2012

ALCOM Public Affairs

9480 Pease Avenue, Suite 120

JBER, AK 99506

Re: JPARC Modernization and Enhancement DEIS

Gentlemen:

Copper Country Alliance is a non-profit conservation organization serving the Copper River Basin and Wrangell Mountains area of Alaska. Most of our members live in the Copper Basin; the others are very familiar with the region. All share an appreciation for the region as it is: scenic and wild, with the chance to see interesting wildlife. Most of our members also engage in subsistence activities in the region. Following are our comments on the JPARC Modernization and Enhancement Draft Environmental Impact Statement (DEIS). Our comments are confined to the FOX and Paxson Military Operations Areas (MOAs).

We are completely opposed to Alternatives A and E in the JPARC Draft Environmental Impact Statement. We prefer the No Action Alternative, but only because no alternate was presented that would have addressed the current flagrant violations of horizontal and vertical airspace and of supersonic speeds below FAA limits.

DEIS FAILS TO ADDRESS SIGNIFICANT ISSUES THAT WERE RAISED IN SCOPING:

Failure to Discuss Violations by Air Force Jets

N0035

Airspace violations are not rare: Our members and others have observed Air Force jets flying below the required 5000 feet AGL in the Fox 3 MOA, training below 18,000 feet in the Paxon ATCAA, and flying at supersonic speeds when they are below required minimums. Our organization raised this issue in our scoping comments. The Bureau of Land Management documented specific incidents. (See v. II, A-45 and A-46.) I believe that other commenters also raised this issue. We have been unable to find any reference to this issue in the DEIS, other than including the BLM documents and mentioning the toll-free number that citizens can use to report jet noise. Noise is clearly not the only issue here, and the DEIS does not—as far as we can determine—disclose that there are violations.

Our organization’s scoping comments specifically requested that this issue be addressed, and we suggested mitigations: “All alternatives should include monitoring and enforcement of flight levels and flight speeds. Random but frequent checks should be made of flight tapes. Look into the feasibility of beepers than warn pilots when they are below prescribed flight levels and when they are approaching Mach 1.”

Failure to Address Important Cumulative Impacts

Susitna Dam:

The proposed Susitna-Watana dam is a huge project for which the Federal Energy Regulatory Commission (FERC) is preparing an Environmental Impact Statement. It has strong backing from the state legislature, which in the summer of 2011 provided the Alaska Energy Authority with \$66 million to study it; therefore, it is “reasonably foreseeable.” The dam’s impacts to wildlife could be substantial, as evidenced by ADFG embarking on multi-year studies on the Nelchina caribou herd, moose, and ptarmigan, while other entities are conducting studies of potential impacts to migratory birds. The dam site would lie beneath the Fox 3 MOA, where this DEIS proposes to lower the minimum flight level from 5,000 feet above ground level (AGL) to 500 feet AGL. According to scoping comments provided by ADFG and USFW on the JPARC proposal, these low-level flights are of particular concern with regard to many wildlife species, including the moose, the Nelchina caribou herd, and migratory birds being studied for the Susitna-Watana project. Also, one of the proposed access roads, departing from the Denali Highway, underlies the Fox 3 MOA. Certainly this is a cumulative impact that should have been mentioned.

Mineral Exploration and Mining:

The DEIS (vol. I, page 3-59) addresses mining claims and active mines in the region. It depicts them in Figure 3-12. Curiously, it does not list any of them as having cumulative impacts in conjunction with the JPARC proposals. To take one example with which our organization is very familiar, Pure Nickel, Inc., has been conducting exploratory drilling on its “MAN” nickel/copper/platinum claims, which include important wintering and rutting grounds for the Nelchina caribou herd. This is of concern to resource managers. As the

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Alaska Board of Game wrote in its March 26, 2008 letter to the Governor, "We recognize the potential for mineral extraction in this area and in associated mineral leases, but remain convinced the long-term value of maintaining wildlife habitat far outweighs the potential benefits of possible development projects known at this time." The claims area is also an important subsistence area and is a favorite destination for hikers, paddlers, photographers, mushers, and tour companies. To date, multinational ITOCHU has invested \$17 million on these claims, making it sufficiently foreseeable to deserve mention. As another example, the DEIS mentions active mining north of the Denali Highway at Valdez Creek, but does not discuss whether there might be cumulative impacts with regard to subsistence, recreation, or wildlife.

In spite of the all the above, the DEIS says, with regard to cumulative impacts to biological resources: "**Cumulative Impacts of JPARC Proposals with Other Non-Military Actions.** No substantive non-military actions have been identified for the areas under the proposed expanded Fox 3 or Paxon MOAs; therefore, contributions of non-military actions to cumulative effects in the Fox 3/Paxon MOA proposal area would be insignificant." (DEIS v. I, page 4-27)

Climate Change:

Our scoping comments stated, "Research is especially important for those species with small populations and/or special vulnerability to other stressors like climate change. Examples include wolverine and pika." The only reference that the DEIS makes to climate change is on page 4-17, where air quality is discussed. There is no mention of how implementation of Alternative A or E might interact with climate change to affect biological resources. For instance, how might low level flights and/or sonic booms affect denning wolverine?

DEIS UNDERSTATES IMPACTS:

Noise:

The DEIS gives 123 dB as the loudest noise that would be heard in the Fox 3 and Paxson MOAs during low-level (500 feet AGL). Presumably, this would be generated by subsonic flight, because supersonic flight is not supposed to be conducted below 5,000 feet AGL or 12,000 feet AGL. "This degree of noise would likely annoy or startle persons overflown," (DEIS v. I, page 3-79). However, according to the *Canadian Journal of Otolaryngology*, just 120 dB exposure can injure the ear. The Final EIS should acknowledge ear damage and return the minimum flight level to 5000 feet AGL to prevent such damage.

Within the DEIS, we have not found any information on the decibel level of a supersonic jet flying at 500 feet AGL or 1000 AGL. As documented by the Bureau of Land Management (DEIS v. II, A-25 and A-26), *supersonic flight already does occur* at 1000 feet AGL or even hundreds of feet AGL. "Annoy" and "startle," the words used in the DEIS, hardly describe the reactions of those exposed. "Terrify" is more accurate. I have experienced this myself while berry picking with a child a few miles east of the Fox 3 MOA, and I thought that

N0035

a bomb had dropped nearby. (See Copper Country Alliance Scoping Comments.) The Final EIS should acknowledge that these events occur and will become more common, should quantify the noise level, should describe impacts to wildlife and humans, and should describe the ways that it proposes to address the problem of too-low supersonic flight.

MITIGATIONS:

- 1. Keep the minimum flight level at 5,000 feet AGL.** The proposed 500-foot AGL would put civil aviation in harm's way; disrupt wildlife at critical times; disrupt human activities such as subsistence, wildlife viewing, hiking, and paddling; and damage the ears of humans and wildlife.
- 2. Enforce restrictions on pilots flying Air Force jets.** Violations of minimum flight level, MOA boundaries, and supersonic flight minimums have been rampant. Somewhere, the system is breaking down. Restrictions and the consequences of violations should be emphasized before each flight. Flights should be closely monitored. Discipline should be swift and certain. Foreign pilots who violate restrictions should be sent home.
- 3. Conduct any supersonic operations at or above 5,000 feet AGL or 12,000 feet MSL, whichever is higher.**
- 4. Create a civilian oversight group with members selected by affected communities and interest groups.** Meet at least quarterly to exchange information. Fund the meetings and participants' meeting-related expenses.
- 5. Delineate and establish seasonal flight avoidance areas and overflight/operational restrictions over wildlife and other areas.** Solicit and take the advice of biologists in the Alaska Department of Fish and Game, the U.S. Fish and Wildlife Service, and the Bureau of Land Management.
- 6. Establish a no-flight zone over the Delta and Gulkana Wild and Scenic Rivers and 10 miles on each side of them.** This means no flights, at any altitude.
- 7. Establish a no-flight zone over the Denali and Richardson highways, and 10 miles on each side of them.** This means no flights, at any altitude.

Thank you for this opportunity to comment and for planned future opportunities.

Sincerely,

COPPER COUNTRY ALLIANCE

Ruth McHenry, Volunteer Staff

N0035

Ruth McHenry, Volunteer Staff
Copper Country Alliance
HC60 Box 306T
Copper Center, AK 99573
907-822-3644

N0036

[REDACTED]

From: William (Bill) Glanz [REDACTED]
Sent: Monday, July 02, 2012 4:33 PM
To: ALCOM J08 Admin Box
Subject: EIS

I am Chair of the local Fish and Game board here in Central and the Locals feel that we do not wish to see the Range expanded since we all feel that the number of sonic booms are some thing we do not wish to increase and the number of Aircraft are a danger to local Pilots plus We have seen the wild animals dart off leaving there young new born open to being taken by Wolves and Bears. Please No more land and air being taken by the DOD.
Thanks William L. Glanz Central, Alaska [REDACTED]

N0037

[REDACTED]

From: Wellwood Center [REDACTED]
Sent: Tuesday, July 10, 2012 2:59 AM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS

Re: JPARC Modernization and Enhancement EIS

ALCOM Public Affairs:

I am greatly concerned, in fact alarmed, by the proposal to enlarge the jet training areas (MOAs) to include Lake Louise, most of the Denali Highway including the Tangle Lakes region, and some of the Richardson Highway. The tremendous expansion of space is cause enough for objection, but the allowance of flights as low as 500 feet above ground level is unconscionable over this terrain. War planes are necessary and, in their own way, beautiful, but they do not mix with the character of this region and the values placed upon it by those who use it for recreation, hunting, fishing, camping, exploration, and the quest for quiet and solitude. The aerial invasion and blast of sound would harm and alarm both wildlife and humans.

The Delta and Gulkana Wild and Scenic Rivers, the beautiful and peaceful Tangle Lakes, the Denali Highway itself with its wild and expansive vistas, all are places dear to the souls of many people, both those who live in this area and those who visit, who find these regions valuable beyond price for the increasingly rare opportunities they give us to experience the world as it was created.

In the military's honorable quest to protect us, let's not damage those things that are truly worth protecting.

Thank you for your thoughtful consideration of these concerns.

--Dave Wellman
Business Owner (Wellwood Center Bed and Breakfast) Board Member (Wrangell Institute for Science and Environment, Copper Country Alliance) Executive Director (Wellwood Conservancy)
Retired science teacher (Kenny Lake School)

N0038

[REDACTED]

From: Coalition for Susitna Dam Alternatives [REDACTED]
Sent: Thursday, July 05, 2012 5:53 PM
To: ALCOM J08 Admin Box
Subject: Public Comment on Draft EIS for Modernization and Enhancement JPARC

7/5/12

Board of Directors
Coalition for Susitna Dam Alternatives (CSDA)

In the best interests of the public, CSDA wants to point out that under Cumulative Impacts, the draft has not mentioned the proposed Susitna Dam. This should be done. Include the following:

Proposed Susitna-Watana Hydroelectric Project

This is a megaproject that would develop a large footprint in the Fox 3 MOA. It is proposed to build a 700 to 880 foot dam at River Mile 184 of the Susitna River. There would be a permanent airport and a permanent road built. During the construction of the proposed project, there would be many airplane flights bringing workers and equipment into the area. In the next three years, there will be over 50 studies done in the area as part of the Federal Energy Regulatory Commission Licensing process and the NEPA process. The reservoir will be approximately 40 miles long by 2 miles wide and will be a focal point for increased human presence in the project area.

--
Phone contact:
907 733 5400

Website:
www.susitnadamalternatives.org

N0039

[REDACTED]

From: Pamela Miller [REDACTED]
Sent: Monday, July 09, 2012 12:43 AM
To: ALCOM J08 Admin Box
Cc: Jenna Hertz; [REDACTED]
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission
Attachments: NAEC JPARC Final Comments 7-9-2012.pdf

Please find our organization's comments, attached.

Pamela A Miller
Arctic Program Director
Northern Alaska Environmental Center
830 College Road
Fairbanks AK 99701
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www.northern.org

N0039



July 9, 2012

Lieutenant General Dana Atkins
ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506
Via E-Mail: alcom.i08@elmendorf.af.mil
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission

Dear Lieutenant General Atkins,

The Northern Alaska Environmental Center (NAEC) thanks you for the opportunity to submit comments on the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Environmental Impact Statement (EIS) on behalf of our organization and its members. Our non-profit conservation organization promotes conservation of the environment and sustainable resource stewardship in Interior and Arctic Alaska through education and advocacy. We have over 1,500 members most of whom live, work, and recreate in the areas that will be affected by the proposed JPARC activities.

Recommended Alternative

Based on the alternatives listed in the proposal thus far, we recommend the no action alternative. We will address in more detail some particular issues that affect the quality of life of Fairbanks members and elsewhere in the Interior of Alaska, which primarily involve the FOX 3 and Paxson MOA addition, Tanana Flats Training Area Roadway Access and expansion of the Proposed Realistic Live Ordnance Delivery west of the Donnelly Training Area. We also recommend consideration of a new alternative that would decrease level of existing impact in the national conservation areas which include preserve, refuge, and wild and scenic rivers, as well as throughout the Yukon River watershed.

FOX 3 MOA and Paxson MOA

The eastern Alaska Range is an important area to many of our members, who spend considerable time deep in the mountains. Many have cabins within FOX 3 and within the additions. Lowering AGL's from 5,000 to 500 feet is a dramatic change and one that has negative impacts to various user groups and potential impacts to wildlife. Planes flying at an altitude of 500ft would produce cumulative impacts to people and fish and wildlife from noise disturbance including human health and wildlife reproduction and energetic stresses, impacts to sport and subsistence hunting, fishing, and other activities, effects on federal and state conservation areas and other public lands, wild lands and wilderness values including solitude and intact ecological system integrity, recreation and tourism, effects on bush and commercial flight safety, and air and water quality impacts. We are also concerned

A 501 (c) (3) NOT-FOR-PROFIT ORGANIZATION
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about the effects on Pacific salmon, migratory birds, marine mammals, and other wildlife that migrate from the Gulf of Alaska to sub-arctic and arctic habitats and may be affected by the Gulf of Alaska Temporary Maritime Activities Area.

Wildlife

As the EIS states, the Fox 3 MOAs and the new Paxson MOA include some of the largest hunting grounds for caribou as well as lambing and rutting areas for caribou and Dall sheep. It is vital that mitigation measures and flight restrictions be put into place to protect calving grounds, lambing areas, and rutting areas indicated in Figure 3-5 and 3-6. We support the establishment of a minimum overflight altitude of 3,000 feet AGL over the Delta and other Caribou Herd calving areas from May 15 to June 15. Judging by Table 3-11, not much caribou habitat has been spared in the Expanded Fox 3 MOA as 94% of the airspace consists of caribou habitat. We recommend measures to reduce this to 75% or less to protect this vital subsistence resource. The EIS only cites one study of the impacts on Dall Sheep. One study is inadequate. In terms of wildlife, NAEC believes Alternative E superior to Alternative A because it impacts less acreage of wildlife habitat. The No Action Alternative is our preferred alternative.

The EIS should also consider impacts on smaller, less iconic animals and migratory birds. Figure 3-7 is inadequate in showing the diversity of Migratory Waterfowl Habitat underlying the Fox 3 and Paxson MOAs. Since the EIS states that studies have shown that the visual aspect and peak noise level (Lpk) of overflights diminish rapidly with increasing altitude of overflight, we recommend that you raise the 500 foot AGL to at least 1,000 feet in this critical waterfowl area.

Hunting and Recreation

Hunters are perhaps the most common user group throughout the eastern Alaska Range. AGL's of 500 feet will certainly impact the experience of their hunt -- from the loss of a wilderness experience to the potential and unpredictable herd scattering that could occur when an aircraft traveling at or near mach speeds nears by. The proposal would affect recreational visitors to the Denali Highway -- including its surrounding public lands -- which is a favorite area to bring the important tourism visitor sector "visiting friends and relatives" as well as independent travelers and others. NAEC urges the Air Force to consider limiting air traffic during the months that ADF&G data has shown high visitor use and hunter success (namely mid-August, late September, and end of October to early November). The Paxson MOA would certainly make operations more difficult for local pilots and their clients, wildlife, and ground travelers.

Mountaineering

Mountaineering is another common use for which lowered AGL's and increased MOA's would bring negative impacts. Sonic booms from jets have been known to trigger avalanches on slopes that otherwise would remain stable for mountaineers. In addition, jets flying so close to mountaineers -- who can often be in serious situations in the first place -- presents unnecessary stresses, compromises safety, and also greatly detracts from the experience of solitude which is best exemplified in our great mountain ranges. Such low AGL's may also pose problems for bush pilots who would normally be flying under the MOA's, adding extra expense to traveler's budgets if they are required to add more miles to their flight plans or simply not be able to go. We recommend that the EIS include an analysis of such comments and explain the process for the public to provide documentation of such events.

N0039**Special Areas**

We are especially concerned about this expansion southward to the Lake Louise area and farther eastward on the Denali Highway. In addition to the greater Eastern Alaska Range, there would be substantial impacts to the Tangle Lakes – a very popular birdwatching, camping, hunting, fishing, and paddling destination not currently affected by any MOAs. The proposed 500 foot AGL's would certainly alter the experience of users there, as well as potential stresses to the Nelchina Caribou Herd, which relies on that region for wintering habitat. Many of our members have publicly spoken out about designating the area as a State Wildlife Refuge. The proposed 500 foot AGL's are not compatible with that type of use and land management. We recommend that Tangle Lakes be designated an avoidance area as Lake Louise is proposed to be to minimize impact on residents. This area also includes the Tangle Lakes Archeological District as well as the Delta National Wild & Scenic River.

Noise Pollution

In Table 1-10 of the EIS, the FOX 3 MOA and Paxson MOA are noted to have potential for significant adverse impacts on socioeconomics, noise, safety and land use. Under Alternative A, the noise pollution in the Paxson MOA would increase substantially, from 37 to 54 dB L and noise pollution in FOX 3 MOA would increase from 29 to 49 dB L. In Alternative E, the Paxson levels would increase from 37 to 54 dB L and Fox from 39 to 50 dB L. For these reasons, we do not find that the benefits outweigh the risks in the proposed plan for the addition to FOX 3 and MOA, and therefore request No Action be taken regarding these areas. The military already controls large swaths of airspace and could certainly find a way to use existing resources to fit their mission.

We request that No Action be taken regarding the proposed plan for a Paxson MOA.

Tanana Flats Training Area Roadway Access

The Tanana River is a tremendous resource near and dear to the inhabitants of Alaska's Interior. It is a major tributary of the Yukon River and a vital salmon subsistence river, waterfowl corridor, and transportation corridor for recreationalists and local residents of the interior.

Wetlands and Water

Table 1-10 of the EIS notes that the Tanana Flats Training Area Roadway Access comes with the potential for significant adverse impacts on physical resources including soils and permafrost, water resources, biological resources, and wetlands. We are concerned about potential impacts of the proposed roadway project on the delicate biological balance of this river downstream. Specifically, as the EIS admits, hydrologic studies are needed to ensure that culverts installed along the proposed roads would not produce a discernible change in the hydrologic flow regime of the area. We ask that you consider the potential for significant adverse impacts on subsistence for this project.

The area surrounding the Tanana is wetlands-rich. Sixty-five percent of the Tanana Flats Training Area is wetlands and special care must be taken to preserve the ecosystem integrity of this area to mitigate impacts downstream. Detailed wetlands surveys should be required before this project moves forward. We urge developers to follow the recommended site selection criteria and BMPs in section

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3.8.6 to reduce impacts on water and wetland quality. Sensitive areas for Raptors should be included in the list of criteria developed to reduce adverse effects on page 3-381

Living/Recreating on the Tanana

Many of our members canoe and motor between Fairbanks and Nenana as a recreational and subsistence activity. The population of Fairbanks uses this area heavily for summer salmon fishing and fall moose hunting. Members living on this stretch of the river have complained of shocking noise pollution and disturbance from what they have described as “bombs” in the Tanana Flats Training Area on the East Bank of the river. People on the West Bank of the Tanana should be considered in the Affected Environment section of Socioeconomic impacts.

Yukon River Watershed Impacts

The upper Yukon River watershed already has a high concentration of MOAs (Yukon 2, 3, 4, 5) that can result in adverse impacts to wildlife, recreation, and subsistence resources and users and noise disturbance that is incompatible with the purposes of Yukon-Charley National Preserve, Yukon Flats National Wildlife Refuge, part of Arctic National Wildlife Refuge, and the Birch Creek, Charley, and 40-mile Wild & Scenic Rivers, and we recommend consideration of a new alternative that would decrease level of existing impact in the conservation areas and throughout the Yukon River watershed.

Realistic Live Ordnance Delivery

We believe the Proposed Realistic Live Ordnance Delivery west of the Donnelly Training Facility is also unnecessary. We are opposed to additional live ordnance designations and feel those activities should be limited to existing facilities. We have heard from members whose planned expeditions to exit the peaks of the Eastern Alaska Range have already been thwarted upon learning about the restrictions that made it illegal to float down Delta Creek. We are opposed to any additional restrictions that undermine Alaskans’ ability to enjoy their surrounding landscapes.

General Comments

Document and Maps

The DVD copies of this document were fairly easy to navigate and we appreciate the attention put to that. We similarly appreciate Figure 3-10 (Land Status and Special Use Areas in the Fox 3 MOA Expansion and New Paxson MOA Proposal area) in that it delineates land use categories but feel the EIS could go much farther in clearly identifying conservation areas by their individual place names, rather than slight shifts in colors and dash marks. Because the proposed areas encompass such a complicated patchwork of land designations, we recommend that all maps show the boundaries of federal and state conservation areas. This should include parks, refuges, conservation areas, recreation areas, National Wild and Scenic River, proposed wilderness areas, state habitat areas. We believe this will help the public understand incompatible uses and to assess impacts as well as better assess mitigation such as additional seasonal restrictions to avoid effects on wildlife reproduction, migrations, and other sensitive activities.

Energy Conservation and Renewable Energy:

Energy conservation is a core value of our organization. We support and applaud the plan’s efforts to reduce fuel consumption and increase efficiency. We applaud the inclusion of figures like 3-13 that

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shows the Renewable Resources in the Fox 3 MOA and New Paxon MOA Proposal Area, although we do not sense meaningful integration of this data into the EIS or purpose of the expansion. We do not, however think that the most impactful savings can come at the cost of AGL reductions to 500 feet, a height that is jarring and disruptive to wilderness qualities of solitude and quiet that we prize Alaska's remote areas for.

If the military is truly concerned with energy efficiency, it seems that they should do everything in their power to base flights more locally. There is much energy used getting planes to the Yukon-Charlie area from Fairbanks and Anchorage. If the Eielson Air force Base was moved to Anchorage, there would be a huge increase in fuel costs associated with getting the planes to interior-based flight areas. We request that the cumulative impacts of this potential move be addressed in the EIS.

Noise Pollution

We believe additional night hours on existing MOA's will pose great impacts to residents, recreational and subsistence users and wildlife. We ask that the Air Force exercise some restraint and limit its noise impacts on these places by using existing policy regarding night hours. None of the alternatives adequately address the cumulative impacts of the existing MOA night flying disruptions. In the materials submitted to the public, there is no definition of what a "documented noise sensitive area" is or what restrictions, if any, might be associated with these areas.

Flight Numbers and Hours

While there are alternatives described with different extensions of Proposed Night Joint Training for all training purposes versus major flying exercise, there is no indication of the total number of flights anticipated for each alternative. Alternatives should also be considered that may reduce flight hours or numbers of flights in existing MOAs in consideration of the cumulative impacts.

Thank you for taking the time to read our thoughts on this important matter. We hope to be involved in the future, as do many of our colleagues.

Sincerely,



Jenna Hertz,
Arctic Grassroots Coordinator



Pamela A. Miller
Arctic Program Director

N0040

[REDACTED]

From: Mackenzie Dickson [REDACTED]
Sent: Monday, July 09, 2012 2:01 PM
To: ALCOM J08 Admin Box
Cc: Randy Hansen; Sean Elliott
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission
Attachments: Alaska JPARC Comment.pdf

Good Afternoon,

Attached is EAA's comments to the proposed JPARC expansion.

Respectfully,

Mackenzie Dickson
Government Relations Intern

EAA - *The Spirit of Aviation* - www.eaa.org

[REDACTED]

See you at EAA AirVenture Oshkosh, July 23 - 29, 2012, www.airventure.org

N0040



July 9, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

Re: Draft Environment Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex

The Experimental Aircraft Association (EAA), on behalf of over 176,000 general aviation pilots and aviation enthusiasts nationwide, including more than 5,000 members in Alaska, submits the following response to the U.S. Department of Defense (DoD) in regards to the Draft Environmental Impact Statement (DEIS) for the expansion of the Joint Pacific Alaska Range Complex (JPARC).

EAA concurs with the concern of its members who live, work, and fly in the areas included in the DEIS. The impact of the proposed expansion of the JPARC Military Operating Areas (MOAs) to general aviation must be considered due to the importance of general aviation to the Alaskan civilian population. Some of the busiest airspace for general aviation traffic in Alaska lies within the areas included in the proposed expansion. Furthermore, the JPARC lies in close proximity to three of Alaska's largest population centers: Anchorage, Fairbanks and the Mat Su Borough. Busy air routes which link these population centers and their surrounding areas will be impacted by the expansion of the MOAs.

Included in the DEIS is the lateral and vertical expansion of the Fox 3 MOA and the addition of the new "Paxon" MOA. The lowering of the Fox 3 MOA's floor from 5,000 feet AGL to 500 feet AGL significantly diminishes safety and increases the risk of collision between the small general aviation aircraft that frequent this airspace and fast moving military jet traffic. This large decrease in the MOA's floor elevation also severely restricts general aviation pilots to flying at low altitudes which are unrealistic and unsafe in mountainous terrain. This restriction greatly reduces a general aviation pilot's options in the event of an emergency such as an engine failure. Due to these risks, the floor of the Fox 3 MOA should be kept at 5,000 feet AGL and its boundaries should be extended the least amount possible.

The proposed Paxon MOA would also essentially cut off major portions of important air routes that link Southern and Northern Alaska. High amounts of general aviation traffic would be restricted to small corridors, increasing the likelihood of mid-air collisions. The proposed Paxon MOA would also cover a heavily utilized recreational and hunting area. The Paxon MOA should

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either be stricken from the proposal completely or restricted to high-altitude operations to minimize risks to general aviation.

These proposals as well as others included in the DEIS are far-reaching and would have a profound impact on general aviation in Southern Alaska. The impact to the livelihoods of Alaskans living in the areas that will be affected by these proposed changes should be carefully considered before any decisions are made regarding the future of the JPARC.

EAA is grateful for the opportunity to comment on this important issue. We kindly ask the DoD to consider the concerns of the Alaskan general aviation community before approving these proposals. We look forward to a reasonable solution so that the needs of both the United States military and the Alaskan general aviation community are met.

Thank you for considering these comments. Please contact us at 920-426-6103 if you have any questions.



Randy Hansen
EAA Government Relations Director

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JUL-9-2012 08:51A FROM: AIRMEN'S ASSOCIATION 9072451259

TO: 5525411

P.1



ALASKA AIRMEN'S ASSOCIATION, INC.

July 7, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

by fax 552-5411 ☺
email alcom.JOB@
elmendorf.af.mil

Re: DRAFT EIS comments on the proposed Joint Pacific Alaska Range Complex Expansion

Dear Sirs,

The Alaska Airmen's Association is a statewide organization with 2500 members dedicated to supporting safe aviation in Alaska. In this letter we hope to define the requirements of the civil aviation community and elucidate industry concerns. Specific areas of the proposal include the expansion of the Fox 3 MOA, the proposed Paxson MOA Low Altitude Structure, IFR Access to MOA Airspace, restricted airspace over the Battle Area Complex south of Delta Junction and the proposed UAV Corridors. Given the importance of the aviation transportation system for all Alaskans we trust the military acknowledges the requirements of the civil aviation community for the safety of all users.

The proposed expansion of the Fox 3 MOA intrudes both laterally and vertically in to an area of Alaska highly used by the general public. Expanding a MOA to within 30 miles of Alaska's fastest growing populace is precarious. The Mat-Su Valley is home to over 230 landing areas and to over 2,000 of Alaska's general aviation pilots. The Lake Louise recreation area is one of the most frequented destinations for all Alaskan's who enjoy hunting, fishing, hiking, boating but most importantly for the quiet and pristine outdoor experience. Military aircraft traveling in excess of 500kts and/or 500' would not only endanger civil aviation traffic but destroy Alaska's quintessence.

The same argument applies to the Paxson MOA Low Altitude proposal. This area is a major VFR route connecting northern Alaska with the south central and eastern regions of the state. Variable weather in this area eliminates the discussion of corridors that would create congested, unsafe situations for aviation traffic.

MOA's today prohibit IFR access by civilian aircraft during exercises. This not only affects the economic viability of communities with and outside of these areas but history shows it has been difficult even obtaining access during emergency situations. This results in an even bigger concern: the loss of safety for VFR operators who are being encouraged to use low-level civil corridors. If larger, IFR capable aircraft are forced to use the VFR corridor during these exercises, this puts these larger, faster aircraft on the same flight path as our smaller general aviation aircraft at low altitude, which is a loss of safety for all civil operators. We oppose any additional airspace that hinders IFR traffic and the negatively impacts our communities.

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JUL-9-2012 08:51A FROM:AIRMEN'S ASSOCIATION 9072451259

TO:5525411

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Five years ago the Alaska Airmen participated in an EIS process that resulted in the building of the Battle Area Complex south of Delta Junction. One of the concerns at the time was the possibility of restricted air space over the complex. We were assured that this would never be a requirement. Our position has not changed even though the military's planned use of airborne weapons release has changed. We oppose restricted airspace over an area where weather, terrain, and mountain passes creates a challenging and potentially unsafe situation.

The proposals to establish more restricted airspace for live ordnance delivery further impacts the Fairbanks, Delta Junction areas and north even more. Again, the areas affected are accessed by Alaskans utilizing these areas for mining, hunting and recreation. Existing restricted areas already have a negative impact to civilian communities.

We understand Unmanned Aerial Vehicles are the future and that the military would like to integrate these into their training. Corridors allowing UAV's to access training areas is an enormous safety concern. Currently the National Airspace System does not have a mechanism that allows UAV's to harmoniously fly and communicate in the same airspace as civil aircraft. Until true sense and avoid capability is defined and developed we need to side with safety and oppose these corridors as proposed.

Alaska already has one of the largest areas of airspace in the world secured for training. The Alaska Airmen's Association supports our military and understands the need for training; however we are concerned for other users of this airspace. Through the scoping and public meetings it was explained that the military needed such low altitudes and expanded areas in order to train for existing and future threats to the 5th generation fighters and to train with new weapons systems. It was also stated that this redesign was based on saving transient time and fuel to reach the training areas. While not part of this proposal, we ask the military to look at all Alaska airspace they currently hold and release airspace that is not being effectively utilized. We also question the reasoning and claims for the proposed F-16 move to JBER as they seem to contradict the motives of the JPARC redesign.

We do know that improved and consistent communication that includes real-time information for pilots sharing this airspace needs to occur. Implementing a statewide Special Use Airspace Information Systems (SU AIS) as well as improving the existing service are essential to operating an airspace complex of this size. Radio coverage and communication remains unreliable in the eastern areas of the current complex. Beside improvements to the current program, we would like alternatives to be explored for communicating the status of the MOA's improving access in the ranges for civil aircraft when not in use. We ask that the floor of current and proposed airspace be determined based on communication coverage for SU AIS.

Thank you for the opportunity to comment. We ask that the Military, the FAA and the aviation community continue to work together until we find a solution.

Sincerely,



Adam White
President

N0042

[REDACTED]

From: [REDACTED]
Sent: Monday, July 09, 2012 3:39 PM
To: ALCOM J08 Admin Box
Subject: [Fwd: JPAEC Response]
Attachments: The Alaskan Aviation Safety Foundation response final.pdf

Sirs, the first email address I got from you did not go through, so am trying a second. Would you please acknowledge receipt of our letter by return email? Carl Siebe

----- Original Message -----

Subject: JPAEC Response
From: [REDACTED]
Date: Mon, July 9, 2012 12:31 pm
To: alcom.j08@us.af.mil

Dear Sirs, please find attached comments on the JPARC DEIS from the Alaskan Aviation Safety Foundation that are due today. Would you please acknowledge receipt of our letter by return email? Carl Siebe

N0042

Alaskan Aviation Safety Foundation
2811 Merrill Field Dr.
Anchorage, AK 99501

July 8, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

Dear Sirs:

The Alaskan Aviation Safety Foundation (AASF) is a non-profit membership driven organization with the central goal to promote aviation safety in Alaska. We had a team review the Joint Pacific Alaska Range Complex (JPARC) Draft Environmental Impact Statement (DEIS) document dated March 2012, which contains proposals for modernizing and changing various features of the airspace and training ranges in the JPARC. We offer the following comments and observations.

Purpose and Need

The National Environmental Policy Act (NEPA) regarding Purpose and Need (40 CFR §1502.13) states, “The statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action.” In this DEIS document, the purpose statement (section 1.2) does not document the purpose of the DEIS as we understand it, which is to provide comprehensive training areas for current and future military training. The AASF supports providing comprehensive training areas, but the AASF is not supportive of the purpose stated in the document. We suggest restructuring the purpose to focus on current and future training areas. Section 1.3 containing the Need statement is not focused and does not include the proposed actions as required in §1502.13. We found it extremely difficult, and at times not possible, to connect a need with the proposed actions found later in the document.

The following is our analysis and comment on each of the proposed actions.

Fox 3 MOA Expansion and New Paxon MOA

The USAF has extensive MOAs in Alaska, and in order to justify an expansion NEPA requires an explanation of why the existing MOAs are not adequate. The alternatives section states there is a need for more air space without discussing why the existing MOAs are inadequate, and fails to connect to the stated need in section 1.3. In addition the purpose and need statements in sections 1.2 and 1.3 do not appear to support either alternative A or E. As such, the AASF

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requires additional justification and at this time opposes both the Fox 3 MOA Expansion and the New Paxon MOA.

Section 2.1.1 says the need is to provide a 180 x 60 nautical mile airspace. We submit that the Yukon MOAs already provide more than three times this airspace. There is no explanation why this existing airspace will not provide a realistic training environment that meets the USAF training need.

Section 3.1.1.4 acknowledges adverse impacts, but in NEPA terminology we submit that these impacts are significant and require mitigation. Table ES-2 codes these as significant, which is inconsistent with section 3.1.1.4. The wording in this section does not address mitigation, rather it says (paraphrasing from the section) that the FAA and USAF will study impacts and mitigation measures, and work with civil aviation users to resolve issues. We expect a DEIS to document impacts, rate them significant or not significant, and if significant to propose adequate mitigation. If the SUAIS is proposed as a mitigation measure, we expect the DEIS to show us the translator locations and coverage areas.

Section 3.1.3 Safety is of utmost concern to the AASF. Proposed expansion of the MOAs down to 500 ft will increase the collision risk between civil and military aircraft, aircraft mishap potential, and bird/wildlife-aircraft strike hazards. The AASF opposes this expansion of these MOAs down to 500 ft due to this decrease in both civil and military flight safety. In addition, Table ES-2 codes Safety –Flight for the Fox 3 MOA Expansion and New Paxon MOA as “Potential for significant adverse impacts; Requires management actions or mitigations to avoid or reduce impacts.” While in section 3.1.3.4 Mitigations provides some existing programs/procedures, but states “No further mitigations are proposed for this resource.” This is unacceptable to the AASF, and appears contradictory to the executive summary.

Other impact areas such as noise, biological resources, land use, infrastructure, subsistence, and economic justice likewise need concrete mitigation measures identified.

Realistic Live Ordnance Delivery

The alternatives section discusses the need for more space, mostly “As the technology for new weapons systems continues to evolve, the ground footprint for ordnance delivery continues to expand...” So again we have a need statement in the alternatives section rather than in the need section. The need statement is vague, and appears more as an effort to secure some land now that may or may not be needed in the future. The existing MOAs constitute a huge amount of land and air. What we fail to find, and expect to find in a DEIS analysis, is exactly how much is needed now, why the existing MOAs are not adequate, and a reasonable projection of how much will be needed in the future. There may be some further justification hidden in the lengthy Affected Environment and Environmental Consequences section, but as written we could not connect the sections of this NEPA document into a coherent and well thought out proposal.

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Section 3.2.1.4 looks to be a copy of the airspace mitigation section from the Fox 3 MOA Expansion section. As such our comments above apply to this section too.

Battle Area Complex Restricted Area Addition

The AASF rejects this proposal because the impacts to civil aviation safety are significant, and the proposed mitigation is inadequate. Existing Restricted Area 2202 to the west already forces civil traffic out of the most desirable terrain route to and from Isabel Pass. Isabel Pass includes the Richardson Highway VFR corridor connecting the northern half of the state to south central and south eastern Alaska. Winds and highly variable weather associated with the Alaska Range and the mountain pass make it impractical to confine civil traffic to a single, narrow corridor in this area. During previous EIS analysis of USAF expansion proposals, the aviation community raised the issue about the possible need for restricted airspace. While this is easy expansion area for the military, such expansion causes significant impacts to civil aviation. Section 3.3.1.4 acknowledges potential adverse impacts on airspace. As we stated above, we submit this is very significant by any reasonable measure. Mitigation measures offered are to study the issues, which is not acceptable. Disregard of the NEPA process to identify and mitigate significant impacts causes us distress. The USAF has stated they want to work with us, but this proposal disregards such working together for the benefit of all. The military has other options and this DEIS must explore these other options in detail.

Expansion of Restricted Area R-2205

In general the expansion of R-2205 follows recommendations we have made in comments to previous environmental documents. We remain concerned that sections such as 3.4.1.4 acknowledge potential adverse impacts and the mitigation is to study the issues. This does not adequately comply with the NEPA process.

Night Joint Training

In general we support the need for adequate night training. As aviators we understand this issue. We also find that we need to remind the USAF that noise impacts on the human environment are recognized to be larger at night. The FAA noise analysis process applies a 10 decibel penalty to night noise impacts. Section 3.5.2.4 does not acknowledge this fact. Additional mitigation may be required. We also find it curious that the USAF has not applied administrative relief to your own rules for aviation currency as a way to fix the problem. We would like this DEIS to discuss the potential to administratively modify the USAF rules for pilot night currency.

Unmanned Aerial Vehicle Access

We understand the Military's desire to establish UAV training areas. Furthermore we agree with the airspace analysis paragraph 3.6.1.4 that there are adverse and significant impacts, however this section does not offer any clear mitigation for these adverse and significant impacts. We

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submit aviation safety is likewise impacted. Therefore, based on the airspace management and safety sections we find cause to oppose the proposal.

Missile Live-Fire for AIM-9 and AIM-120

The AASF does not offer any constructive comments. We do find it curious that the impact area is relatively close to Kodiak Island, and not aimed for impact in the southeast portion of the area. We suspect there are reasons that are not articulated in the document, and a DEIS should articulate such reasons.

Further Comments

The AASF has a long history of working with the USAF to provide aviation safety for all users, civilian and military. Our volunteers have always tried to provide fair and balanced comments to USAF proposals. Our membership contains many current and former members of the military. We value the USAF as a legitimate user of the Alaskan airspace, and desire to provide airspace adequate to meet the USAF training needs. With that said, our team struggled to analyze and comment on this DEIS document. Some drawings and submittals have been sub-standard and difficult to read and analyze. This document was 655 pages long, rather than the 300 pages codified in NEPA §1502.7. There are discontinuities between the purpose, need, alternatives, affected environment, and environmental consequences, and we were not able to capture and comment on all of them. A DEIS document compiled to meet the NEPA code should be well laid out and the required sections connected to form a comprehensive and understandable program, and we found this document to be lacking in this regard.

Use of the Naknek, Stony, Galena, and Susitna MOAs are currently part of the military training options for Alaska. From our perspective the Naknek and Stony MOAs provide an alternative to meet the need for expansion of the Fox 3 MOA. Yet their use was not addressed in this document. Again our stated goal is to help the USAF acquire the area needed to meet your training needs, but we are not agreeable to have the USAF keep or bank MOAs all over Alaska that may or may not be needed in the future. Please address the total MOA need in the final EIS.

In summary because of the deficiencies in this DEIS document, the AASF submits this DEIS should be rewritten to follow 14 CFR 1500-1508, also known as the NEPA, and resubmitted. The need still exists for adequate training airspace and ground surface and we look forward to working with the USAF to identify needs and meet those needs.

Respectfully submitted on behalf of the Board of the Alaskan Aviation Safety Foundation.



Carl Siebe, Vice Chairman

N0043

[REDACTED]

From: Steve Baker (AS) [REDACTED]
Sent: Monday, July 09, 2012 4:57 PM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS
Attachments: ASA JPARC Draft EIS Comments.PDF

Please accept our comments on the Draft EIS for the JPARC expansion.

Thank you,

Steve Baker
Senior ATC Support Specialist
Alaska Airlines
206-392-6204

N0043



July 9, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

RE: Draft Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training areas in the Joint Pacific Alaska Range Complex

To whom it may concern:

As a major air carrier serving the community of Fairbanks and a daily user of the airspace surrounding the Joint Pacific Alaska Range Complex, Alaska Airlines appreciates the opportunity to provide comments on the Draft Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex. The following are our concerns with this proposal:

FOX 3 MOA Expansion and New PAXON MOA Affecting High Altitude Jet Aircraft

Alaska Airlines regularly files over Northway via J502 between Seattle and Fairbanks. We rely on the most direct routing to ensure profitability and schedule reliability. Under the existing MOA/ATCAA activation, we incur regular and costly reroutes when forced to file via the 63°N corridor due to the J502 route being closed to IFR traffic. Any additional impact posed by an expanded MOA/ATCAA might prove unsustainable for our operation. As Alaska files and flies consistent and repeatable flight paths via advanced navigation methods, it is conceivable that an enhanced corridor for High Altitude IFR traffic be created that allows efficient transit through military airspace.

Expand Restricted Area R2205, Including the Digital Multipurpose Training Range

As proposed, the expanded R2205 is in the vicinity of the primary arrival and departure Airway (J502). This airspace expansion must be analyzed with consideration of the Fairbanks RNAV SIDs, STARs and RNAV (RNP) approach procedures slated for implementation later this year. All impacts stated in the Draft EIS are based on existing flight tracks and do not consider these new arrival and departure tracks.

Proposed Remotely Piloted Aircraft (RPA)/Unmanned Aerial Vehicle (UAV) corridors

The UAV corridors could pose a significant impact to Alaska Airline's operation by restricting essential arrival and departure paths to Fairbanks International. Alaska Airlines opposes the development of these corridors due to the further restriction of access to Fairbanks International.

BOX 68900 SEATTLE, WA 98168-0900/206-433-3200

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Consideration of Future Airspace and Procedure Enhancements

Significant FAA and industry resources have been deployed to complete several RNAV Optimized Profile Descents, RNAV Departure Procedures, and RNAV (RNP) Approach Procedures at FAI – all scheduled for full implementation in September, 2012. These new procedures are necessary to ensure efficient operations for all capable users and align with the FAA’s NextGen initiative. Alaska Airlines feels it is essential that these arrival and departure tracks be considered in the EIS study in effort to aid in impact analysis and developing mitigation strategies.

Missile Live Fire For AIM-9 And AIM-120 In The Gulf Of Alaska

Alaska Airlines transits the Gulf of Alaska between the Hawaiian Islands and Anchorage and the Lower 48 States and Anchorage. As we have recently started to take advantage of more direct over-water routing between the lower 48 and Anchorage, the Draft EIS does not directly address the impact that this proposal has on existing Gulf of Alaska traffic. The EIS must include this information in order to fully analyze the impact of the proposal.

Cumulative Impacts

The cumulative impacts of adding further restrictions to airspace that is already limited by MOAs and ATCAAs in the State of Alaska needs to be identified and addressed by providing data on both direct and indirect impacts. Other elements of the JPARC, such as Stony, Naknek, Susitna, and Galena need to be evaluated in conjunction with the JPARC expansion EIS and determine if they are still necessary to meet modern training needs. Because Alaska provides “the largest available land, air and sea training in the world”, expansion of JPARC should identify ways to offset impacts of other current military airspace. Evaluating the JPARC Expansion proposal independently of existing military airspace does not allow for consideration of the cumulative impacts to civil airspace users throughout the State of Alaska.

Thank you for considering our comments on the Draft EIS for the Joint Pacific Alaska Range Complex. Alaska Airlines supports the United States military and their need to train realistically. We look forward to close collaboration with the FAA, DoD, and other system users to support this need while ensuring an equitable solution for all users of the NAS.

Sincerely,



Steve Baker
Senior ATC Support Specialist
Alaska Airlines

N0044

[REDACTED]

From: Janeen Hutchins [REDACTED]
Sent: Monday, July 09, 2012 6:44 PM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission
Attachments: JPARC EIS Comments_NOLS_7.9.12.pdf

Please find attached comments on the JPARC EIS by the National Outdoor Leadership School.

Sincerely,
Janeen

Janeen Hutchins
Alaska Director
National Outdoor Leadership School
5805 N. Farm Loop Rd. Palmer, AK 99645 907.745.4047
janeen_hutchins@nols.edu

N0044



National Outdoor Leadership School

NOLS Alaska
PO Box 981
Palmer, Alaska 99645-0981
907-745-4047 Fax 907-745-6069

The Leader In Wilderness Education

July 9, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

Re: Comments on the JPARC EIS by the National Outdoor Leadership School

To Whom It May Concern:

The National Outdoor Leadership School appreciates this opportunity to provide comments during the public comment stage of the Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC). As an outfitter running extended backcountry expeditions throughout the state of Alaska, we closely follow proposed projects that have the potential to affect the wilderness experience that our students expect.

NOLS has been operating in Alaska since the school established its base near Palmer in 1971. Since then, thousands of students have experienced the world-class wilderness opportunities available across this vast state through backpacking, sea kayaking, and mountaineering opportunities provided through our school.

The Talkeetnas in particular are a core destination for NOLS backpacking and mountaineering courses. With a strong wilderness feel, a quiet setting, good wildlife viewing opportunities, and a close proximity to NOLS Alaska, these mountains are an excellent fit for our program. Each year, NOLS runs 10-15 courses in the area, totaling approximately 5,000 user days. Our season runs from mid-May through mid-August. Other operators value the Talkeetnas as an operating area as well, including Alaska Pacific University. Furthermore, the area is very popular during hunting season, especially in August and September, and many local guides bring clients to the area to harvest from the big game populations found there.

The existing Fox 3 Military Operations Area (MOA) overlays a major portion of our operations in the Talkeetnas. At current use levels, and with the existing flight boundary at 5,000 feet above ground level (AGL), military exercises do not significantly impact our courses. It is not uncommon for a course in the Talkeetnas to hear sonic booms multiple times on a course—a jarring experience for any wilderness traveler, and one that would only be amplified were the flight level boundary reduced to 500 feet.



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Changes associated with the proposed actions, however, would negatively impact NOLS operations in the Talkeetnas. Specifically, aspects of the proposed Fox 3 MOA expansion and the proposed Paxon MOA will impede the quality of our courses, and may in fact impede our ability to support our courses with aircraft. The significant expansion in boundaries, the proposed lower floor boundary of 500 feet AGL, and the expectation of increased frequency of training exercises will combine to have a major impact on NOLS and other operators in the area.

The first and most obvious concern related to the JPARC EIS is that of a diminished wilderness experience for NOLS students due to the increased presence of frequent, low-flying aircraft, and the associated visual and aural impacts on both our courses and on the wildlife of the area. Such a dramatic change in the wilderness feel of the area would not only diminish the quality of the experience for students on wilderness courses, but would also discourage future potential students from enrolling, affecting our bottom line. Our clientele—most of whom come from outside Alaska and seek out our courses for a backcountry adventure in The Last Frontier—anticipate natural quiet, an absence of human impact, and abundant wildlife.

Beyond big game like moose, caribou, Dall's sheep, and brown bear, the Talkeetnas are a thriving habitat for birds, including ducks, geese, trumpeter swans, and golden and bald eagles. Wolverines also call the area home. Though on-the-ground impacts of the project may be minimal, significant adverse impacts on the flora and fauna have been identified (page 3-47). Even with mitigation efforts the biological resources of the area may see lasting damage. We appreciate the airspace modification to conduct supersonic operations at or above 5,000 feet AGL or 12,000 feet MSL, whichever is higher, so as to reduce their aural impacts (page 3-50). We look forward to seeing a more detailed plan for monitoring effects of military training on select wildlife species (especially herd animals, waterfowl, and raptors) as described on page 3-51 in the final EIS. We would also welcome a detailed plan for monitoring the effects of military training on visitors to the area.

Secondly, there is a potential for complications with private flights, which are essential to an extended NOLS wilderness expedition in these mountains. Courses in the Talkeetnas are typically re-routed by bush plane, and if there is a medical emergency, airplanes or helicopters are often the best options for evacuation. In public meetings, there have been assurances that private flights could continue. However, "...Scoping and other informal indicators suggest that an increasing segment of this aviation community may elect to avoid an active MOA. This may create impacts if these pilots would cancel or delay their flights, or otherwise fly increased travel distances around an active MOA to avoid this active airspace..." (page 3-18). We look forward to an explicit plan for dealing with planned and emergency flights in the proposed Fox and Paxton MOA expansions.

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As the final EIS is developed, we encourage planners to consider reducing the size of the Fox 3 and Paxon MOAs and to consider keeping the boundary at 5,000 feet AGL in popular backcountry zones. This is just one opportunity to mitigate and/or minimize the impacts on backcountry travelers.

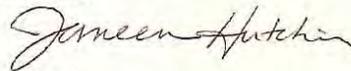
During scoping, we supported Alternative C, which included the Fox 3 MOA expansion (the proposed Fox 3,4,5, and 6 MOAs) without the low-altitude MOA. Though it was not clear at the time, we also asked that the proposed Paxton MOA also maintain a boundary of 5,000 feet AGL. If the Alaska Command requires a zone for low-altitude exercises, NOLS would be least impacted in the proposed Fox 6 MOA, and the southern half of the proposed Paxon MOA.

Because in the draft EIS only Alternatives A, E, and No Action are explored, we feel compelled to suggest a compromise. With adjustments as specified above, we could support a revised Alternative E. Though we recognize that the Alaskan Command is seeking to respond to public comment by amending the southern border of the Fox 3 MOA in Alternative E, this change will not reduce the impacts of the project on NOLS courses significantly enough for us to support this alternative. We anticipate that this alternative that would allow us to conduct our courses with few noticeable impacts if the adjustments specified above were adopted into Alternative E.

Lastly, we encourage the Alaskan Command to explore the possibility of alerting the public to upcoming exercises as described on page 3-17, preferably several weeks in advance. In the case of NOLS, this advanced notice would give us an opportunity to alert our courses in the field, and would give our instructors a chance to make any necessary preparations.

Thank you for your careful consideration of these comments. In a land as vast and untrammled as Alaska, there should be room for everybody. If the concerns of all stakeholders are given careful consideration, and if the spirit of cooperation and balance is preserved in this JPARC EIS process, there is reasonable hope that we might reach an amicable compromise. Please do not hesitate to contact us with any further questions or concerns.

Sincerely,



Janeen Hutchins
NOLS Alaska Director
janeen_hutchins@nols.edu

N0045

[REDACTED]

From: Marleanna Hall [REDACTED]
Sent: Monday, July 09, 2012 6:46 PM
To: ALCOM J08 Admin Box
Subject: JPARC EIS Comments
Attachments: RDC JPARC EIS Comments.pdf

Good afternoon:

Please find a copy of RDC's comments attached, and please confirm receipt.

Thank you,
Marleanna

Marleanna Hall
Projects Coordinator
Resource Development Council for Alaska, Inc.
121 West Fireweed Lane, Suite 250
Anchorage, AK 99503
907-276-0700
<http://www.akrdc.org>

Growing Alaska Through Responsible Resource Development

N0045



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Congressman Don Young
Governor Sean Parnell

June 9, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506-2101

Via email to alcom.j08@elmendorf.af.mil

Re: Comments on Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement – Draft Environmental Impact Statement

To Whom It May Concern:

The Resource Development Council (RDC) is writing in response to the request for comments and information for the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Draft Environmental Impact Statement (EIS).

RDC is a statewide business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

RDC submitted a letter March 3, 2011 explaining it recognized the importance of military training but is concerned that sufficient economic impact studies were not conducted prior to the release of the JPARC Modernization and Enhancement EIS. RDC urged the military to work with the Alaska Miners Association and other stakeholders (such as tourism) to develop an EIS that achieves maximum benefit for resource industries, public access, and military training needs. Overall, it does not appear these concerns were addressed.

Additionally, RDC requests mitigation measures be developed with stakeholders, to include:

- Prevention of mid-air collisions by developing a minimum altitude for military training aircraft;
- Improvement of radar and communications systems so that civilian stakeholders and military personnel operating in training areas are better informed;

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- Reduce the Unmanned Vehicle Aircraft corridors to the minimum airspace needed, and mitigate use of these areas to reduce or eliminate the impact to resource development activities in the area;
- Consider making the most use of federal areas not designated for mineral resources, instead of lands with mining or other activities.

The potential economic impacts of the proposals in the EIS will likely be overly burdensome for not only large projects, but also for the “mom and pops” projects in the areas. RDC supports multiple-use of Alaska’s land, air, and resources, and advocates for increased access for resource and community development.

Thank you for the opportunity to comment on this important issue.

Sincerely,



Marleanna Hall
Projects Coordinator

N0046

[REDACTED]

From: Jane Dale [REDACTED]
Sent: Monday, July 09, 2012 10:03 PM
To: ALCOM J08 Admin Box
Subject: Alaska Airports Association JPARC Draft EIS Comments
Attachments: Alaska Airports Association JPARC Extension II - akaa final.pdf

Thank you for the opportunity to comment.

Jane Dale
Executive Director
Alaska Airports Association
[REDACTED]

N0046



Alaska Airports Association
P.O. Box 344
Willow, 99688

July 8, 2012

ALCOM Public Affairs
9480 Pease Avenue
Suite 120
JBER, AK 99506

RE: JPARC Comments on Draft Environmental Impact Statement

The Alaska Airports Association (Akaa) is a non-profit organization dedicated to enhancing the operation and management of airports and back country landing areas within the State of Alaska. In addition, the goals of the Akaa are to support the needs and safety of aviation. Established in 2009, membership includes municipal and state airport operation managers, pilot groups, pilots, and aviation consultants. Our organization has over 100 members through individual and corporate memberships.

The US Department of Defense has proposed a significant expansion to the Joint Pacific Alaska Range Complex (JPARC) in support of military training. This complex, already the largest military airspace complex in the country, occupies some 65,000 square miles of airspace, in addition to significant holds of land, sea and an additional 42,000 nautical square miles of airspace on the Gulf of Alaska. A series of proposals are included in the draft Environmental Impact Statement that would further expand this complex. While we support military training, it is imperative that aviation safety and access be preserved for civil users of the regional complex area and for military personnel given the importance of aviation for basic transportation, goods and services, and medical resources in the state of Alaska.

Proposed Fox3 MOAs

The proposed expansion of the Fox 3 MOA is a significant increase in lateral extent, but also in vertical dimension, lowering the floor from 5,000 ft above ground level (agl) to 500 ft agl. This expansion is in direct conflict with areas that are frequently used by general aviation pilots and air taxi/transport operators to support hunting camps, mining operations, air tour operations, access recreational areas, homesteads, support ongoing Susitna-Wantana Hydroelectric Project related activity up to and including a proposed 7,000 ft IFR runway or make other uses of this region important to the economic benefit of Alaska.

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Landing areas are dispersed throughout this proposed MOA on river bars, lakes, valleys, and ridges, in communities and in undeveloped areas where new airport facilities will be needed to support future projects such as the Susitna-Wantana hydroelectric project. Due to its proximity to the largest population center in Alaska, this proposed expansion will result in an increased collision potential between high-speed military aircraft executing low level training maneuvers on MOA airspace and civilian aviation. The Draft Environmental Impact Statement did not clearly identify why this area is necessary for use or why other existing MOA's are not available. In addition, mitigations for the proposals were not clearly identified. Additional work should be completed prior to expansion or creation of new MOA's.

The Special Use Airspace Information Service (SUAIS) was created as a result of the mid-1990's expansion of the MOAs. The existing SUAIS around FAIRBANKS has been plagued with communication issues. Two of the repeater sites have been out of service for extended periods of time with one recently planned to be replaced. In a heavily used area just outside of Black Rapids, near the West Fork of the Little Delta it has been difficult to make radio contact. This is not an uncommon complaint by pilots landing and departing along the river in the area. If the existing SUAIS is poorly maintained and insufficient in numerous areas, how will expansion of the same provide for public safety? This area is extremely important for camping, mining, subsistence, hydroelectric projects, and hunting which are important to the economic benefit of Alaska.

Recommendation 1: Due to the importance of the airspace for access to the southern Alaska Range, Denali Highway and Talkeetna Mountains, and to minimize the risk of mid-air collision, especially while landing and departing airports, back country airfields, lakes, airstrips and ridges the Fox MOA, should be limited to 5,000 feet agl, and to the smallest possible lateral extent to minimize the risk of mid-air collision. In addition, real time IFR access should be provided to IFR traffic when the MOA is active.

Recommendation 2: Any expansion of MOA airspace must have accompanying radio coverage, staffing and other elements of the SUAIS infrastructure to allow civil pilots to communicate with US Air Force Range Control during times the MOAs is in use. It is also essential that the tape recorded messages, broadcast during hours when Range Control is unmanned, and be more uniformly broadcast across the JPARC complex. While the current language in the Draft EIS indicates that "funding will be pursued," given that we still do not have adequate communication in the existing airspace, it is essential that:

(a) Radio repeaters should be installed and operational before airspace is granted and in use. The repeaters should provide adequate coverage so aircraft can make contact and communicate with range control prior to entry into the special use airspace. The terrain in the proposed Fox MOA offers many different landing scenarios and communication in valleys and hillsides may be challenging.

N0046

(b) Mitigations include raising the floor to the level where two way communication is available any time a station is down or the system is otherwise not fully operational, to allow general aviation or commercial pilots to operate without unanticipated encounters with high-speed military traffic.

Paxson MOA Low Altitude Structure

The military has proposed a Paxson MOA, which covers Isabel Pass and portions of the eastern Alaska Range. The pass is a major VFR route which links northern Alaska with south central and south east regions of the state. Along the southern flanks of the Alaska Range are mining operations, recreational cabins, airstrips, and backcountry landing areas along with lakes which experience high levels of use, which are not compatible with high speed, low level military aircraft. While the concept of VFR corridors has been discussed, the variable weather in this area is not conducive to identifying a specific single corridor which concentrates VFR traffic and increases the mid-air collision risk.

The Draft Environmental Impact Statement did not clearly identify why this area is necessary for use or why other existing MOA's are not available. In addition, mitigations for the proposals were not clearly identified. This work should be completed prior to creating the new MOA.

Recommendation 3: The proposed Paxson MOA, if considered, should be for high altitude usage only, recognizing the importance of Isabel Pass, and the air traffic routes extending from the interior south to Gulkana and beyond for civil aviation. Real time IFR access should be provided when the MOA is active.

IFR Access to MOA airspace

Considerable public investment is being made to expand airways, instrument approaches, weather reporting and remote communication outlets across Alaska; the trend is to continue modernization as funding resources become available. A corresponding private investment will be made by aircraft owners and facility owners to utilize these existing and proposed facilities. Expansion of MOAs over IFR airways precludes civil access to the airways when the MOAs are active, excepting for emergency and lifeguard flights. Experience gained over recent years with the Delta MOA's, which overlays V-444 between Fairbanks, Delta, Tok and Northway, have continued to demonstrate difficulties for lifeguard repositioning flights and other uses such as wild fire suppression logistical flights. Asking these operators to fly VFR is a potential reduction in safety and economic benefits for Alaskans. The loss of IFR access also impacts proposed projects such as the proposed 7,000 ft IFR runway to support the Susitna-Wantana Hydroelectric Project located within the boundaries of the proposed airspace and projects located outside of the boundaries of the proposed airspace.

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Recommendation 4: No additional MOA airspace should be granted that interferes with IFR access until provisions are made to provide real-time IFR access through active MOAs or to an IFR instrument approach/departure associated with an airport facility. While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities or facilities both inside and adjacent to MOA airspace given the critical role aviation plays in the Alaskan transportation system especially during IMC requiring IFR operations.

Proposed Battle Area Complex Restricted Area

The proposal to establish restricted airspace over the Battle Area Complex southeast of Delta Junction is of particular concern to the civil aviation community. Existing Restricted Area 2202 to the west already forces civil traffic out of the most desirable terrain route to and from Isabel Pass, a major VFR corridor connecting the northern half of the state to south central and south eastern Alaska. Winds and highly variable weather associated with the Alaska Range and the mountain pass make it impractical to confine civil traffic to a single, narrow corridor in this area. Five years ago, during an EIS process, the aviation community raised the issue about the possible need for restricted airspace, given that there were other locations available to site the military training facilities that already offered this type of airspace.

Recommendation 5: The Alaska Airports Association supports the aviation community, to oppose the addition of restricted airspace as proposed in this area, given the need to access the mountain pass, unique weather and terrain, and presence of existing restricted airspace. We suggest the military seek other alternate means to allow their training to take place, such as the controlled firing area used today, where firing is halted when a civil aircraft enters the area.

Proposed Restricted Areas for Realistic Live Ordinance Delivery (RLOD)

The proposals to establish restricted airspace for live ordinance delivery impact access between Fairbanks, Delta, the Richardson Highway corridor and the recreational and mineralized areas in the Alaska Range to the south. Further restriction of airspace limits access to these areas.

Recommendation 6: The existing Restricted Areas (2211 and 2202) already limit access between the road corridor communities in the region. The Alaska Airports Association opposes connecting the two restricted areas making an overall barrier to access in this area of the State of Alaska.

Proposed Unmanned Aerial Vehicle Corridors

There is no doubt that unmanned aerial vehicles play an important role in today's military aviation and that training is required. UAV integration into the National Airspace System is currently a topic of discussion at the national level as these airships are expanded in aviation

N0046

usage alternatives. Restricting civil airspace to accommodate UAV transits next to the second largest airport hub in the state is a concern.

Recommendation 7: Corridors that are proposed would interfere with the safe and efficient access into Fairbanks International Airport and other local airports such as Chena Marina, the Richardson Highway Corridor and the Alaska Range. Other means to separate UAV from civil aircraft, without utilizing restricted airspace, should be pursued.

Mitigation for Caribou/Sheep/Moose Season in the Alaska Range

While the Air Force already avoids scheduling of Major Force Exercises during September, December and January to avoid interference with sport and subsistence hunting, key areas under existing and proposed MOAs are heavily used for wildlife and sport fishing harvest. Military operations during these times should be avoided to ensure safety of civilian aircraft and avoid the potential for mid air collisions with low flying military operations.

Recommendation 8: Avoid the scheduling of Major Flying Exercises during the fall Moose, Sheep and Caribou hunting seasons and during times for subsistence harvests.

F-16 Relocation Proposal

While not identified in the JPARC Draft EIS, announcements in the press have communicated an Air Force plan to relocate the F-16 squadron, currently based at Eielson AFB in support of military training activities, to Joint Base Elmendorf Richardson (JBER) within the next year or so. It is also not clear what the impact of relocation of the F-16 squadron might have on airspace in and around the Susitna MOA and the corresponding civil public use facilities in Anchorage and the Matanuska Susitna Borough airports.

Recommendation 9: More analysis of this plan is required to understand the true impact on this development to allow informed public comment.

Evaluation of other Alaska MOAs

The draft EIS proposals focus on expansion of the airspaces. These MOAs and those located in other parts of the state are elements of the JPARC. The overall justification for the expansion of the FOX 3 and creation of the Paxson are for operation efficiencies however, there has been no published evaluation of the present uses of the Yukon, Stony, Naknek, Susitna and Galena MOAs to determine if they are still required to meet modern training needs or justify the expansion. No data was found in the Draft EIS on uses of these MOAs other than limited use data on the Stony MOA.

Recommendation 10: Provide an analysis of existing uses of the existing JPARC Complex including Yukon, Stony, Naknek, Susitna and Galena MOAs to establish their continued

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need given the changes in training requirements, and need for operational efficiency described in the Draft EIS proposals.

The Alaska Airports Association respects the public comment process and appreciates the opportunity to provide recommendation, comments and input from airport operators and aviation professionals around the State of Alaska to support the safe and efficient use of the aviation transportation resources available.

Alaska Airports Association
chair@akairports.org
www.akairports.org
[907.495.6708](tel:907.495.6708)

N0047

[REDACTED]

From: Whitney Wolff [REDACTED]
Sent: Tuesday, July 10, 2012 12:17 AM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission
Attachments: JPARC FINAL w.doc

N0047



*Talkeetna Community
Council, Inc.*

A non-profit, community service organization

July 8, 2012

Comments Regarding the JPARC EIS
Specifically: Expanded FOX MOA and New PAXSON MOA

The Talkeetna Community Council, Inc. has studied the proposed JPARC Enhancement and Modernization EIS and has determined that the "NO ACTION ALTERNATIVE" is the only option which provides our community with the aviation safety, recreational opportunities and economic stability we currently enjoy. Neither Alternative A nor Alternative E offer relief from both lateral and vertical expansion which have been determined to cause significant adverse effects in the areas of Socio - Economics, Air Space Management/Flight Safety, Land Use - recreational / subsistence, and Noise from the proposed FOX MOA Expansion and the New Paxson MOA.

Of particular concern to our community is the proposed high/low flight sectors and the dropping of the operations floor to 500' AGL (above ground level). This dangerous drop in flight operations coupled with the inclusion of UAV (Unmanned Aerial Vehicle) corridors, constitutes a severe risk to Talkeetna's robust commercial and general aviation. This lowering of the minimum flight training altitude to 500 feet also compromises recreational use of the area and poses negative impacts to wildlife.

Many of our concerns have been cited in the Scoping Process and are included in Vol. 1, Chapter 3.0 Affected Environment and Environmental Consequences. 3.1 FOX MOA Expansion & New PAXSON MOA. The following are areas within the scope of the proposal that we have determined to be inadequately examined:

Air Space Management and Safety - Talkeetna hosts one of the busiest small airports in the state. The area of proposed expansion is a mountainous region presenting terrain challenges and limited flight corridors through passes. The increased safety risks from the expanded special use air space and lowering of the MOA floor, will potentially result in aircraft conflicts and crashes. Pilots flying VFR, may opt to avoid the MOA causing delays, route finding and fuel issues. It is particularly troublesome to some VFR (visual flight rules) pilots to be applying "see and avoid" skills in the vicinity of UAV's. Those operators instituting IFR (instrument flight rules) will be forced to seek

***Talkeetna Community Council, Inc.
P.O. Box 608, Talkeetna AK 99676***

N0047

alternate routes. The inclusion of the Richardson Highway corridor in the MOA will be a loss to aviators using it to safely navigate area terrain. Many small operators do not have the communication capabilities to utilize SUAIS (Special Use Airspace Information Service) and other mitigation tools proposed in the EIS.

Remote Airfields- Many Talkeetna businesses depend on civil and commercial aviation: hunting guides, fishing guides, hiking and adventure guides, rafting tours, and flightseeing operators. The JPARC EIS has determined that there will be significant impacts to civil aviation using airfields in the proposed areas. On page 3-11 of the above mentioned table 3-0, a list of airfields is included with a few lodges and lakes noted- it is extremely limited. The proposed expansion encompasses an area of the Talkeetna Mountains containing numerous additional airfields and popular lakes not noted. The expanded southern and western boundary includes the Iron Creek area, all of the Talkeetna Mountain glacial headwaters, the Sheep River and many other highly used areas for hunting, subsistence and recreation. The EIS suggests that “analysis should identify small landing strips and private airfields affected by the action, particularly those providing IFR services”. This analysis has not been thoroughly conducted.

In conjunction with this weak analysis, TCCI has determined that the Impact Assessment Methodology does not adequately quantify general aviation use of the proposed areas. The JPARC EIS continually cites that civil aviation use is either unavailable from the FAA or “cannot be quantified”. A cursory review of operators in the area shows no attempts by the JPARC to survey area aviators or contact local flight service operators for information regarding number of annual flight plans into the Talkeetna Mountains. A full survey of commercial and general aviation users of the area should be undertaken.

Impacts to Wildlife - The proposed expansion encompasses GMU 13 and GMU 20 which are some of the most productive and heavily used in the state. None of the proposed mitigation concepts in the EIS will completely protect area wildlife from the threats posed from supersonic noise and low level flight. TCCI is adamantly against the dropping of the MOA floor to 500 feet AGL. The 1997 Record of Decision (that followed the 1995 EIS) raised the proposed minimum flight altitude to it's current 5,000' due to impacts from noise. Scattering the Nelchina Caribou herd and impacting breeding and birthing of other mammals are just some of the many potential impacts to area wildlife. These impacts will have socio-economic and subsistence impacts on our community. TCCI supports the ADF&W working closely with JPARC to manage these sensitive resources.

***Talkeetna Community Council, Inc.
P.O. Box 608, Talkeetna AK 99676***

N0047

Recreational Impacts- The Talkeetna Mountains are a popular area for hunting, fishing, hiking and rafting - for both visitors and locals. The increased military presence will detract from the wilderness experience. Night operations will be particularly unappealing to campers. The proposed southern expansion will now include the upper sections of the Talkeetna River (the longest stretch of Class IV white water in North America) which is accessed by commercial air taxi's out of Talkeetna. Not only will transportation to the headwaters of the river be potentially compromised by inclusion in the MOA, but the combination of supersonic, low level flights, noise, and mock combat maneuvers could cause the type of anxiety many campers look forward to leaving behind in their urban homes.

Socio - Economic Impacts to Talkeetna - Many visitors to Talkeetna are lured to the area by the promise of abundant wildlife, pristine wild lands, clear air, and the quiet found in remote locations. These "intrinsic values" of our area support tourism, local businesses and wilderness outfitters. The JPARC Modernization and Enhancement contradicts these values. The quality of the Talkeetna Mountain hunting/recreational experience will be greatly reduced by these proposed actions, and will in turn have negative impacts on the local economy. Impacts to wildlife numbers coupled with the overall noise and military presence in the backcountry could easily lead a hunter to alternative venues in the state. Hikers and fishermen may have difficulty getting to their desired locations on small strips within the expanded area. Local air taxi's may have to charge higher rates due to re-routing or avoidance of MOA's. Compromised safety could exclude the once productive Talkeetna Mountains from many itineraries.

Cumulative Impacts - The EIS neglects to include cumulative impacts incurred with the proposed Susitna Watana Dam. The dam site is at Watana Creek in the heart of the expansion and will require excessive use of air support for many years of potential construction. The EIS also does not include current mining operations being surveyed by MMG/Alaska Earth Sciences. These surveys also require numerous air hours and air taxi transportation of personnel. The mining survey is south of the Denali Highway and consists of ground crews as well as aerial surveys.

Supersonic flights, UAV's, live munitions, strafing, dog fighting and all that this proposal encompasses has been seen by some area residents as a denial of their rights to a peaceful lifestyle. The proposed Expansion of the FOX MOA and addition of the Paxson MOA cover an area heavily used by Alaskans and tourists. TCCI supports the NO ACTION ALTERNATIVE and encourages JPARC to seek alternative locations for training which do not present such high levels of conflict with civilians and wildlife.

***Talkeetna Community Council, Inc.
P.O. Box 608, Talkeetna AK 99676***

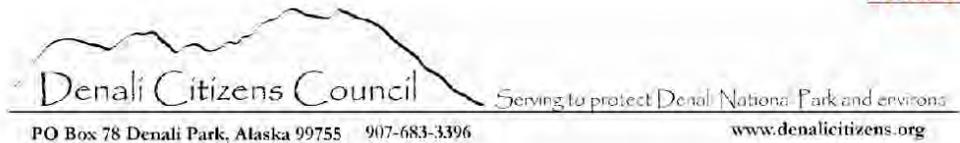
N0048

[REDACTED]

From: Hannah Ragland [REDACTED]
Sent: Tuesday, July 10, 2012 1:20 AM
To: ALCOM J08 Admin Box
Subject: JPARC Draft EIS Comments
Attachments: DCC JPARC Draft EIS Comments 7-9-12.pdf

Attached are Denali Citizen Council's comments on the Joint Pacific Alaska Range Complex Modernization and Enhancement Draft EIS.
Thank you for the opportunity to comment.
Hannah Ragland
Board of Directors, Denali Citizens Council

N0048



ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

To ALCOM Public Affairs,

The Denali Citizens Council (DCC) is a locally founded (1974), non-profit, grassroots community education and advocacy organization. We write to express concern about the proposed expansions outlined in the *JPARC Modernization and Enhancement Draft EIS*. We support the “No Action” alternatives, and have provided our concerns below. Denali Citizens Council (DCC) works to promote the natural integrity of Denali National Park and Preserve and foster responsible planning in the greater community. These expansions will affect lands within our area of concern, including several hundred square miles of land inside the Denali Borough, and airspace throughout the Borough, and over Denali National Park and Preserve. While our concerns do not end at these boundaries, our primary area of concern includes this land. Our board has heard from a number of members, and others within our communities. There have been a number of local meetings where residents have expressed concerns about the proposed training expansions. The Denali Borough Assembly passed a resolution in support of the “No Action” alternatives in 2011, and reasserted this opinion in 2012. The Middle Nenana Fish and Game Advisory Committee has done the same. Denali Citizens Council also supports the “No Action” alternatives due to the following concerns:

1. Much of the land and airspace included in the proposed expansions is used for travel by hunters and recreational users. Expanded land and airspace use, intensified use of existing areas, live ordnances, extended nighttime training hours, and lowered flight levels in these areas would greatly change their nature, and also raises safety concerns for those using the area.
 - a. The proposed expansion to the Fox MOA would relocate 1,250 overflights from the Stony MOA to the Fox MOA. We feel that dispersing use is more appropriate than concentrating use (even in a larger Fox MOA) and that the action would be inappropriate over the sensitive lands and valuable resources located below the airspace, especially considering the hazardous materials, noise, air quality, disturbance to wildlife, and human uses.
 - b. The addition of the Paxson MOA would more than double the amount of aircraft overflights across and around the Denali Highway region. As with the Fox MOA expansion, we feel that concentrating this type of aircraft use, rather than dispersing it, is too drastic to be appropriate. How did the need for an additional 11,000+ overflights arise so suddenly? Why is there a need for such a drastic expansion, rather than an incremental one?

DCC Board of Directors

Nancy Bale
Barbara Brease

Nan Eagleson
Charlie Loeb
JJ Neville

Hannah Ragland
Erica Watson
Jared Zimmerman

N0048

page 2

2. The areas these expansions would impact contain complex environments unique not only to the United States but to the entire world, not simply uninhabited terrain available for training. DCC is concerned about impacts to sensitive ecological factors, such as habitat quality, calving areas, rutting areas, sensitive aquatic areas, and migration routes for both mammals and birds.
3. The Draft EIS states “The Air Force would encourage and facilitate the continued study of chaff alternatives (e.g., biodegradable chaff) to reduce hazardous waste-related impacts on soils, surface water, air, and biological resources within and underlying the MOAs, such that no beneficial or adverse impacts would occur (page 3-37).” Considering the massive increase of debris from chaff and flares from increased airspace use through the proposal to expand MOA areas and operating hours (combined with identified future actions), deferring hazardous waste management to a later time is inadequate.
 - a. In approving any expansion of flights in this area, the plan must come to terms with the special use designations and high standards for habitat quality that support subsistence, sport hunting and fishing, and other recreation uses.
 - b. The EIS states that: “Depending on the chaff used, plastic or nylon pieces, a felt piece, or 2- by 3-inch squares of parchment paper can fall to the ground with each released chaff bundle.” It adds that: “The existing use of flares as defensive countermeasures results in small plastic, nylon, and aluminum-coated Mylar pieces falling to the ground.” The proposed addition to the hazardous waste (and non-hazardous garbage) littered on land below would be dramatically increased by this proposal and should not be allowed.
 - c. Chaff and flare should never be allowed during regular training and should never be allowed at altitudes lower than 5,000 feet AGL (or higher) to reduce impacts to wildlife (including wildfire potential in associated habitat), subsistence and other human uses.
 - d. The “flare safe & initiation (S&I) device” is garbage that is unaccounted for as increased litter and/or hazardous waste, and should be explained in the same areas as chaff and flares are.
4. If nighttime training hours must be changed to allow for changes to Daylight Savings, this change should only be for one hour, and should accordingly be one hour earlier in the morning departures. Requesting 2 or more hours of additional nighttime training in the evening, without changing morning departure would be solely for expansion of training opportunities (not continued activities) and should not be presented under the guise of accommodating for Daylight Saving time changes. Because this EIS bases most of the need for Night Joint Training on Daylight Saving time changes, it should be revised to fully disclose that this is not the case. We do not support changes to nighttime training hours unless it is only to accommodate the Daylight Saving time changes, thus only changing to one hour later in the evening, and one hour later in the morning.
 - a. Increased night joint training will increase the overall number of flights in the airspace above sensitive habitats, soundscapes and critical lands outlined above. For reasons stated elsewhere, this is not acceptable.
 - b. No increased night joint training should occur over or near areas of heavy recreational and subsistence use (such as the Denali Highway), near noise sensitive areas, or near sensitive wildlife habitat such as calving or wintering grounds.

5. Many documented noise sensitive areas are located nearby and within existing and proposed MOAs. The Susitna MOA overlaps with Denali National Park and Preserve. DCC is concerned about the impacts increased Night Joint Training could have on the soundscapes in and adjacent to these noise sensitive areas, as well as the potential noise impacts to residents and others using the area.
 - a. Noise pollution over Denali National Park and Preserve and other noise sensitive areas must be maintained at current levels or reduced altogether. Additional noise pollution over noise sensitive areas should not be expanded. Stating that impacts will be “minimized” is inadequate.
 - b. The National Park Service has established standards for amount of noise disturbance consistent with park values in all areas of Denali, and we recommend you consult with NPS regarding the impact of the training expansion on these standards, and comply with their existing policies and standards.
 - c. The Draft EIS dismisses drastic increases to noise pollution as an “annoyance” to human users. Subsistence users and other consumptive and nonconsumptive wildlife users will be more than “annoyed” when wildlife is affected by noise, even if temporarily. Still, while “annoyed” may sometimes be an adequate description, the impacts would usually be much greater considering the increased intensity and abundance of overflights. This impact to humans and wildlife is exacerbated along with the increased noise from sonic booms and other maneuvering, as well as the scare factor (not necessarily quantifiable, but worth considering) of a low-altitude training or dry target maneuvers. These impacts should be given more weight in the consideration of cumulative impacts, and because of the impacts to these areas, training should not occur above or near areas of heavy recreational and subsistence use (such as the Denali Highway), near noise sensitive areas, or near sensitive wildlife habitat such as calving or wintering grounds.
 - d. All training (including, but not limited to supersonic training) should be done in higher altitude over areas of heavy recreational and subsistence use (such as the Denali Highway), near noise sensitive areas, or near sensitive wildlife habitat.
6. What ground uses or closures would be implemented for dry target runs? The EIS claims there would be no changes to land use, yet refers to the use of “nonfunctional threat vehicles and trailers beneath MOA airspace approved by the Alaska Department of Transportation.” Are these dry targets located then along the Denali Highway? If they are located along the road they present additional safety and other human impacts and should not be increased or added to military training. No dry target should be located near areas of heavy recreational and subsistence use (such as the Denali Highway), near noise sensitive areas, or near sensitive wildlife habitat such as calving or wintering grounds.
7. We believe that Table 3.9 only accounts for currently emitted air pollutants, and not permitted air pollutants. Permitted air pollutants (for example, the Healy Unit 2, currently not operating but predicted to in the near future) would cause a substantial increase in actual emissions. According the Alaska Regional Haze State Implementation Plan (regarding Healy Unit 2), “If brought on line, the point source NO_x emitted within the Denali Borough would increase by a factor of 4.0 and the Sox would increase by a factor of 2.8 (based on permitted not actual emissions). This increase would make the Denali Borough the largest sources of anthropogenic emissions and the second largest source of all emissions impacting the Denali monitors.” Aside from this, the fact that the Denali Borough currently has lower

N0049

From: [Lisa Herbert](#)
To: [ALCOM 308 Admin Box](#)
Subject: Fairbanks Chamber Comment Letter on DRAFT JPARC EIS
Date: Monday, July 09, 2012 6:20:46 PM
Attachments: [Fairbanks Chamber Comment Letter on DRAFT JPARC EIS.pdf](#)

Please see attached letter that was adopted by the Fairbanks Chamber's Board of Directors at their meeting this afternoon.

Thank you,

Lisa Herbert | Executive Director | Greater Fairbanks Chamber of Commerce

[REDACTED]
[REDACTED] | www.FairbanksChamber.org

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N0049

July 9, 2012

Lieutenant General Stephen L. Hoog
Commander, Alaska Command
9480 Pease Avenue, Suite 110
JBER, AK 99506-2101

RE: Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC) in Alaska (JPARC Modernization and Enhancement Draft EIS)

Dear Sir,

The Greater Fairbanks Chamber of Commerce would like to take this opportunity to comment on the referenced Draft JPARC EIS.

The Fairbanks Chamber supports the United States Air Force and the United States Army and its missions in Alaska and welcomes the expansion of the JPARC to accommodate modern and future training needs. We support the increased use of the JPARC and its planned expansion as this action is beneficial to the training of our military and the defense of our Nation, with no unmanageable negative impacts on our community under the current force structure at Eielson Air Force Base and Fort Wainwright.

The JPARC military training ranges and facilities, as a whole, far surpass in quality and quantity those found in other U.S. locations. The sheer size of the ranges:

- allows for the use of live ammunition from all Army, Air Force, and Navy platforms and weapons systems;
- allows for the Air Force to fly at combat speeds well over Mach 1;
- allows for joint exercises between the Army, Air Force, Marines, Navy, Coast Guard and our Allies in weather conditions ranging from sub-zero arctic temperatures to hot humid summer days; and
- results in the finest training opportunities for soldiers, sailors, and airmen within the United States.

A recent proposal by the Air Force to move the F-16 Aggressor squadron from Eielson Air Force Base (Eielson) to Joint Base Elmendorf-Richardson (JBER) could change the dynamic of the JPARC and affect our support for JPARC use and expansion.

The Fairbanks Chamber encourages the military to consider expansion of their missions and manning within Interior Alaska, and in return we will consider supporting associated reasonable requests to increase Alaska land and air space usage that accommodates this increased military activity. However, we will reconsider our position of support if the military proposes actions that may lead to a reduction of missions and manning in Interior Alaska

Mission: The Greater Fairbanks Chamber of Commerce represents our members by advocating for a healthy economic environment and by building partnerships that promote the greater Fairbanks area as an attractive place for business and community.

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University of Alaska Fairbanks
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N0049

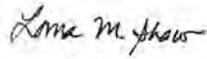
without a corresponding reduction in military restrictions and use of Alaska land and air space assets.

We also encourage DOD to continue to work cooperatively and closely with the State of Alaska to develop the natural resources within the JPARC and the surrounding environment.

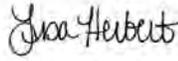
Thank you for the opportunity to offer comment on the *Draft JPARC EIS*. The Greater Fairbanks Chamber of Commerce looks forward to continuing a productive relationship with Alaska Command, the U.S. Air Force, and the U.S. Army.

Sincerely,

GREATER FAIRBANKS CHAMBER OF COMMERCE



Lorna Shaw
Board of Directors, Chair



Lisa Herbert
Executive Director



Steve Lundgren
Military Affairs, Chair

Cc: Senator Lisa Murkowski
Senator Mark Begich
Congressman Don Young
Governor Sean Parnell
Brigadier General James Post, 354th Fighter Wing
Colonel Michael McCurry, US Army Alaska
Colonel Ronald Johnson, Fort Wainwright Garrison
AMFAST
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Fairbanks North Star Borough Assembly
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Fairbanks City Council
Mayor Doug Isaacson, City of North Pole
North Pole City Council
Alaska State Chamber of Commerce
Greater Fairbanks Chamber of Commerce Membership

Mission: The Greater Fairbanks Chamber of Commerce represents our members by advocating for a healthy economic environment and by building partnerships that promote the greater Fairbanks area as an attractive place for business and community.

N0050



COPPER COUNTRY ALLIANCE

a 501(c)(3) non-profit corporation

"Protecting the rural and wild natural environment of the
Wrangell Mountains/Copper Basin region."

October 26, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

By email to alcom.j08@elmendorf.af.mil

Re: JPARC Modernization and Enhancement DEIS

Gentlemen:

Copper Country Alliance is a non-profit conservation organization serving the Copper River Basin and Wrangell Mountains area of Alaska. Most of our members live in the Copper Basin; the others are very familiar with the region. Many of our members have been disturbed, and even terrified, by low-flying Air Force jets, often creating sonic booms, in the Copper Basin and the adjoining Denali Highway region. They have been perplexed by the Air Force's lack of corrective action in the face of complaints that these aircraft were straying outside of the existing Fox 3, that they were below 5000 AGL, and that they were flying at supersonic speeds below 10,000 AGL, all in seeming violation of Fox 3 requirements. Finally, only last month, we learned of the existence of a Military Training Route (MTR #937) that crosses Fox 3 and goes beyond it, to cross the Gulkana Wild and Scenic River and the Richardson Highway, and that has a branch near Lake Louise and Nelchina.

The existence of these MTRs is difficult to discover in the *JPARC Modernization and Enhancement DEIS*. They are not listed in the Index. They are not described with reference to geographic features, such as Maclaren River; they have only numbers. Almost all maps omit them. (One would expect them to be shown on Figure 1-1, "Joint Pacific Alaska Range Complex Assets and Region of Influence," or Figure 1-4, "JPARC Master Plan Objectives," and a number of other maps.) I finally found them on Figure 4-1, which is 691 pages into the Volume I PDF, and on Figure D-2, page 365 of the Volume II PDF. Because their titles give no hint about MTRs, and because figures do not come up when using the Search function, it is easy to miss these maps in such long documents.

Likewise, their significance is almost indiscernible. Only if one happens upon Table D-4 (PDF page 368 of Volume II), does one discover that jets in MTRs can fly as low as 100 feet Above Ground Level. I still have not found within the DEIS the fact that jets may travel up to sonic speeds within MTRs, but such is the case, according to another Air Force document.¹

¹ "All routes would be capable of flight operations at up to sonic speeds, low altitude (as low as 100 feet above ground level [AGL], daylight or darkness, and in all weather conditions," per *Finding of No Significant Impact for Improvements to Military Training Routes in Alaska*, June 2006. The date of the Final EA to which the FONSI relates is repeatedly cited as 2007 instead of the correct 2006. This adds to the difficulty of learning about MTRs.

N0050

Finally, the DEIS fails to adequately consider MTRs with regard to cumulative impacts. In the cumulative impacts section, MTRs merely appear on a map (Figure 4-1) and on a table (Table 4.5), and an MTR document is listed on a table (Table 4.5). The document, cited as “*Modification of Military Training Routes (MTRs) Draft EA June 2005*,” is described thus on the table:

The Air Force is proposing to modify existing MTRs within the state of Alaska to better connect the MTRs with existing SUA. These changed MTRs would be used by aircraft with low level navigation missions. MFE training in the proposed Delta MOA includes low-level flight in the Birch and Buffalo MOAs.²

Cumulative impacts are crucial components of Environmental Impact Statements. The Environmental Protection Agency³ states:

The combined, incremental effects of human activity, referred to as cumulative impacts, pose a serious threat to the environment. While they may be insignificant by themselves, cumulative impacts accumulate over time, from one or more sources, and can result in the degradation of important resources. Because federal projects cause or are affected by cumulative impacts, this type of impact must be assessed in documents prepared under the National Environmental Policy Act (NEPA).

Listing an MTR document on a table, (Table 4.5) does not constitute a meaningful assessment. The JPARC DEIS fails to discuss the interaction between the MTRs and the proposed new and expanded MOAs. And there are interactions. According to a long-time resident of Maclaren and Paxson, “The moose are on edge, our dogs in the kennel hide trembling in their houses and my three-year-old daughter is afraid to go outside when the jets are overhead; ‘Daddy, I’m scared of the jets.’” He adds, “Caribou will have a hard time; they are along the Denali mostly during the spring and summer months. Caribou are more flighty than moose. They tend to jump and run when startled; that is their defense mechanism.”⁴ The incidents referred to occurred within MTR #937, which is also within the existing Fox 3. If the Fox 3 expansion and Paxson MOA are added, that increases the area where wildlife, hunters, recreationists, and visitors are stressed by jets. If the floor is lowered to 500 AGL in the current and proposed MOAs, that greatly exacerbates the problem.

Copper Country Alliance requests that the Final JPARC DEIS give the reader a clear understanding of what jets do in MTRs, show them on maps at the beginning of the document, list them in the index, and give them the discussion they deserve in cumulative impacts. We do understand that the JPARC DEIS does not propose to change MTRs, but understanding them is essential to comprehending what is happening in the present and proposed MOAs within the region that is our home.

Sincerely,

COPPER COUNTRY ALLIANCE

Ruth McHenry, Volunteer Staff

² On the table, the timeframe for the Draft EA action is given as past and present, but not future. The Final EA is not listed on the table, even though it had been published almost six years before the JPARC DEIS was released.

³ *Consideration of Cumulative Impacts in EPA Review of NEPA Documents*, EPA 315-R-99-002/May 1999.

⁴ John Schandelmeier, in his Sports Section article, *Anchorage Daily News*, July 31, 2012.

N.2.4 Individual Comments in Order by Identifier ID Number

I0001

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0001	George Davidson	self		Airspace Management, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxson MOA	The expanded Fox MOA covers my private land, private cabin & private air strip. If you are insisting on doing this expanded Fox with the lower ceiling then buy me out as I am the only private inholding in this expanded Fox MOA. I have owned this property for 30 years and your proposal will destroy the peace and quiet that I spent considerable money on to acquire. The new airspace also deprives me of my ability to easily access my private property as my access would only be feasible during periods when the MOA was not active. My earlier comments (last time your requested comments) provided you with the Lat & Lon for my property. More generally I am on the Oshetna River about 1 mile down stream from the confluence of the Little Oshetna River. This put me squarely into the active (long axis) of Fox & Paxson MOA Please provide me with some form of contact so that I know my comments have at least been read by someone involved with this project. Thanks! George Davidson An Alaskan

10002

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10002	john smart			General (to the EIS), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	Will their be enhanced radio coverage to assist both military and civilian pilots in the lower levels of southern airspaces? thanks john

10003

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10003	Shawn Roberts			All proposed actions	<p>38 1.5.1.6 Unmanned Aerial Vehicle Access A 12 1.5.1.1 Fox 3 Military Operations Area Expansion: As a pilot who utilizes a lot of area around Fairbanks I worry about more restrictions and larger control of existing airspace by the military. I have seen jets flying vertically through a hole in a large cloud near the Parks Highway south of Clear. I was not in an MOA at the time and wondered if he ever saw me and could avoid me if he did. I feel larger areas would just provide more of these excursions outside for GA. 32 1.5.1.12 Missile Live-Fire for AIM-9 and AIM-120 This concerns me due to the possibility of contamination to wildlife and water-shed in the area. What toxins would be left to leach out after large amounts of live ordnance in a concentrated area? 39 1.5.1.13 Low-Altitude Tactical Navigation Training: Having seen what low altitude jets have done in the wilderness I object to prolonged low altitude flights over wilderness. I have witnessed a birds nest blown out of a tree along with a large percussive to my chest with low flight and sonic booms. I believe pilots in the air over wilderness don't realize there is 'something down there' by the way they fly over it. They act as if the terrain is theirs to 'play with'. I have witnessed glass in my cabin break and saw a helmeted pilot zoom past with frost on the nose of his jet while low-flying along the Nowitna River. I do not see noisy low-flight in any way compatible with human or wild-life in Alaska's wilderness areas. Thank you..</p>

I0004

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0004	Mike McQueen			General (to the EIS)	I have already attempted to submit comment via this Internet based system. Did you receive them?

I0005

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0005	Mike McQueen			General (to the EIS)	I have already attempted to submit comment via this Internet based system. Did you receive them?

10006

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10006	Mike McQueen			General (to the EIS), Noise, Biological Resources, Land Use, Subsistence, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>I realize that training is the key to having an effective military and I support training, training, training! However, some of the proposals for the expanded Fox 3 MOA and the new Paxon MOA will undoubtedly impact my use of the state and public lands in these areas. My wife and I fish, float, camp, hike and x-country ski in these areas each year. I am very concerned about the following areas: Gulkana River, Tangle Lakes, Delta River, Lake Louise, and Crosswind Lake. The Denali Hwy corridor is also of great concern to me. The noise of low level (500 ft AGL) jet flights will be more than startling in my estimate. If these occur at night the noise will be downright stunning. The size of the EIS (700 and some pages) combined with the detailed nature of the presentation makes comprehension of the proposed action, alternatives and impact analysis challenging. Since you stated the majority of the scoping concerns were directed at the two MOAs I suggest you present perhaps in table form a list of the actions proposed for these MOAs the pace of operations and comparisons to noise levels a normal person can relate to. What in the world does 100 or 62 db sound like? It was difficult to understand how many passes aircraft would be making over any given area and at what altitude during normal training, during MFEs major flight exercises and at night. Without some understanding of the numbers of aircraft the number of passes and the associated noise levels of each pass it is impossible to understand what the on the ground experience will be. Please describe to me what I will experience if I were standing on one of the ridges above Tangle Lakes or some other high use location during normal training, during major flight exercises and during joint night training. Please include the intensity of the noise, duration of the noise and how many repetitions may occur each hour and each day. Please relate the noise levels to something I can relate to, i.e. thunder clap, distant thunder, rifle shot, etc. It was unclear to me if 6 MFEs annually occurred for a total of 60 days or each MFE lasted for 60 days. I believe you have incorrectly dismissed the potential for the flares to start wildfires under the MOAs. Flight exercises at the Top Gun School at the Fallon Naval Air Station in Nevada have started a number of fires on BLM lands that required the initiation of suppression activities.</p>

10006

I believe that the BLM office located in Carson City Nevada has documentation of these fires. I know that the end of a flare was identified at the origin of one fire. The climate, habitat, and potential for fire may be different here in Alaska but this issue should be investigated more thoroughly. I do agree that flares released at 5K feet should not reach the ground but they did in Nevada. Alaska Department of Fish and Game currently conducts or at least sponsors aerial shooting of wolves in Game Management Unit 13 that I believe is under a large portion of the Fox 3 MOA. ADFG recently reports that these numbers have been reduced from around 500 animals to around 150 animals. The remaining wolves may be more sensitive to low level flight noise than populations of wolves that are not hunted from airplanes. I suggest the military support ADFG in studies or at least observations of wolves and other animals of interest such as caribou, moose, migratory waterfowl and other birds responses to the sounds and sights generated by low level jet flights in these MOAs. I suggest the following: 1. The military agrees to pay for all suppression activities related to fires started by military operations. 2. Avoid low level jet flights (day or night) over known high use areas such Lake Louise, Tangle Lakes, Delta River, Gulkana River. And campgrounds along the Denali Hwy. 3. Select an alternative that minimizes noise impacts on high use areas. 4. Select an alternative that excludes high use areas from the MOAs.

5. Adopt an adaptive management strategy that will reduce noise impacts on large ungulates, predators and large migratory birds if they are found to respond adversely to low level jet flights or other aspects of military operations. 6. Low level jet flights will not be conducted parallel to or directly over high use river corridors such as the Delta River, Gulkana River etc. Low level jet flights, when absolutely necessary, should cross these high use corridors at angles approaching perpendicular. This should also be applied to the Denali Hwy. Thank You,

Mike McQueen

I0007

[REDACTED]

From: Don Garrett [REDACTED]
Sent: Saturday, April 07, 2012 7:04 PM
To: ALCOM J08 Admin Box
Subject: EIS area

I have never seen a reason for the military to need the use of 1/3 of Alaska for their exercises. I have live here for more than 50 years and had interference of my hunting and fishing areas of a great deal of Alaska by military aircraft and other vehicles. There is enough area already designated for you to use and you need no more.

Don Garrett
[REDACTED]

10008

[REDACTED]

From: Karl Monetti [REDACTED]
Sent: Monday, April 09, 2012 1:40 AM
To: ALCOM J08 Admin Box
Subject: JPARC

I am writing to express my concerns over the proceed expansion of military fly zones.

Much of the area the expansion will cover includes settlements, lodges, subsistence areas, and recreation areas such as Paxson and Meiers Lakes, Sourdough, Maclaren, Lake Louise, and the Tangle Lakes/Delta Wild and Scenic River system, as well as most of the Denali Highway. Most people who live in rural areas do so in part to escape the stresses, including noise, of more settled areas. They forsake many conveniences—water and sewer service, supermarkets, hospitals—in order to do so. Alaska's rural and backcountry areas should provide an alternative to city and suburban life, for locals as well as visitors. Visitors (tourists) expect nothing less. Many of them spend their lives dreaming of the Alaskan adventure; having that dream shattered by low flying military aircraft all hours of the day or night, almost anywhere they choose to travel in the state, is unacceptable.

JPARC is already huge. It takes up a great swath of Alaska. We believe that our Armed Forces are fully capable of finding ways to perform their necessary training within the present 65,000 square miles. On a personal note, I live 3 miles southwest of the Eielson AFB runway, in the Eielson Farm Road. Eielson AFB owns thousands of acres of land to the northeast of the runway; why is it that the touch and go practice is always conducted over populated areas like the Eielson Farm Road instead of over the unpopulated lands the base already owns? This question has direct bearing on the proposed expansion; if current military practice does not take into consideration the peace and quiet of current residents, why should we believe any attempts to minimize noise/nuisance would occur over vastly expanded land areas in the future?

Past personal experience tells me that AGLs and sonic boom restrictions will be violated. For instance, I have had at several such experiences in the Tanana Flats Training Area. I live on the flight path between EAFB and Blair Lakes bombing range. Numerous times I have had low flying (less than 500 feet AGL) come right over my house, just barely above tree-top level. Worse than that nuisance and noise is the fact that they also fly right over my personal runway; if a plane were taking off from this runway when a violating chopper went over, disastrous consequences could arise.

Sonic booms aside, the noise and sight of jet aircraft at 500 AGL is unacceptable. The proposed extension covers thousand of square miles of prime hunting and flight-seeing lands, where dozens of light aircraft are to be found fling at similarly low levels AGL on a daily basis. Having high speed military aircraft mixing with these light aircraft is unsafe. Existing restricted areas already provide thousands of square miles of land over which aircraft can practice low level high speed flight and maneuvers.

High noise levels at night are even worse than in daylight. **Night flying time should not be extended!**

Wildlife is likely to be stressed by the low flights, with or without sonic booms.

EIS Should Include:

1. All alternatives should include monitoring and enforcement of flight levels and flight speeds. Random but frequent checks should be made of flight tapes. Look into the feasibility of beepers than warn pilots when they are below prescribed flight levels and when they are approaching Mach 1.
2. All alternatives should include more and continued publicity about the number that people should call to report sonic booms and violations of prescribed flight levels and training area boundaries. Publicity should include what types of information people should be prepared to provide. Consideration must be given to the fact that a few days may elapse before people can make the report. Some of us do not carry cell phones, and even if we did, cell phone coverage in the FOX areas is spotty.
3. It is important to understand how dozens of species of birds and mammals are affected by low level flights and sonic booms. This information is not readily available for most species, because Alaska's wildlife managers, operating on

I0008

restricted budgets, tend to concentrate their research on those species most used by humans. Anecdotal reports alone cannot be relied on; they lack rigor, and they often conflict. Research is especially important for those species with small populations and/or special vulnerability to other stressors like climate change. Examples include wolverine and pika. The military should contract with independent scientists, possibly at the University of Alaska, to undertake research.

4. What is the possibility of an avalanche being triggered by a sonic boom? The proposed Paxson MOA includes popular winter climbing, backcountry skiing, and snowmachining areas.

5. Low level flights over areas where birds are concentrated could be hazardous to both birds and airplanes. For instance, large flocks of ducks and a number of swans utilize a series of lakes around mile 48 to 50 of the Denali Highway, in the existing FOX 3 MOA. The tragic, fatal collision of a jet with geese at Elmendorf illustrates this hazard. A similar hazard would exist during migrations.

6. Household subsistence studies, now twenty years old, should be updated to give a current picture of current consumptive uses of wildlife. The National Park Service has been able to research only a few communities so far.

Thank you for your consideration.

Karl Monetti

[REDACTED]
[REDACTED]

I0009

[REDACTED]

From: Lee Mortimer [REDACTED]
Sent: Saturday, April 14, 2012 7:52 PM
To: ALCOM J08 Admin Box
Subject: Copper River MOA Expansion

You're hereby invited to come sit on my deck above the Copper River, watch the bald eagles soar, see the bears down on the river--and then hold your ears as one of your Heres or Apaches blasts up the Canyon level with the river bluffs. Your fly guys don't play by the existing rules--and you seriously want to give them a bigger playpen? I've experienced the same flagrant disregard for MOA rules at Mountain Home ID AFB and Davis-Monthan AFB in Tucson. Might be better to enforce the existing rules before you seek to expand your turf. Lee R. Mortimer, MP [REDACTED]

10010

From: Dianne Herman [REDACTED]
Sent: Thursday, May 17, 2012 12:36 AM
To: ALCOM J08 Admin Box
Subject: JPARC expansion

I attended the last session JPARC had in Healy, and, because nothing much seems to have change, I won't be attending the one on May 21st. I agree with the attendee in Palmer who told you that it is an outrage that the military is taking over Alaska's playground, turning it into a war game zone, which will make it extremely inhospitable to the Alaskans who have been recreating there for many years (not to mention the native Alaskans who have been hunting there for time immemorial). Most of the military war-gamers will likely be kids from the lower 48, who have no love or care for our Alaskan land, environment, plants, and animals. This is not ethical!!!

As a long time Alaskan, 67 years of age, who has lived all over the state, I have seen the devastation caused by the military taking over Alaskan terrain (Long Island off of Kodiak town, for example). There are old, rusting, polluting oil drums all over the tundra, in many villages where I have taught, remnants of the military presence. As an avid environmentalist, I am aware of other places that the U.S. military has ruined with their war games, such as Makua in Hawaii.

I am adamantly OPPOSED to any additional military presence in Alaska! Please take your war games and weapons and polluting, expensive aircraft elsewhere. Keep them on the bases already established in the lower 48.

Sincerely, Dianne Herman, [REDACTED]

I0011

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0011	Mark Bartlett	Mr.	N/A	General (to the EIS)	I am all in favor of training areas that will be used by Our Armed Forces to keep finely honed on specialized warfare. I do not, however, give them Carte Blanche to BLOCK ME OR MY FAMILY OUT FROM THESE recreational areas. My Family and I are willing to share—not take over so we can never enjoy these remote areas. However you need to do that—scheduling or notifications or whatever. Regards, Mark A. Bartlett Jane L. Bartlett

I0012

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0012	dave sullivan			General (to the EIS), Airspace Management, Safety (Airspace), Subsistence, All proposed actions	The Talkheetna Mountain, Nelchina Basin should not be used for extensive military training as it is a high use recreational area. Use areas over National Parks, etc. as the recreational use is restricted there. Sincerely, Dave Sullivan

I0013

Alaska Airman's Association
[REDACTED]

4-21-12

Dear Sir,

RE: JPARC

The Joint Pacific Alaska Range Complex Modernization and Enhancement of Ranges and Training Areas program has recently released an Executive Summary. I have spent 2 ½ hours trying to understand the changes that might affect me and am baffled.

Rather than the military saying "HERE IS WHAT WE ARE GOING TO DO, WATCH OUT!" They really need to identify the 24-7-365 **SAFE CORRIDOR** for General Aviation Aircraft flying from Tok to Fairbanks. I'm sure pilots in other communities would express a desire for similar **SAFE CORRIDOR** routes in their areas.

On the afternoon of 4-18-12 a rogue military 4 engine turbo-prop buzzed over Tok several times @ 4-5 hundred feet above ground level! This scared the be-jeebers out of me... Approximately one hour earlier I had returned from a General Aviation flight at that same altitude and same location. My little Super Cub wouldn't stand a chance avoiding an Orion - Hercules size 4 engine military aircraft flying at 200+ mph. The prop wash and wing tip vortices would roll me right out of the sky... provided that we missed a collision in the first place. This kind of flying is going to kill someone. Yet, with the proposed ceilings and floors of the JPARC this is exactly the kind of flying situation that is being set up.

Please take whatever steps are available to require establishment of 24-7-365 **SAFE CORRIDORS** along General Aviation routes.

REMEMBER: **IT'S OUR SKY TOO!!**

David Parker (AAA #8576)

David Parker
[REDACTED]

cc:

Governor Sean Parnell
[REDACTED]

Representative Don Young
[REDACTED]

Senator Lisa Murkowski
[REDACTED]

Alcom Public Affairs
[REDACTED]

I0013

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Representative Alan Dick
[Redacted]

AOPA
Tom George
[Redacted]

Representative Dan Saddler
Joint Armed Services Committee
[Redacted]

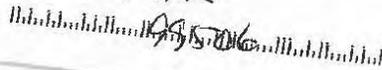
Fairbanks Flight Standards
District Office
[Redacted]



David Parker
[Redacted]



ALCOM Public Affairs
9480 PEASE AVE
SUITE 120
JBER, AK



I0014

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0014	Deborah Kalakis	Member	The Lake Louise Phoenix	Land Use	As a property holder of nearly 20 years, I respectfully request that all of the Lake Louise, Susitna, and Tyone Lakes be excluded from Alternative E of the Joint Alaska Pacific Range Complex Modernization and Enhancement Environmental Impact Statement (statement). I further respectfully request that there be no action alternative of the proposals within Alternative E of the statement. Sincerely, Deborah A. Kalakis aka Deborah A. Holmes The Lake Louise Phoenix, LLC.

I0015

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[REDACTED]

19 COLONEL ORR: Next we'll have comments from Mr. Terry
20 Carter (sic).

21 MR. CARTEE: Cartee.

22 COLONEL ORR: Cartee?

23 MR. CARTEE: Yes.

24 COLONEL ORR: Apologize.

25 MR. CARTEE: First I'd like to clarify that the MOA only

[REDACTED]

I0016

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■ [REDACTED] [REDACTED]
■ [REDACTED] [REDACTED]
■ [REDACTED] [REDACTED]

4 MR. KENDALL: Mr. Orr. Mr. Orr, name is Paul, middle
5 initial D, Kendall. I'm from Alaska and I came to your meeting
6 tonight to kind of wedge something in because I'm not articulate
7 and learned enough to really understand the EIS like some of the
8 professional members of my community.

9 I'm an energy activist. This is a business card I'd like
10 to give into the record and also a list of links and these links
11 represent a new energy design that is now expected to come
12 online within the next six to 18 months. Most of you know it as
13 cold fusion. What, should I just hand this to somebody or.....

14 UNIDENTIFIED MALE: Yes.

15 MR. KENDALL: Oh, all right. You'll be looking at
16 something called an E cat, energy catalyzer, by Mr. Rossi and
17 they're getting what they call COP, coefficients of performance
18 or production. They're six to 30 times the energy out that they
19 put in. They're suggesting that these units can run for six
20 months under temperatures of 1,500 degrees Celsius on five grams
21 of hydrogen and about 55 grams of nickel and they produce zero
22 pollution. They can also drive a five KW electrical unit at the
23 same time. Scientists are now talking the time has come to
24 where oil pipelines, there's no need for those or power lines.
25 They're talking about energy that can be looped. When you can

[REDACTED]

I0016

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1 loop energy it's infinite. And if that weren't enough, another
2 competitor came out with a 45 KW unit which will run for a year
3 and a half on a limited amount of hydrogen and nickel. And if
4 that weren't enough, last week a company by the name of
5 Brillovin, which you can find on pesn.com out of Berkeley,
6 proposes that they have found a frequency which separates these
7 subatomic particles and you can run a boiler in Nome, Alaska for
8 three years on a quart of water. And if you bring that same
9 boiler -- and that's with no gas lines attached to it. And if
10 you bring that same boiler to Berkley you can run it for 20
11 years,

12 And the reason I bring this to you folks tonight is that
13 we have a coal fire power plant in Healy. They're about to fire
14 that plant up on coal and I would think with your funding and
15 your leading edge technology as defenders of which there's a DIA
16 document on that list which refers to this as the greatest
17 potential transformation of the U.S. battlefield forces since
18 the change from horses to gasoline. I would suggest that you
19 intervene as quickly as you can and go into that coal fire power
20 plant with these units which produce tremendous amounts of
21 energy when hooked in sequence. And if that weren't enough, we
22 think the U.S. Navy has purchased one of these small shipping
23 containers that can generate about 15 to 30 KW in electricity.
24 Once it kicks itself off it makes its own energy.

25 And I realize some of these things sound preposterous, but



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1 the chief scientist at NASA has weighed in on this. Stanford
2 Research Institute has validated some of the tests, Los Alamos
3 Laboratories. Some of the most renowned names around the world
4 are now coming online with this, including the Royal Society of
5 Swedish People out of Switzerland, and even they made the
6 comment that Mr. Rossi is credible. There are now six companies
7 vying to come online with a residential unit within the next six
8 to 18 months. And the Swedish scientist said they don't -- the
9 design is credible, they had a big press conference, but they
10 don't understand what it's doing, how it's doing or anybody that
11 does. This is something transformational, what we call, it's
12 almost a metamorphosis of this society. They think they will
13 move through a world production covering the market within three
14 years at the max 25 percent of the world houses with these
15 devices. They are suggesting the military and the DIA document,
16 they're referring to this as disruptive technology. They're
17 saying that this has up to 10 million times the energy per unit
18 of chemical mass of anything we're using on the planet today.

19 I have never seen anything unfolding quite like this in my
20 lifetime. I do think it has a tremendous amount of credibility,
21 but you should see the scientists arguing. You have a chance
22 here with your military operation to be a part of our community
23 to help build that new society almost overnight in a great and
24 wondrous land with many challenges and I think it could play a
25 historical role. And you can't -- surely can't let the Navy get



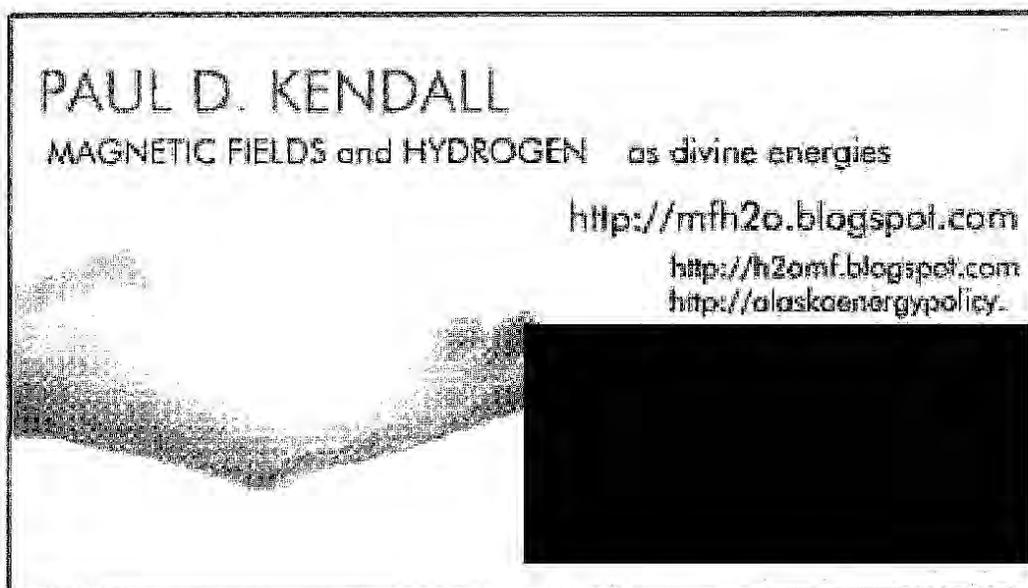
1 ahead of you with one of these units without you knowing it.

2 And thank you very much.

[REDACTED]

[REDACTED]

I0016



I0016

Date: 4-25-12 LINKS PAGE (local call for now 907-222-7882 -- see below)

To: Citizens of Alaska

Ladies and Gentlemen,

Our Alaska Newspapers, most Talk Radio, Other Media Platforms, Schools, Utilities, Oil Producers, Community and Political Leaders **WILL NOT PUBLISH or PUBLICLY TALK** about the Energy Documents Sites below. (I have standing challenges to have a public discussion and they will not)

Thank You, If you have any questions, please call or contact me.

Paul D. Kendall

(Energy in Harmony activist, researcher, commentator and consultant)

You tube / Google

#1 E-CAT Cold Fusion (ROSSI REACTOR)

<http://ecat.com/> http://pesn.com/2012/04/19/9602076_LENR-to-Market_Weekly_April-19/

<http://www.youtube.com/watch?v=R1CTVUuv4k> <http://www.defkalion-energy.com/>

<http://coldfusionnow.org/> <http://ecatnews.com/> <http://www.scoop.int/rossi-s-ecat.com>

(Residential and Commercial Cold Fusion Units launching late 2012 / 13. Scientist are discussing this as a potential World Changing Event - nearly unlimited clean energy - a small nuclear fusion furnace in every dwelling on the planet) <http://www.e-catworld.com/>

Google

#2 DIA-08-0911-003 (A MUST READ - WOW !)

<http://en.wikipedia.org/wiki/File:2009DIA-08-0911-003.pdf>

(Unclassified Defense Intelligence Agency 8 page report on LENR low energy nuclear reactions - COLD FUSION - Paradigm Shifting Results - possible 10 millions times the chemical energy per units used today)

Google

#3 LoU-fuelcell-cars.pdf (DAIMLER test.pdf) (Hydrogen Economy Launched)

<http://www.hydrogenlink.net/download/LoU-fuelcell-cars.pdf>

(7 biggest auto mfg launching Elec Vehicles, Fuel Cell, Compressed Air, Hydrogen & they want the HYDROGEN HWY in place by 2015)

#4 People wanting to sign up for an **E-CAT, HYPERION - other HOME OR BUSINESS**

REACTOR UNIT when available in late 2012 - 13...contact <http://www.e-cat.com/> or

<http://www.leonardo.com/> <http://www.defkalion-energy.com/>

<http://www.brillouinenergy.com/> www.pesn.com

ALSO CHECK OUT

5 <http://www.pluginamerica.org/vehicles/all> (list of electric and fuel cell vehicles)

In closing,

We have begun the "Voice Recognition", "Home Cold Fusion Reactor Evolution", "Hydrogen Economy Infrastructure", "hydrogen generation at will" , and "Electrifying up the Planet" using many new technologies that are now coming forward in residential, transportation and commercial sector designs and devices;

Its all about Individual Clean Energy; Period !..

Our leaders fear this new "Energy in Harmony" Age because it brings us true individual freedoms, true free markets, and real individual accountability.

END -- thanks, [REDACTED]

<http://mfh2o.blogspot.com> see [FINAL_DRAFT_23.pdf](#) and Alaska River Ocean Energy Ideas

I0017

50

█ [REDACTED]

█ [REDACTED]

█ [REDACTED] [REDACTED] [REDACTED]

█ [REDACTED]

█ [REDACTED] [REDACTED]

█ [REDACTED]

█ [REDACTED] [REDACTED]

8 MR. KENDALL: Well, I'm not sure when I've had the
9 opportunity to do this before in my lifetime. I've been in lots
10 of places here, but I am going to seize the opportunity.

11 I think that you need to understand something, ladies and
12 gentlemen, and this is why this is very important. Our society
13 is founded on energy. And in regards to this EIS I have to tie
14 this into here if you'll give me a moment to construct this, but
15 even though the EIS looks to find harmony and your society is
16 chasing money, but there isn't a creature in the universe that
17 eats the money. It's all an after energy moment and I think
18 that it is imperative that you add the energy consideration in
19 this EIS. And when you look at the constructs of that energy
20 you will find that most of it, if not all of it, is hydrogen
21 based.

22 So I'm trying to wedge something in here as best I can in
23 your EIS. It would seem to me the fact that you don't have this
24 included in your EIS is a profound statement about the lack of
25 connection in a properly formed society. And to make an example

[REDACTED]

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1 of that so that you understand the relevance of that, your
2 children do not drink a glass of water. That is an ancient
3 term, it is a primordial term, it is a tricked up term or a
4 sling term. You drink hydrogen and oxygen and when you drink
5 that your body makes electricity, it fires you up. You come
6 online, onboard with synaptic impulses and then you hunt carbon
7 to form frame and hair and infrastructure. And when you begin
8 to realize that you begin to realize the connection. There's no
9 such thing as gasoline. It's hydrogen, pop and carbon. There's
10 no such thing as diesel. It's hydrogen, pop and carbon.
11 There's no such thing as jet fuel. It's hydrogen, pop and
12 carbon. Every creature out there in the universe, ladies and
13 gentlemen, is a transportation system that is specialized in
14 this design. All of those designs are fired by hydrogen living
15 in harmony with its hydrogen. And for you to have an EIS
16 without a hydrogen reference point to the impact of all those
17 things. Anything that's consuming hydrogen, generating a
18 current and altering its mass most likely has a state of being
19 of which we have not recognized in our evolution yet. But when
20 this new cold fusion comes online you're going to find whole new
21 economies and the reason you will is they will not be able to
22 use fuel to be able to give foundation to the dollar. And if
23 you have energy you can tool up, tech up, light up, arm up,
24 transport, communicate, grow food, you are a creature with a new
25 mindset and a new set of priorities and that will evolve your



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1 society. And to see an EIS in a magnitude of outlay of this in
2 such a credible body of -- there are so few credible bodies of
3 commentary anymore that are not talking and dodging points that
4 to see such a credible body as our military of which we have
5 conveyed the greatest hope and trust in not have an EIS
6 reference I think is -- needs to be addressed as a concern in
7 your next EIS.

8 And I think without getting -- doing some kind of sideshow
9 up here I should probably sit down and thank you for the
10 opportunity. I just can't stress enough that our societies are
11 going to be based upon energy and as complex and as cascading as
12 the problems are nest -- now that have become nested problems
13 with the proper amount of energy you can hold your family secure
14 while we take five to 10 years to settle these problems out.
15 You cannot do that with money, ladies and gentlemen. You cannot
16 eat the gold, you cannot eat the silver, you cannot eat the
17 money. Those are false constructs of pursuits which disconnect
18 you from understanding that all around you it is the wonders of
19 the universe which was our mission and we lost that mission.
20 And you are about to see that transform almost overnight if
21 these units come online in the next 18 months. And I assure you
22 there's more, but I can't get into the realm of that because of
23 the time constraints and -- but I -- but due to the -- your
24 accommodating me with your -- due to your generous
25 accommodation, I mean I'm beginning to feel particularly

[REDACTED]

1 embarrassed here so I'll sit down.

2 But please, I think that it's imperative that you address
3 our more concrete values and those fundamental values are
4 individual freewill and complete and undeniable truth and if you
5 miss those along with the energy you will continue to have us in
6 a society that simply circles itself in some predatory mode of
7 disruption and lack of evolution. And so I think as a military
8 and a large body, a credible body, I am as obligated to bitch at
9 you as you are to lis -- to complain as you are to listen to me
10 in some ways and if I don't exercise that right then I'm as
11 guilty as those people who simply become disconnected and
12 suddenly push back in some malcontented position which harms
13 somebody. So.....

14 COLONEL ORR: Okay.

15 MR. KENDALL:I'll stop. Thank you very much.

█ [REDACTED]

[REDACTED]

I0018

PALMETS HEARING

**Joint Pacific Alaska Range Complex Modernization and Enhancement
DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Written Comment Form

**For more information and to submit comments online, please go to:
www.jparceis.com**

Public comments are requested pursuant to the National Environmental Policy Act, 42 United States Code 4321, et seq. All written comments received during the comment period will be considered during Final EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Final EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Final EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

Name (First and Last): Lisa Moorhead Date: 5-14-12

Title: _____

Organization: _____

Is this a government agency (choose one): yes no

Comment submitted on behalf of (choose one):

- your organization/business/agency
 yourself as a private citizen

Email: _____

Phone: _____

Mailing: _____

If you know, please check the boxes below that relate to your comment. This will assist us in organizing and reviewing your comment.

Comment Topic(s):

- General (to the EIS)
 NEPA Process
 Purpose/Need
 Description of Proposed Actions and Alternatives (DOPAA)
 Cumulative Impacts
 Mitigations

Proposed Actions:

- All proposed actions
 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA
 2 - Realistic Live Ordnance Delivery
 3 - Battle Area Complex Restricted Area Addition
 4 - Expansion of R-2205 Restricted Area
 5 - Night Joint Training
 6 - Unmanned Aerial Vehicle Access
 7 - Enhanced Access to Ground Maneuver Space Areas
 8 - Tanana Flats Training Area Access Road
 9 - Joint Air-Ground Integration Complex
 10 - Intermediate Staging Bases
 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska
 12 - Joint Precision Airdrop System Drop Zones

Resource Areas:

- All resource areas
 Airspace Management
 Noise
 Safety (Airspace)
 Safety (Ground)
 Air Quality
 Physical Resources
 Land Use
 Infrastructure and Transportation
 Water Resources
 Hazardous Materials
 Biological Resources
 Cultural Resources
 Socioeconomics
 Subsistence
 Environmental Justice

Please provide your comment(s) on the back of this form and turn it in at a public hearing, or submit by June 7, 2012, to: ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506; Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

I0018

Comment(s):

① Fox 3 MOA Expansion: I support no action alternative. Our recreational cabin would be encompassed (or nearly) by the proposed expansion (Alternatives A and E). We already hear military training (sonic booms). We do not want to hear them any closer or louder, we go out there for peace and quiet and spend a lot of time there. Expansion would negatively impact our quality of life.

② Night/Day Training: I support no action alternative ^{to minimize} ~~to~~ The noise impacts on wildlife.

All other proposals: my comments are not specific to alternatives as I don't have time to study them, but I do have concern about air and ground impacts on the biological resources, air quality and water resources involved.

Use additional sheets as needed.

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Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

Thank you for your input.

10019

PALMER HEARING

**Joint Pacific Alaska Range Complex Modernization and Enhancement
DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Written Comment Form

**For more information and to submit comments online, please go to:
www.jparceis.com**

Public comments are requested pursuant to the National Environmental Policy Act, 42 United States Code 4321, et seq. All written comments received during the comment period will be considered during Final EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Final EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Final EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

Name (First and Last): Self, Gay Turner Date: 5/14/12

Title: _____

Organization: _____

Is this a government agency (choose one): yes no

Comment submitted on behalf of (choose one):

- your organization/business/agency
 yourself as a private citizen

Email: _____

Phone: _____

Mailing Address: _____

If you know, please check the boxes below that relate to your comment. This will assist us in organizing and reviewing your comment.

Comment Topic(s):

- General (to the EIS)
 NEPA Process
 Purpose/Need
 Description of Proposed Actions and Alternatives (DOPAA)
 Cumulative Impacts
 Mitigations

Proposed Actions:

- All proposed actions
 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA
 2 - Realistic Live Ordnance Delivery
 3 - Battle Area Complex Restricted Area Addition
 4 - Expansion of R-2205 Restricted Area
 5 - Night Joint Training
 6 - Unmanned Aerial Vehicle Access
 7 - Enhanced Access to Ground Maneuver Space Areas
 8 - Tanana Flats Training Area Access Road
 9 - Joint Air-Ground Integration Complex
 10 - Intermediate Staging Bases
 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska
 12 - Joint Precision Airdrop System Drop Zones

Resource Areas:

- All resource areas
 Airspace Management
 Noise
 Safety (Airspace)
 Safety (Ground)
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10019

Comment(s):

I feel safety issue of
flight levels is a concern for
separation between Alaska's general
aviation and govt aircraft
(Gov) Military aircraft over mountains 1000
feet higher than the mountains plain over
flat land 2,000' AGL to help
in separation.

Use additional sheets as needed.

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Thank you for your input.

I0020

3

[REDACTED]

19 MR. WOOD: Thank you again. Mike Wood, W-O-O-D.
20 Initially I asked the question about restricted areas that were
21 proposed just south of Delta and to the east of the highway.
22 Proposal A leaves a fairly wide corridor for VFR traffic going
23 north and south. It's the main route, we all know that, we've
24 (indiscernible) that area. Proposal B butts right up against
25 the highway, comes right close to the pipeline and it follows

[REDACTED]

I0020

4

1 VFR traffic into an extremely small corridor that goes north or
2 south. If you've ever been in that area you more than know that
3 a lot of aircraft do not have radios. They go through there in
4 marginal weather and to put everyone in that small little
5 corridor is basically giving a high risk for the possibility of
6 a midair. I would like to see proposal B give an extra buffer
7 to take it further to the east of approximately maybe one
8 kilometer or even two kilometers. This way people who do follow
9 highways, and a lot do, will be able to know that they're well
10 clear of any restricted area.

11 As far as flying the pipeline, it is clear for us, however
12 I would still like to see it either 2202 (indiscernible),
13 proposed east restricted areas (indiscernible) so at least you
14 could go either to the west and stay away from the east
15 restricted area or vice versa.

16 As far as the MOA is concerned at Paxon, this area is not
17 supposed to be active as a MOA except under certain
18 circumstances. However, I believe 500 AGL for the base of it
19 when it is active is far, far too low. Many aircraft transit in
20 that area between Glenallen, Black Rapids, through the Alaska
21 Range or in through Tok and giving us only 500 feet when it is
22 active for all of us is just not enough. I would like to see a
23 base of 2,000 feet, but I would accept 1,000. And we must have
24 some form of radio communication such as there is to the north
25 where we can call up radar on -- on range rather on 125-3. They



█ [REDACTED]

11 COLONEL ORR: Our next speaker is Mr. William, I think he
12 goes by Bill, Folsom. Is he here?

13 MR. FOLSOM: Bill Folsom, I have several reasons that I
14 don't think that any of the MOAs in this corridor of the rail
15 belt should be activated, only on the military bases. There's
16 way too many reasons. We have a large population in the rail
17 belt now and there's a lot of hunting activity and fishing
18 activity and camping activity and what have you that goes on
19 that be accessed by the largest population area. You know,
20 hunting season from August 15th to October 15th would probably
21 be the outside parameters.

22 You currently have an MOA for a 5,000 foot fly zone in
23 part of the area that you're proposing. I've had friends that
24 have had some of the pilots come, they're not sure, 100 feet
25 above the top of them. And they don't see them, they hear them.

[REDACTED]

I0021

6

1 I mean it's just kind of a shock when they go over. And so if
2 they are -- if they're breaking the 5,000 feet down to 100 foot
3 or whatever, the 500 feet is going to be put aside I'm sure.

4 Fish and Game I'm sure has all kinds of activities that
5 they would like to do in this area. When they are taking
6 surveys and their windows for taking surveys on game are very
7 narrow and to have them disrupted because of activity. I wrote
8 some of these down. You know, six events for 10 days each or 60
9 a year and then there was the Army would have 242 days if I
10 heard that right. And then there's 14 days per battalion. I
11 don't know how many battalions there are. So I'm not even sure
12 of the -- whether there's a weekend open in this thing. But I
13 think the whole operation except for your bases, if you want to
14 have a fly zone to do these things should be moved east now. I
15 was thinking west before, but east to the Wrangell St. Elias.
16 That's federal land and we can't go in there without a note from
17 God. So that would be a good place for you to take that
18 operation I think.

19 So I think that's about all I have. I just don't think
20 that it's advisable to put this right in the populated areas
21 accessible by the largest group of people in the rail belt. I
22 am the local chair of the Fish and Game Advisory for the Mat
23 Valley, however, and I think most of them will agree with
24 everything I've said, but we're going to get some consensus as a
25 group and put in some comments later. So I guess that's all I



I0021

7

1 had to say. Thanks.

[REDACTED]

[REDACTED]

I0022

7

■ [REDACTED]

2 COLONEL ORR: Thank you. Our next speaker is Mr. Jim
3 Stocker. Is he here?

4 MR. STOCKER: Thank you, Colonel. For the record, my name
5 is Jim Stocker. And before I start my testimony or my comment
6 period I want to make something really clear to all the military
7 personnel here. Anything that I say please don't take it
8 personally. I have a high degree for all of you and for the
9 military itself and I know that this didn't come out of your
10 think tank. This probably came out of Washington somewhere,
11 somebody sitting at a desk that doesn't live here, doesn't
12 really understand the area, doesn't understand the issues.

13 But with that said, I've been here for 40 years. I've
14 been a pilot for 40 years. I have extensive time flying in this
15 proposed MOA or Military Operation Area 3 up in the Talkeetna
16 mountains, game management units 13 and 14. And when I first
17 heard about this, and I'll be up front about this, I don't know
18 a lot about it and I should know more about it. When you take
19 into consideration that the largest population of Alaska sits
20 right here in the Mat Su Valley in Anchorage and the playground
21 for the -- the epicenter of Alaska is the Kenai Peninsula and
22 the Talkeetna mountains. It's accessible -- let's talk about
23 the Talkeetna mountains, MOA 3 area and that little area that's
24 to the east of it there, that magenta area. It's accessible by
25 airplane, it's accessible by foot, it's accessible by boat, it's

[REDACTED]

I0022

8

1 accessible for four-wheelers and by vehicles. That's the
2 playground for Alaskans right there and for somebody in
3 Washington to come down and want to put a military operation
4 right over the top of it is absolutely ludicrous. I cannot
5 believe that somebody would be so arrogant to do that. There's
6 areas in the state that would do just as fine as that area right
7 there. And Bill Folsom, you stole some of my thunder. The
8 Wrangell St. Elias National Park, I've been in it. There's
9 nobody there. It's empty. The Wrangell St. Elias gate to the
10 arctic, you've got the parks out to the west, the Lake Clark
11 Park, you have Mt. McKinley Park. You have all these federal
12 areas. This is a state -- mostly state property. Why don't you
13 think about taking those areas out to a federal park or taking
14 it out of this area. It doesn't belong here, this is wrong.
15 This is just totally wrong.

16 And I don't mean to be so outspoken, but I've been here
17 for a long time. I've been a guide. I know what goes on here.
18 I know how many caribou permits are given out, how many moose
19 are taken. I've been on the Board. I used to be the Fish and
20 Game advisory chairman here at one time and I've worked with
21 Fish and Game, I've worked with the biologists, I've worked and
22 done counts. This area right here is a very sacred area for
23 people that live in Alaska and, like I said, this is the
24 epicenter right here as far as hunting and fishing. Sure,
25 Alaska's big, but as we all know, if you want to hunt in the



I0022

9

1 Brooks Range or you want to hunt out west or you want to hunt
2 down on the Alaska Peninsula it's a logistical nightmare, it
3 costs a fortune and it's not practical for a lot of people.
4 This area here should be left to Alaska, it should be left to
5 Alaskans. And again, nothing against the military, but this is
6 wrong and I would like to have the group of people here that
7 proposed this, you know, the people that really came up with
8 this idea in the first place because I'd really like to talk to
9 them.

10 But anyway, with that said, this is wrong and I don't
11 think it should be here. I think it should be moved and I think
12 this whole idea, this whole area of the military operation, MOA,
13 I see it on my flight map all the time, in this case three, Fox
14 3, and that other area should be changed and I think there
15 should be a great deal of consideration given to that. Thank
16 you.

■ [REDACTED]

[REDACTED]

I0023

10

1 close accessible state land. The State only has about 24
2 percent of the land and this state is managed by the State.
3 Sixty-four percent of it is federal and 12 is private ANCSA
4 land. So this is extremely important to our membership for
5 hunting, fishing, trapping and recreational use of the Nelchina
6 basin.

7 The 500 foot lower level, you know, that's just totally
8 not going to work out just because of the way the Alaskans use
9 the aircraft for access up here. You know, what happens up in
10 GMU-20, which is another really important part of game
11 management and state land, well, you know, the military lands
12 there, you're -- you know, obviously you can do what you want on
13 those. But on this one little piece of state land here it's
14 extremely important for Alaskans to be able to access that.

15 Another point I'd like to make is in the last couple
16 decades I've participated in a number of EISs that the federal
17 government's put up, BLM, their resource management plans and
18 comprehensive conservation plans for refuges and I hope the same
19 standards are used by the military on their EIS as the standards
20 that are put on the Alaskans when we try to participate and
21 actively be on federal lands. Thank you.

■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]

[REDACTED]

I0024

10

[REDACTED]

22 COLONEL ORR: Our next speaker is Ms. Lisa Moorehead.

23 MS. MOOREHEAD: Lisa Moorehead, M-O-O-R-E-H-E-A-D. And I
24 have a cabin just south of the existing MOA 3. Is that what
25 it's called? Fox 3 Military Operations Area. Our recreational

[REDACTED]

I0025

11

1 [REDACTED]
2 [REDACTED] [REDACTED]
3 [REDACTED] [REDACTED] [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED] [REDACTED]
7 [REDACTED] [REDACTED]

8 COLONEL ORR: Thank you. The next speaker is Mr. Peter
9 Probasco.

10 MR. PROBASCOS: Yeah, I'm Peter M. Probasco and I have a
11 couple comments. The first one is about communications and I
12 have the draft copy of this plan and it is a very, very
13 difficult study I think from the perspective of many of us that
14 are civilians. I got out of the Air Force in 1960 and I was
15 never that familiar with that many acronyms then. But there are
16 five pages of acronyms that go with this draft copy and if you
17 start studying it, I took them out so I could refer to them all
18 the time, but it's very, very confusing. And I think when you
19 want to communicate something you need to do it with some
20 clarity and recognition to the audience you're trying to
21 communicate with and I thought that was very confusing. I think
22 there is more clarity with this meeting than the one we had last
23 fall in Wasilla at the Menard Center.

24 Another thing, the comments that the individuals have made
25 about this being the playground center and the aspects of this

[REDACTED]

I0025

12

1 and the amount of it that's state land I think is very, very
2 significant. And I think state land is different from federal
3 land and is different from park land. Park land is federal
4 land. And I agree totally that there should be park land that's
5 part of this. Some of the park land is never even looked at by
6 anybody and it's not going to have any impact as far as
7 populations or probably not going to have any great impact on
8 our wildlife populations. But state land are -- have to be
9 managed supposedly in compliance with the Alaska Constitution
10 and so you need to take into consideration sovereignty of the
11 state,

12 And I think coordination was mentioned in one of the
13 presentations about coordination with FAA and a couple of other
14 entities. I think a coordination group should be actively
15 involved should be the department of Alaska Fish and Game
16 because game populations are very dynamic and the things that
17 game populations do is dynamic and what could be reasonably
18 acceptable one year may not be totally out of line the next year
19 because of changes in population, migrations, route and
20 everything else.

21 So I think all of these things -- I think it'd be very
22 important if there were clear statements in there that this has
23 been evaluated and assessments made by the Alaska Department of
24 Fish and Game.

25 Another concern, and coordination was a big one, but you

[REDACTED]

I0025

13

1 talked about biological refer -- or biological resources and the
2 evaluation indicated in a couple cases that this was not
3 significant, the impact on the biological resource. I think
4 that if you evaluate a biological resource, be it caribou or
5 what, during calving season, during any stage of pregnancy, any
6 kind of impact, it's very significant. I know in domestic
7 animals it's not difficult to cause a whole flock of sheep to
8 abort by stress and I'm sure that the same thing can happen in
9 caribou and I'm sure with dall sheep. I don't know about moose,
10 whether they're prone to that sort of thing, but I think if you
11 harass them enough they do abort too.

12 So these are significant considerations that need to be
13 made and I think there needs -- you'd communicate much better if
14 there were references made in the publication that there were
15 assessments made by the Alaska Department of Fish and Game,
16 coordination with other entities within the state clearly
17 stated. The fact that you went to studies is very, very good,
18 but where these studies came from, who made them and when is
19 very, very important. Thank you.

■ [REDACTED]

I0026

13

[REDACTED]

20 COLONEL ORR: Thank you. Our next speaker is Mr. Bob
21 Dittrick.

22 MR. DITTRICK: Thank you for letting me go on record. I'm
23 Bob Dittrick, D-I-T-T-R-I-C-K again.

24 COLONEL ORR: Okay.

25 MR. DITTRICK: And I was -- with my question earlier about

[REDACTED]

I0027

14

[REDACTED]

24 MR. KREGGER: My name is Frank Kreger, K-R-E-G-E-R, and
25 today I live in Wasilla. I don't have anything new to say.

[REDACTED]

I0027

15

1 What I want to do is attempt to underscore some of the things
2 that have already been said. I would say it is not simply
3 inadvisable to do this, it is wrong. It is dead wrong. Not 99
4 percent, 100 percent. The federal government already has
5 control of 61 percent of this state. Do it there, period. End
6 of discussion. Go away now.

[REDACTED]

I0028

15

[REDACTED]

8 MS. HOLT: Hello. My name's Jean Holt, H-O-L-T, and I
9 just want to be put on the record that alternative E is not
10 enough. The border needs to move further north and -- because
11 there's too much at stake here and it is a recreational area and
12 that's what it has been and it should continue. But it should
13 -- the -- alternative E, the border needs to be moved further
14 north. Thank you.

[REDACTED]

[REDACTED]

I0029

15

[REDACTED]

17 MS. MATTHEWS: My name is Beverly Matthews and I live at
18 Lake Louise and we have about 200 -- over 250 cabins up there.
19 Now in the summertime lots of people fly and they -- I don't
20 know that they fly 500 feet, but they're coming back and forth
21 to their cabins and this just isn't going to work. That's why
22 they like having property on the lake. It's a beautiful place
23 and we just got to get the military up higher.

[REDACTED]

I0030

15

[REDACTED]

25 MS. KREGGER: My name is Ann Kreger, K-R-E-G-E-R, and I

[REDACTED]

I0031

16

[REDACTED]

16 MR. STOCKER: Thank you, Colonel. Once again, for the
17 record, my name is Jim Stocker. There's something that I
18 omitted that I wanted to bring up. And it was a few months ago,
19 I don't know, five or six months ago the Air Force lost a jet up
20 in the Talkeetna mountains. Correct? As a pilot it shut me
21 down. You guys -- and again, nothing personal, but you put a
22 big corridor around that area, blocked everything off, and if
23 that's just one example of what might happen when there's, you
24 know, training exercises on the ground or other exercises or if
25 you have an accident and accidents happen. And I don't have any

[REDACTED]

I0031

17

1 problem with that. Accidents happen, we burn fuel. That's one
2 of my concerns. When that happened it really kind of threw my
3 plans into a tailspin and I don't want to be worrying all the
4 time if I'm flying in the wrong airspace or if I'm going to have
5 some jet come up and escort me down or I'm going to get turned
6 into the FAA and have a hassle with them. I don't need that.
7 You know, I'm 60 years old, I don't need anymore hassles. It's
8 a nice simple place to go. The rules right now are pretty
9 simple, you know, mostly class E airspace, everything's fine.

10 Another comment I wanted to make, as far as the fuel's
11 concerned, I can tell some of you military folks in the back
12 exactly how much fuel was used in Iraq per day. It was a lot
13 and I don't have a problem with that. If you need to use it,
14 use it, burn it up. But for us to say that -- or for you guys
15 to say, or the people that are, you know, proposing this, to say
16 that we're going to have to save some fuel, that doesn't work,
17 that doesn't work for me at all. You know, we move militaries
18 to Iraq, to Afghanistan. If we have to do it we do it, fuel's
19 not an issue, and I don't think it should be an issue here. The
20 issue here is the people in Alaska. In another state this
21 wouldn't happen, you wouldn't get away with it, not even maybe.

22 But with that said -- and I could stand here for hours and
23 hours and I appreciate the second opportunity to give a few
24 comments. I just basically wanted to state what happened here a
25 few months ago with shut down airspace, big inconvenience to



■ [REDACTED]

■ [REDACTED]

3 MS. HOLT: Yes, Jean Holt again, H-O-L-T. I would just
4 like to make public comment that alternative E hasn't done
5 anything except move the border boundary 20 miles and that isn't
6 addressing the ceiling from 5,000 to 500. That's very crucial.
7 And also the increase of sonic booms from 35 to 50 decibels.
8 All these three impacts will -- these impacts and the six
9 adverse impacts on the MOA 3 haven't been addressed just by
10 expanding 20 miles and we do need to address the -- especially
11 the flight ceilings and the sound. Thank you.

■ [REDACTED]

(907) 276-3554 503

I0033

18

[REDACTED]

15 MR. FOLSOM: I've been to a lot of hearings on proposals
16 right here in this same building, you know, Bogard or this and
17 that and the other and every time so far it's been a pre-drawn
18 conclusion as to what's going to happen and no matter what the
19 testimony is it's always gone the way they want it to go. I've
20 never seen one time where we've turned anything around. Well,
21 yeah, one time when they burned an FRG (ph) out here at the
22 Butte school (ph). But -- and I hope that that's not what's
23 happening here.

24 It seems like a lot of effort's been put into this and
25 that you give lip service to listening to people and their

[REDACTED]

I0033

19

1 concerns, but then you continue to do exactly what you intend to
2 do with maybe a few little modifications. It does not belong in
3 the rail belt other than your bases. It just is not going to
4 work.

5 Now you have a small representation of people here, but as
6 soon as all this hits the fan and it actually starts happening
7 then people are going to come out of the woodwork and I mean
8 there'll be hundreds and hundreds of people that are going to be
9 upset. And so I hope that the whole thing is reversed except
10 for whatever you do on your existing bases and get all the MOAs
11 out of this rail belt area, these other expansions,

12 THE REPORTER: Sir, could you please state your name for
13 the record again?

14 MR. FOLSOM: Oh, yeah, Bill Folsom.

■ [REDACTED]

[REDACTED]

I0034

19

[REDACTED]

20 MS. HUTCHINS: (Indiscernible). My name's Jeanine
21 Hutchins. I do plan to come in online, but I do want to respond
22 to that. I think that a lot of people don't understand what an
23 acronym named JPARC means and I think that my comment -- one of
24 my comments, and I will make more online, is that we need to be
25 better communicated in layman's terms to the community than just

[REDACTED]

I0034

20

1 acronyms that really don't -- even JPARC really doesn't mean
2 anything to me until I was alerted to the issue and did some of
3 my own research. And so I think people will be blindsided and I
4 think what we can do is to spread the word in our community that
5 people should be educated about this proposal, but it feels like
6 time is of the essence. We have less than a month to comment.
7 So I would encourage all of us here to tell everyone you know at
8 least about this and let them form their own opinion, but at
9 least make it more widely known what this obscure acronym means.
10 And there are great materials here and it seems like there is a
11 lot of information online, but I would say clearly by the
12 numbers here it is not very well known to the general public
13 that will be impacted by JPARC. Thank you.

14 THE REPORTER: Could you please spell your last name for
15 the record?

16 MS HUTCHINS: Hutchins, H-U-T-C-H-I-N-S.

■ [REDACTED]

[REDACTED]

I0035

20

[REDACTED]

18 MR. PROBASCO: Peter M. Probasco. And as to the question
19 you stated and that's a very good question, as to what we can
20 do. Don Young spoke at the Palmer Chamber here a month or so
21 ago and one of the questions came up to him, the commentary made
22 about the amount of land up here that's controlled by the
23 federal people and the amount of land in parks. And of course
24 everybody thinks park land is totally sacred, they're not tread
25 or anything else, but there is a lot of park land that isn't

[REDACTED]

1 even looked at. And this was brought up to Don and he thought
2 that was one thing that possibly that there could be some
3 changes made is to recognize that there is a lot of land
4 available there not being utilized that isn't going to hurt
5 people if we do use it.

6 One of the comments was made that this area up here, Unit
7 13, is the breadbasket of Alaska. Don did come back and very
8 rightfully so say that to much of Alaska military payrolls are a
9 breadbasket also. So we do need to be very conscious of the
10 role that military plays in our economy. But that park land up
11 there that's available to get away from using state land, there
12 is no reason why they can't do many of these things over. It's
13 not going to hurt it at all and it's not even going to hurt our
14 game populations because none of those probably migrate into
15 areas where we can utilize them as prescribed by the Alaska
16 Constitution. So I think that's -- Don was sensitive to that
17 and maybe there is an outlet to do something.

18 COLONEL ORR: Thank you. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
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10036

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10036	Joe Gerwig			<p>General (to the EIS), Airspace Management, Safety (Airspace), Safety (Ground), Physical Resources, Land Use, Infrastructure and Transportation, Subsistence, All proposed actions, 1 – Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA</p>	<p>I have grown up in the Chickaloon area and realize how much recreation goes on in the area, and how important it is, in the air and on the ground. I also realize that we have a safe country because of what our military does. I don't want our military to have insufficient training, but I want recreation and economic bases to continue. I don't think that the military realizes how much recreation and revenue there is in the areas behind Eureka and Lake Louise. The idea of the Fox 3 MOA expansion is that the general public could still use it hot or cold for VFR, but you are asking for more airspace now, what will keep you from getting more later? What will keep you from making it a cold only entry? Making it extend to the ground? The government rarely gives land back to the public after they obtain it, so even if the military does not use the airspace in the future, it would never be the same. I have flown in the area a lot and know that both Fox 3 expansions are over lots of private facilities, and the Paxon one as well. I am not trying to be a selfish recreator or aviator, just trying to get the word out. I know I am only one of many who feel this way. I want the military to be properly trained too, but I don't see a practical need for them to get that much more airspace in an area of such high public traffic, making it much more inconvenient for all the private activities that go on their. Thank you.</p>

10037

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10037	Franklin Chythlook	Treadmill Repairman	ExEquip Service	Airspace Management, Safety (Airspace), Water Resources, Cultural Unmanned Aerial Vehicle (UAV) Access, 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska	I do not favor having live missiles tested or used in the Gulf of Alaska, I don't think the casings are biodegradable, nor I like the idea of errant projectiles interfering with fisheries activities and whale habitat. I do not favor unmanned vehicles flying near Fairbanks either. The last thing I need is a robot plane hitting a goose and crashing into my house. Also, the idea of "Eyes in the Skies" above private citizens doesn't appeal to me.

10038

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10038	Many Odden			Description of Proposed Actions and Alternatives (DOPAA), Cumulative Impacts, Airspace Management, Safety (Airspace), Infrastructure and Transportation, Socioeconomics, All proposed actions, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>Dear JPARC Proposers: Alternative E for the Fox 3 and Paxon MOAs is a substantial improvement over Alternative A. It does not however adequately mitigate impacts to airspace safety caused by the planned low-level flight activities. Keep low-level (500' - 5000') military flights out of the Fox 3 and Paxon MOAs March through October to avoid substantial conflicts. Also there is a socioeconomic "intangible" ignored by your document. Strangely in a document representing an effort to increase the protection of American freedoms through flight training, no mention is made of the substantial reduction in civilian freedoms that the establishment and expansions of yet more Alaska military operations areas represents. You, the planners, and if, the document, absolutely do not understand what it means that you are taking away the sky. There are large ragged holes all over the state in our ability to travel, to access our homes, to look for and manage mineral and biological resources, to expand our badly-in-need-of-expansion economic opportunities. You are restricting the very freedoms you have sacrificed so much to defend. And you have put the burden on us to find out what you have taken away from us. Saving gas, a stated goal of this expansion, is a worthwhile goal, but it does not justify the losses that will result. Are you even aware of what this loss of the sky means to all of us? President John Adams (who by the way established the US Navy) once disbanded the standing US Army because he believed soldiers should never again be garrisoned in American homes. Because of President Adams, this concern is part of our Bill of Rights. What would he think about you taking the sky? This big picture concern for the JPARC expansion has no expression in this EIS document. You should put it there, and allow it to amend these proposals. The EIS also does not take into account this loss of airspace as part of the cumulative effects of past losses caused by the establishment of the large National Parks and their restrictions of airspace use and recreation, nor present losses of climate change, nor future plans for a Susitna Dam and mineral development around the Denali Highway. We are being "pinched" between these elements, and yet your EIS does not take them into account.</p>

10038

You have created a 1400 page document which we are invited to pick apart, and yet it is blind and incoherent on the issue of freedoms being lost. We are grateful that the southern boundary of the proposed Fox 3 MOA has been withdrawn somewhat from the highest civilian activity level areas (in alternative E), but the problems presented by low level flights remain. The Nelchina Public Use Area and the Copper Basin should remain free of low-level military flights March-October to avoid conflict with bird and animal breeding and migration, wildlife and other resource management activities, transportation and access, recreation and hunting. What you have said to us in the meetings and in writing, as evidenced in this EIS process, indicates that you still do not understand how active this sky is, or how the importance of your military service depends on the integrity of civilian lives. What will you be fighting for when you take away our freedoms? We are fighting, too. Whether you know it or not, we are fighting for this place and the people who live here. Respect us. Sincerely, Mary Odden Nelchina (Glennallen) Alaska Resident of Alaska since 1980 Citizen of the United States of America

10038

I0039

Untitled

JPARC Comments
Submitted by:
Whit Hicks, resident
[REDACTED]

Points for clarification

- How much fuel will be consumed by military aircraft flying under 30,000 feet over areas that do not currently have exhaust emissions? Will there be a Title V air pollution permit for the impacted region instead of the point of takeoff?
- What studies have been conducted related to the effect of sonic concussion on wildlife, on livestock, on people?
- Have there been economic impact studies conducted to assess the impact on private, native, and State property values within proposed training range?
- What is the impact of sonic concussion on marine mammals? Are there permits required for this impact?
- Who has priority use of the areas encompassed by the range? If the people of Alaska have open access to State lands and air space, then how will the Department of Defense request permission to operate to avoid conflicts and assure safety?

Major Concerns

- An environmental permit is not a deed to the land and air space. The Alaska Constitution assures Alaskan residents equal access to resources or compensation otherwise:
§ 16. Protection of Rights
No person shall be involuntarily divested of his right to the use of waters, his interests in lands, or improvements affecting either, except for a superior beneficial use or public purpose and then only with just compensation and by operation of law.
- More and more often we hear “the main reason we are leaving is the increasing activities and restrictions of military in the area.” I am not sure what all of the environmental impacts will be, nor do I think anyone will until the impacts are obvious; however, I do think that there is a huge potential for a negative effect on residential and recreational property values and quality of life due to the JPARC designation.

Ideas for Consideration and Comment

- Restrict training activities to no longer than two week periods, and not more than once per quarter of the year. Publicize the times and plans and take public comment before the training activities.
- Restrict to sub-sonic air speeds within 50 miles of any residence and 100 miles from any designated community.
- Publish all radio frequencies bands and power levels that will be used within the training area.
- Restrict drone flight to uninhabited areas only.
- Disclose any possibility or occurrences of surveillance on any Alaskan, whether intentional or unintentional by any Department of Defense related technology deployed in the region encompassed by JPARC, whether defined by FISA or otherwise.
- Relocate the activity to the Arctic and off shore. It would be wise to increase our presence there and it would not devalue our State and private land due to noise, safety, and the potential for inadvertent surveillance on US citizens.

10040

Joint Pacific Alaska Range Complex Modernization and Enhancement
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Written Comment Form

For more information and to submit comments online, please go to:
www.jpisceis.com

Public comments are requested pursuant to the National Environmental Policy Act, 42 United States Code 4321, et seq. All written comments received during the comment period will be considered during Final EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Final EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Final EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

Name (First and Last): PIANA FARRAR Date: May 2012

Title: _____

Organization: _____

Is this a government agency (choose one): yes no

Comment submitted on behalf of (choose one):

- your organization/business/agency
 yourself as a private citizen

Email: _____

If you know, please check the boxes below that relate to your comment. This will assist us in organizing and reviewing your comment.

Comment Topic(s):

- General (to the EIS)
 NEPA Process
 Purpose/Need
 Description of Proposed Actions and Alternatives (DOPAA)
 Cumulative Impacts
 Mitigations

Resource Areas:

- All resource areas
 Airspace Management
 Noise
 Safety (Airspace)
 Safety (Ground)
 Air Quality
 Physical Resources
 Land Use
 Infrastructure and Transportation
 Water Resources
 Hazardous Materials
 Biological Resources
 Cultural Resources
 Socioeconomics
 Subsistence
 Environmental Justice

Proposed Actions:

- All proposed actions
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 4 - Expansion of R-2205 Restricted Area
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 8 - Tanana Flats Training Area Access Road
 9 - Joint Air-Ground Integration Complex
 10 - Intermediate Staging Bases
 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska
 12 - Joint Precision Airdrop System Drop Zones

Please provide your comment(s) on the back of this form and turn it in at a public hearing, or submit

by June 7, 2012, to: ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506;

Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

10040

Comment(s):

I am concerned with access and use of the Granite Mountain area between the Richardson Hwy. and Alaska Hwy. This is a great subsistence and Recreational use area, that should remain open to the public and area Residents. It is my strongest hope that Restricted areas south of Ft. Greely and east of the Delta River, NOT be expanded any further. The Coal Mine Road Recreational use area, is one of the Best local Trails/Lakes etc.

Noise on the Ranges and in the air (sonic booms) effect our quality of Life. Fire potential and Resulting air quality is of utmost importance. All precautions and possibly delay of planned exercises need to be considered depending on prevailing FIRE (wild fire) conditions.

Use additional sheets as needed.

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ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506
Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

Thank you for your input.

10041

Joint Pacific Alaska Range Complex Modernization and Enhancement
DRAFT ENVIRONMENTAL IMPACT STATEMENT

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Name (First and Last): John Beckley Date: 5/9/12

Title: _____

Organization: _____

Is this a government agency (choose one): yes no

Comment submitted on behalf of (choose one):

- your organization/business/agency
 yourself as a private citizen

If you know, please check the boxes below that relate to your comment. This will assist us in organizing and reviewing your comment.

Comment Topic(s):

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 Purpose/Need
 Description of Proposed Actions and Alternatives (DOPAA)
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Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

I0041

Comment(s):

I am particularly concerned with Access to Coal Mine Rd camping and the old CAT trail down to the JARVIS CREEK area. This open forum shows there will be no changes in that particular Area - Land or airspace. If that is correct, fine. I appreciate the opportunity to examine this information and be a part of the planning process.

ps. I also think the land road into Tanana flats is a good idea, hopefully to minimize ATV's tearing up the trails. Again, of course if it doesn't impact hunters or hunting seasons.

Thanks

John Beckley

Use additional sheets as needed.

Please turn in this form at a public hearing or submit by June 7, 2012, to:
ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506
Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

Thank you for your input.

10042

Joint Pacific Alaska Range Complex Modernization and Enhancement
DRAFT ENVIRONMENTAL IMPACT STATEMENT

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www.jparceis.com

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Name (First and Last): TERRY KEZER Date: 16 May 2012

Title: _____

Organization: _____

Is this a government agency (choose one): yes no

Comment submitted on behalf of (choose one):

- your organization/business/agency
 yourself as a private citizen

If you know, please check the boxes below that relate to your comment. This will assist us in organizing and reviewing your comment.

Comment Topic(s):

- General (to the EIS)
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 Purpose/Need
 Description of Proposed Actions and Alternatives (DOPAA)
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Resource Areas:

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- All proposed actions
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Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

10042

Comment(s):

- 1st I am Retired From the Army / Army Reserve with 37 YRS, 11 Mo, 22 days, starting as a deaf volunteer and retiring as a UAFOR.
- 2nd I am opposed to the proposed land-use as presented. I would like to see a minimum 5,000 Ft. AFR ceiling, and no restrictions to the current use of the land for RTR subsistence and Recreation.
- 3rd The reasons for the recommended changes are:
- Pilots will NOT keep a 500 ft ceiling when game mostly CARIBOU AND moose are visible for "buzzing". I have personally known too many pilots to allow this, and pilots have not changed since I have had them try to blow me off a motorcycle before a El Paso and Alamogordo.
 - The noise level will stress game, in particular caribou during calving and early growth. The caribou have been tightly managed to continue a healthy herd, and added stress by low level jets would adversely impact their health.
 - Subsistence and game harvesting use will become restricted if access to the lands is denied/restricted. Recreational use should not be denied, nor the ability to acquire meat for families. Costs here are extremely high, and many if not most of the residents of the area depend on this land for food.
 - I have worked in joint operations commands and as a Tech-1 Surveillance officer have witnessed in TSO's, hence I have some familiarity with AFR operations. While I recognize the need for training, I believe there are sufficient areas for low level training without denying us access to the land we currently use.
- 4th In closing, I recommend no restrictions be placed on the land not now explored to prevent civilian usage. I recommend limiting the ceiling to about 5,000 feet. I recommend NO training during the calving season, and limited use during subsistence and game harvesting seasons.
- James E. Hertz
Major, U.S. Army (Ret)

Use additional sheets as needed.

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Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

Thank you for your input.

I0043

[REDACTED]
5-18-12

To Whom It May Concern:

RE: Expansion of Joint Pacific Alaska Range Complex
(Fox 3 expansion, the new Paxon MOA, the lowering of
the MOA to 500 feet AGL)

I would like to express my concern about the possible expansion of JPARC. I do not think it would be good idea. In fact, it would be very dangerous.

There are too many air taxi operators in the area where this is proposed. Military aircraft flying at 500 feet above ground level would be a danger to these pilots, their aircrafts, and their passengers. The speed at which military aircraft fly would be a deadly combination with slow flying Super Cubs, 185's, Beavers, and Otters. The November 16, 2010 F-22 Raptor crash is an example of how things can go wrong. With more low flying high speed aircraft in the area with slow flying aircraft, there would be even greater chances of accidents occurring.

This same region is a major hunting, camping, and recreational area. I have hunted in the region for over 40 years. Many people of all ages go there to pick berries. It is a huge wildlife area, especially being a caribou migration/calving area and a moose calving area. Migratory birds (such as Trumpeter swans) pass through the area and have their nesting grounds here. Most of the hunters from Mat-Su, Anchorage and Fairbanks use this area to hunt moose and caribou. This would completely disturb this traditional hunting area. Many people who hunt live a subsistence life style. It is distracting enough with the MOA the way it is now. This would infringe upon the rights of Alaskans. We did not choose to live amid noise. We came here for quiet and solitude.

I oppose the expansion of JPARC (Fox 3 expansion, the new Paxon MOA, the lowering of the MOA to 500 feet AGL) in every way. War games should not interfere with the rights of Alaskans.

Sincerely,

Donnie Billington
[REDACTED]

I0043

cc:

www.markudall.senate.gov

www.bennet.senate.gov

www.perlmutter.house.gov

www.polis.house.gov

— www.bishop.house.gov —

— www.hankjohnson.house.gov —

www.inouye.senate.gov

www.murkowski.senate.gov

www.begich.senate.gov

www.donyoung.house.gov

*wouldn't take comments
outside of Georgia*

I0044

[REDACTED]
5-18-12

To Whom It May Concern:

RE: Expansion of Joint Pacific Alaska Range Complex
(Fox 3 expansion, the new Paxon MOA, the lowering of
the MOA to 500 feet AGL)

I would like to express my deep concern about the possibility of expanding JPARC. I do not think it is a wise idea. In fact, it could be very hazardous.

There are countless air taxi operators in the area where this is proposed. Military aircraft flying at 500 feet above ground level would endanger these pilots, their aircrafts, and their passengers. The speed at which military aircraft fly would be a lethal combination with slow flying Super Cubs, 185's, Beavers, and Otters. The November 16, 2010 F-22 Raptor crash is an example of things gone wrong. With more low flying high speed aircraft in the area with slow flying aircraft, the odds are even greater for accidents.

In addition to this hazard, this same region is a major hunting, camping, berry picking, and recreational area. It is a huge area for wildlife, especially being a caribou migration/calving area and a moose calving area. Migratory birds (such as Trumpeter swans) pass through the area and have their nesting grounds here. Most of the hunters from Mat-Su, Anchorage and Fairbanks use this area to hunt moose and caribou. This would completely disturb this traditional hunting area. Many people who hunt live a subsistence life style. This would infringe upon the rights of Alaskans. Peace, solitude, and quiet are things that Alaskans treasure. It is why we live here.

I completely oppose the expansion of JPARC (Fox 3 expansion, the new Paxon MOA, the lowering of the MOA to 500 feet AGL).

Sincerely,

Cathy Teich
[REDACTED]

*I will follow
up with more specific
comments after
hearing the presentation.*
CT

I0044

cc:

www.markudall.senate.gov

www.bennet.senate.gov

www.perimutter.house.gov

www.polis.house.gov

~~www.bishop.house.gov~~

~~www.hankjohnson.house.gov~~

www.inouye.senate.gov

www.murkowski.senate.gov

www.begich.senate.gov

www.donyoung.house.gov

*Wouldn't take
arguments outside of
Georgia*

10045

Joint Pacific Alaska Range Complex Modernization and Enhancement
DRAFT ENVIRONMENTAL IMPACT STATEMENT

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Name (First and Last): Beth Freund Date: 5/23/2012

Title: _____

Organization: _____

Is this a government agency (choose one): yes no

Comment submitted on behalf of (choose one):

your organization/business/agency

yourself as a private citizen

If you know, please check the boxes below that relate to your comment. This will assist us in organizing and reviewing your comment.

Comment Topic(s):

- General (to the EIS)
- NEPA Process
- Purpose/Need
- Description of Proposed Actions and Alternatives (DOPAA)
- Cumulative Impacts
- Mitigations

Resource Areas:

- All resource areas
- Airspace Management
- Noise
- Safety (Airspace)
- Safety (Ground)
- Air Quality
- Physical Resources
- Land Use
- Infrastructure and Transportation
- Water Resources
- Hazardous Materials
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- Cultural Resources
- Socioeconomics
- Subsistence
- Environmental Justice

Proposed Actions:

- All proposed actions
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Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

I0045

Comment(s):

More specificity as to Actual required rest times would be extremely helpful. For example - flight training will close the airspace for 2 hrs 2x per training day.

Use additional sheets as needed.

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Thank you for your input.

10046

15 MAY 2012

Dear sir;

I am a long time Alaskan. The Federal Government has taken over the majority of land here in Alaska. After the take over this land was closed to use by most Alaskans. It was closed for subsistence only on Federal land to those that were chosen by the Federal Government. The Federals took over management of Fish and Game on all Federal land in Alaska. You do not respect Alaska or our State Constitution. Why should we trust you after all of your broken promises. I am not willing as an Alaska resident to give you any more land or air space here in our State. If you could earn back some of our respect again if you turn over management of Fish and Game on all Federal land as stated in the Statehood agreement. Why do we allow foreign nations to come into our State and train their military? All training should be done to benefit and train only U.S. military personnel. I support the military but not the Federal land grab here in Alaska. The Federal Government is using the military to grab more land. It will never end, you will never be satisfied. I do not trust you.

GRAY L. CORLE

Gray L. Corle

God Bless America, God Bless Alaska, Alaskans

I0047

[REDACTED]

From: CANFIELD, MIKAL R MSgt USAF ALCOM JTF AK/J08
Sent: Thursday, May 24, 2012 10:36 AM
To: SMART, JOAN M GS-11 USAF ALCOM JTF AK/J08
Subject: FW: APAR Comments
Attachments: JPAR comments 1 001.jpg; JPAR Comments 2 001.jpg
Signed By: [REDACTED]

-----Original Message-----

From: [REDACTED]
Sent: Wednesday, May 23, 2012 3:14 PM
To: ALCOM J08 Admin Box
Subject: APAR Comments

Here are my comments concerning the military expansion.
thanks
Peg Foster

10047

Joint Pacific Alaska Range Complex Modernization and Enhancement
DRAFT ENVIRONMENTAL IMPACT STATEMENT

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Name (First and Last): Peg Foster Date: 5/22/2012

Title: _____

Organization: Concerned Citizen

Is this a government agency (choose one): yes no

Comment submitted on behalf of (choose one):

- your organization/business/agency
 yourself as a private citizen

Email: _____

Phone: _____

Mailing Address: _____

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 Socioeconomics
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 Environmental Justice

Proposed Actions:

- All proposed actions
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 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska
 12 - Joint Precision Airdrop System Drop Zones

(Please provide your comments on the next page.)

10047

Comment(s):

I would like to express my opposition to expanding the JPCA area.

I believe the noise, sonic booms, night flights will have a negative effect on the local wildlife & migrating wild birds.

We use this areas for hunting and recreation. And live in Unit [redacted]. We ~~also~~ believe that the areas MOA Fox 3 are not necessary.

~~We ~~also~~ believe that~~
We would like to see Fox 3 MOA eliminated from your proposed expansion.

Use additional sheets as needed.

Please turn in this form at a public hearing or submit by June 7, 2012, to:
ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, IBER, AK 99506
Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

Thank you for your input.

10048

**Joint Pacific Alaska Range Complex Modernization and Enhancement
DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Email or Phone Comment Form

**For more information and to submit comments online, please go to:
www.jparceis.com**

Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act (FOIA), you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals or officials representing organizations or businesses, will be made available for public inspection in their entirety.

Name (First and Last): John Dickens

Title: Individual

Organization: [Click here to enter text.](#)

Is this a government agency? [Choose an item.](#)

Are you commenting on behalf of your organization? [Choose an item.](#)

Email: [Click here to enter text.](#)

Phone: [REDACTED]

Mailing Address: [Click here to enter text.](#)

**Please turn in this form at a public hearing or submit by June 7, 2012, to: ALCOM Public Affairs, 9480
Pease Avenue, Suite 120, JBER, AK 99506; Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil**

Comment Topic(s):

- General (to the EIS)
- NEPA Process
- Purpose/Need
- Description of Proposed Actions and Alternatives (DOPAA)
- Cumulative Impacts
- Mitigations

Resource Areas:

- All resource areas
- Airspace Management
- Noise
- Safety (Airspace)
- Safety (Ground)
- Air Quality
- Physical Resources
- Land Use
- Infrastructure and Transportation
- Water Resources
- Hazardous Materials
- Biological Resources
- Cultural Resources
- Socioeconomics
- Subsistence
- Environmental Justice

Proposed Actions:

- All proposed actions
- 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA
- 2 - Realistic Live Ordnance Delivery
- 3 - Battle Area Complex Restricted Area Addition
- 4 - Expansion of R-2205 Restricted Area
- 5 - Night Joint Training
- 6 - Unmanned Aerial Vehicle Access
- 7 - Enhanced Access to Ground Maneuver Space Areas
- 8 - Tanana Flats Training Area Access Road
- 9 - Joint Air-Ground Integration Complex
- 10 - Intermediate Staging Bases
- 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska
- 12 - Joint Precision Airdrop System Drop Zones

(Please provide your comments on the next page.)

I0048

Comment(s):

John Dickens called on 2 April at 1538. He said, “Good afternoon this is John Dickens calling from [REDACTED]. I just got the environmental impact statement for JPARC from you and wanted to thank you. Also to tell you that if you got any public meetings that you need somebody that’s really on your side, give me a heads up as I’m on your side. That’s John Dickens at [REDACTED]. I totally support what you are doing and let me know what I can do to help you.”

I0048

Thank you for your input.

10049

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10049	Heather Heusser			1 – Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	Our family has a cabin on Lake Louise that has been in the family since my husband's grandfather homesteaded the land in the 1950s. The family has been enjoying the area ever since. It is a wonderful recreation area, decently populated, but not the busy party place that Big Lake was during my childhood. I want to see the area remain a family recreational area so that our children and grandchildren can enjoy the area just as my husband and his parents have. It's hard to enjoy the solitude of a nice calm, quiet lake when a high-speed aircraft, such as an F-22, flies over you at low altitude. Not to mention the moose and caribou, which are well documented in the area, may be driven out of the area due to the noise. We are strong supporters of the military, having friends and family who serve. We understand that training is important, but feel that a proposal exists that will meet both military and civilian needs. It comes down to concurrent use. While I understand that the EIS process is a Federal process, I personally believe the State of Alaska, Article 8 Constitutional Mandate "encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest" is a statement that should be followed with all public land and resources. And that is exactly what we have here, a resource that needs to be shared. I feel that Alternative E, with an additional stipulation to add an Overflight Avoidance Area of an additional 20 miles north and parallel to the southern border of Alternative E. This would move the southern boarder back and additional 20 miles from the proposed Alternative E boundary and when maintained year round would address resource concerns. In short with the additional stipulation to Alternative E would benefit both parties – the military to do their training maneuvers and the public to have recreational and subsistence uses.

10050

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10050	Noel Robinson			Land Use	My cabin is approximately 18 miles south of Ft. Greely. It is U.S. Survey 5357. It is a short distance from the pipeline. No one lives there at present but we intend to fix it up and have it available for family. One of my concerns is that rockets frequently go astray and explode in vulnerable places. Have any added precautions been put in place to prevent this?

I0051

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0051	Noel Robinson			Land Use	The lot and cabin are east of the highway. Richardson Highway behind the Thank you, Noel Robinson

I0052

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0052	Tom Braund	Civilian		Purpose/Need, Description of Proposed Actions and Alternatives (DOPAA), Cumulative Impacts, Physical Resources, Water Resources, Biological Resources, Cultural Resources, Land Use, All proposed actions	Dear decision makers, The vast expansion of the military training ranges in Alaska under the Joint Pacific Alaska Range Complex proposal to use the 2,5,000 square miles of land in the Talkeetna, Lake Louise, Paxson, and Cantwell areas greatly disturbs me. Although I am a staunch supporter of our military and its needs, of all places in Alaska, I don't want it there. To me, that has to be the worst choice of location in Alaska. It is my favorite camping, hunting, and fishing recreational area that is within range of my home. It's loaded with fish and game. Given the size of Alaska and the wide array of suitable terrain available in Alaska, please, put it somewhere else and don't destroy our opportunities there. No matter where you put it, the military can get there. That's my two cents. Thank you. Respectfully submitted, Tom Braund

I0053

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0053	Harry Gay	Individual	n/a	General (to the EIS), All resource areas, All proposed actions	I am a strong supporter of our Military and the need for training. I must submit a strong resistance to this expansion of land consumption by the Military. I live in Delta Junction and have first hand experience and knowledge of the misuse and mismanagement of the land ahead under "training areas". The military could use better management and do all needed training in half the space they already have. The military does not clean up it's mess and just expects to move on to new land. The Military abuses the rules and regulations of their own making. Until the military is willing to clean up it's left behind pollution and problems, I do not wish to have them consume more land that I use to hunt and fish on. I strongly oppose this expansion and will voice my feeling to all that I come in contact with. Sincerely Harry Mitchell Gay

I0054

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0054	John Schandelmeier	Chair	Paxson Fish and Game Advisory	General (to the EIS), Purpose/Need, Cumulative Impacts, Noise, Socioeconomics, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	The proposed MOA expansion near Paxson is outrageous. At the present time, the Air Force doesn't monitor it's own activities--frequent violations of their own rules regarding flight levels, MOA boundaries and sonic booms along the Denali Highway and in the Paxson area are a testimony to this. Instead they ask the public to call in, after the fact. There is no need to expand the current MOA. Instead, I would ask for 10 mile wide corridors along both the Richardson and Denali Highways. To have low-level F-16 traffic in populated areas is not only disrupting, it is unsafe. In an area with poor communications, there is little opportunity for local citizens and the many out-of State and out-of-country visitors to the area to be informed when the MOA is live.

I0055

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0055	Dwayne Bertholl	Mr.		General (to the EIS), Airspace Management, Safety (Airspace), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 6 - Unmanned Aerial Vehicle (UAV) Access, 9 - Joint Air-Ground Integration Complex (JAGIC), 12 - Joint Precision Airdrop System (JPADS) Drop Zones	I am just learning and understanding the changes and additions.

I0056

[REDACTED]

From: Don Smith [REDACTED]
Sent: Monday, May 28, 2012 11:38 AM
To: ALCOM J08 Admin Box
Subject: JPARC initiative

I am requesting an extension of the JPARC initiative. The volume and complexity of the JPARC initiative should necessitate a minimum of 90 days for public comment. To move forward without ample public review opportunity would be contrary to the spirit of the National Environmental Policy Act and will have a continued negative impact on the relationship between the public and military.

Sincerely,
Donald M Smith III
FAA Licensed pilot
AOPA member

I0057

[REDACTED]

20 MS. ODDEN: Okay. Well, I hope to give a better more
21 detailed and objective statement written. This is a perhaps
22 emotional reaction or perhaps socioeconomic, whatever you want
23 to call it. We are mostly concerned with the Fox 3 MOA
24 expansion and especially with the low level and the effects on
25 commercial aviation, general aviation, people getting to their

I0057

1 homes, wildlife management. But we're concerned in general
2 about the appropriation of land and sky resources in Alaska in
3 general and we're not unappreciative of what the military is
4 doing for us, so please don't think that we are.

5 John Adams, second President, father of the U.S. Navy,
6 established the U.S. Navy, once disbanded the standing U.S. Army
7 of the United States even under the threat of conflict with
8 France at that time because he believed the soldiers should
9 never again be garrisoned in our homes. He thought that was a
10 substantial reduction of our freedoms that Americans should
11 never be subjected to and because of his concerns that is in our
12 Bill of Rights today. We do not have soldiers garrisoned in our
13 homes, Americans do not. What would John Adams think about the
14 military taking our sky above our homes in so many areas? What
15 should we think about it, what should you think about it as
16 members of the military?

17 You've heard about what we think is a treasure chest of
18 resources in our area. Some of the only recreation area, the
19 public -- Nelchina public use area that we've worked hard since
20 the 1970s to maintain for snow machines, for airplanes, for
21 hunting, for the exploration for oil and gas, for many levels of
22 public use and we didn't want the restrictions that were put
23 elsewhere by the national park. We didn't want the restrictions
24 on people's basic freedom to do those things. We wanted to
25 share the use. It's not empty space. We've worked hard to keep

I0057

1 that space free for the development -- economic development,
2 maintenance of our wildlife stocks, our fish.

3 You've heard about the noise levels at Paxson Hatchery,
4 that they can't slam a door at certain times a year, they cannot
5 play music in the fish hatchery where this very important red
6 fishery hatchery for the whole Copper River loses the fry. We
7 have deep concerns about the expansions of these MOAs.

8 This is the age of digital reality. We don't want you to
9 kill young pilots. We want you to have the simulations, we want
10 you to be able to go over the terrain. We've worked in Alaska,
11 since the 1970s we've worked around the MOAs out at McGrath, up
12 north at Fort Yukon. We know that you spend the same amount of
13 gas when airplanes go like this or if they go like this. That's
14 the same amount of gas. The reality is that the MOA does not
15 have to come over the top of us. You can keep it north, you can
16 keep it further north than 20 miles and we believe that you
17 should stay above, caution, 5,000 feet.

18 Okay. You who have given much to us to protect, our
19 freedom, and we know what that means. There's people in this
20 area that have lost their kids to the wars overseas. Do not
21 proceed with plans which reduce our freedoms. We've lived here
22 a long time. This is important to us. Be careful, careful how
23 you do this. Thank you.

24 COLONEL ORR: Ma'am, before you sit down, I do this in
25 court a lot. When people use their hands it doesn't translate

I0057

1 onto the -- so can you describe what you were doing with your
2 hands?

3 MS. ODDEN: You have an air.....

4 COLONEL ORR: Take as long as you'd like.

5 MS. ODDEN: You have an airplane at point A and point B
6 and they want to do an exercise between them. They spend the
7 same amount of gas if they meet in the middle or if airplane A
8 stays where it is and point -- and airplane at point B goes to
9 meet it. Does that adequately -- does that get it?

10 UNIDENTIFIED MALE: I understand it.

11 COLONEL ORR: Okay..

12 MS. ODDEN: Okay.

13 UNIDENTIFIED MALE: Thank you.

14 MS. ODDEN: Thank you very much.

█ [REDACTED]

I0058



1 and traditional use of the areas when we're out there. You
2 know, how it's going to affect the caribou and the moose and
3 other wildlife. Those are my concerns.

4 The other one I'm concerned about is the hunting and
5 fishing season dates. Every year the Board of Game meets and
6 they change the season dates. So when you say late August, you
7 know, that doesn't -- that isn't in -- doesn't time with our
8 seasons. It should be August 1st through the end of September
9 in the report or the EIS.

10 Those are my concerns mostly is the hunting and fishing
11 and being able to continue that and -- without interruption or a
12 lot of noise and to the wildlife management, being able to make
13 sure those wildlife stay out there and they're healthy and
14 they're not being destroyed, or damaged, or ruined, or taken
15 away from us. Thank you.

█ [REDACTED]

[REDACTED]

I0059

1 [REDACTED]

2 MR. BAKEWELL: Thank you. I am Audubon Bakewell, B-A-K-E-
3 W-E-L-L from Paxson and I'd like to take this time to thank the
4 members of the Air Force and Army who came to Paxson tonight to
5 present your statements and I yield the balance of my time.

6 COLONEL ORR: Thank you. [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

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100 [REDACTED]

I0060

[REDACTED]

21 MR. ALCOTT: What's up with that. My name's Gary Alcott

22 and I get some very.....

23 UNIDENTIFIED MALE: (Indiscernible).

24 MR. ALCOTT: All right. A-L-C-O-T-T. Louise May was my

25 mom. Yeah, Gary. So probably my biggest concern is with the

[REDACTED]

I0060



1 hatchery and stuff too because I think that's such a huge deal.
2 But I really feel the need, you know, to have these live
3 exercises and stuff and -- but probably don't want it right here
4 where it's going to damage the hatchery. But I definitely --
5 you know, you can fly over my house down in there anytime you
6 want, you know. I get my pacemaker struck up there a little
7 bit.

8 But the other thing I'm thinking is I know -- now, you
9 know, our pilots I'm sure would not violate any, you know, drop
10 down and go for it, but we also have other pilots, right, that
11 do these things from all over the world, you know, England and
12 whatever. So, you know, maybe our guys might get in a little
13 bit of trouble if they did something like that, but you might
14 not be able to control the people from the other countries. And
15 so, you know, it just takes one jet, go down there go right over
16 the hatchery and just like wasn't that a blast. But -- you
17 know, and then that's done.

18 So anyway, I really want all the training because you look
19 at what our Air Force does and stuff in the world and dominates
20 like that. Well, they don't do that on computers, you know,
21 they got to have it. So -- but I guess the hatchery's my
22 biggest thing I'm worried about because it is such a huge thing
23 and it doesn't even look like it, you know. So a lot of people
24 don't even know it. So anyway, I guess that's it. Oh, sorry.



I0061

■ [REDACTED]

■ [REDACTED] ■ [REDACTED]

■ [REDACTED] ■ [REDACTED] ■ [REDACTED]

■ [REDACTED]

5 MS. RODINA: My name is Jenny Rodina, spelled R-O-D-I-N-A.
6 And this is a comment period, but it's kind of a question also.
7 My question comment is about the alternative E for the Paxson
8 MOA. It's stating that there's the potential for moving the
9 southern boundary of the Paxson MOA north by approximately 20
10 miles because residents around Lake Louise complained about
11 potential noise and there are also impacts to residents, tourism
12 companies and other organizations in that area. And the
13 alternative E was proposed after the public comment -- the first
14 public comment period. Well, my question is a number of us here
15 in the Paxson community also made public comments about noise
16 and impacts to residents and tourism companies in this area. So
17 my question is if you're listening to the people in Lake Louise
18 and moving the southern boundary of the Paxson MOA by 20 miles
19 why not move it 20 miles north of Paxson as well.

20 You already state in your literature that there are
21 significant adverse impacts for socioeconomic, land use and
22 noise. You already know that these are potentially big problems
23 and we know it too. So I'll just make the comment again
24 verbally that we'd like for you to listen to us here in Paxson
25 just the same as you listened to the folks down by Lake Louise.

■ [REDACTED]

10061

Thank you,

[Redacted text block containing multiple lines of blacked-out content]

[Redacted signature block]

I0063

[REDACTED]

15 MS. MACCALLUM: Yeah, I might as well.

16 COLONEL ORR: All right.

17 MS. MACCALLUM: Oh. My concern too is with the hatchery.

18 UNIDENTIFIED MALE: Your first name, spell....

19 MS. MACCALLUM: Oh, Nancy MacCallum. M-A-C capital C-A-L-
20 -L-U-M.

21 UNIDENTIFIED MALE: Okay.

22 MS. MACCALLUM: My concern -- my first concern is with the
23 hatchery. They are -- they do a wonderful job and they're a
24 very necessary part and they're a great part of our community.
25 And I also look as a lodge owner. As you can look around and

[REDACTED]

I0063



1 see, my windows. I would hate like a sonic boom to take out any
2 windows here for -- also with guests coming in here. We rely on
3 our summer business to get us through the winter because we are
4 open 365 days a year. And so, you know, if we get into being
5 known as complaints about people not being able to sleep here,
6 being scared, you know.

7 But again, I go back to the hatchery. The hatcheries are
8 wonderful neighbors of ours. They rent from us. They're great
9 people, they do a wonderful, wonderful job and I do not want to
10 see anything happen to their fish. Thank you.

█ [REDACTED]

[REDACTED]

I0064

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

6 COLONEL ORR: Our next speaker is Ms. Judy Olson Hicks.

7 Got it?

8 MS. OLSON HICKS: Uh-huh (affirmative). I am Judy Olson
9 Hicks and I represent just me. But as a citizen of Delta I know
10 that tonight is a major scheduling conflict for our small town
11 in that it is high school graduation and so many of the leaders
12 in our community are not available to come here tonight. I also
13 noticed that there were no signs posted up at our grocery store
14 where everyone goes or at our post office about this meeting.
15 There was nothing published on our website about this meeting or
16 in our local newspaper. So I feel as if trying to engage the
17 public in this very important meeting was not really done in
18 earnest or not done with truly getting to know who we are.

19 Thank you.

20 COLONEL ORR: And could you spell your name.....

21 MS. OLSON HICKS: Yes.

22 COLONEL ORR:for the.....

23 MS. OLSON HICKS: J-U-D-Y, O-L-S-O-N, H-I-C-K-S.

█ [REDACTED]

█ [REDACTED]

[REDACTED]

I0065

[REDACTED]

8 MR. QUARBERG: My name is Don Quarberg, Q-U-A-R-B-E-R-G.
9 I'm a private pilot and a hunter and I'm here to represent
10 myself. But maybe what I have is a request and some
11 observations, but, you know, I preface this with saying that we
12 appreciate everything you fellows do. Not only fellows, Armed
13 Forces Service. We don't want to jeopardize your mission and
14 training and we want you to be the best prepared that there are
15 when we ask you to step into harm's way and so we all appreciate
16 that.

17 Game Management 20A which is out here to the west of Delta
18 and south of Fairbanks is one of the most intensively managed
19 game management units in the state. It currently has a very
20 healthy population of most -- in fact you could probably pick up
21 a Sports Afield or a Petersen's Hunting magazine and read about
22 20A in there. As I look at the EIS and what is planned for that
23 activity, and I've hunted over there for over 30 years. It's
24 beautiful, nestled in between Mount Hayes and Mount Moffit where
25 I go and it looks like it's over. Unless we look at all the

[REDACTED]

I0065



1 opposition, if you will, I don't even know what's controlled
2 opposition, people that have concerns as Representative Feige
3 mentioned over on Lake Louise and the pilots and things like
4 that. This area is accessed by a number of air taxis and
5 transporters, it's accessed by a number of guides, it's accessed
6 by a whole array of private hunters and recreators of which the
7 military is well represented. I hate to lose that and I wish we
8 could share it and I think we can. And the way we can share
9 that is if there was some way we can impress upon the military
10 to maybe adjust their scheduling just -- because I would guess
11 that 90 some percent of the use over there, recreational use, is
12 during the month of September, maybe from August 15th on. And
13 Range Manager Sharp that retired from Fort Greely was a hunter,
14 like probably all of you are. He had the ability to schedule
15 maintenance on the range during September. An OCA who was in a
16 Cub could putz around out there, you know, and go hunting and
17 whatever we had to do and we didn't conflict with anybody. Past
18 couple of years we've had a little bit of an off flavor with the
19 scheduling because we've had people that schedule years in
20 advance, for example, especially with commercial operators.
21 With me it's my relatives coming up when we go hunting. And
22 they're sitting there with airline tickets and all of a sudden
23 they close it, the air space is closed. And that's the way we
24 get in there. Most of that's all fly in. And then of course we
25 call Representative Feige or Murkowski or whatever happens and



I0065



1 then the day before hunting season they open it back up again,
2 but that really didn't help the person that changed their
3 ticket. I mean they lost that opportunity.

4 And I don't know who to ask, but I think there's some
5 pretty good minds in here that could probably get that to the
6 right place. And so if there's any way possible to schedule
7 this. You know, in addition to us flying around, at that time
8 there's lots of cranes and waterfowl and things like that and
9 it's a little bit hazardous too, even for us, you know. We
10 don't -- they can almost out fly me, so they can get out of my
11 way but not with an F-16 or a 22. I guess that's, you know, the
12 gist of my request is look at scheduling, see if there isn't
13 some way we can accommodate both of us. Thank you.

█ [REDACTED]

[REDACTED]

I0066

[REDACTED]

16 THE REPORTER: Could I ask you to spell your name for the
17 record?

18 MR. MUSGROVE: Yeah. Jay W. Musgrove, M-U-S-G-R-O-V-E.
19 I'd like to echo Don Quarberg. We're glad that -- for the
20 opportunity to make a comment and all the effort that they have
21 obviously put into this. Some people don't agree with pieces
22 and parts of it, but I personally appreciate the fact that we
23 have a military and we want them to keep strong and capable.
24 And of course at any -- sometime in the future what they may
25 need as far as equipment will change and that's something that

[REDACTED]

I0066

■

1 we don't really know. So I can see why it would be -- it would
2 -- might look like something of a land grab because they're not
3 really sure what their capabilities might require at some time
4 in the future. But I personally don't feel that it's going to
5 be that large of an effect on, you know, most little guys. And,
6 you know, when it comes to the bigger airlines or the -- say the
7 air taxis that do emergency flights, I think they've got some
8 provisions to take care of most of that. So I don't see a
9 really big problem with this personally. Thank you.

10 COLONEL ORR: Thank you.

■ [REDACTED]
■ [REDACTED] [REDACTED] [REDACTED]
■ [REDACTED] [REDACTED]
■ [REDACTED] [REDACTED]
■ [REDACTED] [REDACTED] [REDACTED]
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I0067

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12 COLONEL ORR: Any additional comments? Yes, sir.

13 MR. QUARBERG: May I make a request?

14 COLONEL ORR: You may.

15 MR. QUARBERG: (Indiscernible). As long as I don't have
16 to do anything. This is Don Quarberg again. My request this
17 time is to the Army and it -- I made some comments earlier about
18 the Eielson range control and that special use airspace
19 information service that they have where we can call an 800
20 number and talk to them in the air. And, you know, they'll
21 really accommodate us pilots that are flying around because if
22 the 16s or 15s or whatever it is are out of the way they'll tell
23 us how long is it going to take you to get across there and I
24 tell them 35 minutes. You can hear them gasp a little, you
25 know, but they'll say go ahead but call us when you get there

[REDACTED]

I0067

1 and of course you don't ever forget that because they'll -- be
2 out there with them.

3 But the -- what I really want -- would like from the Army
4 is they will take -- a prime example is restricted area 2202
5 alpha out here and that's where they're apparently flying these
6 UAVs. And they will inform the Air Force that this -- they're
7 going to be hot, active, tonight from 5:00 o'clock to forever
8 and it'll be that way sometimes through Monday or Tuesday. You
9 know, and I realize I can't hear one, can't hear much anyway,
10 but -- and you can't see them. So after awhile it's kind of
11 like hollering wolf, you know, I don't think anybody's out
12 there. But the Air Force will let us through, you know, they
13 know the current status. And I don't know what the
14 complications are to be able to provide the same kind of
15 service, but if you could do that it would be deeply
16 appreciated. Thank you.

■ [REDACTED]
■ [REDACTED]

[REDACTED]

I0068

[REDACTED]

21 MS. FARRAR: (Indiscernible). I'm Dianna Farrar. Dianna
22 Farrar, F as in Frank, F-A-R-R-A-R, Dianna, and I'm a resident
23 of Delta Junction and I'm just speaking for myself. And I grew
24 up here and it's been an uneasy partnership with the military
25 most of the time because we had different goals and different,

[REDACTED]

I0068

1 you know, directives. And I do appreciate the military and I
2 thank the young men for their service to our country, but I
3 would like to feel that we had more respect for each other in
4 these kind of proceedings that what we say will actually be
5 heard. I have some of the same concerns that other people
6 mentioned tonight and wildfires are definitely one of them. At
7 times the military will choose not to fight a wildfire that they
8 may or may not have caused across the river with ordinance fire
9 and that's -- it's not threatening the town or anything, but it
10 can -- it impacts our air quality and over the course of a
11 summer, depending on how many fires happen, air quality can be a
12 significant thing in Alaska. You don't -- you know, you don't
13 think about that, but wildfire season is -- can be pretty
14 hazardous for people with any young children or respiratory
15 problems, allergies and stuff.

16 I'm concerned with access and use of the -- to the Granite
17 Mountain area between the Richardson Highway and the Alaska
18 Highway. This is a great subsistence and recreational use area
19 that I hope will remain open to the public and area residents.
20 It's really my strongest hope that this -- the reservation of
21 Fort Greely not expand anymore southward into that area because
22 it's already pretty close. And, you know, we're out there in
23 the fall, I'm out there berry picking and fishing when Don's
24 hunting. So it's just a great area. Noise is some concern, but
25 I would have to say it would be access and wildfire for me.

I0069

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] The first speaker this
5 afternoon is Mr. Jay Harris.

6 MR. HARRIS: Is this the microphone? Yes.

7 COLONEL ORR: It doesn't amplify, it just records.

8 MR. HARRIS: It doesn't amplify? Okay. Yes, I'm here
9 today in protest of civilians being killed by drone attacks in
10 Pakistan. I think that this should be addressed in this forum.
11 My concern is that much of the testing that is being done isn't
12 taking into account the need to protect civilians in battle
13 zones and it's really my opinion that sometimes drones are
14 misused to actually depopulate areas of northern Pakistan and I
15 hope that this will be addressed today. Thank you.

■ [REDACTED]

[REDACTED]

10070

[REDACTED]

20 COLONEL ORR: All right. Mr. Al Barrette.
21 MR. BARRETTE: Thank you for this opportunity. I would
22 just like to point out that the federal government owns 67
23 percent of the lands in Alaska currently and I understand that
24 the whole ordeal about having this added access is because the
25 federal government and those people that manage those lands do

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I0071

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9 COLONEL ORR: All right. Our next speaker is Ms. Anna
10 Godduhn.

11 MS. GODDUHN: Thank you. Do appreciate the opportunity.
12 Hello? Okay. The mic's not working, so I'll just talk loud.

13 COLONEL ORR: No, it doesn't amplify, it just records.

14 MS. GODDUHN: Oh, it's a recorder. Okay.

15 COLONEL ORR: Right.

16 MS. GODDUHN: You probably said that before. I don't have
17 comments prepared and I regret that because I understood and
18 last year for the scoping meetings the public comments were
19 taken in a closet, so I wasn't inspired by that. So I didn't
20 write these comments down, but I do object to this expansion on
21 both local and global grounds. I personally find the sounds of
22 fighter jets and bombs dropping very, very deeply disturbing.
23 And I can hear them from my house way out in northwestern
24 Fairbanks and I'm on the other side of campus, you know, well
25 away from Wainwright. But I can hear those bombs and it is

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I0071

1 disturbing, but that is certainly not why I object to this
2 expansion. I -- mostly on the same grounds as Jay and some of
3 the other folks here do not see our need for predator drones. I
4 do not see assassination and targeted killings that do just
5 happen to kill a lot of civilians as well as an appropriate
6 method of dialogue with the world. I really think we need more
7 peaceful methods and I don't think we need more predator drones
8 that are indiscriminate and lethal. And pretty bad for the
9 pilots who do the job too. The guys who are running these drone
10 strikes from Arizona and Texas are not in real good shape. And
11 the lie that we put to our kids when they're young and want to
12 fly airplanes that they should join the Air Force and be trained
13 as pilots is just another fallacy. Thank you.

█ [REDACTED]

[REDACTED]

I0072

[REDACTED]

14 COLONEL ORR: Thank you. Our next speaker is Mr. Robert
15 Mulford.

16 MR. MULFORD: Thank you. I have spent much of the last
17 two and a half years or so attending conferences as a systems
18 integrator engineer at The Institute for Defense and Government
19 Advancement conferences. I've been briefed by generals like
20 General Peter Chiarelli, General Michael Vane, heads of DARPA,
21 et cetera, on some of the new technologies that I think your
22 JPARC expansion is going to be using.

23 You talk in your preamble about these technologies. These
24 are pretty horrific technologies. They're very invasive and
25 they're also very destructive and there's no way to protect

[REDACTED]

I0072

1 civilians from them. And they also find use inside Homeland
2 Security in the United States. I've heard the head of the
3 Department of Homeland Security's commercialization department
4 say to a group of Lockheed Martin and Rayzion (ph) people, hey,
5 you write a 10 page white paper, you can get \$20 million to
6 design some of these anti-terrorism systems. This is all linked
7 together.

8 And your weapons, your drone operators, your drone
9 navigation operations and your drone sensor controls, all this
10 are all based on commercial off the shelf technologies. These
11 are technologies that anybody, a kid with facial jewelry, can
12 learn how to program. You know that it's going to be -- there's
13 going to be proliferation of these technologies and I'll bet you
14 that is why we now have a cyber command in the United States.
15 This is going to come home to us in the United States. This
16 network centric warfare that your -- Admiral Cebrowski started
17 years ago and what your doctrine is all about is going to come
18 home to bite the people in this country. And I'm sure opposed
19 to it and if I can stop you any way and how I'm going to. Thank
20 you.

■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]

[REDACTED]

I0073

[REDACTED]

14 COLONEL ORR: Thank you. Our next speaker is Mr. Tom
15 Lamal.

16 MR. LAMAL: My name is Tom Lamal and the comments I have
17 to make are mostly on the Paxson area for pilots. And I would
18 like to see for this area for safety reasons two corridors in
19 the area, one down the Richardson Highway that's high enough
20 that if there's turbulence that private pilots can get out of
21 that and also wide enough that if there's snow squalls or
22 thunderstorms that they have enough room to maneuver around
23 those. Also another corridor I'd like to see is on the Denali
24 Highway going more east and west from Paxson over to Denali Park
25 and also wide and high enough for safe flying for private

[REDACTED]

I0074

[REDACTED]

11 COLONEL ORR: Thank you. Our next speaker is Mr. Chris
12 White. Right over here, sir.

13 MR. WHITE: My name is Chris White. I've been up in --
14 living here in Alaska for 30 or 40 years and I like to hunt and
15 trap and fish and I'm kind of concerned how this is going to
16 affect the people who hunt and fish in that area. So I hope as
17 soon as you can get that thing sorted out because if you have to
18 restrict that area we'd like to know what these restrictions are
19 before we go along with this thing.

20 Another concern that I have is that if this -- using these
21 drones, it doesn't seem to be too good for the people that get
22 hit by them and it seems there's quite a few where it's been
23 used kids are getting killed because of the inaccuracy of these
24 things. But apparently it gets accurate enough, sometimes it
25 isn't. So people -- my concern would be that when the military

[REDACTED]

I0074



1 starts using this stuff it'll start using them on civilians.
2 When the business communities come together with your military
3 communities we end up getting more authoritarian type government
4 and that's on a road to fascism. You got to be careful with
5 that slide because we don't want to live and lose the republic
6 that way.

7 So that's another concern I have, not just the hunting and
8 the fishing and the trapping, but how big of an area are you
9 going to be taking over in square miles to do these exercises.
10 And we're kind of concerned you might have the people on the
11 other side getting hit with this stuff regard us as terrorists
12 and if we start mirroring that way of doing business with drones
13 just dropping out of the sky, boom, if we start mirroring their
14 behavior. And we've seen this with, you know, our government
15 with torture even. They actually think it was okay at one
16 point. If we start seeing us going that was this is not good
17 for the republic.

18 So besides hunting and fishing and trapping in those areas
19 you're about to use is also the broader issue is this going to
20 harm the republic as we know it. That's my concern, sir.

■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]

[REDACTED]

I0075

■ [REDACTED]

2 MR. OSBORN: Hi. My name's Phil Osborn. I've been here
3 40.....

4 COLONEL ORR: Could you spell it for him please?

5 MR. OSBORN: O-S-B-O-R-N. I've been here 45 years and
6 I've come to love this place a great deal. My concern today is
7 that I believe firmly that our nation is in decline. We are a
8 hair breath away from insolvency in so many areas. I think
9 there's no business whatsoever expanding the military presence
10 in our state at this critical time. We need money for people
11 and what they need, not to fight a phantom enemy which doesn't
12 exist. There's no state actor in today's world that demands our
13 high level of technology. That's a fallacy. So I would say I'm
14 categorically opposed to expanding JPARC and that's a big thumbs
15 down to JPARC.

■ [REDACTED]

[REDACTED]

I0076

[REDACTED]

20 MR. HARRIS: I'm John Harris and I had a few comments to
21 add to my prior comments. I want to remind everyone here that
22 the media grossly misrepresents the use of drones and their use
23 in Pakistan. The evidence that I've been able to gather clearly
24 indicates that the drones are being used for much more than
25 isolated targeting of particular individuals. I believe that

[REDACTED]

I0077

■ [REDACTED]

3 MR. WHITE: Yes. My name is Chris White and I mentioned
4 in my comments previously about an area that I was concerned
5 about and the area I was specifically concerned about was the
6 Tanana Flats and the -- well, I'm actually concerned about all
7 of the area that the JPARC or Range Complex covers and what
8 restrictions will be put on the citizens and how will we -- will
9 we have to sign up to hunt in these areas? This is prime
10 hunting and trapping areas and the -- many people are going to
11 be concerned if you start closing this off to -- or restricting
12 us too much out of it. That would not be good. So those are
13 the areas I mentioned in my previous comments regarding the
14 hunting, fishing and trapping in those areas.

■ [REDACTED]

[REDACTED]

I0078

[REDACTED]

23 MR. AMEEN: My name is Rasool Ameen, last name A-M-E-E-N.
24 All right. Good evening everybody, thank you. I guess my main
25 concern is the unmanned drones. That's my main concern. I

[REDACTED]

I0078

1 already know of several places in the United States where drones
2 are being used to gather intelligence on American citizens. Now
3 I understand the need for this as far as military training and
4 everything, but nothing in the world is constant. We don't live
5 in a vacuum and everything that's happening in our country and
6 around the world is connected. We're seeing more and more
7 people overseas who are discontented. We're seeing in our own
8 country discontented people. I mean I was watching PBS news
9 hour last night and the Congress just passed a huge defense
10 bill. Now I understand we need a strong defense, we do, but
11 we're living in a time where we just came through an economic
12 collapse where they're -- many of our fellow citizens are
13 hurting. I mean the latest figures, over 46 million people are
14 out of work. There's a lot of discontented people. We see that
15 on the news, we see that in protests, we see that in things that
16 are happening.

17 So my biggest fear is I understand that this is right now
18 being used militarily, but, you know, it's happened before in
19 history and I see it happening again, that we have a lot of
20 citizens who are discontented and if this technology is already
21 being used to gather intelligence on our fellow citizens who
22 decides -- who is deciding what is a threat. I mean who makes
23 the decision that says an American citizen is a threat? And if
24 we're using this technology on citizens what's to stop us from
25 using other tactics?

I0078



1 I mean I remember reading a story in 2002 about the -- I
2 believe it was Vice President Chaney at the time, I don't -- you
3 know, I don't know, but I read a story about in Buffalo, New
4 York, they were considering sending in Delta Force on American
5 citizens and when I read that I was like wow, this is -- I don't
6 know, this is strange. And I really hope that, you know, we ha
7 -- we as a country do not allow ourselves to become so paranoid
8 that we find it necessary to use this technology on our own
9 citizens because I -- everything that I've seen what's going on
10 in the world, I don't see it getting any better. I don't see
11 our economic situation getting any better. Europe is already
12 desperately in need of help as far as the Euro is concerned and
13 that's just going to come over here. So I mean there's a lot of
14 potential for a lot of bad things to happen and I guess I'm just
15 hoping and praying that these things are not abused 20, 30, 40
16 years down the road, you know, when things do collapse here,

17 I mean take a look at Hurricane Katrina for example. You
18 know, that was a natural disaster and you had cops, you know,
19 pretty much well meaning people, I'm sure when they joined the
20 force, you know, were shooting American citizens. And this was
21 a natural disaster. This wasn't an economic collapse, this
22 wasn't, you know, hey, I can't put gas in my car anymore because
23 there's no more gas flowing. You know, this was a natural
24 disaster so I can only imagine with all of this technology we
25 have when our society does get to that point, you know, do we



I0079

[REDACTED]

20 MR. AMEEN: Okay. Just briefly. As far as the -- I'm
21 coming back to the drones again because I'm sure we've all seen
22 it on the news, we've all read the reports. I mean even using
23 it militarily there are mistakes that are made by these drones.
24 And my con -- my big concern about it is we haven't perfected
25 this technology, but we're pushing forward with it. We're still

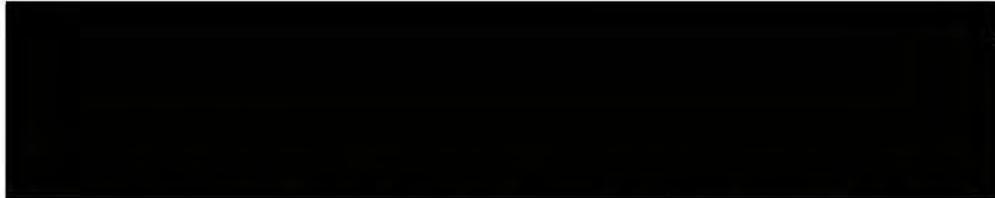
[REDACTED]

I0079

1 using it and we haven't perfected it. I'm reading on here about
2 this quasar thing that they unveiled where somebody's sitting
3 there controlling these things and I -- my thinking is are there
4 standards that these people have -- that they have to meet to
5 control this? You know, are there psychological tests, you
6 know, like police officers have to take before they're allowed
7 to join the force? I mean what are the safeguards and the
8 assurances that these things are not going to be happening here
9 and that's what concerns me about it.

10 It's -- you know, it seems to me like our society, we're
11 going -- we're getting to the point where we're trying to mask
12 what war is really about. I'm a veteran myself. I was an
13 infantryman and I did one combat tour to Iraq. And it seems to
14 me with all of this, you know, we're about subtracting our
15 manpower, but we're -- it seems to me we're masking the real
16 pain and horror of war. When it gets to the point where it's --
17 where you can talk easily about war then something's wrong, you
18 know, something's wrong in our society. And, you know, war
19 should -- the pain and horror of war should be known because it
20 should be the last resort of any government and it seems to me
21 that we're getting to the point in our society where every --
22 where things are going to be controlled by computers and it's
23 easier not to put a face to that. You know, and that scares me,
24 the fact that war is becoming easy, almost like a video game,
25 like we're sitting around on Xboxes playing Call of Duty or

I0080



5 MR. GRAHAM: Yeah, it's Robert Graham, G-R-A-H-A-M, and
6 I'm a missionary pilot up here in Alaska. I fly to and from the
7 villages taking supplies, clothes, diapers, so on and so forth
8 in. I've brought 400 missionaries up since 2008 and I just want
9 to make sure that aviation traffic to the general public
10 wouldn't be shut down and restrict when and where we fly already
11 -- more than what it already is. That's pretty much all I have
12 to say.



I0081

[REDACTED]

18 And I think that covers all our preliminaries and if we
19 could begin the -- with the first speaker, Brian Okonek.

20 MR. OKONEK: My name is Brian Okonek, last name is spelled
21 O-K-O-N-E-K. Thank you for this opportunity to comment. I'm
22 most familiar with the Fox 3 MOA area. I understand the
23 military's need for practice areas, but also feel that the
24 military practice areas or the practicing that's being done on
25 these areas has a huge impact to other users on the ground.

[REDACTED]

I0081

1 There's -- it's very, very hard, even as big as Alaska is,
2 to find areas where there's truly natural soundscape and it's
3 becoming ever more difficult. I used to run a guiding business
4 and we would take people on wilderness backpacking trips and
5 their stereotype image of the wilderness was a place for the
6 most part devoid of human and mechanical noise.

7 We had a business for quite a few years going to an area
8 that we took very small groups. We didn't visit it very often.
9 But as aircraft traffic continued to increase in this state we
10 started getting comments from our visitors that they were
11 surprised by the amount of aircraft noise and finally it got to
12 the point that we got enough negative comments about aircraft
13 noise that we had to quit using certain areas that we had
14 traditionally used because of over flights. It just didn't --
15 it didn't go with their vision of what wilderness is. Quality
16 wilderness really needs quality soundscape.

17 I was very disappointed to see that there were only two
18 real alternatives left for the Fox 3 area, that alternative A and
19 alternative E, and they both had flights -- minimum flight
20 altitudes that went down to 500 feet. That's really low and
21 it's really low when you have fast moving aircraft and aircraft
22 coming like over a ridge top when you're in a valley. It's just
23 amazing the impact it has on the ground. High flying aircraft
24 you slowly hear it coming and the noise gradually gets louder
25 and then as it goes over it's the loudest and then it dissipates



I0081



1 as it flies away, but when you're in a valley and you suddenly
2 have an aircraft, even a 185, pop over a ridge it's a real shock
3 to the whole valley. You don't hear it coming and all of a
4 sudden you've got this full impact of the noise and it really
5 changes an experience when you're on the ground, have this type
6 of activity.

7 I'd really encourage you to go back and reevaluate that
8 minimum altitude. This Fox 3 area is a very popular area for
9 people on the ground, people backpacking, people fishing, people
10 rafting, people hunting. There's a lot of use. Just look on
11 the map of where it's at. It's close to Anchorage, it's close
12 to lots of urban areas. It's between all the highway systems in
13 the state. It's one of the easier places to access and actually
14 get a wilderness experience from a road. But as you go into it
15 you end up getting more and more air traffic.

16 The natural soundscape matters for the animals too.
17 There's -- it's very hard finding definitive sound studies and
18 how they affect animals and birds. I -- I'm on a -- a member of
19 a over flights committee for Denali National Park and we've had
20 access to a long, long list of sound studies and many, many,
21 many are inconclusive and hard to substantiate just the impacts,
22 but some of them do indicate that there's -- puts animals at a
23 high stress level, especially during calving and lambing
24 periods. The Nelchina caribou herd is in this Fox 3 area. One
25 of its main calving areas is right in the middle of your MOA,



I0081

1 your MOA, and there's also a lot of sheep in the Talkeetna
2 mountains and in the Alaska Range and their lambs are very
3 sensitive to disturbance by noise. I encourage you to work
4 very, very closely with the Alaska Department of Fish and Game
5 to find out just where these areas are and consult with them
6 each year to find out where the caribou are calving to try to
7 create a bubble over those areas to protect them. It's quite a
8 long period. It's not just the day they drop their calves
9 that's the critical period. It's the first couple months of
10 their life. They're very small young calves trying to stay with
11 the cows and major noise disturbance can separate them and
12 create problems.

13 And like I -- my question I had about the mitigating, many
14 of your mitigating factors are very much educational. I'll just
15 continue just a few minutes here and wrap it up. And I -- and
16 you did explain that there are other ongoing mitigating factors
17 going on, but I think you need to really concentrate on some
18 mitigating factors that will protect critical areas within these
19 -- all these MOAs. Thank you very much.

■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]

[REDACTED]

I0082

[REDACTED]

20 COLONEL WEISS: Mr. Schapansky.
21 MR. SCHAPANSKY: Thank you. My name is Elwood Schapansky,
22 S-C-H-A-P-A-N-S-K-Y. I'm a retired local glacier pilot so my
23 point of view will be that of a pilot rather than of a person
24 interested in wildlife. I'm also interested in wildlife. We
25 make many trips to see that from the air and do our best not to

[REDACTED]

I0082

1 disturb anything.

2 My main concern tonight is that this is like a planning
3 stage and that our words won't be heard by the FAA. The FAA
4 should be here ultimately and so that's my first comment. I
5 would like to be able to say these words to people that will
6 hear me rather than people that are putting them down on a piece
7 of paper and hoping that the FAA will see them.

8 I have flown all over Alaska during the last 40 years.
9 I've been in the Naknek (ph) MOA, I've been in the MOAs to the
10 west of the Alaska Range, I've been up all along the Tanana
11 Valley. I've only had one negative experience in a MOA. A MOA
12 for a pilot is a place where we can fly, but we have to look out
13 and I've been very, very close to a couple of F-15s in the
14 Galena area. That's the only bad experience I've had in 10
15 years flying the Susitna MOA, not a problem. So I'm not
16 concerned about those areas, I am concerned about the Fox 3 area
17 and I am concerned about expanding that. I would like very,
18 very much to have the Fox 3 area to be like the Buffalo area
19 where there are altitude restrictions. The Buffalo MOA has a
20 impact below 1,500 feet AGL. I'd like to see that moved up to
21 3,000 feet as a minimum. Just north of that there's another MOA
22 that does have the 3,000 foot restriction. I'd like to see that
23 throughout the entire Fox area and I definitely would not like
24 to see that expanded.

25 I would certainly favor the expansion of the restricted



I0082

1 airspace that is used for live targeting in the Fairbanks area.
2 I don't think those people will necessarily appreciate that, but
3 it is a necessary thing for the military to do and I would be in
4 favor of that. We're already used to restricted airspace. It's
5 very well defined, how we deal with it is well defined. The
6 worst thing for me as a pilot is that the restrictions on
7 altitude. The altitude flight rules start at 3,000 feet AGL,
8 that is above ground level. These high speed military aircraft
9 can penetrate that airspace and it's my responsibility to be
10 aware of them. I don't have T Cass (ph), I don't have the
11 ability of seeing them by using my transponder. I don't have
12 the electronics to do that. So it's see and be seen and I am
13 not in favor at all of military aircraft impinging upon the
14 airspace that I'm already used to as an FAA pilot. So 3,000
15 feet AGL puts me or puts the MOAs in the same restricted region
16 or in the same set of rules as the FAA already has and we don't
17 have to worry. We have to look out for other small aircraft,
18 but we don't have to worry about a high speed jet impinging upon
19 that area.

20 So if there's any changes going to be made in these
21 expansions certainly make them so that the FAA rules for, you
22 know, picking your flight altitude above the ground is
23 consistent with the altitudes used in the MOAs. Thank you.

■ [REDACTED] [REDACTED] [REDACTED]
■ [REDACTED] [REDACTED] ■

[REDACTED]

I0083

[REDACTED]

22 We are now ready to begin and our first speaker is Mr.
23 Bill Frey. Mr. Frey.
24 MR. FREY: Thank you. Just want to say thanks for all of
25 the work you guys have done presenting this. It's been very

[REDACTED]

I0084

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7 COLONEL WEISS: Mr. Orville Gilman, III.

8 MR. GILMAN: My name's Orville Gilman. I live in Wasilla.
9 And I read this document previously on the internet some, it's
10 large, and coming here tonight I appreciate the fact now that
11 it's actually an Environmental Impact Statement and I have the
12 same concerns as other people. I don't want to get locked out
13 of areas we've hunted in for years. I think that as a whole the
14 military needs these training operations, but I also feel that
15 as opposed to locking them out -- I mean personally I think that
16 it'd be safer -- in the issue of live range fires certainly you
17 don't want anybody in there. In other instances I think working
18 among the citizen population say during the hunting season would
19 be more of an opportunity than a hindrance because in
20 Afghanistan and Iraq right now we're definitely working right
21 through civilians. It just makes sense that for good real world
22 training that there's really no need to remove the public from
23 everywhere.

24 And as far as the environmental impact goes, I -- in all
25 the years I've lived here since '68, since I was seven years

█
█
█

I0084

1 old, and I -- I've never really seen that the military's impact
2 on wildlife game populations was any more or less than any other
3 person or group traveling through the country. So I don't hold
4 that as something that I fear as a problem.

5 I just am more concerned with it seems like every time we
6 have an impact statement, an agreement for something to happen
7 in a certain specific way, a few years later it tends to be that
8 the federal agency or the state agency starts to take total
9 control and it doesn't turn out to be the thing that it started
10 out as. And that's what I'd like to see avoided here, I'd like
11 to see it -- that the military can train, they can operate in
12 the state and that we can all still hunt and fish and enjoy our
13 rights as citizens. Because the bottom line is this is America
14 and each and every one of us is an American and this is our
15 government, not a government above us, but a government of us.
16 It's our decision and I think we can make a reasonable and wise
17 decision. Thank you.

■ [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

(907) 276-3554

I0085

Submittal ID	Commenter	Title	Organization	Comment
I0085	Randy Tyler			<p>As a general aviation user of this air space I am especially concerned about the expansion of the FOX3 MOA expansion and the new Paxon MOA. It does not make good sense to me for the Military to select this area to expand in. This is in the middle of the most heavily used GA portion of the state, directly in the middle of the main population centers of the state. To expand into more of this area and to go to such low AGL floors will place the military traffic directly in with the GA traffic. This is not good. I fully support the military but this is an action that is akin to being the 800 pound gorilla in the room. I respectfully request that the military truly respect the other users of this airspace and not just use the EIS process to check the required boxes and ram this through. I have a small, slow tube and fabric GA airplane with no transponder; something very common in Alaska. I know from experience that Anchorage Tower has a difficult time identifying me on radar when I transition the terminal area. It will be nearly impossible for a military pilot to see and avoid me while traveling at 450+ knots at very low level and fully focused on terrain avoidance and their training target. I highly doubt that AWACS could positively identify me 100% either. This situation is just a disaster in the making. Not only would I and fellow GA pilots and passengers be dead from collisions or near miss turbulence, there is real possibility that the military traffic could be lost as well. The main thing is that this is not necessary. There are many other more remote MOA's in Alaska the military can expand with much less impact to the public and with the speed of modern military aircraft, the time to location is insignificant. For these reasons I respectfully request that the expansion of the FOX3 MOA and the new Paxon MOA not be done and the necessary expansion of MOA's be done in more remote areas of the state with less conflicting GA traffic use. The proposed Realistic Live Ordnance Delivery area is proposed to expand south ans west into popular hunting and recreational use area with private cabins. It would be better and less impact if this was kept more within the limits of the Tanana flats and not encroach into the foothills of the Alaska Range mountains on the south side of the Tanana flats. The Unmanned Aerial Vehicle area is a growing concern and with this expanded area will be a real concern for GA traffic in the Fairbanks area. Again, I think this is an unnecessary risk the Military is placing on the general public and the UAV use needs to be kept within the Tanana Flats area or more remote MOA's rather than placing them in airspace most heavily used by GA traffic. I thank you for your solicitation of public comments and respectfully request that you consider these changes for the safety of the public and military alike. Thank you , Randy Tyler</p>

I0086

May 29, 2012

Good day,

This is our second letter opposing the expansion of the Fox and Paxon military Operations (MOAS). Lowering the Fox 3 MOA to 500 feet, to us, is unacceptable. This is our home. Wildlife will suffer. Civil aviation will be impacted. I and my husband picture ourselves working in our subsistence garden and having military flyovers at low levels. Our Alaskan Traditional lifestyle becomes more difficult daily it seems. We have something wonderful and special in Alaska, please help us to retain this gift. Alternative D proposing to keep the boundaries as they currently exist. Please do not expand the military exercises over the Copper River Basin.

A sad picture.

Sincerely,
Linda Rutledge
Charlie Rutledge



10087

Joint Pacific Alaska Range Complex Modernization and Enhancement
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Written Comment Form

For more information and to submit comments online, please go to:
www.jparceis.com

Public comments are requested pursuant to the National Environmental Policy Act, 42 United States Code 4321, et seq. All written comments received during the comment period will be considered during Final EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Final EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Final EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

Name (First and Last): Curt Anderson Date: 5-25-12

Title: _____

Organization: _____

Is this a government agency (choose one): yes no

Comment submitted on behalf of (choose one):

- your organization/business/agency
 yourself as a private citizen

Email: _____

Phone: _____

Mailing Address: _____

If you know, please check the boxes below that relate to your comment. This will assist us in organizing and reviewing your comment.

Comment Topic(s):

- General (to the EIS)
 NEPA Process
 Purpose/Need
 Description of Proposed Actions and Alternatives (DOPAA)
 Cumulative Impacts
 Mitigations

Resource Areas:

- All resource areas
 Airspace Management
 Noise
 Safety (Airspace)
 Safety (Ground)
 Air Quality
 Physical Resources
 Land Use
 Infrastructure and Transportation
 Water Resources
 Hazardous Materials
 Biological Resources
 Cultural Resources
 Socioeconomics
 Subsistence
 Environmental Justice

Proposed Actions:

- All proposed actions
 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA
 2 - Realistic Live Ordnance Delivery
 3 - Battle Area Complex Restricted Area Addition
 4 - Expansion of R-2205 Restricted Area
 5 - Night Joint Training
 6 - Unmanned Aerial Vehicle Access
 7 - Enhanced Access to Ground Maneuver Space Areas
 8 - Tanana Flats Training Area Access Road
 9 - Joint Air-Ground Integration Complex
 10 - Intermediate Staging Bases
 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska
 12 - Joint Precision Airdrop System Drop Zones

Please provide your comment(s) on the back of this form and turn it in at a public hearing, or submit

by June 7, 2012, to: ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506;

Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

10087

Comment(s):

WE HAVE A RETIREMENT HOME ON A REMOTE LAKE IN THE EXPANSION AREA FOR 3 MOA. WE HAVE SPENT A GOOD DEAL OF TIME & MONEY BUILDING THIS HOME. WE ARE THERE BECAUSE IT IS REMOTE AND WE ENJOY QUIETNESS.

THESE ARE OUR CONCERNS.

1) NOISE POLLUTION

2) WATER POLLUTION.

A) THE LAKE IS AN ONLY SOURCE OF WATER.

3.) AIR SPACE

A) WE ARE AT THE WHIM OF THE WEATHER & FLY WHEN WE CAN. THE 500 FT AGL RESTRICTION COULD BE THOUGHTS SORT & DANGEROUS.

4) THIS EXPANSION HAS MOVED INTO A MORE POPULATED AREA. LAKE LOUISE HAS ABOUT 60 PERMANENT RESIDENTS AND MORE PERMANENT PLACES ARE BEING BUILT. THIS EXPANSION HAS GONE IN THE WRONG DIRECTION. WITH AN INCREASED POPULATION, THE CHANCES OF PEOPLE GETTING ILL OR HURT INCREASES. HOW WILL MEDICALS BE WORKED OUT?

5.) THESE MOA'S ALL OVER THE STATE & THE YUKON MOA LOOKS VERY LARGE. HOW MUCH SPACE DO YOU NEED? I BET THERE IS MORE MOA SPACE HERE THAN ANY OTHER STATE. I FEEL THE FUEL SAVING IS A MUTE POINT.

IN CONCLUSION, WE FEEL THE FOX 3 & DAWSON EXPANSION SHOULD NOT HAPPEN. IT WOULD INTERFERE ON OUR CHOSEN LIFE STYLE AND COULD CAUSE ECONOMIC DEPRESSION TO BUSINESSES AND DECREASES PROPERTY VALUES.

Use additional sheets as needed.

Please turn in this form at a public hearing or submit by June 7, 2012, to:
ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506
Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

Thank you for your input.

I0088

[REDACTED]

From: susan monetti [REDACTED]
Sent: Friday, May 25, 2012 1:16 PM
To: ALCOM J08 Admin Box
Subject: JPARC

To Alaska Command Public Affairs Officials/Agents,

I have reviewed the JPARC Modernization and Enhancement Draft EIS. This missive is my response and public comment to the document and proposal.

I am completely dismayed at the military's proposal, JPARC Modernization and Enhancement Draft EIS, and it's lack of consideration for Alaskan people, Alaskan environment, national economics, and resources conservation.

This document is the most publicly and personally offensive plan proposed because of its disregard for REAL people with REAL lives, who live in Alaska and would be subject to non-stop noise pollution, aerial interference, reduced quality of life, and the increased safety risk on land and air. The proposed idea to increase training exercises does not justify the cost to all Alaskans.

The only choice suitably presented in the JPARC draft is "No Action Alternative" on every document proposal. Do not add to or increase the military training that already exists in Alaska.

Sincerely,
Susan Monetti
[REDACTED]

I0089

[REDACTED]

From: Corky [REDACTED]
Sent: Wednesday, May 30, 2012 8:24 PM
To: ALCOM J08 Admin Box
Subject: JPARC
Attachments: MOA LLCNPC.docx; MOA Letter Matthews 2.docx

I0089

May 30, 2012

ALCOM Public Affairs

9480 Pease Ave. Suite 120

JBER, Alaska 99506

alcom.i08@elmendorf.af.mil

Subject: Joint Pacific Alaska Range Complex

To whom it may concern:

To start this letter, let me be clear, that we do not oppose military training in Alaska.

The expansion of the FOX 3 and Paxson MOAs is totally unacceptable.

We are full time residents of Lake Louise. Both I and my wife are retired, but very active in the public and community. We are both Mat-Su Borough Emergency Medical Responders, my wife is president of the Lake Louise Community Non-Profit Corporation, and I am the Chief of the Lake Louise Volunteer Fire Dept.

The Lake Louise Community comprises of the 3 major area lakes, Lake Louise, Lake Susitna, and Tyone Lake, as well as the surrounding small lakes and land areas. This is a state recreation area and home to about 60 year around residents. People have chosen this area because of its natural beauty, clean waters, abundant wildlife, and road access.

The expansion of the MOAs over populated areas makes absolutely no sense. I understand that to someone sitting in the Pentagon, looking at a map, it looks like a vast wilderness. This is the recreation area for the largest population center in Alaska. This is the most accessible hunting area. This is Alaska's outdoor backyard. We have already experienced some out of area military air traffic that has strayed out of the existing MOA. This unplanned preview has not been a pleasant experience. We can only imagine the accidental air traffic if the MOAs are expanded.

Alaska is a huge area, most of which is under Federal management. To pick an area that is mostly State of Alaska, and Mat-Su Borough lands are unacceptable. Use the vast Federal lands including the National Parks for MOA expansion. We have listened to all of the reasons presented by the various public meetings; none of these make a justifiable case: fuel savings, proximity to airfields, terrain similar to the current war areas.

Respectfully,

Corwin and Beverly Matthews

████████████████████
████████████████████
████████████████████

I0090

From: John Strassenburgh [REDACTED]
Sent: Thursday, May 31, 2012 5:46 PM
To: ALCOM J08 Admin Box
Subject: Public comment JPARC draft EIS

BELOW ARE MY COMMENTS. PLEASE ACKNOWLEDGE THAT YOU HAVE RECEIVED THEM IN GOOD ORDER. THANK YOU.

May 30, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

Via email: alcom.i08@elmendorf.af.mil

To Whom It May Concern:

These are my comments regarding the Draft EIS of the proposed expansion of the Joint Pacific Alaska Range Complex (JPARC) military training area.

I support the NO ACTION alternative, which would keep the existing training areas and regimen in place. Alternative E is a smaller expansion and so would be marginally less detrimental to fish and wildlife and human use and enjoyment of the affected lands than would be Alternative A, but I do not support either of these action alternatives. Both would have an unacceptable level of adverse effect on the health and abundance of wildlife populations, on the Alaska Department of Fish and Game's ability to conduct research and manage fish and wildlife, and the public's use and enjoyment of the area. Both also represent concern with respect to aviation safety.

I am concerned also because the military is fundamentally turning a blind eye to the serious and legitimate impacts of its proposed expansion and modernization. I note that just over a year has passed since the public commented in the scoping phase of this proposal and now. That is not nearly enough time to comprehensively and meaningfully do the research and analysis and otherwise assess the effects on wildlife, the environment, and human use of the areas, so that the proposal can be modified and mitigating measures established accordingly.

Impact mitigation is more than just notifying the public of when and where training exercises will take place. To develop mitigating measures means first knowing what the effect of the training exercises would be, and where. Then it is necessary for the military to actively work with ADF&G and citizen groups at the front end, before the final EIS and Record of Decision, to redesign the proposal and develop specific mitigation measures necessary to avoid impacts or reduce the impacts to an acceptable level. For example, how, specifically, will the caribou calving, Dall Sheep lambing, nesting birds, etc. be impacted and how will they be protected?

The MOAs (especially FOX 3) overlay very productive wildlife areas, including calving grounds for the Nelchina caribou herd and the Nelchina Public Use Area. The areas are very popular with the public for a variety of uses. It is not just about hunting and fishing. Folks enjoy the outdoors and they get out there for many

I0090

reasons... often to find a little quiet solitude. There is flightseeing, mining, trekking, subsistence, lodges, guiding, remote cabins, birding, mountain climbing, agency fixed wing and rotary aircraft (e.g., ADF&G doing research), and so on.

The military is proposing to significantly expand and intensify its training operations. According to information from the Talkeetna meeting on May 22, 2011, there would be training sessions, one in the morning and one in the afternoon, on weekdays. And the military aircraft would be flying as low as 500 feet above ground level (AGL). This is very frequent, repeated, low-level, intense flying. Obviously, this kind of activity would disturb and displace wildlife. The wildlife would be less successful because of the direct disturbance, but also because they would move away, to less productive habitat. Both Action Alternatives, A and E, would clearly put the health and numbers of wildlife populations at risk.

And it not just mammals. Migratory birds would be disturbed during the critical time of nesting and rearing, and preparing for fall migration. The frequency and intensity of the low-level flying (i.e., less than 5000 feet AGL) represent a significant disturbance that would be detrimental to the nesting success rates.

On top of that are the impacts on human use and enjoyment of the area, including public safety concerns associated with private and commercial small aircraft flying. There would be more air traffic and a mixture of military and civilian aircraft, which would increase the chances of mid-air collisions. And there is the direct impairment of human on-the-ground activities, whether it be a backpacker seeking a wilderness experience (a large part of which is a natural soundscape), a hunter faced with less game, or a family camping along the Denali Highway seeking respite from city life.

The Matanuska-Susitna Valley is one of the fastest (if not the fastest) growing areas in the state. That means more people, more remote cabins, more hunting and fishing, more trekking, more mountain climbing, trekking, more flight seeing, more charter flights, and so on.... all of which increases the severity of the JPARC impacts, but also in themselves create pressure on wildlife. The EIS should analyze the effect of the Alternatives in the context of the increase in population and human use of the area, which will, by all accounts, occur. In addition, population increase is foreseeable, and its effect should be analyzed as part of the Cumulative Impacts section of the EIS.

Many of the impacts of the proposed expansion and intensification of the JPARC training area can be significantly reduced or eliminated altogether if the minimum AGL remained at 5000 feet. If I were to make one recommendation, it would be to add a zero to the proposed 500 feet AGL to keep the minimum AGL at 5000 feet.

Thank you for considering my comments.

Sincerely,

John Strassenburgh



I0091

May 24, 2012

These comments are submitted in response to the Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska.

Comments submitted by Robert Gerlach, 39 year resident of Talkeetna, Alaska, private pilot, guide, hunter, recreationalist, concerned citizen and property owner relatively near the proposed Fox 3 MOA expansion area.

As a private citizen actively utilizing not only ground but also air space affected by this proposal, I have great concerns for the proposed military expansions made in this request.

Before I extend my comments specific to the request, I am compelled to voice a few issues with the ‘public comment process’ I am participating in.

1. It is somewhat outrageous to me that we cannot *easily* decipher “who” is making this request. From the Joint Pacific Alaska Range Complex EIS website, it is not at all clear WHO is not only asking for the expanded military use of our State’s air, land and water, but worse, WHO is governing this decision. Digging deeper, we find the EIS report states reference to broad federal agencies involved, but honestly, it is still not clear or forthright for us to clearly understand WHO is actually involved, both on the request side and the decision side of this proposal. In my opinion that leans toward feeling more like this is done and out of our hands, and as such, a sign for how much this whole proposal reaches over the line.
2. Controlling the Public Comment Process. I am writing in response to an exhaustive document that the public has had very little time to understand. I can only imagine the extent of the professional team who created this document, and the exhaustive amount of time they took doing so, yet we as the public are given just 70 days, to not only just read it, but to digest, understand and decipher: what is being proposed, who is proposing it, what are the impacts said proposal will have on the lives, natural resources, communities, economies, fish and game, lifestyles and much more, for the public residing within the affected areas. And, we are expected to decide if the proposal seems feasible to allow. This is FAR too much. I am not even completely certain who I am addressing, precisely who the entities involved are, nor who is deciding the outcome, let alone clear about all the implications this proposal has upon my life and the lives of my fellow Alaskans. And still, I am required to decipher what is reasonable. I can say, THIS in itself is unreasonable.
3. Conflict of Interest. The Public Hearing held in Talkeetna, Alaska, March 22, 2012, was moderated by a military judge, who allowed only four minutes per person to submit public comment. **With all the military personnel hovering about, I was too intimidated to do verbal comments. It felt like an occupying force had taken over.** THAT was unreasonable. Is it not an obvious conflict of interest to utilize military personnel (even uninvolved-to-this-request-military) as

I0091

gatekeepers when collecting data on a project that aims to benefit the military? This meeting was a clear example of ‘the powers that be’ following ‘the letter of the law’ without following the ‘spirit of the law’ in adhering to the requirement to allow public involvement. Sincere interest for including public input would provide EASE and COMFORT in collecting public input. The process I have experienced has seemed more like an effort to control the public comment process, and ultimately limit the “obstacle” of the public, as opposed to actually encouraging public involvement in deciphering what is truly within the best interests of all parties involved while determining the true impacts of this proposal.

Now, despite my displeasure with the process and the uncertainty for exactly who is involved, I DO have some very clear concerns that I am very certain must be expressed with regard to this request for expanded military use of Alaska’s land, air and water spaces.

We Alaskans who live, work and recreate in the areas listed in this proposal are being encroached upon by the military. This place is our home. With the proposed areas listed in this expansion, it feels as if we are being literally squeezed out of our own backyards.

With all due respect, I recognize the military needs space to train and conduct its exercises, and it needs to do so in areas where civilians will not be affected. Yet therein lies the problem. The proposed areas ARE occupied and heavily utilized by the public. The military has taken a lot of space from Alaskans already, and it is my concern that this request is going well over the line.

About 15 years ago, the military came through our State with a similar EIS process, and at that time, they established a wide range of Military Operations Areas. The Fairbanks area and northeast of there is almost continuously air space dedicated to military operations. They have a low level ops area, a high level ops area, live-fire areas and restricted areas. I provide below a list of all the Restricted Areas, Military Operations Areas, and Area refueling tracks for air space alone that are already in use across our State, by the military. There are probably more military use areas that I am not aware of, not even to mention the numerous military bases that occupy our State.

Restricted Area 2203 A
Restricted Area 2203 C
Restricted Area 2211
Restricted Area 2202

Susitna
Naknek 1
Naknek 2
Sparrevohn
Stoney A
Stoney B

I0091

Galena
Utopia
Fox 1
Fox 2
Fox 3
Eielson
Birch
Delta Junction
Buffalo
Viper
Yukon 1
Yukon 2
Yukon 3 High
Yukon 3A Low
Yukon 3B
Yukon 4
Yukon 5
Sand Point

In the time since the military's last request roughly 15 years ago when they claimed a good portion of our space then, the population of Alaska has grown considerably. Civilian use of our air and ground space has significantly increased, not decreased. We don't have less public use of our land and air space, we have considerably more.

My concern is that air space already taken by the military (noted above), combined with a considerable increase in civilian population, says we do not have more space to give the military, we have less. The military has already taken enough. As stated in the EIS report itself, the military already occupies 65,000 square miles of our Alaska air space (not to mention additional land and water space already occupied by the military). It is entirely unacceptable to increase these amounts, now.

Though the military may be trying to make it very easy on themselves, to have areas closer to their bases to avoid travel to war game practice locations, such convenience for the military creates far too much additional limitation on the public populations that live, work and recreate in these areas.

The military has taken enough of our space. Asking for more is too much.

BIG CONCERN – Fox 3 and Paxon:

I am extremely concerned with the requested expansion and changes for the Fox 3 MOA and the Paxon MOA addition. Expansion with these two areas are completely out of the question and entirely unacceptable for expanded military use.

These two areas are the bread basket of Alaskan recreation.

I0091

The military may think these areas are perfectly remote for their use. Well they ARE remote, and as such, they are PRIME locations where MANY Alaskans utilize the space – both ground AND air. It is entirely unacceptable for the military to expand there. Alaskans utilize these areas extensively all year long – skiers, snow machiners, hunters, recreational boaters – not to mention the wildlife abundance and the negative impacts any military involvement would bring to the natural resources in those pristine areas.

The Paxon and Fox 3 areas are simply too close to human populations AND they are the cream of the crop for Alaskans utilizing the outdoors. Military use in these areas is entirely unacceptable. There should be NO expansion or changes to altitudes in these areas.

Flying levels.

This proposal has also asked for an extension of air space reaching to 500 AGL (above ground level) flying. This is entirely unacceptable in the Paxon and Fox 3 areas. Have you been on the ground and experienced the noise that comes with military fly overs? In NO WAY is it appropriate or acceptable to allow flying lower than 3000 AGL in ANY of the areas requested – especially not the Fox 3 and Paxon areas – in order to maintain the health and safety of the public, and protect the wild habitats that dwell in these places.

It is with grave concern for the maintenance of our public areas that I present these comments. I cannot stand by and watch our military encroach upon our lands any further than they already have. The requests made within this proposal are simply unacceptable.

I am calling for the NO ACTION ALTERNATIVE for the requests made in this proposal.

Thank you for you time and consideration.

Sincerely,

Robert Gerlach

I0092

[REDACTED]

Sent: Monday, June 04, 2012 3:35 PM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS
Attachments: JPARC2.docx

I0092

To Whom It May Concern:

Since both my parents were in the Air Force, I am always interested in what the military has to say, particularly when it perceives it has needs. However, looking at the maps of the proposed JPARC enhancements raises some serious red flags for me:

1. IT WILL BECOME AN AREA TOO LARGE TO MANAGE

I live where we shouldn't be hearing sonic booms, but do, and that makes me concerned that enlarging the MOA will lead to it being too large to supervise adequately. These booms startle me; I've thought 'Earthquake!' until my husband, who grew up around Beale Air Force Base, recognized it as a sonic boom. I was glad to find out about 1-800-JET-NOIS at our local scoping meeting in Glennallen, but if there are enough problems at the present size to need such a number, it will be impossible to manage an even larger area.

2. WILDLIFE

-DURING MATING & BIRTHING SEASONS

If a boom causes me to startle, it will do the same for wildlife. I'm sure there are studies that show both negative and no effects, but my experience indicates it would alarm wildlife. A scene I can imagine is a bird flying off the nest frequently during a training exercise, causing the eggs to cool down so much that they don't hatch. Repeated, this would be disastrous, and since it could affect other wildlife, it will have to be studied for each species, both during mating and birthing seasons.

Much of the area proposed to be included is pristine wilderness. To disturb it would just be wrong, as well as disastrous and very difficult to make right.

-MOOSE IN SPRING

I also worry about moose in the spring when they are weakened from a hard winter with stressors like a lack of food and deep snow. They are just hanging on then, and running a few times from startling noises could be enough to kill them.

3. QUALITY OF LIFE:

-NUISANCE NOISE

-REDUCED PROPERTY VALUES

-PROPERTY DAMAGE

There are rules in the Lower 48 and other countries severely limiting sonic booms because they are so annoying. They lower property values and can cause damage to buildings, as is to be expected from a noise that rattles a house like an earthquake. I object to that happening to my home, and it is especially worrisome that there is a request to lower the flying level to 500 feet, unheard of anywhere else.

4. INCONSISTENT WITH NATIONAL PARK & PRESERVE VALUES

10092

The proposed expansion is between two national parks, and according to the handout, appears to be less than 10 miles from Wrangell-St. Elias. If I am being affected now, the enhancements will surely cause the sound and over-flights to slop over into the parks. The kind of noise and activity that will accompany this extension is antithetical to the preservation of wilderness.

5. AVALANCHES

If snow machines or even skiers can start avalanches, sonic booms certainly could, too, sending them roaring down on unsuspecting backcountry recreationalists. I may be a grandma, but I try to get to the mountains to ski a few times every year.

6. LACK OF PERTINENT STUDIES

How far do sonic booms go in cold? Is that why we heard several recently? Do sonic booms bounce off mountains? There are probably no studies that will allow anyone to say what the true effects of sonic booms are in extreme cold or near high mountains.

7. ECONOMIC DETRIMENTS

Potential economic benefits would likely be at the expense of some existing businesses.

-PRIVATE PILOTS

A larger MOA means the chance for more restrictions for private pilots, who are often the lifeline to remote areas. They have worked hard in rough conditions to develop small businesses, and the possibility of new jobs for someone else does not make negative impacts to their established income and life style any less onerous.

-TOURISM

Why should tourists come all the way to Alaska and its rugged weather, when they can take a shorter, less expensive trip to see beautiful scenery if the Alaskan experience is going to include noise and Army, Navy, Marine Corps, and Air Force activity?

I do love the sight of jets. I pay attention hoping to catch sight of them when I go by Eielson AFB—where I did CAP camp during high school –on my way to visit family in Fairbanks. That’s where my mother homesteaded in the late ‘40s while working at Ladd AFB and where she met my father, a WWII pilot stationed there. I appreciate the military and understand that Alaska might seem wide open and under populated, just the kind of place for this increase. But I feel that with all the potential negatives at the same time there are 65,000 square miles in the present JPARC, the military needs to stay within the already generous space it has to use in Alaska.

Thank you,
Felicia Riedel

[REDACTED]

I0092



January 31, 2011

I0093

[REDACTED]

From: [REDACTED]
Sent: Monday, June 04, 2012 9:25 PM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS Comment Submission
Attachments: JPARC Public Comments-June 2012.docx

Please see the attachment for public comment of JPARC EIS.

Harry and Jean Holt

I0093

Harry and Jean Holt
[REDACTED]

June 3, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JPER, Alaska 99506

Dear Sir,

We would like to make written comment on the proposals submitted in the JPARC Modernization and Enhancement Environmental Impact Statement. After review of the executive summary draft study and attending two of the public meetings, let's hope the process with this EIS Study will once again show the military does listen to the public's important concerns of the Lake Louise Area as they did in 1996.

We did notice that the Alternative A to Alternative E Proposal in this draft study is exactly the same "mitigation proposal" that was proposed in 1995. This draft study has not come up with anything new, except to try and throw in an old "mitigation proposal" from 1995. But that ended with the military taking the No Alternative Proposal because of their findings of the impacts to the Lake Louise Area in the Final EIS Study of 1996.

This Alternative E has moved the southern boundary of the proposed expansion 20 miles to the North. The proposed boundary now intersects the North end of Susitna Lake. Clearly, Alternative E does not take into consideration the entire lakes systems. All the proposals within Alternative E still stand from last year preliminary proposals (2011): Lower the flight deck from the existing 5,000 feet to 500 feet AGL, extend night flying hours and increase noise level from 35 to 50dB.

It is clearly defined in the six "significant adverse impacts" to the Fox 3 MOA Expansion Area. These are airspace management and use, noise, safety-flight, land use-land management and use, land use-recreation and socioeconomics. These six "significant adverse impacts" make it no more reasonable today as back in 1995. Thus the Lake Louise Area has met the NEPA implementing regulations criteria to be eliminated from any of the military's proposals.

In talking with the military at the last public hearing, they appear to be receptive to civilian concerns and they mentioned an Over Flight Avoidance Area. Our suggested additional proposed area would be an area, twenty (20) miles north and parallel to the southern border of Alternative E. The flight altitude would be restricted to the existing altitude of 5,000 feet AGL for high speed aircraft. As long as this proposal is added to Alternative E and maintained year round. It appears from the discussion with the military at the hearing, an Over Flight Avoidance Area has no draw backs in the future from my understanding? A clarification to the public would be appropriate before any final decision of the study is made if this option is considered. Otherwise, the other option is: Alternative E but all of the lake systems area should be excluded, further the boundary north and the No Action Alternative should be taken on all proposals within Alternative E.

I0093

It is complicated because of the ramifications of this draft summary. The military saw Lake Louise, as a wonderful recreational area back in the 1950's for their personnel. There has to be a compromise with the stakeholders here, what is necessary for the military and Alaskan's outdoor recreational needs.

Thank you for the opportunity to make comment on this important issue for the Lake Louise Area.

Sincerely,

Harry and Jean Holt

10094

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10094	karen miller			Airspace Management, 1 – Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	Comment for Alternative E and my concern around Lake Louise as identified in the area of Fox 3 MOA. I would like to add my voice in agreement with the "Over-Flight Avoidance Area of an additional twenty (20) miles north and parallel to the southern border of Alternative E." The flight altitude in this "additional twenty (20) miles would be restricted to the existing altitude of 5,000 AGL for high speed aircraft. It makes sense that this proposal of an Over-Flight Avoidance Area added to the existing Alternative E boundary and maintained year round, addresses some of the resource concerns about "significant adverse impacts" karen miller Lake susitna cabin owner

10095

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10095	Danny Billman	Owner/Th e Point Lodge		1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	I am very much in support of alternate E for the proposed Fox 3 Operation Area (MOA). I appreciate that earlier comments from the Lake Louise area were heard and considered. Many of those earlier comments stated concerns about Lake Louise and I believe most of those commenters consider Sustina and Tyone Lakes to be part of the Lake Louise Area. It seems unfair to not to include these lakes in the proposed alternate E as all 3 lake are part of the Lake Louise community. Please consider a higher floor over these lakes to 5000' or extend the alternate E boundry the few miles to include Sustina and Tyone Lakes.

10096

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10096	Mary Corcoran			<p>General (to the EIS), Mitigations, Airspace Management, Noise, Safety (Airspace), Safety (Ground), Water Resources, HAZMAT, Biological Resources, Land Use, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 3 - Battle Area Complex Restricted Area Addition, 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska</p>	<p>General comments: I appreciate this opportunity to comment on the JPARC Draft EIS. I am opposed to increasing JPARC particularly in the Fox MOA expansion, Paxon MOA Addition, ICALF areas to such a large extent both in terms of area and activities. While the subject of the EIS may be convenient for the military, the variety of uses, geographic areas, communities still presents a huge challenge to those who wish to comprehend all proposed changes and comment constructively. I am very concerned for taxpayers about the consequences with this development. The mitigation measures that suggest to "pursue funding" offer no certainty or serious follow-through. To finance this venture, "borrows" from somewhere else. To weigh in fully, we need to have those sources identified. The proposal imposes too many restrictions on traditional uses of public and private lands. I am concerned that levels of activity will increase over these areas in another short time period, with little need for review of the new impacts. Even though Alaska has the appearance of vast expanses of empty land, further expansion of training facilities would displace others. This land and airspace is already used by miners, prospectors, outdoors enthusiasts of many interests, aviators of all capacities, etc. Expansion would restrict public use, current and future and has the appearance of a land grab. The Gulf of Alaska waters are contain a food source that cannot be duplicated and is a relatively unpolluted environment. If training could be done without harm to ecosystems that are necessary to the livelihood of Alaskans or in the ecosystems that we depend on, I would have no objections. Disturbance to sea creatures, pollution from explosives and exploded target drones would result to harm to this area. Unexploded ordnance would be a threat for future users. Making better use of the current training areas and not expanding is really the best real time solution for military training needs. Doing more with existing training areas makes the most sense. Environmental Resource Areas 1. Airspace Operations • Airspace: It appears to me that there are corridors selected and flight levels proposed that will impede private and commercial traffic traditionally using/routed along highways, rivers and access to hunting grounds. Enhanced mitigation regarding publicity should include PSA's on local radio stations and community websites like www.deltanewb.com</p>

10096

• Noise: Existing training in DTA and BAX has increased markedly over the last few years both in terms of volume, frequency and at all hours of the day. I can hear machine gunfire, bombing and sonic booms from my house. I have large low flying aircraft flying directly over my house. Why not move operations that resemble a warzone to training areas that are not within a couple of miles of residential areas? Supersonic operations continue to be more than an annoyance in populated areas. Mitigation suggests studying effects on animals, but not people who live close to these ranges. Some areas should also restrict MFE's during sheep season (mid August...) Flight levels down to 500 ft. could easily have an adverse effect on a hunt. • Safety (Ground and Air): When training occurs in proximity to residential areas, any accident has the potential to claim more loss. AK citizens are not collateral. 2. Natural Resources • Water: Increased live fire in PWS could pose additional hazards in terms of pollution and safety. Paxson and Fox 3 include at least a half dozen bodies of water that are used regularly by residents and recreators. Mitigation sounds like those citizens will need to schedule their activities on public and private land around training schedules. • Biological: How realistic is it to propose that natural resources (who/what are these? What agency/personnel?) and range managers coordinate training schedules that are not dictated by animals on the move but personnel in an off-site office? Some of the mitigation suggestions name specifically ADFG others do not. Who is responsible for what needs to be firm. 4. Human Resources • Land Use: Paxson and Fox 3 expansion restricts use by residents, recreators and cabin owners. USARAK website is not user friendly for civilians searching for access. For example, maps with range names mean nothing to the civilian who wants to know on a weekend whether an area is open or not. • Recreation and Visual Resources: The extensive target of this proposal has tremendous effect on residents, tourists, hunters, hikers, dog mushers, snowmachiners, in particular #1 Paxson and Fox 3. These areas are used year round by many. 5. Community Infrastructure • Hazardous Materials: The Military does not have an admirable record of keeping track of hazardous substances/ordnance in AK. Introducing more to areas that are so close to the Delta Junction community is disturbing in terms of fire fighting, pollution and future use.

10096

10097

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10097	Jean Hartman			General (to the EIS), Noise, Biological Resources, Land Use, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 5 - Night Joint Training	<p>I am a resident of the Trapper Creek area and live under the Susitna MOA. I am also a frequent user of the Fox 3 area along the Denali Highway. I am concerned with the Fox 3 expansion and also with the Night Joint Training issue. Night Joint Training: I live under the Susitna MOA and am quite familiar with the noise from overhead practice flights. At times the noise is extremely annoying making it impossible to carry on a conversation or hear the radio. I would definitely not want to hear this noise at night when I am trying to sleep! I understand that this is proposed because of daylight savings time starting and ending so early. It seems a better solution would be to go back to the old dates of daylight savings time. Really, it is annoying to start daylight savings time so early not to mention that daylight savings time in Alaska is totally pointless. Perhaps if congress understood that the current daylight savings time interfered with military training they would be willing to change it. Additionally, I would recommend that the Air Force familiarize itself with the settlement areas under the various MOAs. I live in the Trapper Creek Glen subdivision which is a state land disposal of about 235 lots. Not all lots are developed, but there are a lot of people out here to be annoyed by flying when they are trying to sleep. Fox 3 Expansion: I am a frequent user of the area along the Denali Highway for backpacking, fishing and boating. My husband also uses the area for hunting. I am particularly concerned with the impacts of low altitude training flights in this area. Living under the Susitna MOA, I am familiar with the noise level from planes that are so high that they can't be seen. Frequently the noise makes having a conversation impossible. I can't imagine how loud the noise would be from planes flying at low altitudes. I really don't ever want to have to hear it. The Denali Highway area is an area used for a lot of recreational activities. When people come out to their weekend cabins in my area, they always comment on how quiet it is. I think the quiet is one of the things that people go out into the wilds to enjoy. I think the noise from low altitude flights would totally ruin their experience. This area is one of the few areas easily accessible by road for the average Alaskan or tourist. It is as scenic as Denali Park and offers a lot of diverse recreational activities. I think that the ability of people to enjoy the area should be preserved and that low altitude training would be totally unacceptable in this area.</p>

10097

I am also concerned with the impact of low altitude training flights on the wildlife. I once had a military jet fly low over my barn. It totally scared my animals. A lot of people depend on the caribou herd in the Fox 3 area. It would be a disaster if the herd decided to move to get away from the low flights. It would seem that it could also have serious negative impacts at calving time. The same would be true for other wildlife in the area. I am also concerned with the proposed Paxson MOA addition. The area along the Denali Highway (Tangle Lakes) and along the Richardson Highway also see a lot of recreational use. Again, it is an area easily accessible for a lot of people. I think that it is important to reserve some areas where people can enjoy the wilds without a bunch of annoying, loud aircraft overhead. There is already too much noise from small planes in the area. Perhaps the far eastern edge of this area could be used without disrupting too many people's experience. Thank you for this opportunity to comment. Jean Hartman

10097

10098

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0098	peter stern			<p>General (to the EIS), Purpose/Need, Cumulative Impacts, Airspace Management, Noise, Safety (Airspace), Safety (Ground), Land Use, Infrastructure and Transportation, Socioeconomics, Air Quality, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 2 - Realistic Live Ordnance Delivery, 5 - Night Joint Training, 6 - Unmanned Aerial Vehicle (UAV) Access</p>	<p>The military in Alaska seems to be on course to try to tie up large areas of air space and land for training purposes. In the case of the proposals to increase FOX 3 MOA and create the Paxson MOA, these areas are accessible to civilians by road as well as general aviation aircraft. They contain some of the most beautiful road accessible wilderness in interior Alaska. There are also areas that support a large number of hunters. Creating large longitudinal training corridors with access from multiple directions may be important, but should not be allowed in this area of the state. The Air Force is trying to move its' last fighter squadron out of Fairbanks so proximity to Fairbanks should not be considered a valid justification. Page 259 Vol 1 paragraphs 3 and 4 describe the quiet and naturalness people seek in going into this country. Page 265 Vol 1 paragraphs 5 & 6 cover the impact of low level high speed operations on people in the area. The EIS proposes to lower the FOX 3 MOA air space to 500 ft AGL and use the same restriction in the Paxson MOA. This is far too low and would seriously impact civilians trying to enjoy this wilderness. The Air Force is trying to transfer the last F-16 squadrons out of Eielson and move them to Elmendorf. This plan undermines the argument that proximity to Fairbanks is important. Dropping thousands of pounds of chaff in the area is written off as having little impact. There is no mention of the biodegradable status of the chaff. Long hours of operation and 240 days a year of exercises mean the area will be heavily used for both low and high level training. The EIS acknowledges more civilian and commercial aircraft will be using GPS navigation at lower altitudes and this impact is unknown on the NEXTGEN system coverage. low level transiting of the passes through the Alaska Range by civilian and commercial aircraft should not have to mix with high speed military aircraft doing low level training. The Air Force should find other places to do low level training of F-22 and F-35 aircraft. I support the 2.1.1.2 No Action Alternative. The Live Ordnance Delivery expansion should be rejected. Live ordnance training areas are problematic locations for wildland fires started either by ordnance or lightning strikes. The EIS says very little about suppression plans for live fire impact areas beyond the military's coordination with BLM and AFS. Wildland fire smoke in Fairbanks and the interior can be substantial, both esthetically and from the health stand points.</p>

10098

10098

There is no discussion in the EIS about this potential problem. I support 2.2.1.2 No action alternative. Expansion of Night Ordnance Use beyond 10pm is not in the best interest of residents of interior Alaska. Residents should not have to listen to explosions or other aircraft operations after 10pm. While it may be difficult to meet the night exercise requirements, they can be met or the goals can be rewritten. I support 2.1.5.2 No Action Alternative. Airspace Corridors for UAV Access appears to be an attempt by the military to jump the gun on reserving airspace when the FAA hasn't yet released a plan for integrating UAV operations with general aviation and commercial aircraft. The proposals are significant in they want to reserve airspace from 1200' AGL to FL 180. This proposal is premature. I support 2.1.6.1.3, 2.1.6.2.3, 2.1.6.4.3, 2.1.6.5.3, 2.1.6.6.3, 2.1.7.3 No Action. The EIS and appendices are a hugely long and complex documents. The issues discussed are important. Alaska should oppose the military trying to tie up large areas of the state both for ground and air training. The answer isn't always "more is better". Once these areas become tied up as MOAs it will be very hard to get the military to release them back to general public use. Live fire impact areas will remain off limits probably for a very long time. Unless expansion is opposed, Alaska stands to lose large areas of the state that offer residents and tourists truly unique wilderness experiences both from the ground level and from aerial access.

10099

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0099	Dwayne Bertholl	Mr.		Purpose/Need, Airspace Management, Noise, Safety (Airspace), Physical Resources, Cultural Resources, Subsistence, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxson MOA	<p>Thank you for the chance to comment on the proposed new Paxson MOA and expanded Fox 3 MOA. The proposed new Paxson MOA will take in hunting and fishing areas which have been used for generations by my family and my wife's family. This area was not used for military training in the past. So the new - low and loud - sounds in the MOA will disturb the wildlife in the area and start unusual behavior in the animals. This is an important calving area for moose, caribou and Dall Sheep. The expanded Fox 3 MOA is over the Nelchina Caribou breeding grounds. That herd has sustained Alaska families for generations - in addition to my family. The Nelchina Caribou herd also provides an excellent sport hunting opportunity for out-of-state military personnel in both MOA areas (which I believe should continue). I don't believe the US Air Force needs more airspace in the Fox 3 MOA. The flat terrain in the expansion area gives no new training options which do not already exist in other existing MOAs. Having spent time in the 82nd Airborne, I know - and understand - the US military has enough training areas without locking up more airspace or land for training in Alaska. The US Air Force has locked up the Naknek 1 & 2, Stony A & B, Susitna areas for MOAs. All of those MOAs are closer than the proposed Paxson MOA. So your reasoning of needing closer aircraft training areas to Elmendorf is not justifiable. And you're moving all fighter aircraft out of Fairbanks, remember? While the US Air Force provides notifications and warnings about flying in MOAs, US Air Force pilots do not feel constrained by designated and published boundaries, routes, altitudes, or times. This observation and statement is from my flying and outdoor recreation experience within the Susitna, Copper, and Tanana basins. I love and believe in our military, but the military is our spoiled child - gimme, gimme, gimme. As parents (or taxpayers and owners of public lands) we have to say no to baseless "gimme's". I say that knowing whatever Alaska residents say, nothing will change what the military is planning to do. Thank for the opportunity to comment anyway. I will read further and try to find a designated corridor within the new Paxson MOA which would allow Alaska pilots unrestricted transit between Glennallen and Delta within the new Paxson MOA. Dwayne Bertholl</p>

I0100

**Joint Pacific Alaska Range Complex Modernization and Enhancement
DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Written Comment Form

For more information and to submit comments online, please go to:
www.jparceis.com

Public comments are requested pursuant to the National Environmental Policy Act, 42 United States Code 4321, et seq. All written comments received during the comment period will be considered during Final EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Final EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Final EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

Name (First and Last): DAVID JOHNSTON Date: 28 May 2012
Title: CITIZEN

Organization: Home SAPIENS

Is this a government agency (choose one): yes no

Comment submitted on behalf of (choose one):

- your organization/business/agency
- yourself as a private citizen

[Redacted Signature Area]

Please turn in this form at a public hearing or submit by June 7, 2012, to: ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506; Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

Comment Topic(s):

- General (to the EIS)
- NEPA Process
- Purpose/Need
- Description of Proposed Actions and Alternatives (DOPAA)
- Cumulative Impacts
- Mitigations

Resource Areas:

- All resource areas
- Airspace Management
- Noise
- Safety (Airspace)
- Safety (Ground)
- Air Quality
- Physical Resources
- Land Use
- Infrastructure and Transportation
- Water Resources
- Hazardous Materials
- Biological Resources
- Cultural Resources
- Socioeconomics
- Subsistence
- Environmental Justice

Proposed Actions:

- All proposed actions
- 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA
- 2 - Realistic Live Ordnance Delivery
- 3 - Battle Area Complex Restricted Area Addition
- 4 - Expansion of R-2205 Restricted Area
- 5 - Night Joint Training
- 6 - Unmanned Aerial Vehicle Access
- 7 - Enhanced Access to Ground Maneuver Space Areas
- 8 - Tanana Flats Training Area Access Road
- 9 - Joint Air-Ground Integration Complex
- 10 - Intermediate Staging Bases
- 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska
- 12 - Joint Precision Airdrop System Drop Zones

(Please provide your comments on the next page.)

I0100

THE "REALITY" OF YOUR MILITARY WORLD IS SO COMPLETELY OUT OF SYNC WITH THE NATURAL WORLD THAT — IF I COULD BE KING FOR A DAY — I WOULD SHUT DOWN YOUR WHOLE SHOOTING MATCH — FOREVER — HUMAN KIND HAS BEEN TRYING TO NEGOTIATE CONFLICTS

Comment(s): WITH YOUR METHODS FOR THOUSANDS OF YEARS. IT AIN'T WORKING — THIS ENDLESS ESCALATION OF HUMAN AGGRESSION — ALWAYS BIGGER, BIGGER, STRONGER, FASTER — IS TOTALLY NUTSO — UNDESIRABLE — UNSUSTAINABLE. YOU WILL SUCCEED IN EXTINGUISHING MONOSAPIENS. WE'VE GOT TO FIND A BETTER WAY. LIKE COMPULSORY SERVICE IN THE PEACE CORPS.

BUT FOR NOW, SINCE I'M UNWILLING TO BE KING FOR A DAY:

I SAY NO — TO EXPANDING FOX 3
NO — TO THE PARRSON ADDITION —
NO — TO FILING BELOW 5000'.

I SAY YES — TO REQUIRING YOU TO FUND INDEPENDENT STUDIES OF IMPACTS OF YOUR OPERATIONS ON WILDLIFE — ESPECIALLY IN LIVE ORDNANCE AREAS.

I SAY YES — TO PROHIBITING PUBLIC ACCESS ON MILITARY LANDS / ROADS USING MOTOR VEHICLES

I MUST COMPLEMENT THE THOROUGHNESS OF YOUR PRESENTATION IN THURSDAY. BUT THE VAST VOLUME OF INFORMATION WAS PRESENTED WITH SUCH UNRESENTING INTENSITY AS TO FEEL LIKE AN ASSAULT — LIKE A STEAMROLLER COMING THROUGH. IT WAS OVERWHELMING. THE MEMBERS OF CIVILIAN MILITARY MEN IN THE SAME SPACE WERE INTIMIDATING AS WELL. ONE ON ONE, GOOD GUYS — BUT AS A GROUP, OUT OF TOUCH WITH THEIR EFFECT ON PEOPLE'S LIVES OUTSIDE THE MILITARY.

IF US CITIZENS WERE IN THE HAND OF THE FREE FEEL INTIMIDATED IN OUR OWN TOWN, ON OUR SIDE. I CAN ONLY IMAGINE HOW RUDE FARMERS IN AFGHANISTAN FEEL WHEN DROVES COME IN & TAKE AWAY THEIR FAMILIES. NO WONDER AL QUAIDA THROWS.

THANKS FOR LISTENING!

DAVE JOHNSON AGE 70 -

Use additional sheets as needed.

Please turn in this form at a public hearing or submit by June 7, 2012, to:
ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, IBER, AK 99506
Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

Thank you for your input.

I0101

[REDACTED]

From: Linda [REDACTED]
Sent: Wednesday, June 06, 2012 3:19 PM
To: ALCOM J08 Admin Box
Subject: Fw: Joint Pacific Alaska Range Complex EIS Comment Submission

Greetings,

I attended the last meeting held at the Menard Complex in Wasilla. I have some comments regarding the project as it pertains to the vicinity of Lake Louise (including Susitna and Tyone). Everyone is aware of the growing uses in the close vicinity of the lakes in this area and also the much increased use of the surrounding lands for miles in all directions.

These are my comments with alternative:

1) I saw the military proposed alternative that moved the southern boundary of the Fox 3 (MOA) expansion. In addition to that boundary move, I believe this boundary line should again be moved more northerly to totally avoid the entire lakes system. Whether you draw a line across the area from east to west or create a square or block area to remove the area all around all the lakes in the southeast part of the training area makes no difference. Let us not also forget about the lakes to the east of Lake Louise, i.e., Crosswind, Ewan, Fish and other small lakes in the immediate vicinity. It would be easy to remove the southeast block of this training area –again, my point is to have the military operations avoid the entire lakes system.

2) The meeting brought forward comments regarding an Over Flight Avoidance Area. If, for some reason, the project area is not totally removed to avoid the entire lakes system, then this Over Flight Avoidance Area should be put in place due to impacts regarding noise, land use and flight safety. For this, training flights above ground level should be a minimum of 4000 feet.

3) The next comment is for the military's proposed flight level of 500 AGL over the lakes area. This is not acceptable. At no time should the AGL be lowered to 500 feet over the entire lakes system. The noise created by the training at this low level is a huge disturbance itself to both the human population and game. This does not even include the projects proposed increase of a higher noise level from 35 to 50dB. This higher noise request is not acceptable for the entire lakes system.

I do have another comment. I believe there should be minimum 3000 AGL along all the road corridors in all the training areas. This corridor should be a minimum of one (1) mile wide – with special attention given to the Denali Highway and Richardson Highway.

Thank you for opportunity to comment,
Linda Page

[REDACTED]

I0102

[REDACTED]

From: Deborah Brocke and Jeff Robinson [REDACTED]
Sent: Thursday, June 07, 2012 12:10 PM
To: ALCOM J08 Admin Box
Subject: JPARC Modernization and Enhancement public comment

To: ALCOM Public Affairs
Re: JPARC Modernization and Enhancement Environmental Impact Statement

From: Deborah Brocke June 7th, 2012

Comment submitted on behalf of private citizen

e-mail address: [REDACTED]
mailing address: [REDACTED]

Comment with regard to noise and biological resources in Fox 3 MOA

Public Comment:

As someone who recreates in the Talkeetna mountains and Denali Highway area for quiet wilderness experiences, I am opposed to a 500 foot AGL of aircraft flight in the FOX 3 MOA. To increase the minimum flight level from 5,000 feet AGL to 500 feet AGL over this huge area is unreasonable. There are many other people who use the area for many purposes which are in conflict with such low-flying, high-speed aircraft. I have experienced an overflight like this in a remote valley, and it is the antithesis of a wilderness experience. Changing the minimum AGL flight level to 3,000 feet could be acceptable.

The Draft EIS for the JPARC Modernization and Enhancement does not consider the effects of low-flying (500 feet AGL) aircraft on wildlife. As a human being, I could quickly determine that the terror of a low-level flight over a ridge just ahead of me was not actually dangerous, just terrifying and heart-stopping when it's completely unexpected. How do calving moose and caribou react? What are the effects of these flights on all kinds of wildlife? The fact that the draft EIS does not consider the impacts on wildlife in these many thousands of square miles of habitat is unacceptable.

Thank you for your consideration.

I0103

[REDACTED]

From: Doug Millard [REDACTED]
Sent: Wednesday, June 06, 2012 7:58 PM
To: ALCOM J08 Admin Box
Cc: [REDACTED]
Subject: Joint Pacific Alaska Range Complex EIS

Gentlemen,

As I understand it, the plan is to close Eielson Air force base any move all aircraft to Elmendorf.

While cost reduction is an admirable effort, Is this a wise move from a strategic standpoint?

Consider all military A/C based at one location when an Earthquake hits and renders the runways inoperable and unable to launch.

I remember the damage suffered by Anchorage from an earthquake. Do we really want to trust to fate and put all our "Eggs" in one basket ?

Just a thought,
Doug Millard
Capt. (Ret)
Wien Alaska Airlines

I0104

[REDACTED]

From: Keith and Sarah Kehoe [REDACTED]
Sent: Friday, June 08, 2012 1:25 AM
To: ALCOM J08 Admin Box
Subject: Minimum altitude proposed is too low

Dear Sir,

I am writing to you with my comments regarding the JPARC-EIS. I live in the area that you propose expanding for air space training called Fox 3 MOA and work in the same area as a health care provider.

I have huge concerns about the the overflight altitude being changed from minimum 5,000 feet above ground level (AGL) to minimum 500 feet AGL. The impact of noise on wildlife and human populations is very concerning. Not only will the noise affect where my family, friends and community members live, but also the huge number of tourists who come to our area to enjoy the peace and tranquility of rural remote areas of Alaska. My family and I hike and camp regularly in Denali State Park. Fox 3 MOA threatens these "public" lands and would make it impossible for the myself, my family and the public to enjoy time there.

The EIS does not sufficiently address the impact that the noise level would have on resident wildlife, the animals, birds, and fish. They will be impacted. There are suggestions in EIS to avoid lambing and calving areas and to study bald and golden eagle nesting areas, but these barely touch the vast number of other wildlife populations. If noise over a certain decibel level is a known stressor for humans, even with our ability to intellectually understand it, it follows that the same noise level will create significant stress for wildlife.

I am in favor of the NO ACTION alternative for Fox 3, which would leave the areas at status quo. I could agree to an expansion of the area if flying was set at NO LOWER THAN 3,000 ft but it is my understanding that all other alternatives were withdrawn that left the minimum altitude at a higher level.

Five hundred feet is too low.

Thank you for accepting my comments and for your consideration,

Sarah Kehoe
Physician Assistant
Sunshine Community Health Center
[REDACTED]

I0105

**Joint Pacific Alaska Range Complex Modernization and Enhancement
DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Written Comment Form

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Name (First and Last): Cody Barnett Date: 5/20/12

Title: President

Organization: Alaska Extreme Four Wheelers

Is this a government agency (choose one): yes no

Comment submitted on behalf of (choose one):
 your organization/business/agency
 yourself as a private citizen

Email: _____
 Phone: _____
 Mailing Address: _____

If you know, please check the boxes below that relate to your comment. This will assist us in organizing and reviewing your comment.

Comment Topic(s):

- General (to the EIS)
- NEPA Process
- Purpose/Need
- Description of Proposed Actions and Alternatives (DOPAA)
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- Mitigations

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- 7 - Enhanced Access to Ground Maneuver Space Areas
- 8 - Tanana Flats Training Area Access Road
- 9 - Joint Air-Ground Integration Complex
- 10 - Intermediate Staging Bases
- 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska
- 12 - Joint Precision Airdrop System Drop Zones

Resource Areas:

- All resource areas
- Airspace Management
- Noise
- Safety (Airspace)
- Safety (Ground)
- Air Quality
- Physical Resources
- Land Use
- Infrastructure and Transportation
- Water Resources
- Hazardous Materials
- Biological Resources
- Cultural Resources
- Socioeconomics
- Subsistence
- Environmental Justice

Please provide your comment(s) on the back of this form and turn it in at a public hearing, or submit by June 7, 2012, to: ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506; Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

I0105

Comment(s):

I would like to keep access to the established trails open for public use. These established trails are historic and recreational trails that are used for recreational camping and hunting. Examples of these trails are the Bonaford trail and the Donnelly-Valkona trail.

Use additional sheets as needed.

Please turn in this form at a public hearing or submit by June 7, 2012, to:
ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506
Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

Thank you for your input.

I0106

[REDACTED]

From: Kate McKelvey [REDACTED]
Sent: Monday, June 11, 2012 7:47 PM
To: ALCOM J08 Admin Box
Subject: Comments on JPARC- EIS

Thank you for considering my comments regarding the JPARC- EIS.

1. I agree that the Air Force could be allowed to expand the range of area they can carry out training

2. The Air Force should NOT be allowed to lower the altitude AGL for their operations.

3. Fox 3 needs noise mitigation proposals. I believe the minimum altitude of 5000 feet AGL should be maintained for Fox 1, 2, and 3 in order to address biological, recreation, land use and subsistence problems caused by noise disturbance.

4. Only 2 weeks a year for human recreational users? Why are hunters more important than the many humans who seek quiet recreation on our public lands?

5. Funding is needed to pay for wildlife studies to provide baseline data of current wildlife populations and behaviors.

Sincerely,
Kate McKelvey

[REDACTED]

I0107

[REDACTED]

From: usacitizen1 usacitizen1 [REDACTED]
Sent: Sunday, June 10, 2012 8:05 AM
To: ALCOM J08 Admin Box
Subject: your failure to give an e mail address makes publci comment just about impossible - dont force us into snail mail which is stupid in this era
Attachments: ATT00001; ATT00001

From: [REDACTED]
To: [REDACTED]
Date: Sun, 10 Jun 2012 04:58:54 -0800
Subject: Delivery Status Notification (Failure)

This is an automatically generated Delivery Status Notification.

Delivery to the following recipients failed.

alcomj08@elmendorf.af.mil

--Forwarded Message Attachment--

From: [REDACTED]
Subject: attentino tania bruana and henry williams - why dont they give email addresses in their federal register notices - dont they recognize public needs to use internet and prez says cabinet to use internet not anail mil
Date: Sun, 10 Jun 2012 08:57:24 -0400

Ppadding:0px

--Forwarded Message Attachment--

From: [REDACTED]
Subject: public comment on federal register FW: it is substantive to say i dont want to enlarge range - is military disrespecting the public
Date: Sat, 9 Jun 2012 15:56:36 -0400

Ppadding:0px

there is no reason at all to "modernize" this range. i believe this is an attempt to kill even more trees and wildlife. it would be better if you stayed on your own old turf, not look into new ones to destroy. there is too much impact from this. these training exercises should be done over afghanistan. stop destroying america. this comment is for the public record. jean public

[Federal Register Volume 77, Number 108 (Tuesday, June 5, 2012)]

I0107

[Notices]

[Page 33202]

From the Federal Register Online via the Government Printing Office [www.gpo.gov]

[FR Doc No: 2012-13570]

DEPARTMENT OF DEFENSE

Department of the Air Force

Notice To Extend Public Comment Period for United States Air Force Modernizations and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska Environmental Impact Statement

AGENCY: The United States Air Force, DoD.

ACTION: Notification of extension of public comment period.

SUMMARY: Alaskan Command (ALCOM), on behalf of the U.S. Air Force and U.S. Army is issuing this notice to advise the public of an extension to the public comment period. The initial Notice of Availability published in the Federal Register on March 30, 2012 (Vol. 77, No. 62/Notices/19282), requested public comments no later than June 7, 2012. ALCOM has extended the deadline for submitting public comments to July 9, 2012. All substantive comments on the Draft EIS received during the public comment period will be considered in the preparation of the Final EIS.

FOR FURTHER INFORMATION CONTACT: Please direct any written comments or requests for information to Capt Tania Bryan, ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506, ph: 907-552-0876.

Henry Williams Jr.,
Acting Air Force Federal Register Liaison Officer.
[FR Doc. 2012-13570 Filed 6-4-12; 8:45 am]
BILLING CODE 5001-10-P

I0108

Joint Pacific Alaska Range Complex Modernization and Enhancement
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Written Comment Form

For more information and to submit comments online, please go to:
www.jparceis.com

Public comments are requested pursuant to the National Environmental Policy Act, 42 United States Code 4321, et seq. All written comments received during the comment period will be considered during Final EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Final EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Final EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

Name (First and Last): Thomas Gatzke Date: 31 May 20

Title: _____

Organization: Alaska Extreme 4X4

is this a government agency (choose one): yes no

Comment submitted on behalf of (choose one):
 your organization/business/agency
 yourself as a private citizen

Email: _____

Phone: _____

Mailing Address: _____

If you know, please check the boxes below that relate to your comment. This will assist us in organizing and reviewing your comment.

Comment Topic(s):

- General (to the EIS)
- NEPA Process
- Purpose/Need
- Description of Proposed Actions and Alternatives (DOPAA)
- Cumulative Impacts
- Mitigations

Resource Areas:

- All resource areas
- Airspace Management
- Noise
- Safety (Airspace)
- Safety (Ground)
- Air Quality
- Physical Resources
- Land Use
- Infrastructure and Transportation
- Water Resources
- Hazardous Materials
- Biological Resources
- Cultural Resources
- Socioeconomics
- Subsistence
- Environmental Justice

Proposed Actions:

- All proposed actions
- 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA
- 2 - Realistic Live Ordnance Delivery
- 3 - Battle Area Complex Restricted Area Addition
- 4 - Expansion of R-2205 Restricted Area
- 5 - Night Joint Training
- 6 - Unmanned Aerial Vehicle Access
- 7 - Enhanced Access to Ground Maneuver Space Areas
- 8 - Tanana Flats Training Area Access Road
- 9 - Joint Air-Ground Integration Complex
- 10 - Intermediate Staging Bases
- 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska
- 12 - Joint Precision Airdrop System Drop Zones

Please provide your comment(s) on the back of this form and turn it in at a public hearing, or submit by June 7, 2012, to: ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506; Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

I0108

Comment(s):

I believe the land should be left open to off road vehicles,
and the trails keep open to off road vehicles

Use additional sheets as needed.

Please turn in this form at a public hearing or submit by June 7, 2012, to:
ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506
Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

Thank you for your input.

I0109

Joint Pacific Alaska Range Complex Modernization and Enhancement
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Written Comment Form

For more information and to submit comments online, please go to:
www.jpargcis.com

Public comments are requested pursuant to the National Environmental Policy Act, 42 United States Code 4321, et seq. All written comments received during the comment period will be considered during Final EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Final EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Final EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

Name (First and Last): Sheryl Salasky Date: 5-23-2012

Title: _____

Organization: _____

Is this a government agency (choose one): yes no

Comment submitted on behalf of (choose one):

- your organization/business/agency
 yourself as a private citizen

Email: _____

Phone: _____

Mailing Address: _____

If you know, please check the boxes below that relate to your comment. This will assist us in organizing and reviewing your comment.

Comment Topic(s):

- General (to the EIS)
 NEPA Process
 Purpose/Need
 Description of Proposed Actions and Alternatives (DOPAA)
 Cumulative Impacts
 Mitigations

Resource Areas:

- All resource areas
 Airspace Management
 Noise
 Safety (Airspace)
 Safety (Ground)
 Air Quality
 Physical Resources
 Land Use
 Infrastructure and Transportation
 Water Resources
 Hazardous Materials
 Biological Resources
 Cultural Resources
 Socioeconomics
 Subsistence
 Environmental Justice

Proposed Actions:

- All proposed actions
 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA
 2 - Realistic Live Ordnance Delivery
 3 - Battle Area Complex Restricted Area Addition
 4 - Expansion of R-2205 Restricted Area
 5 - Night Joint Training
 6 - Unmanned Aerial Vehicle Access
 7 - Enhanced Access to Ground Maneuver Space Areas
 8 - Tanana Flats Training Area Access Road
 9 - Joint Air-Ground Integration Complex
 10 - Intermediate Staging Bases
 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska
 12 - Joint Precision Airdrop System Drop Zones

Please provide your comment(s) on the back of this form and turn it in at a public hearing, or submit by June 7, 2012, to: ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506;

Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

I0109

No action alternative

Comment(s):

I live in this area
and do not want defense
maneuvers in the air at low
elevations where all life will
be impacted. Remain at the
current levels

I support a "NO ACTION"
alternative

Use additional sheets as needed.

Please turn in this form at a public hearing or submit by June 7, 2012, to:
ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506
Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

Thank you for your input.

10110

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10110	Marge Nord			General (to the EIS), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>Comment on Proposed Action -- Expansion of Fox 3 MOA I have been a resident of Cantwell for 30+ years. As the pilot of a small aircraft I am greatly concerned about the proposed lowering of the Fox3 MOA to 500 feet and the increased traffic in the area from the diversion of Stony sortie missions to the Fox 3 MOA. A prime recreation area would be negatively impacted! The Fox 3 MOA encompasses prime recreational and wilderness area. There are only a few road systems in Alaska where private individuals have access to wilderness areas. The Fox 3 MOA overlies an area accessed by the Denali Highway as well as the Parks and Richardson Highways. The area is utilized by recreationalists, the tourist industry and hunters and fishermen. Recreation: Hikers -- the general public and the NOLS (National Outdoor Leadership School). The NOLS organization has six or more groups of 10-15 students hiking through various parts of the area through the early summer to the late fall season. Their emphasis is teaching leadership through participating in a wilderness experience. Tourism -- Bus tours over the Denali Highway during the summer season. Fishing -- Fishing along the Denali Highway and the lakes in the area which are accessed by road, ATV or airplane. Hunting -- Because of its access, the area is heavily hunted. Wildlife: Caribou, moose, bears, fox, lynx -- startled by more sonic booms-- the sound reverberates off the mountains when you're in a low valley -- I know it startles me every time. Birds -- many nesting swans on the numerous pothole lakes -- are disturbed by low-flying aircraft and also represent a collision hazard as do the eagles (I generally encounter an eagle on every flight). Environmental impact: Increase of emissions -- (246,313 tons CO2/yr plus the increased tonnage of chaff) -- that's significant!! GENERAL AVIATION WOULD BE GREATLY RESTRICTED IF THE 500-FOOT FLOOR WERE ESTABLISHED! a. it is often too turbulent to fly below 500 feet in a small aircraft. b. There is no guarantee that military aircraft will remain above the 500-foot floor. (1) They have no warning-system to alert them from straying beyond vertical parameter. (2) In simulated battle exercises it will be difficult to maintain situational awareness. The reaction time in these high-speed maneuvers would delay recovery. (3) The altitude restrictions of the existing boundaries are violated (based on personal observations and experiences of other local pilots) so there is considerable doubt that the 500-foot floor would be observed.</p>

I0110

I0110		<p>c. There is more general aviation activity in the Fox 3 MOA area than is indicated by Flight Service statistics. Local pilots generally file flight plans with friends or company personnel. No alternative listed when the initial proposal was released there was an option not to include the 500-foot floor. Although many general aviation pilots objected to the lower floor, this option was deleted. Now the only option is to "check and see if the airspace is active" and avoid it. That is like saying, "I'm in your backyard so don't come out of the house". There are only a limited number of days in the summer and fall to fly. That is what keeps us going through the winter so if the weather's good I'm going flying and I hope I don't run into a fast-flying aircraft that I don't have time to avoid. I do support the military but surely there are some more remote areas where there would be less impact.</p> <p>Margie Nord Cantwell, AK</p>
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I0111

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0111	matthew wojnowski			Airspace Management	please do not allow low fly area over tyone,susitna or lake louise,alaska area as having ben brought up in northern new york state 30 miles north of now abanded griffis afb i have personally witnessed the sound of low flying aircraft and no respect of people or animals living in the area. i am 63 & remember this very well also have a cabin in this area of lake louise.alaska

I0112

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0112	Matthew Cooper			General (to the EIS), Purpose/Need, Cumulative Impacts, Airspace Management, Safety (Airspace), Socioeconomics, 6 - Unmanned Aerial Vehicle (UAV) Access	I support military training in Alaska. However, the proposed UAV corridors (and the proposed corridors to R-2211 in particular) create and undue burden on general and commercial aviation and create a negative impact on the human environment. When active, these corridors combined with the existing restricted airspace will negatively affect all civilian air traffic southeast bound from Fairbanks. General aviation traffic will either have to take circuitous detour around the restricted airspace, leading to increased time and costs for GA pilots, or fly below 1200 feet AGL. Funneling southeast bound general aviation traffic below 1200 feet AGL will create significant safety hazards. In addition, the proposed corridors along with the proposed MOA expansions will negatively affect commercial IFR traffic. I respectfully request that greater consideration be given to the impacts of the his proposed expansion on civilian aviation in Alaska.

I0113

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0113	Don Garrett		none	Purpose/Need, All resource areas, All proposed actions	The Federal government doesn't need 75% of Alaska for their use. It is a state, and belongs to the residents of Alaska and should be controlled by them. Not the military. Not BLM, and not the Park Service. Don Garrett

I0114

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0114	Travis Anderson			General (to the EIS), Cumulative Impacts	I will suggest not putting GA aircraft in such a tight corner around the delta area. Corridors for free movement must be allowed in order for incursions into restricted airspace and MOAs to be minimal. Please keep GA in mind when these changes are implemented.

I0115

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0115	Mark Bartlett	Mr.	N/A	General (to the EIS)	My comments still stand from my last entry. Thank you, Mark A. Bartlett Wasilla

I0116

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0116	norman pickus	american	AAHF	Purpose/Need, Airspace Management, Noise, Safety (Airspace), Land Use, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 2 - Realistic Live Ordnance Delivery, 3 - Battle Area Complex Restricted Area Addition, 4 - Expansion of R 2205 Restricted Area, 5 - Night Joint Training, 9 - Joint Air-Ground Integration Complex (JAGIC), 10 - Intermediate Staging Bases (ISBs)	I am an old us army aviator, 7 years active duty, 3 of those years at Ft. ww and have witnessed many unnessary uses in the proposed areas, I have tried to discuss this with all levels of command and ignored time and time again so why would I think you have any real concerns now, this is just another BS smokescreen to look good to some. We'll see if anyone will discuss any of this with me. I doubt anyone will. Regards, Rusty Pickus.

I0117

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0117	Janelle Eklund			General (to the EIS), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>The EIS states that the MOA must have a floor of 500 feet AGL and at the same time says the airspace should minimize the interruption of commercial and general aviation traffic. This does not make sense. I am deeply opposed to the MOA having a floor of 500 feet AGL. It is virtually impossible to have a ceiling of 500 feet and still be safe for low flying general aviation traffic. Especially in this area where there is high small fixed wing traffic use for hunting and recreation. There are bound to be people killed even if there are scheduled use times. The military doesn't even adhere to the 5,000 foot ceiling now, as I have experienced low flying aircraft while recreating in the Tangle Lakes area. It ruins my day. This kind of flight is not only dangerous to humans but also the wildlife - migrating swans, ducks, other birds, caribou, moose, small animals. It will displace and confuse them plus change migrating patterns that are detrimental to their survival. To me the area between Paxon and Cantwell is sacred and should be treated as such. It has a majestic beauty, peace, quiet and solitude that is hard to find in our human impacted world. I go there to hunt, berry pick, canoe and enjoy the quiet, solitude, and beauty. Please do not destroy it by impacting it with low flying aircraft. In one of the meetings the information was that the 500' level has never been implemented in a real war situation but that they want to practice it now because maybe in the future they might use it. I don't think this is justification to practice a 500' ceiling and jeopardize the lives of other people and wildlife.</p>

I0118

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0118	Maurice Byers			All proposed actions	The military has enough training areas world-wide. Our family is firmly against any further JPARC Modernization and Enhancement.

10119

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10119	Brian Okonek			Mitigations, Noise, Safety (Airspace), 1 – Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>Dear JPARC, EIS team, Thank you for this opportunity to comment on the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Environmental Impact Statement. The area that I am most familiar with is the Fox 3 MOA (Military Operating Area) which extends from the southern side of the Alaska Range between the Parks and Richardson Highways south across the Denali Highway to the northern part of the Talkeetna Mountains. I have backpacked in remote parts of the Talkeetna Mountains for many years. Currently the military practices aircraft maneuvers between 5,000 feet above ground level (AGL) to 18,000' above mean sea level in this area. The only alternative that I find acceptable is the No Action alternative. I am totally against Alternative A for the Fox 3 and Paxon MOA's. The area is too large and the minimum altitude of 500 feet is much too low. Alternative E makes the Fox 3 MOA smaller, but it is still too big and the minimum flight altitude is also 500 feet. I am not in favor of Alternative E. The only way Alternative E could be acceptable is if the minimum altitude is raised to 5,000 feet. The noise created by aircraft flying as low as 500 AGL over this huge area will adversely affect many backcountry users. There are mountaineers climbing in the eastern Alaska Range, many types of recreation takes place along the Richardson and Denali Highways, there are many cabin owners in the Lake Louise area, backpackers hike in the Talkeetna Mountains and hunters and fishers are throughout the entire area. It is becoming increasingly more difficult to find quiet places to recreate. Hearing fighters practicing overhead diminishes wilderness values considerably. I am concerned that low level military aircraft practicing in the region will adversely affect the wildlife. There are Dall sheepplumbing in both the Alaska Range and Talkeetna Mountains and caribou calving in the northern Talkeetna Mountains (often in the region of the Oshetna River valley) in the spring, birds nesting including Trumpeter swans and other animals including moose in the region. There are numerous general aviation and air taxi flights throughout the proposed expansion of Fox 3 and Paxon MOA's. Suddenly meeting high speed, low level military planes is both disconcerting and dangerous for these pilots and their passengers. I believe that low level military training flights will be very unsafe. I am totally against Alternative A and E of expanding the Fox 3 MOA and lowering the flight level from 5,000 feet AGL to 500 feet AGL. This size of MOA with such low flight levels would be very disruptive to the activities the public already enjoys in the area and could have detrimental effects to the regions wildlife. I believe the military can come up with creative ways to train in the existing Fox 3 MOA at the existing 5,000 feet AGL to 18,000 feet above mean sea level. It is not acceptable for the military to state that the "No Action" alternative is not satisfactory. Sincerely,</p> <p>Brian Okonek</p>

I0120

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0120	Scott Rufa			General (to the EIS), Purpose/Need, Description of Proposed Actions and Alternatives (DOPAA), Cumulative Impacts, All resource areas, Water Resources, HAZMAT, Biological Resources, Cultural Resources, Land Use, Subsistence, Environmental Justice, All proposed actions	How does this effect the availability of access to local resident hunters and fisherman? What are the environmental impacts expected from the detonation of munitions and training?

I0121

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0121	Susan Wallin			Airspace Management, Noise, Safety (Airspace), HAZMAT, Biological Resources, Air Quality, 2 - Realistic Live Ordnance Delivery, 4 - Expansion of R-2205 Restricted Area, 6 - Unmanned Aerial Vehicle (UAV) Access, 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska	I live in the Susitna strategic air corridor. My main concern is safety for myself and my land. The planes fly so low they rattle the dishes in my cupboards! Jet do refueling maneuvers RIGHT over our hay fields! There are many acres of undeveloped, uninhabited land in this Susitna Strategic air corridor, WHY use our 90 ac of cleared fields??? A pilot friend took me up to show me why, it is a great landmark, easy to find and meet each other but.....come on there are many other spots just as easy to find without family or fortune at risk. I do not know specifics on all these proposed actions...How could I find out details of realistic Live ordnance,UAV access,missile live fire in Gulf of Alaska NO WAY!!! People live and work there. Many food animals live there. Go doink around in some other GULF!

I0122

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0122	Charles McMahan	Chairman	Copper Basin Fish and Game Advisory Committee	Airspace Management, Safety (Airspace), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	I am opposing lowering of the floor of the expanded Fox 3 MOA and new Paxon MOA to 500 feet from 5000 feet. I am also opposing the expansion of these areas, especially if the floor is lowered. I have flown many thousands of hours at lower levels and lower speeds in small planes for the past 40 years in this area for business and recreation and continue to do so. There are many others that fly more and some less than I do. I am certain that safety would be severely compromised if high speed fighter jets were turned loose to train in the same airspace that we routinely fly with small, slow and hard to see planes for game counts and captures, predator control, and recreational hunting and fishing. The chances of a mid-air collision would be unacceptable. Our previous comments have gone unheeded and the probable danger has been disregarded in the EIS. We should not have to comment again now for the same things we said in our previous comments the first go around, and I feel many that commented the first time may not again this time and their previous comments will not be counted. Chuck McMahan

I0123

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0123	Earl Valley	Air Traffic Manager	F.A.A.	Purpose/Need, Airspace Management, All proposed actions	My personal option is this is a land grab. The airspace in use already is larger than the state of Florida. Larger than New England. If the needs cannot be met within this HUGE airspace, something is wrong with airspace management. There is no battle area larger than the airspace currently in use. The proposed plans would have a major impact on general aviation within the interior. Also, the USAF command has shown that their word is no good. Red Flag was promised not to conflict with hunting season. Beginning in 2010 it conflicts, when asked why or if the dates could be changed, the answer was because of other restrictions and no the dates could not be changed. If no concerned is shown for this issue, how can you be believed on other issues?

I0124

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0124	Nick Cassara			General (to the EIS), Airspace Management, Safety (Airspace), Safety (Ground), Physical Resources, Biological Resources, Land Use, Infrastructure and Transportation, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	"Freedom is not Free" however if the costs of Freedom disenfranchises the rights of the Free...then Freedom is lost. The proposed low level F-16/22 interception flights will have adverse effects on the resident sheep and caribou populations in the Talkeetna Mountains, as well as avian populations. The research has already been done by Alaska Department of Fish and Game, ADF&G, in pass MOA studies. My freedom to fly these mountains in search of game is what Freedom means to me!!!! ADF&G data shows that this area is contains some of the most heavily use areas by Alaskan Hunters, so many others go to these mountains to experience their Freedom also. Please Do Not Destroy My Freedom!

I0125

[REDACTED]

From: Bill and Kim Burgess [REDACTED]
Sent: Saturday, June 23, 2012 3:32 AM
To: ALCOM J08 Admin Box
Subject: JPARC expansion

Greetings,

I am a recreational private pilot operating out of Lake Hood Strip (Z41) and Lake Hood when on skis. I recently attended the Palmer Pancake Breakfast/FAAST meeting where the C17 guys were on the agenda to talk about midair avoidance. I was disappointed to see that the scheduled speaker was unable apparently assigned elsewhere and a substitute was called on short notice with little time for preparation. I was also disappointed to hear that the attitude of the DOD pilots is that it is not inappropriate to mix up C17s and C130s with general aviation (GA) traffic at low levels as long as we are listening to your position reports on the proper frequency. I doubt that you fear the wake turbulence of my C170B and it is unlikely that I will startle you by getting too close for comfort. You probably have me spotted or targeted on radar and a variety of other instruments before I know you are in the area. You are also travelling 2 to 3 times as fast. I would guess you could fly through me and leave a faint red mist and a shower of aluminum with scarcely a bump. My day will not end so well. Perhaps this sounds a bit melodramatic, but it illustrates a point that I believe is accurate. I do not believe DOD is an advocate for GA in Alaska. I do believe that DOD operations increase the risk of GA accidents in the vicinity of Anchorage and the Mat Su Borough. I oppose the JPARC expansion and do not want to see fast and heavy aircraft operating at low levels outside the current MOAs.

Sincerely,
Bill Burgess

[REDACTED]

I0127

[REDACTED]

From: Janet Ownby [REDACTED]
Sent: Tuesday, June 26, 2012 2:37 PM
To: SMART, JOAN M GS-11 USAF ALCOM JTF AK/J08
Subject: Re: Joint Pacific Alaska Range Complex Draft EIS Comment Period Extended to July 9, 2012
Attachments: WP_000359.jpg

The photo I am sending is one of the few that I have. This plane had just barely cleared the house. I am standing in front of my two story house, on my lawn. This perspective looks like he is high, but in fact had been very low. Sadly the camera perspective pushes the image away. This plane is one of the six that came through

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

-----Original Message-----

From: Janet Ownby [mailto:[REDACTED]]
Sent: Monday, June 25, 2012 6:33 AM
To: SMART, JOAN M GS-11 USAF ALCOM JTF AK/J08
Subject: Re: Joint Pacific Alaska Range Complex Draft EIS Comment Period Extended to July 9, 2012

To: Joan Smart
ALCOM Public Affairs

I0127

I am responding to your e mail because I am very disturbed about the consequences of JPARC restricting this areas' air space.
The last two weeks we experienced your. "Red Flag" exercise in this area. It was unbelievable the amount of sonic booms we incurred. One was executed under 5000 feet. Calling the Air Force number in Fairbanks has had no response to complain or express our concerns.
I had called FAA to express my concern with the C170's. They were flying to close to my house, and on the last day of your exercise, it had barely missed my house. I did get pictures and I was very shook up. My neighbors are higher in elevation than I am. They (airplanes) had to take evasive actions to miss their houses, but were out of room by the time he got to my house. Had his landing gear been down, I would not be writing this e mail. He was flying carelessly and in a reckless manner. I am in a residential neighborhood, and the pilots can see that.
If this is what we are in store for when you restrict the air space for training, you will have a detrimental effect and impact on this area. This will have been the second time my house has been a near miss. I fear for a third.
During training, these pilots do not take care of who they will be disturbing, or if sonic booms are way too loud and in need of having ear protection on, if on land.
If my house was almost hit, how close will you be to the pipeline and the pilot cannot divert an obstacle? They are putting themselves, as well as innocent civilians in danger with these training missions. I repeat,,it is reckless endangerment with the tactics they use.
I am forwarding this as well as the pictures to Senator Murkowski, and anyone else who will listen. I do not want to see any of your pilots crash,,and I do not want to be in their line of sight if such a tragedy should occur.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Sincerely,

I0127



I0128

[REDACTED]

From: Gary Wilken [REDACTED]
Sent: Monday, June 25, 2012 8:10 PM
To: ALCOM J08 Admin Box
Cc: SMART, JOAN M GS-11 USAF ALCOM JTF AK/J08
Subject: JPARC EIS support
Attachments: JPARC support letter June 2012.doc

To Whom it May Concern,

Please accept the attached letter as part of the public comment in regard to the Draft EIS for the JPARC deliberations.

Thank you,

Gary Wilken
Fairbanks Alaska

I0128

Gary R. Wilken
State Senator (Retired)



June 25, 2012

ALCOM Public Affairs
9480 Pease Avenue
Suite 120
Elmendorf AFB, AK
99506

Re: Public Comment
Joint Pacific Alaska Range Complex (JPARC) Support

To Whom it May Concern,

Please register this letter to be an indication of strong support for the draft *JPARC Modernization and Enhancement Environmental Impact Statement*.

I am privileged to encourage the Department of Defense to utilize Alaska's assets needed to train America's fighting forces. Alaska offers the geography, the space, the global location, and the isolation to effectively and efficiently train for combat in near real-world situations.

As a participant in the MOA expansion in the mid-nineties, I am aware of the many concerns and promises made during this expansion process. While occasional conflicts have occurred, one can only proclaim the past effort a resounding success. I am confident our military and civilian leaders will make every effort, in this necessary new expansion, to maintain mission joint readiness while keeping safety as the utmost consideration and local impact to the absolute minimum.

Thank you for the opportunity to provide input and please advise if I may assist further.

Sincerely,

/s/ Gary Wilken

Gary Wilken
CAB

I0129

[REDACTED]

From: Marcus Wisdorf [REDACTED]
Sent: Tuesday, June 26, 2012 1:08 AM
To: ALCOM J08 Admin Box
Cc: [REDACTED]
Subject: expansion of airspace/ training area

To the person who will ultimately make the final decision on this.

Regarding the JPARC. I am totally against any expansion. You do not need it. first of all the reality of fighting in the environment you train in is NIL.
the enemy would die just trying to access area's like that, be consumed by mosquito's and black flies, maybe fall in a crevasse.

the second reason is that as you remove airspace , you remove freedom to travel around our state and the continental 48 states...
would you as a military enlisted person, who is supposedly trying to protect OUR freedom, and receives his/her pay from the hardworking people of the US. Would you want to be responsible of taking away more freedom from the Men and Women of this country than you are giving. Think about what you are doing very hard before you make these decisions. No more whittling away at our freedom.

Marc Wisdorf Airline Transport/Commercial pilot
[REDACTED]

I0130

12 June 2012

Dear Sir

I do not support any use of State of Alaska land or air space. The U.S. Federal government has control of 60% of land in Alaska. No more land or space put under your control.

I can not hunt fish trap or most Federal lands now. I will not give you more.

My solution to you is for the Federal government to give back control of Fish and Game to the State of Alaska. Then give us all the land we were entitled to in the State Hood Act.

Use your own Federal land. you claim ownership of 60% Alaska.

I used to Hunt, Fish, Trap or most land in Alaska freely. now the military and Federals all say no to use. Unless I'm willing to tell them how long I'll be on the lock, obtain Federal permits, agree to give up all my rights as a free citizen. Taking of Fish, Game, Fur can not be done except for those chosen few you endorse.

... take the land we will

I0130

never get it back again.

In the years past I have been harassed by military operations during hunting season on state lands.

I live a subsistence life style but its not a Federal subsistence life style. Its a State of Alaska subsistence life style. The State of Alaska has all its citizens given equal access to land and resources. If ou Federals give access to only those who you personally choose.

Our founding fathers had the right idea. You new fellows messed it up. Better get out a copy of the constitution and read it over. I'd suggest more than once.

a patriot
Joy L. Cook



ALCOM PUBLIC AFFAIRS
9480 PEASE AVENUE, SUITE 120
JBER, AK 99506

I0131

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0131	Michael and Robin Maher			<p>1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 2 - Realistic Live Ordnance Delivery, 3 - Battle Area Complex Restricted Area Addition, 4 - Expansion of R-2205 Restricted Area, 5 - Night Joint Training, 6 - Unmanned Aerial Vehicle (UAV) Access, 7 - Enhanced Access to Ground Maneuver Space Areas, 8 - Tanana Flats Training Area (TFTA) Access Road, 9 - Joint Air-Ground Integration Complex (JAGIC), 10 - Intermediate Staging Bases (ISBs), 12 - Joint Precision Airdrop System (JPADS) Drop Zones</p>	<p>As local Fairbanks pilots and considering the recent moves of our F16s from Eielson to ANC this proposal for more airspace is way out of line. We oppose this airspace grab and can't begin to understand why you want to remove personnel and increase military airspace use. Please abandon your requests. Thank you</p>

I0132

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0132	W.R. Reed			Biological Resources, Subsistence, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 2 - Realistic Live Ordinance Delivery, 5 - Night Joint Training, 6 - Unmanned Aerial Vehicle (UAV) Access	<p>Fox 3 MOA Expansion: Recommend the No Action Alternative. All other alternatives will result in further loss of access to and use of State lands for recreation and subsistence, more restrictions governing the use of land, and no viable method for communicating the closures of land effectively to stake holders. Realistic Live Ordinance Delivery: Recommend the No Action Alternative. The selection of any other alternatives that expand area will result in loss of Non DoD-owned/managed airspace-restricting pilots from flying this popular corridor. The loss of this airspace in particularly the Lake Louise area would be devastating to both recreational and commercial pilots, as the Lake Louise area is one of the States most popular year-round recreational areas. Limited road access makes flying in by small planes the only viable option for access year-round. Lastly, consideration must be given to the continually declining populations of wildlife in the area. Caribou and moose are two wildlife populations that would be significantly impacted by Live Ordinance training and the losses as a result of this training on formerly State-Owned lands cannot be accurately assessed. Night Joint Training: Recommend Alternative A. Unmanned Aerial Vehicle Access: Recommend Alternative B.</p>

I0133

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0133	Timothy Berg	Golden Heart Aviation		General (to the EIS)	As a member of AOPA, The Alaska Airmen's Association, and the Fairbanks General Aviation Association. I would direct you to these organizations, well thought out responses to the proposal. My own comment is just what you don't want to hear. There should be no more Airspace or land given up by the residents of the state of Alaska for military Training. If you need it, try to get it in the lower 48. See how that works for you? Enough! Tim Berg Fairbanks, Alaska

I0134

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0134	P. William Tappen	MAJ	US Forces - Afghanistan	General (to the EIS), Airspace Management, Safety (Airspace), 3 - Battle Area Complex Restricted Area Addition, 4 - Expansion of Restricted Area, 6 - Unmanned Aerial Vehicle (UAV) Access	<p>I am writing to express my opposition to more restricted airspace in the Delta Junction area, and along the routes to Fairbanks and Anchorage. I can and do work with the MOAs, but restricted airspace is already too much. More will only make recreation, work, and safe, expeditious travel so much harder for rural Alaskans. Below, I am including a conversation I had this week with the XO of the Predator UAS company that supports us here in Afghanistan. If you will read it, you will see what an experienced Army helicopter pilot thinks after reading about the proposed expansions in Alaska. Finally, I have a farm in Big Delta, my family is still there, and I am a bush pilot that is looking forward to coming home to the Interior. Previously I have worked in the Ground-based Midcourse Defense program at Fort Greely, and hope to be assigned there again. I fly my Cessna 170B in support of our farming, more quickly transporting my family around Alaska, on some TDYs, and recreationally for sightseeing, camping, fishing, hunting, etc. I hope that you will reduce your desired dependence on restricted airspace in the air corridors of Interior Alaska, especially over the Delta Junction area. Thank you, MAJ Paul William Tappen MAJ Tappen, it was a nice tour to hold. Thanks for the pictures. I love seeing the ones from Alaska, although it makes me feel homesick all over again! The article you forwarded was pretty interesting. It seems to me like we military have plenty of airspace without adding more to the Alaskan sectionals. What's more, we don't exclusively use the military airspace anyway. We can go wherever we want! One of the perks of flying in AK, to be sure. I would think more restricted/special use airspace is unneeded. Range control should be able to help coordinate altitudes for UAS when in operation and allow the flyers to be professional in their occupation. As long as the UAS use the current MOAs, range control could easily coordinate with other military users letting them know there is a UAV in the sky. Most Respectfully, PHILIP T. EARWOOD CW2, AV Executive Officer Aggressor 05 A/306 MIBN - TF ODIN</p> <p>-----Original Message----- From: Tappen, Paul MAJ MIL USA USFOR-A Sent: Saturday, June 30, 2012 6:18 PM To: Earwood, Philip T CW2 TF Odin Company XO Subject: (U) Thanks for the Tour UNCLASSIFIED</p> <p>Chief! Below is a story about the proposed additional restricted airspace in Alaska, esp. in the Delta Junction area (my home). Read it and see how much you recognize. Thanks for the tour, photos and answers. I had a great time and my sons were pretty excited by the pictures, esp. the two boys in the Air Force. When I become the USFOR-A C12X in Oct, I plan on calling you guys. And if you need help w/anything here in Kabul, just call. Thanks, MAJ Bill Tappen NKC BSG XO</p>

I0134

I0134

AOPA seeks changes to large military airspace proposal in Alaska By Dan Namowitz Share on google_ plus on twitter Share on email Share on print More Sharing Services 1. AOPA is urging the Department of Defense to work with the aviation community to solve access and routing problems posed for general aviation by a revised special-use airspace plan for the Joint Alaska Pacific Range Complex (JPARC). Members may comment on the plan by July 9. In formal comments filed June 26, on the plan's draft environmental impact statement, AOPA called for solutions to numerous concerns pilots have raised about proposed new uses, boundaries, and altitudes of the complex of land, sea, and air training areas that support military exercises in Alaska—known as the JPARC plan. The association opposed various parts of the plan and urged "utmost caution" in modifying other portions of the airspace, dependent on by a \$3.5 billion state aviation industry, and providing access that "enables many small communities to exist." "This range is already the largest military airspace complex in the country," said Melissa McCaffrey, AOPA senior government analyst for air traffic. "Pilots should examine how the proposed changes would affect their ability to fly."

AOPA objected to a proposed significant expansion and lowering of the floor of a military operations area (MOA) in an area "frequently used by general aviation pilots and air taxi operators" to conduct air tours, support businesses, and provide access to recreational areas. Expansion of the Fox MOA should be minimized to avoid raising the risk of mid-air collisions near population centers including Anchorage, Fairbanks, and the Matanuska-Susitna (Mat-Su) Borough, AOPA said. Also, any expansion should be accompanied by increased coverage by the special-use airspace information service, which provides pilots with information about MOA use. AOPA expressed concern about lack of assurances that funding for program infrastructure would remain sufficient. Although existing T-routes and the instrument approaches provided by the Wide Area Augmentation System have increased IFR access, such gains could be "seriously degraded" by expanded MOAs, AOPA said, requesting in the formal comments that expansions be deferred until real-time IFR access through active MOAs can be effected.

I0134

I0134

Another concern was the proposal to establish restricted airspace over the Battle Area Complex, near Delta Junction where winds and variable weather and the need to access a mountain pass already limit pilots' navigational options. Proposed restricted corridors for the sole purpose of unmanned aerial vehicle operations—which the FAA has customarily rejected—“would clearly interfere with the safe and efficient access between Fairbanks, the Richardson Highway Corridor and the Alaska Range,” AOPA said. The association has been calling for development of a reliable sense-and-avoid capability for UAVs, rather than creation of segregated airspace for their development. AOPA said the JPARC proposal provides an opportunity to study the Stony, Naknek, Susitna, and Galena MOAs “to determine if they are still required to meet modern training needs.” The results of the evaluation should be included in the environmental impact statement and made available for public comment. Members may comment on the proposal online, by email, or by mail to ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506. Please share your comments with AOPA.

I0135

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0135	Robert Prescott			Purpose/Need, Cumulative Impacts, Airspace Management, Noise, Land Use, All proposed actions	I am still very concerned with the proposal to use Fish and Game management area #13 as a place for your exercises!! This area is vital for Caribou calving and migration as well as an area of large moose population. Low flying aircraft in certain areas at certain times can change the calving production, and also migration routes!! Use of live fire ordinance will close those areas off for personal use by Alaska citizens. Building roads and facilities in this area will close off more of the area. There are plenty of areas that are not used as extensively for fishing, hunting, recreation as Game management area #13!!!! Please find a area that meets your criteria and does not ruin the land for the animals and humans!!!! Your proposal is completely wrong for this area!!!! Bob

I0136

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0136	John Hester			General (to the EIS), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	I think extending the MOA area and dropping its lower limit to 500 AGL is absolutely crazy. The Talkeetna mountains are heavily trafficked by private aircraft and with these proposed extensions, a very dangerous situation is being set up. Alaska is a huge state and it would make far more sense to have low level military training done far away from populated areas. In addition, the idea of taking fighters out of Eilson and basing them at JBER is a decision obviously made by people who missed history class. Putting all of the top cover in northern U.S. at one base is a bad decision. Ask them if they have ever heard of what happened at Pearl Harbor in 1941.

I0137

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0137	Scott Chesney			General (to the EIS), Purpose/Need, Cumulative Impacts, Mitigations, All proposed actions	I am opposed to ANY expansion of training areas in Alaska. I am constantly amazed, when I hear on the one hand (around red flag times) about how the training areas in Alaska are the largest and best available to the US and many of its training partners, and on the other hand (when the DOD wants yet more), whining about how the DOD can't do the training it wants to do because of limited training space. You can't have it both ways, at least mere mortals can't. I reiterate the same comments I made in the first time around. 1. DOD controls enough land and air space in Alaska. 2. DOD has no respect for the land, air, or water it controls. 3. DOD has a proven track record of befouling the land, air, and water it controls despite promises to not do so. NO ADDITIONAL SPACE IN ALASKA UNDER DOD CONTROL!

I0138

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0138	Terry Cartee	CW4 Retired		General (to the EIS), Airspace Management, Safety (Airspace), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 3 - Battle Area Complex Restricted Area Addition, 6 - Unmanned Aerial Vehicle (UAV) Access	To Whom it may concern My name is Terry Cartee, a born and raised Alaskan, retired CW4 with 36 years of aviation service in the Alaska National Guard. The proposed JPARC Range increase shows a blatant disregard for the lifestyle and safety of the Alaskan people. Mixing high speed jet traffic with known civilian VFR corridors is irresponsible and bordering on criminal negligence. The proposed Fox 3 MOA Expansion covers homes, businesses and known VFR traffic routes and to lower the floor to 500 feet is a extreme safety hazard. The proposed Paxton MOA down to 500 feet is again in the only VFR corridor between Gulkana and Fairbanks. Mixing high speed jet traffic and slow civilian air traffic is irresponsible. The proposed Battle Area Complex Restricted Area is going against a signed agreement with the Big Delta that it would not be expanded. This also is the only VFR corridor for civilian air traffic and to make it more restrictive is putting these pilots in harms way. Th UVA corridors and use do not currently meet the FAA requirement to "See and avoid". UAV Corridors near a major city, is again irresponsible. Build an airstrip in the already Restricted Areas and fly them in that area. Please feel free to E-Mail me if you have any questions regarding this statement. Terry Cartee CW4 Retired

I0139

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0139	Becky Long		Alaska Survival	General (to the EIS), Purpose/Need, Cumulative Impacts, All resource areas, Airspace Management, Noise, Safety (Airspace), Safety (Ground), Physical Resources, HAZMAT, Land Use, Socioeconomics, Subsistence, Air Quality, All proposed actions, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>COMMENTS ON DRAFT EIS MODERNIZATION AND ENHANCEMENT FOR IPARC 7/5/12</p> <p>This is to support the NO ACTION ALTERNATIVE. IPARC has not made a case for expansion of MOA's and Above Ground Level (AGL) dimensions. I also support the Matanuska Susitna Borough Assembly Resolution 12-076 that passed unanimously 6/28/12. It is an excellent resolution that expresses many of my comments on the draft EIS. I also support the concerns of the Lake Louise Community Non-profit Corporation and the comments of the Talkeetna Community Council, Inc. Other concerns that were not dealt with adequately in the draft EIS are: • The introduction of hazardous substances and the creation of hazardous waste sites in the MOA areas. The military leaves hazardous waste sites wherever its presence is felt. The clean-up is a long time in the future with public funds being used. Can we afford this? • Air pollution from the increased flights and the pollution from the chaff used must be considered more fully. • Increase in military accidents and military and civilian aircraft collision accidents were not considered along with the creation of new access roads to get to the crash sites. When the F-22 crashed in the winter of 2011, a whole new access road was built which will be there forever. Low altitudes to 500 feet AGL combined with supersonic flights are not compatible with civilian quality of life and will cause negative impacts to wildlife. This will impact recreationists, hunters, subsistence resource users, berry pickers, ATV travelers along the Richardson and Denali Highways, cabin owners in the Lake Louise area, and backpackers in the Talkeetna Mountains and near the Denali Highway, and hunters, fishers, and trappers throughout the expanded MOA areas. For many reasons, I support the NO ACTION ALTERNATIVE, NO REDUCTION IN FLIGHT ALTITUDE LEVELS, NO INCREASES IN ORDINANCE AND TRAINING AREAS. Becky Long</p>

I0140

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0140	Peter Marshall	M.D.	Self Employed Physician	General (to the EIS), Cumulative Impacts, Airspace Management, Safety (Airspace), Land Use, Infrastructure and Transportation, Socioeconomics, All proposed actions	<p>I am a USAF veteran, an Alaskan resident for the past 37 years and a private pilot and single engine aircraft owner for 30 of those years. It is commonplace for Alaskans to state that small aircraft, both commercial and private are the life blood of Alaska. The proposed regulations seeking to add to the military use airspace will in my opinion severely and negatively impact civilian aviation throughout our state. These effects will be felt in every sector including Fish and Game surveys, mail delivery, passenger transportation and commercial enterprise such as fuel delivery. My greatest concern, however is the burden of unsafe flying conditions that will be generated by the 500 feet ceiling imposed in much of the area under consideration. This leaves pilots of small aircraft very little margin for safety in the situation of high winds, adverse turbulence or other unforeseen weather events that are commonly encountered throughout Alaska but are particularly prevalent in the Alaska Range. For example, I have experienced two incidents flying through Windy Pass where I encountered severe un-forecast turbulence and had to climb to 10,000 ft to get to safety. In another incident I encountered such strong headwinds in Windy Pass and another time above Black Rapids that my 94 mph Arctic Tern was actually traveling backwards. One again my only recourse was to climb. None of these alternatives would have been available if the proposed new rules are put in place! My understanding of the proposed expansion is that the existing and well established routes of flight between Fairbanks and Anchorage and Fairbanks and Delta/Tok/Tanacross will be restricted in ways that will compromise air safety. This is, in my opinion unacceptable and will impose an unprecedented burden on the general aviation users in Alaska. As a supporter of the USAF I am embarrassed that the branch of service that brought me to Alaska would embark on such a reckless and draconian action! Sincerely, Peter Marshall, M.D.</p>

I0141

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0141	Joanna Oudal			General (to the EIS); Airspace Management, Safety (Airspace), Safety (Ground), 1 – Fox 3 Military Operations Area (MOA) Expansion and New Paxson MOA	This is a highly traveled area by general aviation pilots. Using this area for training by the military is bound to cause an accident with a small airplane and I think it is irresponsible to think otherwise. Alaska is a large state with many unpopulated areas that the military can use for their training and I strongly request they look at those unpopulated areas for their training.

I0142

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0142	Debra Oskolkoff			General (to the EIS), All resource areas, All proposed actions	<p>I am not in favor of the proposed actions. I am in favor of a professional & well-trained military, but the cost to Alaskans through the impacts - real & possible - convince me that Alaska is not the optimum choice for this proposed expansion. As a Native Alaskan, Nimitchik Native Association shareholder, Cook Inlet Region, Inc. shareholder & Kenaitze Indian Tribe member, my heritage in Alaska and I speak from the heart. Furthermore, access to Alaska by nations to the West/Southwest, is much easier than access to Oklahoma, for example. Should a 'situation' arise, this huge military training area would become a prime target & would be more vulnerable than one otherwise situated. Any proposal which puts our country & our military in a more vulnerable position than necessary, is not a good proposal.</p>

I0143

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0143	Lewis Beck			All proposed actions	As a former USAF single-seat fast-mover I am intimately familiar with what is required to train our pilots. As a current commercial pilot flying in and around Alaska, in aircraft whose performance limitations make all weather and high altitude flying impossible, I see the proposed airspace restrictions a threat to the safety of flight. I am adamantly opposed to the proposed airspace restrictions.

I0144

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0144	Mark Binggeli			Airspace Management, Safety (Airspace), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 4 - Expansion of R-2205 Restricted Area	As a long time Alaskan and winter and summer visitor of the Tanana Flats and Alaska Range, I am highly concerned about increasing the restricted areas in the Interior of Alaska. As a private pilot the plan to confine the routes to corridors increases risks and reduces safety. The new Paxon MOA is of great concern. With the reductions of Air Force activity in the Interior other than periodic Red flag exercises should not justify the increase in the changes proposed. There are little to no permanent Air Force fighters or bombers stationed in interior Alaska. The 'Fighter Wing' is not a real fighter unit, only an exercise unit. Units from outside Alaska should seek training areas in the Lower 48 and not encroach on and reduce our State's available resources. Or better yet do the flying over the National Parks (Denali & Wrangell St Elias) for the "Training"

I0145

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0145	Robert Kelly			Safety (Airspace)	First let me say, I am in full support of the military and our need for them and their need to train. I know what it takes to stay proficient and recognize the need for special airspace for the military to do this. It is my understanding that the last time the military increased the airspace for training, it was stated "We will never need any more than this." Well that was several years ago and here you are back asking for more. If we give up all our liberty's and all our rights, then of what use is this country. You have enough airspace and "We the People" say the rest is ours, as well as what we allow you to use when we are not needing to use what we have already allowed you access to.

I0146

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0146	Maureen English			General (to the EIS), All resource areas, All proposed actions	The training areas in Alaska are already the largest in the US. The claim is that they are also the best in the US. Why does the DOD claim to need more? I am opposed to any and all of the proposed expansions. Yes, Alaska is the Last Frontier, but it will not stay that way if the DOD is allowed to continually control more and more land and air space. The DOD has already proven that it has no respect for the land, air and water it already controls. For example, no firefighting is done on land where unexploded bombs exist...land where animals do still exist, and where unsuspecting children have been maimed and killed. Respectful landowners clean up their mess! The current proposed actions affect too many people who live in and enjoy Alaska. The proposals will limit access to private pilots, hunters and other recreational users. The noise alone will affect numerous residential areas – I still remember how our house shook with each explosion during the Fall Stryker training exercises at Ft. Wainwright (or Eielson AFB). The explosions continued well past 2am. From the list of resource areas, it looks like it's well known who and what will be affected by the expansions. Please recognize that more harm than good will come out of allowing the DOD to continue with this plan. NO to #1 NO to #2 NO to #3 NO to #4 NO to #5 NO to #6 NO to #7 NO to #8 NO to #9 NO to #10 NO to #11 NO to #12

I0147

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0147	John Brown	GA Pilot	Self	Purpose/Need, Description of Proposed Actions and Alternatives (DOPAA), Cumulative Impacts, Airspace Management, Safety (Airspace), Air Quality, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 3 - Battle Area Complex Restricted Area Addition, 4 - Expansion of R-22.05 Restricted Area	IFR routes should be made available between FAI VORTAC and ORT during all airspace activity. The loss of these routes a few years ago has resulted in aircraft operators conducting an increased number of VFR flights across this route. It has also resulted in hundreds of Air Carrier aircraft being rerouted into the already busy ANC-FAI arrival flow and suffering increased expenses associated with the longer routing. This has also caused rerouted traffic to conflict with exercise tankers that depart EIL with ENN as their first enroute fix. Increasing VFR traffic is a net safety reduction, IFR aircraft are in continuous communication with ATC and fly at known altitudes and speeds. VFR aircraft have no communication requirement and may be operating on random routes at any VFR altitude. There should be two altitudes available for unpressurized aircraft and two above FL180 so high performance aircraft can operate safely within positive controlled airspace. ATCAAs should be published on IFR High charts to allow flight crews a chance to understand their alternatives.

I0148

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0148	BRIAN HARLAN	MR		General (to the EIS)	Comments in regards to the expansion of the R-2202 restricted areas across the Little Delta River. These areas are all have long histories of recreational use for Alaskan sporting activities by both individuals and guiding services. Expansion of these areas would block essential SAFE flight corridors for many small aircraft users transitioning through the region. The R areas have already taken away many quality recreational areas within resonable distance from the Fairbanks area. By further deleting these long standing public use areas the military will create an unnecessary division with many local community members all for the name of "land control". Are these expansion REALLY necessary to complete the mission? Or is this just a matter of expanding an empire at the cost of the subjects that pay the taxes that support the empire. The bottom line should be the greatest availability of resources with the least impact on the greatest number of citizens.

I0149

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0149	Steven Poirot			General (to the EIS), 6 – Unmanned Aerial Vehicle (UAV) Access	<p>Most of these extensions conflict directly with heavily used airspace. My son and I just flew through one of these proposed areas yesterday. Lowering the floor in the Matsu area to 500' forces us to fly too low to get to some of the most scenic areas of Alaska and increases congestion therefore reducing safety. Further, increasing route lengths by cutting off access to so much airspace will make some trips impossible for those of us with limited range. Do you propose that only more expensive planes with longer ranges should be allowed to fly now, or that we should go over-gross by carrying more fuel? Either way, it will cost Alaskans more money to travel. I thought the point of having a military force was to protect citizens, not put them in danger, which these proposals do? Alaska has always been very supportive of the military here, but I can easily see how that could change if you start trying to grab all of our airspace and put us in danger. I am however, very supportive of UAVs. I would support proposals to use UAVs in a number of areas for a number of purposes.</p>

I0150

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0150	charles pearson			<p>General (to the EIS), Purpose/Need, Description of Proposed Actions and Alternatives (DOPAA), Airspace Management, Safety (Airspace), All proposed actions, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 3 - Battle Area Complex Restricted Area Addition, 4 - Expansion of R-2205 Restricted Area, 6 - Unmanned Aerial Vehicle (UAV) Access, 12 - Joint Precision Airdrop System (JPADS) Drop Zones</p>	<p>I am disappointed to learn of recent plans by the USAF with respect to Alaskan airspace. The rugged airspace and meteorological challenges in Alaska tends to funnel all users into fairly narrow and predictable patterns. Restricting access to locations critical to transportation and commerce comes at a tremendous cost financially with a corresponding adverse impact to aviation safety (in the area with the greatest challenge with respect to aviation safety in the country). This despite being assured by the USAF five years ago not to be concerned about airspace requirements encroaching upon VFR corridors or low altitude IFR traffic connecting Alaska and Canada. Furthermore, opening up UAV airspace where "see and avoid" is the rule of the day and many of the user aircraft are not equipped with transponders and surveillance radar is not available (below 3,000') is quite frankly unconscionable. I have personally been advised by the USAF that operations such as C17s doing uncharted low level training is OK because "practice airdrops at Ft Rich are necessary since the troops don't get to maintain their currency in the sandbox. You need to be watchful and stay out of their (C17s) way." There is no other place in the country where military aircraft develop "in house" training routes that are not published, not NOTAMED, or otherwise disseminated. I can't believe this practice occurs at Maguire or Travis, but in Alaska you develop in the ready room low level routes between Wasilla and Ft Rich transiting some of the most heavily utilized airspace in the world with large jets doing 250kts (which means overtake of on average 150kts) because it is inconvenient to fly an hour to train? Many of the general aviation aircraft based in the MatSu/Anchorage area are not transponder equipped (not required), not ADS-B equipped, and no window out the back to see if a C-17 is bearing down on them. A squadron Ops Officer told me "too bad, they should have transponders so we can see them on our system." I am a huge supporter of the military and have a fair appreciation of the competing interests you face. I was a tactical aviator for most my 27 years of service. However, I can't help but think this steamroller missed much of the "risk assessment" process required by military aviation doctrine. Alaska is a huge place, why are you demanding the General Aviation community (part 91/135) assume the significant cost and risk associated with this plan?</p>

I0151

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0151	Guy Lopez			All proposed actions	The military should not take additional civilian airspace. It is unnecessary and puts all parties in greater jeopardy.

I0152

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0152	robert wesley	nr.	self	<p>1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 2 - Realistic Live Ordnance Delivery, 3 - Battle Area Complex Restricted Area Addition, 4 - Expansion of R-2205 Restricted Area, 5 - Night Joint Training, 6 - Unmanned Aerial Vehicle (UAV) Access, 7 - Enhanced Access to Ground Maneuver Space Areas, 8 - Tanana Flats Training Area (TFTA) Access Road, 9 - Joint Air-Ground Integration Complex (JAGIC), 10 - Intermediate Staging Bases (ISBs), 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska, 12 - Joint Precision Airdrop System (JPADS) Drop Zones</p>	<p>* The proposed Fox 3 MOA additions extend laterally and vertically in to an area of Alaska highly used by the general public for business and recreation, due to its close proximity to major population centers of the MatSu Valley, Anchorage and Fairbanks. Lowering the ceiling to 5000ft increases the probability of mid-air collisions for commercial pilots conducting tour activities and general aviation pilots engaging in hunting, mining, recreation or other activities.</p> <p>* The low-altitude portion of the proposed Paxon MOA includes a major VFR route connecting northern Alaska with the south central and eastern regions of the state. Other portions of this proposed MOA are used for mining and recreation. Confining VFR traffic to corridors through this area concentrates traffic, potentially creating an unsafe condition for civil aviation. This area is not conducive for a low altitude MOA.</p> <p>* Under current FAA rules, active MOAs block access by IFR aircraft, other than emergency and life-guard flights. This lack of access limits economic viability and reduces safety to pilots and the public in the communities that our underneath or near this airspace. Establishing MOAs that block IFR airways is directly counter to the work done by the FAA in recent years to increase IFR access with GPS approaches and airways. No new MOAs should be approved that block IFR airways until the FAA and military have developed procedures to allow IFR access to civil aircraft.</p> <p>* The military constructed the Battle Area Complex south east of Delta Junction knowing that this area is important to civil aviation to access Isabel Pass. No restricted airspace should be established over this complex.</p> <p>* Restricted areas west of Delta (2202 and 2211) already limit access between Delta, Fairbanks and the Richardson Highway corridor. We oppose alternatives that completely connect these existing restricted areas, and further block access for mining, hunting and recreation.</p> <p>* Allowing Unmanned Aerial Vehicles (UAV's) to transit between Ft. Wainwright, Eielson and Ft. Greely and the restricted areas where they conduct training limits access, potentially creating a safety hazard for civil aircraft operating to and from Fairbanks, Delta and the Richardson Highway corridor. No segregated airspace should be established in these areas.</p> <p>* The recently proposed relocation of the F-16's from Eielson AFB to IBER appears to have a direct impact on the airspace and airports in Anchorage and the Mat Su Valley. This needs to be quantified and addressed as part of the cumulative impact of the Draft EIS.</p> <p>* Existing MOAs including Susitna, Stony, Naknek and Galena, are not addressed. They should be studied to see if they fit the purpose and need of the JPARC mission.</p>

I0153

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0153	John Parrott			Description of Proposed Actions and Alternatives (DOPAA), All proposed actions	<p>I am a 20 year USAF aviator who spent 2 of those years flying in AK and now live here to enjoy all this state has to offer including a robust aviation culture. I am an ardent supporter of the military as well as the general aviation community. I fully understand the need for adequate training airspace. Having attended one of the public presentations concerning the JPARC EIS I must admit I had many unanswered questions that I felt should have been addressed. How is the current airspace inadequate? Is it too small, too far away or otherwise unsuitable? If it is not going to support the future training needs, will it be removed from military use? If existing airspace isn't useful it shouldn't be kept for military use and should be returned to the NAS. Restricting IFR traffic into and out of FAI should not be pursued. Attempting to make the argument that the training airspace needs to be near the control complex is silly while the air war Afghanistan can be controlled from the US. UAS integration into the NAS remains a challenge. See and avoid is not practical and there does not appear to be a plan that will make "sense and avoid" a reality. All in all, JPARC looks like a great greenfield concept that DOD is attempting to impose on a brownfield without taking into account the negative impacts to the existing users. Offering to pursue funding or study possible mitigation appears to be paying lip service to the existing users. I think there are viable solutions and am disappointed that something more tangible has not been developed.</p> <p>Regards, John Parrott, USAF [REDACTED]</p>

I0154

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0154	Chris Hodel			1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	While most of us welcome the military in Alaska and don't mind sharing the air with military aircraft, the proposed expansion of the MOA and possible expansion of activity beyond established flight routes around Anchorage is disturbing. Civilian aircraft must have room to operate, especially in MVFR conditions and any change to current MOAs and flight rights could prove dangerous. Please reconsider your plans and give serious consideration to the needs of Alaskan general aviation. Thank you, Chris Hodel

I0155

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0155	Chris Catalone	Owner/ Chief Instructor	Fairbanks Flight Train	General (to the EIS), Safety (Airspace), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 4 - Expansion of R-2205 Restricted Area, 6 - Unmanned Aerial Vehicle (UAV) Access	Numerous flights Fairbanks vor direct Gulkana then direct Valdez or Cordova or Mc Carthy over 35 years have convinced me the ability to pick up a IFR clearance enroute (or file IFR) must be there!! Without that you will be endangering many flights trying to maintain VFR in rapidly changing weather over the Alaska Range. I know that a clearance is not available in a MOA. You will be causing accidents and fatalities. Do your MOA stuff further north in less busy Airspace. Chris Catalone ATP, CFII, MEI, SES over 20,000 hours Alaska time

I0156

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0156	Robert Gastrock			Cumulative Impacts, Airspace Management, Safety (Airspace), Infrastructure and Transportation, All proposed actions	<p>As a military, general aviation, and commercial pilot who has resided in Alaska and flown throughout the state since 1968, I feel qualified to comment on the proposed alteration and expansion of JPARC military training areas. As a retired military pilot with many years and thousands of hours flying C-130s in a tactical airlift role, I understand and acknowledge the need for effective training areas for military aircrew. Some realistic conditions can never be replicated by simulators, and Alaska offers unique geographic and topographic venues that cannot be duplicated elsewhere. As a private and commercial pilot with much experience in Part 91, 121, and 135 operations, I also understand the impact created by MOAs and other Special Use Airspace. These areas can impose significant challenges for pilots and operators seeking efficiency and safety in their flight operations. As an aviation safety professional with experience as both an Air Force Safety Officer and Program Manager for the Medallion Foundation, I am quite concerned that the JPARC proposal would expand the "reach" of designated military training areas to the detriment of the civilian aviation community, both commercial and private. Moreover, it would impinge on aviation safety as civilian aviators would be pressed into operating with much more restriction, especially in key corridors such as along the Richardson Highway. Given the challenges of Alaska's often harsh weather and terrain, additional constraints imposed by artificial vertical and horizontal boundaries associated with MOAs and Restricted Areas create real threats to safe flying. While there may be a valid need for tactical training areas for new generation aircraft in both high and low altitude environments, the size and scope of those reservations must be kept to a minimum. They must be located to maximize de-confliction with other airspace users and, to the maximum extent practicable, have designated corridors or "floors" that permit safe transit by civilian aviators. Respectfully submitted, Robert C. Gastrock</p>

10157

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10157	allen barrette			<p>General (to the EIS), Description of Proposed Actions and Alternatives (DOPAA), Cumulative Impacts, Land Use, Socioeconomics, Subsistence, 2 - Realistic Live Ordinance Delivery</p>	<p>Allen F. Barrette 380 Peger Rd. Fairbanks, AK. 99709 907-452-6047 Re: Realistic Live Ordinance Delivery (Blair Lakes and Donnelly Training Area) My comments are pertaining to the State land in Proposal 2, Realistic Live Ordinance Delivery Area, proposed restricted area. I do not support any restriction to access to State lands and or closing of State land to Alaskans to further training of our valued Armed Forces. Alaska has very well written and interruption through the Alaskan Supreme Court a Constitution. The Alaskan Constitution Article 8, the Natural Resource article grants Alaskans many protections and guarantees. Sections 1-4, and 13, 14, and 16 point out my concerns and you should be aware of them. I also don't believe the EIS addressed the economical and recreational value of the possible 305,000 acres of State land that could have access restrictions levied on it. This area is highly valued and used by many Alaskans to gather their wild food resources on annual bases. Even though the EIS made note of State or private airstrips, it did not consider the many Super Cub type airstrips that are used (these are not noted on any maps, but they exist) The same is true of many traditional hunt camps. I did not see in the EIS the possible loss of income from all the guides that are registered to provide guided hunts for this area. With only a minimum of 2 week notice for exercises, how does one book guided hunts, and fulfill contracts with clients if they cannot be in the field? What about air transporters. How will the anticipated 90 to 150 days use by the military effect their businesses? The same could be asked of the miners. Trapper is this area will also be economically affected. If trappers are restricted from being in the area the result could be loss of reasonable opportunity to harvest furbearers, loss of furbearers being in the trap to long, furbearers having to be in traps long than what is reasonably expected. Maintaining a trap line has social, moral and ethical components to it also. Note: Trapping season is November – April. Even though this is not a State designated Subsistence area (by definition) many Alaskans use it as such, they treat the wild food they gather as a necessity for life.</p> <p>The 305,000 acres and predicted 90 to 150 days of use by the military would have a great impact on those who rely on those resources. Moose in this area are managed under State intensive Management (IM) practices. This means "high levels of human harvest" restricting this area at any time during September-November would impact the IM plan. Sheep, caribou, bears are not designated as IM, but many Alaskans do pursue them as a valuable wild food source and some consider them as somewhat of a trophy. The taking of sheep and caribou happens August through September. Black bears have a "no closed" season but the majority of the bears are harvested during the months of June and August and September.</p>

I0157

I0157
Grizzly bears are harvested in the months May and April, and the gain in September till they go into the den sometime mid to late October. So it is very hard for me to see how Alaskan could co-exist with this current proposal on State land, and not impact us greatly. To put in some sort of perspective Alaska only has control of 33% of land within the State. You the Federal Government have the rest. NOTES: I find it somewhat odd that the U.S. Military's EIS on aircraft noise has little effect on game population and their movements. Also that aircraft noise does not affect the values of a person's wilderness experience. Yet the National Park Service, Bureau of Land Management, National Petroleum Reserve-Alaska, National Wildlife Refuge and the National Forest and Conservation Areas all say and have made policies or regulations or are in the process of doing so, to make restrictions on aircraft use with in their jurisdictions. Who is correct about aircraft noise, and how it affects game and wilderness values? Is the State of Alaska and the JPARC EIS correct, or are all the other Federal Agency correct? RECOMMENDATION: Is to not allow any live ordnance release over State controlled land that would restrict access to those lands. Thank you for allowing me comment. Al Barrette

I0158

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0158	John P. Cook	Dr.	n/a	General (to the EIS), Cultural Resources	<p>I am a retired professional archeologist with considerable experience in Alaska. This is a long and detailed DEIS and incorporates a great deal of information; unfortunately it is not particularly good regarding the treatment of cultural resources. This probably is directly due to the fact that the lead cultural resource writer is unknown to any archeologist in Alaska and has, obviously, little personal knowledge of our archeology. Some more specific comments follow:</p> <p>3.1 FOX 3 MOA EXPANSION AND NEW PAXON MOA (DEFINITIVE)</p> <ol style="list-style-type: none"> 1. "No new construction would be associated with this action." But construction access for the trailers is ground disturbing and, therefore, potentially destructive of archeological sites. 2. only the "records of the National Register of Historic Places (National Register) and National Historic Landmarks (NHL)." Is not adequate; there are a large number of unregistered sites within this large expanse of Alaska. 3. "Archeological sites under existing training airspace include Native burial grounds, village and settlement sites, and historic mining sites" No one knows where the "burial grounds" are or even if there are any; the same for "village and settlement sites". This is an example of the lack of knowledge of Alaskan Native settlement patterns. 4. The lack of registered properties is directly related to the lack of military activity and recognition of the sites within their jurisdiction. There may (probably are) many such eligible properties. 5. "There are no Alaska Native tribes within this area" but the "tribes" did not have prescribed territories and there was considerable use of this area for hunting and trading. 6. "Impacts on traditional resources under airspace can include the noise and visual effects of aircraft overflights on rituals and ceremonies" This is nonsense. There are no rituals and ceremonies in these areas, except, perhaps, in the villages. Again, a complete lack of knowledge about the Alaskan situation. 7. "Scientific studies of the effects of noise and vibration on historic properties have considered potential impacts on historic buildings, prehistoric structures, archaeological cave/shelter sites, and rock art." There have been no such studies in Alaska; in addition, there are no "cave/shelter sites" or "rock art" in the area considered. This is an unnecessary comment and is plain stupid. 8. "The potential for traditional resources in the area was identified using..." consulted agencies, plans, maps, and staff." This did not include any knowledgeable persons of professional stature. The agencies, etc. are not sufficient to establish the potential of cultural resources.

I0158

9. Aircraft noise—a common factor in this DEIS—is ridiculous when applied to archeological remains and almost so when directed at other historic properties.
10. “Consultation with potentially affected Alaska Native tribes...” is laughable. There has certainly been no meaningful such consultation.
11. However, overall, I agree there will probably be “no significant impacts”; more likely—NO impacts of any sort from this particular action, except for the potential trailer construction.
- 3.2. REALISTIC LIVE ORDNANCE DELIVERY (DEFINITIVE)
1. Tanana Flats Training Area: 134 sites have not been evaluated. The land area in northeast DTA in TA 544 and in southwest DTA in TA 533 for the two proposed new target areas has not been surveyed for archaeological resources.
 2. line 31. No such term as “flakestone” in Alaskan archeology
 3. “Archaeological sites under training airspace include Native burial grounds, village and settlement sites...” and historic mining sites” Considering the lack of investigation by any military agency, this is not true. It may be, but considering Native settlement patterns, it is unlikely that any village and/or settlement sites are in the ROI(except for short lived hunting camps). “Burial grounds” are, to begin with, a complete misunderstanding of Native burial practices, as well as completely unknown as to locations.
 4. Noise—again
 5. “ALCOM has completed government-to-government consultation with potentially affected Federally recognized tribes, regarding their concerns about potential impacts on Tribal rights...” This has not been properly pursued; a letter was simply sent out; no real consultation was completed.
- 3.3 BATTLE AREA COMPLEX RESTRICTED AREA (DEFINITIVE)
1. Helicopter training” implies the use of ground cleared spaces—usually by bulldozer—destroying any potential cultural sites. “70 percent of the USARAK helicopter operations” The helicopter pad at the Oklahoma range destroyed what was certainly a Register-eligible archeological site. Similar pads at Clear Creek Buttes involve archeological sites.
 2. I have been on the ground within BAX and there are a number of archeological sites that have not been fully evaluated.
 3. “Archaeological sites under training airspace include native burial grounds, village and settlement sites, and historic mining sites” and “include structures relating to gold mining, trapping, or the railroad” within the BAX area, none of this is true, except maybe, for trapping and gold prospecting. Again, a total lack of knowledge.
 4. “One hundred-thirty sites are located within the original boundaries of the BAX SDZ (not all sites are eligible for the National Register).” Because they haven’t been evaluated.
 5. “Rapids Roadhouse, also known as Black Rapids Roadhouse, in Delta.” It is NOT in Delta

I0158

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<p>I0158</p>	<p>6. "ALCOM has completed government-to-government consultation with potentially affected Federally recognized tribes, regarding their concerns about potential impacts on Tribal rights, Tribal resources or Indian land under the proposed new restricted area." Not in any meaningful way. Several Native leaders and others visited the excavation of a site within the BAX area, indicating a more than superficial interest.</p> <p>7. "Army is consulting with the Alaska SHPO and potentially affected Alaska Native tribes, ANCSA corporations, and tribal government entities" but not knowledgeable cultural resource specialists within the State.</p> <p>3.4 EXPAND RESTRICTED AREA R-2205, INCLUDING THE DIGITAL MULTI-PURPOSE TRAINING RANGE (DEFINITIVE)</p> <p>1. "this action...involves no ground-disturbing construction." But it also says "other than surficial ground disturbance associated with ground maneuvers of vehicles." It is exactly this vehicular traffic that is potentially destructive to shallow deposits of archeological value.</p> <p>2. It is interesting that some of the oldest and most productive archeological sites in interior Alaska are located immediately adjacent to YTA (Broken Mammoth, Mead, and Swan Point sites). This should make YTA much more sensitive to cultural resource possibilities than is presently the case.</p> <p>3. Statements regarding noise impacts and Native consultation have been commented upon (and condemned) previously. Programmatic Actions "Prior to implementation of any element of this proposed action, the Army would comply with NHPA Section 106, including identification of historic properties, and assessment and resolution of adverse effects" As long as this is done, there is no present need for comment. The "obsession" with noise impacts on cultural resources is stupid.</p> <p>Appendix H. Cultural Resources The list of references(N=2) is laughable. I can only assume that this Appendix has not been finished.</p>

I0159

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0159	William Theuer	citizen	wrtheuer.co	Purpose/Need, 9 - Joint Air- Ground Integration Complex (JAGIC)	"No Place Else in America" provides the infrastructure and key resources that are available in Alaska. It is among the reasons I support the continued use, renewal and enhancement of our training location and resources. I especially am pleased to learn of the interest in upgrade and priority of technology and cyber component training. I will look forward to the new alignment and utilization of Alaska as a primary training location in the Pacific. very cordially yours, William Theuer Anchorage, Alaska

I0160

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0160	Ward Hurlburt IV	Owner	Forward Services	Purpose/Need, All resource areas, Safety (Airspace), All proposed actions	I recognize you are here to protect us, and need the practice. You already have far more than enough room in our great State of Alaska. Please don't Federalize even more. Years ago I was flying ANC to FAJ, came over a ridge before the flats headed north into FAJ, and found myself head on with an A10. I jinked to the right, and found myself head on with another A10. If you grab more airspace you will be causing that sort of incident to happen even more between us civilians or civilian on military. By the time you kill a few civilians, you will have lost quite a bit of goodwill you now enjoy in our great State. Your airspace grab is just not worth even one civilian life. Years ago I also watched F4's scorch the tundra, and caribou tails, out in the Naknek MOA. You can still do that with the space you have!

I0161

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0161	Mark Strabel			General (to the EIS), Airspace Management, Noise, Safety (Ground), Physical Resources, Land Use, Infrastructure and Transportation, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	I am against the use of the Air Space around the Paxson area, due to the affects it will cause in the Hunting and recreational use of this area. As a side note: Last fall, 2 Air Force jets, along with another Air force cargo plane were flying well below 500ft above ground level, and moved the moose that were in the area that I was hunting in. details, I'm sure can be verified by the Air Force, it was Labor Day week in the West Fork of the MaClearn River.

I0162

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0162	marvin peterson			General (to the EIS), Airspace Management, Noise, Safety (Airspace), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	JPARCS is not good for the MatSu valley. There is already a lot of air traffic in the entire region. The triangle between Anchorage, Fairbanks and Tok is a very busy place for low-level general aviation. The additional low level maneuvering can only increase the risks and when the speeds are factored in, the multiplied chances for a mid-air are increased by a tremendous amount. If these areas are closed for low-level hi-speed military training the negative impact on local use will be substantial. I am an ardent supporter of the military as I have worked in the military or for the military for 40 years. However, there are other options for the military training area. Areas where the local air transport for training, commuting, recreational flying, hunting, fishing and myriad other uses of the airspace are not nearly as busy or widespread. The local wildlife will also undoubtedly be affected in a negative way by the noise and low-level activity of military training. Please reconsider this proposal and relocate the training area to a less densely populated area. The safety and livelihoods of too many Alaskans and tourists to our beautiful region will be adversely affected by the current proposal. Thank you Marvin Peterson Willow, AK

I0163

June 24, 2012



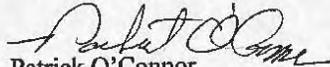
ALCOM Public Affairs
9480 Pease Ave. , Suite 120
JBER, AK 99506

To Whom It may Concern:

My family and I strongly oppose the taking of our recreational lands on the highway system for Military training for aircraft . The Federal Government already has control of vast amounts of lands in Alaska and will not let the public use a big percentage of it.

I am not against the military but, let the public have some land to play on too.

Sincerely,


Patrick O'Connor

I0164

From: Barbara Cellarius [REDACTED] on behalf of Barbara Cellarius
Sent: Friday, June 29, 2012 1:12 AM
To: ALCOM J08 Admin Box
Subject: JPARC EIS Comments

(Please find below my comments on the JPARC EIS. I tried to submit them via the website, but received a phone message that there was a problem with my submission. If you could acknowledge that you received my comments this time, I would appreciate it.)

Dear ALCOM Public Affairs:

This letter concerns the proposed Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA as analyzed in the Joint Pacific Alaska Range Complex Modernization and Enhancement Environmental Impact Statement (JPARC EIS). With regard to these areas, I support the no action alternative. The proposed actions will negatively impact many residents of Alaska, including but not limited to those living in rural communities in the area. The subsistence impact analysis is seriously flawed and consequently the EIS fails to accurately describe or assess the impact that the proposed actions will have on residents of many rural communities that rely on resources in the Fox 3 MOA (including the proposed expansion) and the proposed Paxon MOA. The mitigation measures proposed for the action alternatives are inadequate and would need to be enhanced if you move forward with an action alternative.

Another reason to reconsider the expansion of the Fox 3 MOA and creation of the Paxon MOA is the ongoing problems with F-22s, which account for a significant number of the proposed flights. Safety issues with these planes need to be resolved before plans are made for expanding their use in military training exercises.

The subsistence analysis for the Fox 3 MOA Expansion and New Paxon MOA is seriously flawed in three substantive areas and should be thoroughly revised before any decision is made to move forward with an action alternative.

First, limiting the subsistence analysis to eight communities within 20 miles of the MOAs does not accurately represent patterns of resource use and distribution in the Nelchina Basin/Copper Basin area. Many communities beyond those addressed in the analysis rely on resources in the impacted areas and consequently will be negatively impacted by the proposed actions. Resources are spread across the local landscape, and we go to where the resources are. Sometimes that means driving more than 20 miles. For example, I live in Copper Center, one of the rural communities excluded from the analysis, and I pick blueberries every year in the proposed Paxon MOA. I do so because I haven't found a good blueberry patch closer to home. Several of my friends similarly live in communities not included in the analysis, such as Tazlina and Kenny Lake, but hunt caribou in the impact area. Instead of the handful of communities included in the current analysis, the analysis should be expanded to all those communities with a positive customary and traditional use determination (C&T) for moose, caribou or both on lands within Game Management Unit 13 (and any other GMUs that fall within the Fox and Paxon MOAs) under the Federal Subsistence Program. In contrast to the seemingly arbitrary 20 nautical mile rule, customary and traditional use determinations are based on an analysis of all available data regarding patterns of resource use. In what follows, the phrase "potentially affected rural communities" refers to the communities that have C&T for moose or caribou in the MOAs.

Second, twenty plus year old community harvest data is woefully inadequate for making decisions that affect people's livelihoods. (It is clear that your "most representative year" is actually the most recent year for which comprehensive subsistence survey data are available.) As an example, when the community harvest studies were done in the 1980s, local residents could hunt caribou in Unit 11, but now that area is closed to caribou hunting due to conservation concerns and they must now travel to the area of the Fox and Paxon MOAs if they want to hunt caribou. JPARC should follow the lead of the Alaska Gas Pipeline Project and base its analysis on

I0164

updated comprehensive community subsistence data, providing funding to support updated surveys where needed and waiting for the new data where updated surveys are already underway. (The Susitna-Watana Hydroelectric Project is similarly considering the need to conduct updated comprehensive subsistence surveys as part of its planning process.) As a first step, the list of potentially affected rural communities (as discussed above) should be examined in terms of when the most recent comprehensive harvest survey took place and whether an update is scheduled in the next year or two. For those potentially affected rural communities that are five or more years out from the most recent update and not on the list for an update, funding should be provided to the Alaska Department of Fish and Game Subsistence Division or a similarly qualified independent organization to collect this information. A decision on the project should be delayed until up-to-date subsistence information is available for all of the potentially affected rural communities, to allow it to be incorporated into the subsistence impact analysis.

Third, limiting the communities with high dependence on subsistence to only those with majority Alaska Native populations is problematic and fails to recognize the importance of subsistence to other local residents. While it is appropriate for predominately Alaska Native communities to fall in the "high dependence" category, there are other rural communities in the area that should also be classified as such. Once up-to-date information is obtained regarding the harvest and use of subsistence resources (as described in the previous paragraph), this question should be revisited for all the potentially affected rural communities. Communities where more than about 80 percent of the households report using subsistence resources should be classified as high dependence regardless of the community's composition.

In the event that an action alternative is selected, the mitigation measures for the proposed expanded Fox 3 and new Paxon MOA need to be expanded beyond those listed in the EIS in order to lessen the significant impacts that these alternatives will have on subsistence activities and resources.

The proposed period for no military flights is not adequate. Short seasons and unpredictable availability of resources in accessible areas mean that it is not realistic to ask local residents to schedule their subsistence activities at times when military activities are not occurring. Instead, military activities need to be scheduled at times that do not conflict with subsistence activities in order to avoid a significant impact on subsistence. Berry picking is an important activity that occurs within late July and August, while moose and caribou seasons in Unit 13 also start in early August. March is another important time for hunting caribou for local residents. There should be no military flying exercises during August, September, and March. In addition, in May, June, July and October, the minimum flight level should be 5,000 AGL to avoid conflicts with general aviation aircraft and subsistence activities during the summer recreation and fall hunting seasons. These restrictions should apply to all branches of the military because it doesn't matter to the wildlife who is flying the plane.

Holding a few community meetings is not adequate to monitor the impact of the proposed activities on subsistence. Another round of comprehensive community harvest assessments should be done approximately five years out, with funding from the federal agencies involved in JPARC, and compared to the information that is currently being collected. Funding should also be provided for surveys to monitor the impacts to wildlife resources. This monitoring could be done in cooperation with federally recognized tribes and other Alaska Native organizations.

The list of communities notified about and consulted with regarding the proposed activities should be expanded to include all those with a positive customary and traditional use determination through the Federal Subsistence Program for moose, caribou, or both, in Game Management Unit 13 and any other GMUs that overlap with the MOAs. For those communities with federally recognized tribal governments, the consultation should occur on a government to government basis.

Thank you for the opportunity to comment.

Sincerely,

I0164

Barbara Cellarius
[REDACTED]

June 2012

Barbara Cellarius
[REDACTED]

I0165

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0165	Michael Koskovich	Captain Boeing 747-400	Atlas Air	Cumulative Impacts, All resource areas, Airspace Management, Noise, Safety (Airspace), Land Use, All proposed actions	I very strongly feel that you should NOT extend these MOA's into area's that have road access. There is very limited road access in Alaska. You propose to incringe upon public domain that is used by many citizens for hunting, fishing, snowmachine activity, trapping, mining, and other recreational activity. There already exists, thousands of square miles of MOA's that are under utilized. These areas (Stony, Galena, Naknek) have no road access, and are far more suitable for your requirements with significantly less impact on the general populace. As a professional pilot, a recreational pilot and a long time Alaskan, I STRONGLY OBJECT TO THIS PROPOSITION! I know many people in this state, and thus far know of NOT ONE that approves. Michael J. Koskovich

I0166

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0166	Doyle Ruff			General (to the EIS), Cumulative Impacts, Airspace Management, Safety (Airspace), Socioeconomics, All proposed actions, 1 – Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 3 – Battle Area Complex Restricted Area Addition, 4 - Expansion of R-2205 Restricted Area	The thinking of the USAF leadership for the JPARC proposal is nonsensical. The USAF does not need the expansion under this proposal OR to gain any approval that would force non-military and non-emergency aircraft to a maximum 500' AGL restriction throughout said expansion area. The State of Alaska has dire dependency upon civil aviation, both IFR and VFR, throughout the entire state. The State of Alaska, aviation-wise, is about the civil AND the military side. It is not just about the USAF side. The USAF must compromise on this proposal to an alternative that is acceptable to Alaska civil aviation including the AOPA and Alaska Airmen's Association. Doyle C. Ruff Colonel, USAF (Ret) Former Commander Eielson AFB

I0167

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0167	George Hobson			Safety (Airspace), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 3 - Battle Area Complex Restricted Area Addition , 6 - Unmanned Aerial Vehicle (UAV) Access	The lowering of the MOA floor to 500ft. in an area where there is heavy use of general aviation is a big hazard. If there was a continued radio channel like around FAI this would help but not eliminate it because not all small planes have radios. Restrictions around Delta and Isabel Pass are already a problem in poorer weather. Farther restrictions would effectibely close the pass most of the time. Allowing UAVs in the crowded airspace around FAI before the FAA comes up with rules of operation and see and be seen is a midair waiting to happen. Please hold off on this till the rules are set or move it all to the Delta controlled area.

10168

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10168	Gary Wegner	Airman Second Class	None	General (to the EIS), Airspace Management, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 6 - Unmanned Aerial Vehicle (UAV) Access	<p>The proposed expansion of the Fox 3 MOA intrudes both laterally and vertically in to an area of Alaska highly used by the general public. Expanding a MOA to within 30 miles of Alaska's fastest growing populace is precarious. The Mat-Su Valley is home to over 230 landing areas and to over 2,000 of Alaska's general aviation pilots. The Lake Louise recreation area is one of the most frequented destinations for all Alaskan's who enjoy hunting, fishing, hiking, boating but most importantly for the quiet and pristine outdoor experience. Military aircraft traveling in excess of 500kts and/or 500' would not only endanger civil aviation traffic but destroy Alaska's quintessence. The same argument applies to the Paxson MOA Low Altitude proposal. This area is a major VFR route connecting northern Alaska with the south central and eastern regions of the state. Variable weather in this area eliminates the discussion of corridors that would create congested, unsafe situations for aviation traffic. MOA's today prohibit IFR access by civilian aircraft during exercises. This not only affects the economic viability of communities with and outside of these areas but history shows it has been difficult even obtaining access during emergency situations. This results in an even bigger concern: the loss of safety for VFR operators who are being encouraged to use low-level civil corridors. If larger, IFR capable aircraft are forced to use the VFR corridor during these exercises, this puts these larger, faster aircraft on the same flight path as our smaller general aviation aircraft at low altitude, which is a loss of safety for all civil operators. We oppose any additional airspace that hinders IFR traffic and the negatively impacts our communities. Five years ago the Alaska Airmen participated in an EIS process that resulted in the building of the Battle Area Complex south of Delta Junction. One of the concerns at the time was the possibility of restricted air space over the complex. We were assured that this would never be a requirement. Our position has not changed even though the military's planned use of airborne weapons release has changed. We oppose restricted airspace over an area where weather, terrain, and mountain passes creates a challenging and potentially unsafe situation.</p> <p>The proposals to establish more restricted airspace for live ordnance delivery further impacts the Fairbanks, Delta Junction areas and north even more. Again, the areas affected are accessed by Alaskans utilizing these areas for mining, hunting and recreation. Existing restricted areas already have a negative impact to civilian communities. We understand Unmanned Aerial Vehicles are the future and that the military would like to integrate these into their training.</p>

I0168

Corridors allowing UAV's to access training areas is an enormous safety concern. Currently the National Airspace System does not have a mechanism that allows UAV's to harmoniously fly and communicate in the same airspace as civil aircraft. Until true sense and avoid capability is defined and developed we need to side with safety and oppose these corridors as proposed. Alaska already has one of the largest areas of airspace in the world secured for training. The Alaska Airmen's Association supports our military and understands the need for training; however we are concerned for other users of this airspace. Through the scoping and public meetings it was explained that the military needed such low altitudes and expanded areas in order to train for existing and future threats to the 5th generation fighters and to train with new weapons systems. It was also stated that this redesign was based on saving transient time and fuel to reach the training areas. While not part of this proposal, we ask the military to look at all Alaska airspace they currently hold and release airspace that is not being effectively utilized. We also question the reasoning and claims for the proposed F-16 move to JBER as they seem to contradict the motives of the JPARC redesign. We do know that improved and consistent communication that includes real-time information for pilots sharing this airspace needs to occur. Implementing a state-wide Special Use Airspace Information Systems (SUAIS) as well as improving the existing service are essential to operating an airspace complex of this size. Radio coverage and communication remains unreliable in the eastern areas of the current complex. Beside improvements to the current program, we would like alternatives to be explored for communicating the status of the MOA's improving access in the ranges for civil aircraft when not in use. We ask that the floor of current and proposed airspace be determined based on communication coverage for SUAIS.

10169

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10169	Maureen Chambrone			General (to the EIS), Purpose/Need, Cultural Resources, All proposed actions	<p>I have lived in Alaska for 16 years, based primarily out of the Susitna Valley and the Fairbanks area. I am for ABSOLUTELY NO ACTION on ALL of these proposals. We do not need to enhance and modernize the military; if anything, we need to decrease the current military activity which is already too extreme. With a faltering economy, huge national debt, and dwindling resources (e.g. oil) we cannot support the excessive, expensive behavior of the U.S. military. Alaskans need to protect this last frontier we have from further bombardment of excess military activity. Alaska has a special place in Americans' hearts as a last vestige of wilderness, wildlife, and a wild spirit that has gone extinct in the rest of the nation. Alaska is a last vestige of remote wilderness. Wilderness includes air and sound space. Further expansion of military activity does not support the wilderness spirit.. The United States military is a cancer that is rapidly sickening our nation, not to mention many other nations such as Iraq and Afghanistan. The military exists only for itself and the mega-corporations that make and sell the weapons, planes, helicopters, tanks, drones, and all the other equipment. It has failed to look out for the American people, to serve as a protector from other potentially aggressive nations. Instead, the U.S. military is beating its chest at the rest of the world and stirring up aggression and further threatening the peace of our own nation, not to mention the peace of the world. Where is this so called advanced weaponry getting us besides making complete fools out of ourselves. The U.S. military drags out every mission they set out to accomplish, kill more innocent people than guilty, make us look as bad, if not worse, than the bad guys we're trying to eliminate. It didn't take an F22 and other modern, enhanced technology to find Saddam Hussein or Osama bin Ladin. It took intelligent courageous men to find them, sneak up on them and arrest or kill them. If the U.S. military wants to increase training and create stressful scenarios for potential wars, then they should get the men off their butts, tear them away from their computer and radar screens, yank them out of their cockpits and plop them down in the middle of the wilderness living with minimal technology and using their senses and working together to become tough courageous men ready to face the potential challenge of other threatening nations and people.</p> <p>Alaska is a prime place for this kind of training, especially joint training. Groups of army, air force, and navy men on their feet traveling through the wilderness working together to solve problems and find the hidden imaginary enemy in a cold dark canyon or in a cave in the mountains. Most of our real life enemies (e.g. Osama bin Ladin) are on the ground using their brains to elude us, not in an F22 like the role playing Red Flag Alaska games. I propose an alternative not listed here. It would save vast amounts of tax payers money. Park all the F22s, F16s, drones, and other technology, but leave just enough in training for defending our country.</p>

I0169

Get the men training jointly on their feet, trekking through swamps and up mountains, create scenarios where men learn to sneak up on enemies, teach them diplomacy, how to defend themselves in hand to hand combat, teach them to use their senses rather than rely on technology, teach them to only kill when absolutely necessary. Maybe then they could tell the difference between innocent civilians and the actual bad guys. They can't do it up in the sky screaming along at hundreds of miles an hour. There's already plenty of technology. The U.S. military should use what it has already wasted taxpayers' money on and not act like a spoiled rich kid having to have the latest newest toy. We can save resources and money by just sticking with what we have. What other countries have this kind of technology? Iraq and Afghanistan sure don't but our technology sure didn't just win the war. Those countries, and the terrorists, use creativity to hold their own against us. As all of the long drawn out wars of the 20th and 21st century have proven (e.g. Vietnam, Iraq, and Afghanistan), more modern enhanced technology never allowed this nation to go in and get the mission accomplished in a short time. With our supreme technology we've just made complete fools out of ourselves. What's missing from this EIS is the effect modernization and the military, in general, have on the spirit of Alaska. This is extremely important. Our airspace should not just be a free for all. You can't have wilderness and so called wild and free rivers on the ground and not include the airspace. Fighter jets flying over the wilderness can completely ruin a person's experience on the ground and affect their sanity. I know from first hand experience being right under the flight path for all fighter jets leaving Eielson. We're down on the ground just living a peaceful life while the aggressive military is training to provoke other nations. Our peace is affected in two ways. In the long term from other countries disgruntled by our cocky country and, immediately, from all the noise. The noise from these jets is excruciating. The stress is intense; it strains relationships. Our quality of life is diminished. We need to promote peace, not war. Peace is cheaper than war.

Alaskans gave the military an inch during World War II when it was rightly justified for defense. But they've taken it miles ever since and turned this state into an aggressive, offensive training grounds. The growth of the military in Alaska along with resource extraction industries, which the military heavily depends upon, has led to a lower quality community in Fairbanks. The so called economic growth that has resulted also resulted in a decrease of local shops and a huge increase in Box Store counterculture. Most old timers will tell you, and many short timers as well, that this place just isn't what it used to be. There's also too much hunting pressure coming from the military who don't even need the meat and there's too many stories of unethical military hunting behavior.

I0169

I0169

Expansion of the military in general will result in a further expansion of lower valued people and community. The people who came to Alaska to live a simpler way of life away from the stifling congestion and development of the lower '48 are an important part of Alaska's history and culture even though they may be in the minority. Wilderness and subsistence is an important part of this culture. With the death of wilderness comes the death of a lot of people's spirits. MOAS do not equal wilderness. What little bit of uncluttered, minimally encroached environment that this state has left should be left intact for the benefit of future generations. This includes air and sound space. In these days of ridiculous national debt there is no better time to reduce military technology. Stop giving money to the big multinational corporations making the military technology. Stop using up all of our oil and metals (the extraction of which results in further loss of wilderness) to keep making more modern and enhanced military technology. The military is one of the number one consumers of natural resources such as oil. At the rate we're going we will run out of these resources soon enough. Let's stop now, halt the modernizations, quiet Alaska's air space, let the caribou feed in peace, let the people who came to Alaska for wilderness and subsistence opportunities carry on their peaceful activities, and those who peacefully existed here already for thousands of years continue to do so. Please, absolutely NO ACTION on all proposals. Alaska is a prime place for this kind of training, especially joint training. Groups of army, air force, and navy men on their feet traveling through the wilderness working together to solve problems and find the hidden imaginary enemy in a cold dark canyon or in a cave in the mountains. Most of our real life enemies (e.g. Osama bin Ladin) are on the ground using their brains to elude us, not in an F22 like the role playing Red Flag Alaska games. I propose an alternative not listed here. It would save vast amounts of tax payers money. Park all the F22s, F16s, drones, and other technology, but leave just enough in training for defending our country. Get the men training jointly on their feet, trekking through swamps and up mountains, create scenarios where men learn to sneak up on enemies, teach them diplomacy, how to defend themselves in hand to hand combat, teach them to use their senses rather than rely on technology, teach them to only kill when absolutely necessary. Maybe then they could tell the difference between innocent civilians and the actual bad guys. They can't do it up in the sky screaming along at hundreds of miles an hour. There's already plenty of technology. The U.S. military should use what it has already wasted taxpayers' money on and not act like a spoiled rich kid having to have the latest newest toy. We can save resources and money by just sticking with what we have. What other countries have this kind of technology? Iraq and Afghanistan sure don't but our technology sure didn't just win the war.

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I0169

I0169

The military is one of the number one consumers of natural resources such as oil. At the rate we're going we will run out of these resources soon enough. Let's stop now, halt the modernizations, quiet Alaska's air space, let the caribou feed in peace, let the people who came to Alaska for wilderness and subsistence opportunities carry on their peaceful activities, and those who peacefully existed here already for thousands of years continue to do so. Please, absolutely NO ACTION on all proposals.

I0169

I0170

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0170	Becky Schwanke			Cumulative Impacts, Airspace Management, Safety (Airspace), Biological Resources, Land Use, Socioeconomics, Subsistence, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>Thankyou for the opportunity to comment on this DEIS. The review thus far has failed to effectively describe the impact on the incredible number of users in this extremely popular yeararound recreational area. Leaving the Paxon area as is, and leaving the Fox 3 MOA above 5000 ft. is the only viable, realistic, safe option. Saving fuel so that the joint bases can train in the Nelchima-Oshetna-Lake Louise-Gulkana-Paxson-Denali Highway region is absolutely ludicrous and should never have been recognized as a valid rationale for the proposed changes listed in the DEIS. The wildlife resources in this area provide valuable subsistence and socioeconomic opportunities to over 10,000 Alaskan hunters and gatherers each year. The extensive trail system in Game Management Unit 13 is testament to this fact - the EIS must consider this extensive system in order to fully grasp the extent of the summer and fall use. The waterways provide additional summer transportation, as well as snow in winter. The trapping, fishing, and hunting interest in this area is unparalleled in the state, and this area is so popular for the very reason JPARC is interested - it's in the middle of the 2 largest urban areas of the state. Pilots look down and see trees and water, we all look up and see and hear pilots training all year. At this point the existing Fox 3 MOA is compatible with area uses and has no effect on the wildlife resources. With a 500ft ceiling, the aerial wildlife monitoring in this area will be seriously impacted, and without the highest quality data, subsistence opportunities will be curtailed for the sake of conservative management. That's what happens when biologists don't have the best quality data - subsistence harvest opportunities will be cut drastically. The DEIS failed to acknowledge this. The Nelchima Caribou herd as well as moose in the Nelchima-Copper river basins are managed under the state's intensive management law, meaning the harvest must be maximized annually for the benefit of Alaskan subsistence hunters. The state has thus far done an excellent job bringing these populations back up to the point where they can sustain the incredible hunting pressure from Anchorage, the valley, and Fairbanks, among others. Expanding the Fox 3 MOA and establishing a Paxon MOA would have detrimental effects on the monitoring as well as the use of these wildlife resources. While monitoring occurs from May - November (daily or weekly depending on the season), hunting occurs throughout August, September, after October 21st, November-March. There is no avoiding the critical management or harvest periods. There are simply too many people reliant on these resources to risk them by bringing in joint military training missions. Maintaining the safety of our biologists, hunters, and other locals and recreational flyers was sorely missed in the DEIS.</p>

I0170

You obviously are not aware of all the time periods when people are out there flying in small fixed wing aircraft. First thing in the spring March-April there are considerable numbers of people flying out to their recreational cabins. There are also a number of pilots out pursuing furbearers and wolves in the area, and following tracks from a fixed-wing makes these small planes extra vulnerable to impact and wake turbulence from the large fast flying jet aircraft. From April-May pilots are out tracking bears for later pursuit by hunters as well as for biologists attempting population estimates. In May moose and caribou are surveyed for parturition (calving), a very important piece of data for sustainable wildlife management. In June and July the Nelchina Caribou Herd must be counted annually – it is extremely weather dependent and usually occurs from 25 June – 10 July. This count entails using 3-5 small fixed wing aircraft covering the eastern Talkeetna mountain foothills counting caribou all day, followed by a composition flight in a small helicopter. Sheep surveys occur throughout June and July, weather dependent. Hunting starts August 1st for federal moose and caribou hunters, and the caribou hunting season runs through the end of March. Trapping ramps up November and runs through February – many are on snowmachine but many use small aircraft. Recreational snowmachine riding ramps up from February-April, during the same time that biologists are flying snow surveys in small aircraft. There simply is no good time for large numbers of jet aircraft to be flying around in this region at 500 ft. period. You will kill somebody, then it will probably happen again. It could be me – I spend a tremendous amount of my time in small aircraft throughout the Nelchina-Copper River basin yearround. The actual effects on wildlife are yet to be determined regardless of how many short jet-overflight studies the AK military has funded. The short term overflight studies of caribou and sheep during random periods has no bearing on the reality that the proposed 500ft ceiling in these MOAs will cover the calving grounds of the Nelchina Caribou Herd (the heaviest harvest of any Alaskan caribou herd) and substantial Dall's sheep habitat in the eastern Talkeetna and Chulitna Mountains. Overflights for a week or more during training exercises, especially as jets have gotten larger and louder than all past Alaskan overflight studies, will severely curtail the effectiveness of caribou and sheep to graze and evade predation.

I0170

I0170

Caribou and sheep do not like continuous disturbances, read S. Wolfe's M.S. thesis from UAF per the shift of the Central Arctic Caribou Herd following establishment of Prudhoe Bay. That herd was lucky - they had adjacent areas that they could move to that were of equally high quality. The Nelchina Caribou herd has no adjacent high quality habitat to move to. If JPARC training missions occur over their calving areas at 500', we can be guaranteed the Nelchina Herd will abandon their preferred calving range. The reality is this isn't a short 1-2 week period the military can avoid - caribou remain on their calving range for up to 2 months during summer.

When they shift away from this preferred area in the foothills of the Talkeetna mountains, you will see increased mortality on calves just as the Porcupine Herd saw in years they calved adjacent to their preferred calving grounds in the 10-02 area on the north slope. We have a fantastic management program in place for Nelchina Caribou, having harvested over 50,000 caribou from the herd in the last 25 years. The military will not fare well with the weight of destroying the productivity of the Nelchina Caribou Herd on its shoulders. It is not a matter of if this will happen, it's a matter of when, how soon after the jets start training here. If this is the price to pay for training cost savings, I have severely misjudged our Alaskan military. Do the right thing, use Stony River, or develop a different area out west or up north for use for low level mountainous training. This area is already too well developed and sustains a tremendous subsistence and socioeconomic benefit to Alaskans - a lower ceiling in this area is a death sentence to the basin as well as to the first few people that get killed. Sincerely, Becky Schwanke

I0170

I0171

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0171	Michael Raffaeli			General (to the EIS), Purpose/Need, All resource areas, Airspace Management, Noise, Physical Resources, Water Resources, HAZMAT, Biological Resources, Cultural Resources, Land Use, Infrastructure and Transportation, Environmental Justice, Air Quality, All proposed actions	The no action alternative should be chosen. Do not turn Alaska's landscape, the last surviving continuous wild lands in America into a training ground. Wild and Scenic Rivers have been already designated and the power to maintain the qualities of wild lands should be adhered to. Recreation, hiking, canoeing, river rafting, hunting, and fishing are why people come (and stay) in Alaska- these resources need to be maintained and foster pride and patriotism in America. There is not enough oversight in these proposed actions to protect the biological, physical, and cultural resources- clean water, wildlife (especially bird populations and migrations), solitude, quiet, open lands that we as Americans are allowed to access without restrictions from the military- that Alaskans value, that I as an Alaskan value. I do not want to give our military a larger blank admission to ruin America's greatest legacy- our land.

10172

Submittal ID	Commenter	Title	Organization	Topic List	Comment
10172	Miranda Terwilliger			General (to the EIS), Description of Proposed Actions and Alternatives (DOPAA), Cumulative Impacts, Mitigations, All resource areas, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA	<p>Dear ALCOM Public Affairs: This letter concerns the proposed Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA as analyzed in the Joint Pacific Alaska Range Complex Modernization and Enhancement Environmental Impact Statement (JPARC EIS). With regard to these areas, we support the no action alternative. The proposed actions will negatively affect many Alaskans, rural and urban who use this popular area for subsistence and recreation. We feel that the analyses created for this EIS are both flawed and dated. Much of the data does not really include all of the communities impacted by this area - for example we are subsistence berry pickers and caribou/ moose hunters in the area as are many in our community but it, Copper Center, was not included. We also recreate in the area in the summer, enjoying wildlife watching and camping. Such experiences have been badly disrupted by a passing helicopter, we can only imagine the impact of low flying military aircraft. The subsistence data used is particularly appallingly data given the data used in several similar EIS's that are ongoing in the area (the Suisitna Dam and the Alyeska Gas Pipeline Project). These projects paid for the collection of the data that was missing. It seems that the federal government who holds those other projects to such standards should do no less. Friends of ours as far as Fairbanks and Anchorage are active users of the area as well and it is one of the more popular tourist areas. This aspect was not addressed in the EIS. In the event that an action alternative is selected the mitigation measures for the proposed expanded Fox 3 and new Paxon MOA need to be expanded beyond those listed in the EIS to properly address the impacts to subsistence activities and resources as well as wildlife and recreation and a substantial monitoring program needs to be in place to insure that the mitigation measures are successful. In particular we think it is unreasonable for subsistence activities to be adjusted around flight schedules when they involve uncertain and differentially distributed resources. Thank you for the opportunity to comment. Sincerely, Miranda Terwilliger & Todd Stoeberl July 2012</p>

I0173

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0173	Jennifer Raffaeli			General (to the EIS), All resource areas, All proposed actions	Please choose the No Action alternative. There is too much at stake if we open these lands to military training. The benefits do NOT outweigh the potential risks and losses at stake in terms of the value of these lands as natural resources, wildlife habitat, places to enjoy wild and scenic rivers, solitude and freedom. The military does not have an effective means in place to mitigate the impacts that their training exercises would have on these lands and the animals and people that depend on them.

I0174

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0174	Patrick Shier	Owner Member	9295 Tango LLC	General (to the EIS), Airspace Management, Safety (Airspace), 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA, 3 - Battle Area Complex Restricted Area Addition, 4 - Expansion of R-2205 Restricted Area, 6 - Unmanned Aerial Vehicle (UAV) Access.	Thank you for the opportunity to comment. I often fly a private single engine seaplane in proximity to various MOAs as I transit from Southeast Alaska to the interior, between Fairbanks and Glennallen, and west of Anchorage to and from a remote cabin on Telaquana Lake. I appreciate the value of the unique training opportunities presented by the wide open space found in Alaska. I also appreciate the positive economic impact of exercises held in these locations. I would ask the planners to consider raising the floor of areas adjacent to transit areas, mineral developments, and common recreation routes, particularly in the summer months. Raising the floor to something like 2000ft AGL would create less congested VFR corridors, reduce the risk of in flight collisions, and retain safe access to covered locations. Thank you.

I0175

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0175	Brian Napier			General (to the EIS), Noise, Biological Resources, Land Use, Socioeconomics, 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxson MOA	<p>To whom it may concern, I am writing to express that I prefer the no action alternative for the JPARC Modernization and Enhancement EIS. As a resident of the Denali Borough I live, recreate and subsist off of the lands in and adjacent to the proposed JPARC expansion. I am particularly concerned with the Fox MOA and the Paxson MOA proposals. The Bureau of Land Management (BLM) considers the area, included in the Fox and Paxson MOA, "A historic glimpse into the Last Frontier-wilderness in all directions." The BLM also, describes the Tangle Lakes area within the possible Fox MOA expansion, as a place to imagine and appreciate the past, and also a wonderland for outdoor activities. The EIS for the JPARC expansion suggests that the JPARC will not interfere with other agency functions or missions in the lands possibly added in an expansion. I see little in the way of compatibility between a MOA and a Wild and Scenic River, such as the Gulkana River a BLM managed site, even if the sound intrusion will only occur for approximately 60 days. The JPARC EIS is obviously very comprehensive in scope and depth. I appreciate that there is a lot of time and attention that has been paid to this proposed expansion. However, in regards to possible wildlife impacts, such as sheep nurseries, caribou calving grounds, migratory bird breeding grounds and stopover sites, there are no monitoring standards or plans in the EIS for assuring that wildlife are not adversely affected by sound intrusions and increased air traffic. By not having critical indicators, such as mortality and reproductive rates, identified in the EIS there is no immediate accountability by JPARC for changes in wildlife populations in the JPARC expansion. Simply stating that JPARC will avoid calving grounds, sheep nurseries, and bird migratory routes, leaves too much room for interpretation and lack of accountability in the end for negative impacts. Similarly, I have concerns that JPARC has discounted the recreational community and tourism industry that uses the areas in the Fox and Paxson MOA. As stated above, there is little in the way of compatibility in a wildland being considered for heavier military use and destination for outdoor enthusiast, recreational hunters, subsistence users, just to name a few.</p> <p>While the JPARC EIS considered sound and social impacts from sonic booms and sound intrusions, it picks sound levels based on urban areas and seemingly brushes off social impacts as annoyances. Similar to the disappearance of stars from the night sky in urban areas due to light pollution, the disappearance of a wild landscape is closely behind the night sky. A wild soundscape is a precious resource and one many residents and visitors to the State of Alaska experience and should be able to experience on for years to come. I appreciate that the military is attempting to create a more energy efficient and realistic training ground through the JPARC expansion in order to meet operational goals and environmental standards.</p>

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However, the areas identified for heavier training use and other newly added lands are more than just maneuvering grounds. They are wildlands for recreation and rejuvenations a dwindling resource, the world over. The lands proposed for addition to JPARC are important breeding grounds for wildlife, they are peoples homes and subsistence livelihoods. Additionally third behind, commercial fishing and oil and gas industry, tourism is an economic engine for many of the areas included in the Fox and Paxson MOA, including Tangle Lakes, Gulkana Wild and Scenic River, McClaren River to name a few. The dollars spent in the surrounding communities and the communities servicing travel to these destinations greatly benefit and rely on this very important renewable resource. Thank you for your time. Sincerely Brian Napier Denali Borough Resident

I0176

[REDACTED]

From: CANFIELD, MIKAL R MSgt USAF ALCOM JTF AK/J08
Sent: Monday, July 09, 2012 5:29 PM
To: ALCOM J08 Admin Box
Subject: JPARC Comment

Rex Gray, Palmer

[REDACTED]

I am a general aviation and professional pilot in Alaska for 37 years and I have a son who flies in the military in Alaska and I oppose the expansion of the Fox 3 and Paxon MOA due to safety concerns for mid-air hazards with general aviation users. These areas have high-density general aviation traffic. As a professional airline pilot utilizing Alaska's airspace, I'm extremely concerned about the potential hazards of the UAV corridors near Fairbanks. These corridors have the potential to have a significant safety impact on my job as an airline pilot.

I0177

[REDACTED]

From: SMITH, RANDALL A WS-06 USAF PACAF 354 CES/CEOIC
Sent: Friday, June 29, 2012 11:48 AM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS

I and many others have cabins on the Wood River, to get to it I fly from North Pole and skirt around the Blair MOA; I see in the Proposed Action-6 they want to add an Unmanned aircraft training corridor; my question is if this corridor is hot will I have to go around it or under it? If yes to go around it t not under it then I have to fly all the way around Fairbanks and up the Wood River taking more than double/triple the time and fuel. If I can go under it no problem. There are many of us that use this route to get to our cabin and many commercial outfits flying this route to Gold King, mining operations and guided hunting camps. This is a very busy section on a daily basis! The impact on our operations will become very expensive to us and to customers of the commercial folks.

Is there a document that explains what the impact to us would be if this passes?

Randy

[REDACTED]

I0178

[REDACTED]

From: [REDACTED]
Sent: Friday, June 29, 2012 1:38 PM
To: ALCOM J08 Admin Box
Subject: JAPARC-EIS Comments re: proposed expansion of Fox 3 MOA
Attachments: 2nd Letter to oppose JPARC expansion.doc

The attached letter has my comments. I support NO ACTION on the proposed expansion of the Fox 3 MOA. It should remain as it is.

Cathy Teich

I0178


6-29-12

To Whom It May Concern:

RE: Expansion of Joint Pacific Alaska Range Complex
(Fox 3 expansion, the new Paxon MOA, the lowering of
the MOA to 500 feet AGL)

After learning at the public meeting at the Swiss Alaska Inn on May 22, 2012 that you were interested in very specific comments, I would like to add some things to the letter that I submitted that night.

The area that would be affected by the changes if JPARC is expanded would be very specific...it would be THE ENTIRE AREA of Fox 3 MOA because caribou, moose, bear, smaller mammals, waterfowl, migratory birds inhabit the entire area. Caribou are migratory, which means that they move around. They move around through the entire area.

There are countless air taxi operators in the area where this is proposed. Military aircraft flying at 500 feet above ground level would endanger these pilots, their aircrafts, and their passengers. The speed at which military aircraft fly would be a lethal combination with slow flying Super Cubs, 185's, Beavers, and Otters. The November 16, 2010 F-22 Raptor crash is an example of things gone wrong. With more low flying high speed aircraft in the area with slow flying aircraft, the odds are even greater for accidents.

In addition to this hazard, this same region is a major hunting, camping, berry picking, and recreational area. It is a huge area for wildlife, especially being a caribou migration/calving area and a moose calving area. Migratory birds (such as Trumpeter swans) pass through the area and have their nesting grounds here. I cannot imagine the damage to waterfowl with jets going over at 500 feet AGL. It would be devastating. Most of the hunters from Mat-Su, Anchorage and Fairbanks use this area to hunt moose and caribou. This would completely disturb this traditional hunting area. Many people who hunt live a subsistence life style. This would infringe upon the rights of Alaskans. Peace, solitude, and quiet are things that Alaskans treasure. It is why we live here.

The following site reviews the results of studies that indicate that military aircraft have adverse affects on wildlife:

<http://www.nonoise.org/library/fctsheets/wildlife.htm>

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The result of these studies indicated that the calving of wildlife with this type of noise pollution was adversely affected.

I am a speech/language pathologist and have taken audiology courses. Jets flying over at 500 feet AGL are **loud**...to the point of damaging hearing. The following link has a table of noise levels starting on page 2:

<http://www.musicmotion.com/content/mim/pdfs/noise%20and%20hearing.pdf> Page 3 indicates that noises of 80 dB or greater are potentially dangerous to hearing. Page 4 indicates that noise not only affects hearing, but other things:

- Increases blood pressure
- Has negative cardiovascular effects such as changing the way the heart beats
- Increases breathing rate
- Disturbs digestion
- Can cause an upset stomach or ulcer
- Can negatively impact a developing fetus, perhaps contributing to premature birth □
- Makes it difficult to sleep, even after the noise stops
- Intensifies the effects of factors like drugs, alcohol, aging and carbon monoxide

All mammals would be similarly affected (see <http://www.nonoise.org/library/fctsheets/wildlife.htm>).

Before any changes could be made in the FOX MOA, you really need to have baseline data for the current populations of wildlife and their behaviors/patterns (feeding, calving, birthing, raising their young, nesting, migrating, watering, routines, etc.) in order to have data to compare after a change is made...although I don't think you should make any changes in the current FOX MOA. It should remain as it is. ADFG should be included in studies (funded by the military) in order to obtain accurate information about wildlife behavior/habitat.

Some friends of mine were hiking off of the Denali Highway this spring and experienced 2 triple sonic booms that made them hit the deck. This is not a pleasant experience when you are hiking in a "quiet" environment, enjoying solitude and wildlife. Recreation in the area of the FOX MOA is ongoing most of the year: fall: hunting and berry picking, photography; winter: snow machining in some areas and hunting (if season allows), caribou are scratching out food and trying to make it...they certainly don't need any more pressure; spring: snow machining in some areas, snowshoeing, skiing, and photography; summer: hiking, bird watching, biking, camping and photography.

According to: <http://www.cannon.af.mil/shared/media/document/AFD-110909-039.pdf> 3-12, the sound of an F16 at 500 ft. AGL at 500 KIAS is 102 dB (harmful to human hearing...wildlife have more sensitive hearing). A C-130 flying at 220 KIAS makes a sound at 95 dB (also harmful to human hearing...wildlife have more sensitive hearing).

According to: <http://www.globalsecurity.org/military/library/report/enviro/F22DraftEis/volume1/Mountai>

I0178

[n Home AFB/MH3.pdf](#) page MH3-15, F 22 flying at 500 feet AGL at an airspeed of 520 would generate 114 dB of sound. This, again is damaging to human (and wildlife) hearing. It is not natural and would interfere w/calving and the development of young wildlife and waterfowl/migratory birds.

I completely oppose the expansion of JPARC (Fox 3 expansion, the new Paxon MOA, the lowering of the MOA to 500 feet AGL). There should be No Action. It should be left as it is.

Sincerely,

Cathy Teich


I0179

[REDACTED]

From: Denis Ransy [REDACTED]
Sent: Thursday, July 05, 2012 5:05 PM
To: ALCOM J08 Admin Box
Subject: Public comment-draft EIS
Attachments: D.RANSY JPARC Comments.doc

Please acknowledge that you have received my comments.

Thank you.

Denis Ransy

I0179

COMMENTS ON DRAFT EIS FOR MODERNIZATION AND ENHANCEMENT OF JPARC

7/5/12

I AM FOR THE NO ACTION ALTERNATIVE.

I oppose all of the proposed expansion of, and creation of new Military Operation Areas, Training Areas, corridors, access roads, JAGIC and JPADS.

The vast existing areas are more than adequate for all training purposes. It has not been proven otherwise. The expansion would be a military take-over of huge amounts of our public lands and a hazard to private landowners. These Alaskan public lands provide dozens of uses for thousands of peoples' necessary activities including subsistence, commercial, and recreational uses. People do not want to be confronted with war games and "live fire" when hunting, fishing, trapping, camping, exploring, and all our other outdoor activities. Certainly 500 feet AGL supersonic flights daily are unacceptable and will have noise impacts outside the boundaries of the MOA's.

Problems with military exercises are as follows:

- Dumping of aircraft fuel in many flight situations
- Danger of live ammo and unexploded ordnance
- Unwanted new roads, heli-pads, and airstrips
- Litter, human waste, and aircraft chaff
- Extremely low flight altitudes

In addition, the military has a very poor track record with toxics and abandoned drums of used oil and contaminated fuel.

Much of the areas you want to take over are undeveloped or lightly developed country, and it should remain as such. This is essentially a large development project. It would negatively impact wildlife, fish, water quality, homes, cabins and lodges. The noise of these operations alone would be extremely disturbing to both humans and animals.

We do not need "more military infrastructure" or a "larger military industrial complex". The present enormous areas now open to the military, both on and off bases, are more than adequate for all training purposes.

Your draft EIS needs to consider the proposed Susitna Dam in its cumulative impacts.

Denis Ransy


I0180

[REDACTED]

From: Ron Smith [REDACTED]
Sent: Saturday, July 07, 2012 12:13 PM
To: ALCOM J08 Admin Box
Subject: Airspace

As a private pilot using this airspace it would negatively affect my ability to use my airplane for basic transportation. Please reconsider.

I0181

[REDACTED]

From: Michael Riddles [REDACTED]
Sent: Monday, July 09, 2012 1:14 PM
To: ALCOM J08 Admin Box
Cc: [REDACTED]
Subject: JPARC

Concerning proposed airspace changes:

I am a VFR user of several of these areas and have the following GRAVE concerns for all general aviation users, as noted below by the Alaska Airmen's Association:

- **The proposed Fox 3 MOA additions** extend laterally and vertically in to an area of Alaska highly used by the general public for business and recreation, due to its close proximity to major population centers of the MatSu Valley, Anchorage and Fairbanks. Lowering the ceiling to 500ft increases the probability of mid-air collisions for commercial pilots conducting tour activities and general aviation pilots engaging in hunting, mining, recreation or other activities.
- **The low-altitude portion of the proposed Paxson MOA** includes a major VFR route connecting northern Alaska with the south central and eastern regions of the state. Other portions of this proposed MOA are used for mining and recreation. Confining VFR traffic to corridors through this area concentrates traffic, potentially creating an unsafe condition for civil aviation. This area is not conducive for a low altitude MOA.
- Under current FAA rules, **active MOAs block access by IFR aircraft**, other than emergency and lifeguard flights. This lack of access limits economic viability and reduces safety to pilots and the public in the communities that our underneath or near this airspace. Establishing MOAs that block IFR airways is directly counter to the work done by the FAA in recent years to increase IFR access with GPS approaches and airways. No new MOAs should be approved that block IFR airways until the FAA and military have developed procedures to allow IFR access to civil aircraft.
- **The military constructed the Battle Area Complex** south east of Delta Junction knowing that this area is important to civil aviation to access Isabel Pass. No restricted airspace should be established over this complex.
- **Restricted areas west of Delta** (2202 and 2211) already limit access between Delta, Fairbanks and the Richardson Highway corridor. We oppose alternatives that completely connect these existing restricted areas, and further block access for mining, hunting and recreation.

I am entirely in agreement with the above statement.

While I support our military and the need to conduct training to remain the world's unsurpassed air superiority force, this appears to be an excessive appropriation of airspace that is used by many, and I oppose it; this will severely curtail my enjoyment and rightful use of these areas.

Regards;

Mike Riddles

I0182

From: matt obermiller [REDACTED]
Sent: Monday, July 09, 2012 3:55 PM
To: ALCOM J08 Admin Box

To Whom It May Concern,

I have been a full time resident of the Copper Basin since 1996.

I use the Paxon/Tangle Lakes area as a source of subsistence meat and for recreation. All your proposed usage expansions would negatively impact my and most all other users of this area and I am strongly opposed to any of your proposed expansions.

All your expansions would very likely have strong negatively impacts on the animals, people (Copper Valley residents and visitors) and businesses that depend on this area.

Per information in your presentation at the Caribou Hotel in Glennallen winter 2010, was the fact that, although you already have 65,000 square miles of every type of terrain Alaska has to offer to play in, in which you for some reason can't find precisely the conditions you want, you want to grab up to another 10-11,000 acres of our state with out relinquishing any of the areas you already have. Are you already fully utilizing all the areas you already have to train in? When will you have enough? I strongly object to this both as an american citizen and as an alaskan.

Also brought up at this same presentation: one of the principle benefits of any of the expansions is convenience and fuel savings, the expansion area being equidistant and between two air force bases. The aggressor team can fly from one base, the defender team from the other and meet in the middle, over our high quality subsistence hunting and recreating area. Your convenience is not a good enough reason to offset the harm you will do to me and so many of us.

The users your activities force out of the expansion areas will not go away, they will pile up in other already over-taxed areas in the valley. Many of us resident subsistence users are already having a hard time getting by. Any of your expansions will bring in even more competition for already tight hunting and fishing resources. My reality is, if I don't kill a moose, caribou or bear every year, I don't get to eat meat for the next year. I become an involuntary vegetarian with all the health ramifications that entails. End of story. A lot of us in this valley are in the same boat. Grocery stores are few and far between, cash is hard to come by and if we have to buy our meat, we have to do without something else.

You already have a staggering amount of very diverse terrain in which to very adequately do the training you want to do and it sounds like you are not coming anywhere close to using what you already have, yet you want a great deal more.

Your main real gain appears to be convenience, a little fuel savings and perhaps a brief respite from the boredom of training on grounds you have trained on before. The very real life cost to the animal and human residents and users of this area is way too great to be justified by your small gain of convenience and fuel savings. Please don't enact any of the proposed expansions.

Respectfully, Matt Obermiller
[REDACTED]

I0183

[REDACTED]

From: [REDACTED]
Sent: Monday, July 09, 2012 5:21 PM
To: ALCOM J08 Admin Box
Subject: JPARC Comments
Attachments: JPARC COMMENTS.docx

Good day
i have attached my comments concerning JPARC.
thanks al

I0183

Allen F. Barrette

[REDACTED]

[REDACTED]

[REDACTED]

Re: Realistic Live Ordnance Delivery.(Blair Lakes and Donnelly Training Area)

My comments are pertaining to the State land in Proposal 2, Realistic Live Ordnance Delivery Area, proposed restricted area.

I do not support any restriction to access to State lands and or closing of State land to Alaskans to further training of our valued Armed Forces.

Alaska has very well written and interruption though the Alaskan Supreme Court a Constitution.

The Alaskan Constitution Article 8, the Natural Resource article grants Alaskans many protections and guarantees. Sections 1-4, and 13, 14, and 16 point out my concerns and you should be aware of them.

I also don't believe the EIS addressed the economical and recreational value of the possible 305,000 acres of State land that could have access restrictions levied on it.

This area is highly valued and used by many Alaskans to gather their wild food resources on annual bases. Even though the EIS made note of State or privet airstrips, it did not consider the many Super Cub type airstrips that are used.(these are not noted on any maps, but they exist) The same is true of many traditional hunt camps.

I did not see in the EIS the possible loss of income from all the guides that are registered to provide guided hunts for this area. With only a minimum of 2 week notice for exercises, how does one book guided hunts, and fulfill contracts with clients if they cannot be in the field? What about air transporters. How will the anticipated 90 to 150 days use by the military effect their businesses? The same could be asked of the miners.

Trapper is this area will also be economically affected. If trappers are restricted from being in the area the result could be loss of reasonable opportunity to harvest furbearers, loss of furbearers being in the trap to long, furbearers having to be in traps long than what is reasonably expected. Maintaining a trap line has social, moral and ethical components to it also.

Note: Trapping season is November – April.

Even though this is not a State designated Subsistence area (by definition) many Alaskans use it as such, they treat the wild food they gather as a necessity for life. The 305,000 acres and predicted 90 to 150 days of use by the military would have a great impact on those who rely on those resources. Moose in this area are managed under State intensive Management (IM) practices. This means "high levels of human harvest" restricting this area at any time during September-November would impact the IM plan.

I0183

Sheep, caribou, bears are not designated as IM, but many Alaskans do pursue them as a valuable wild food source and some consider them as somewhat of a trophy. The taking of sheep and caribou happens August through September. Black bears have a "no closed" season but the majority of the bears are harvested during the months of June and August and September. Grizzly bears are harvest in the months May and April, and the gain in September till they go into the den sometime mid to late October.

So it is very hard for me to see how Alaskan could co-exist with this current proposal on State land, and not impact us greatly.

To put in some sort of perspective Alaska only has control of 33% of land within the State. You the Federal Government have the rest.

NOTES: I find it somewhat odd that the U.S. Military's EIS on aircraft noise has little effect on game population and their movements. Also that aircraft noise does not affect the values of a person's wilderness experience. Yet the National Park Service, Bureau of Land Management, National Petroleum Reserve-Alaska, National Wildlife Refuge and the National Forest and Conservation Areas all say and have made policies or regulations or are in the process of doing so, to make restrictions on aircraft use with in their jurisdictions.

Who is correct about aircraft noise, and how it affects game and wilderness values? Is the State of Alaska and the JPARC EIS correct, or are all the other Federal Agency correct?

RECOMMENDATION:

Is to not allow any live ordnance release over State controlled land that would restrict access to those lands.

Thank you for allowing me comment.

Al Barrette

I0184

[REDACTED]

From: [REDACTED]
Sent: Monday, July 09, 2012 5:42 PM
To: ALCOM J08 Admin Box
Cc: Gayle
Subject: comments on JPARC draft EIS
Attachments: JPARC comments 7.12.doc

To whom it may concern:
Attached please find our comments on the alternatives outlined in the JPARC draft EIS.
Please confirm receipt of these comments.
Thank you.
Helen and Gayle Nienhueser

I0184

Helen and Gayle Nienhueser



July 9, 2012

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

Via e mail: alcom.j08@elmendorf.af.mil

RE: Comments on JPARC Modernization and Enhancement draft EIS

To Whom It May concern:

We are writing in support of the No Action Alternative. We are opposed to both the expansion of the Fox 3 MOA and lowering the altitude to 500 feet. This is the only alternative that would neither expand Fox 3 MOA nor allow training exercises below 5000 feet.

Though many of our concerns would apply to the Paxson MOA as well, we are less familiar with that area. Our family spends a great deal of time in the Matanuska-Susitna Borough where we have three cabins and therefore will focus our comments on the Fox 3 MOA. One of our cabins is south of Denali State Park and west of the Susitna River and is already impacted negatively by the MOA west of the Susitna even though it is not directly under it. The others are located in the southern part of the Talkeetnas, generally in the areas known as Chickaloon and Glacier View. Both of these would be negatively impacted by the expansion of Fox 3 MOA.

The reason for having and using these cabins is the opportunity they provide for experiencing Alaska's wilderness—the reason we live in Alaska. One of the most important qualities of that wilderness, increasingly rare in today's world, is natural sounds only. The continual roar of airplanes over Anchorage as I write is very disruptive and unpleasant—and makes the qualities of peace and quiet provided by our cabins all the more important. Among other things we value our cabins for the good night's sleep we get there.

Another concern is the impact on wildlife, also one of the important values of the Talkeetna Mountains. We know that ADF&G has already provided information to you regarding the negative impacts to wildlife from the noise of training flights, particularly those at low altitude. We also know that these training flights will sometimes break the sound barrier, impacting the health and well being of both humans and wildlife. One of our cabins is within the range of the Nelchina caribou herd. Being surrounded by caribou, having wolves answer our howls, watching Dall sheep traverse the mountain slopes or raptors soaring above us are among the highlights of our lives. These populations will likely be reduced or displaced by the disruptive noise impacts of military

I0184

training flights. We share the concerns of the Lake Louise residents/property owners who are not far from us.

Other concerns are restrictions on on-the-ground use and air space use by other aircraft. Getting out into Alaska's back country is a major component of many Alaskans lives. Either we already live there or we depend on being able to go there for recreation, hunting, fishing, hiking, mining, climbing, ORV trips, wildlife-viewing, camping, berry picking, connecting with the "real" Alaska, peace, silence, solitude. It's why we live here. Many of us use small planes to get to these places. For many of us, our windows of opportunity to do these things are restricted either by our own schedules or by the seasons. If you were to close some of these areas during someone's particular window of opportunity it may mean not using the area at all. This is a major and unacceptable infringement on our freedom to enjoy living in Alaska. The Talkeetnas have become Alaskans playground and should remain so.

In addition, smaller airlines offering scheduled service to small villages may face long and expensive detours. This will have negative economic impacts on their businesses. As well, there will be negative economic impacts on charter aircraft businesses.

One further comment: there is a rumor that this expansion of MOAs is related to the proposal to transfer F16s to Anchorage from the Fairbanks area. If true, the simple solution is to keep the F16s in the Fairbanks area and select the no action alternative in the JPARC draft EIS. Anchorage does not need or want those F16s here, appreciably adding to our already high urban noise level. Fairbanks does want them because of the jobs they provide there and their training areas are far enough away from urban centers that they are not a problem, as we understand it.

Thank you for the opportunity to comment.

Sincerely,
Helen and Gayle Nienhueser

I0185

[REDACTED]

From: Ruth Wood [REDACTED]
Sent: Monday, July 09, 2012 6:31 PM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS

To:

ALCOM Public Affairs

9480 Pease Avenue, Suite 120

IBER, AK 99506

Phone: 907-552-2341

Email: alcom.i08@elmendorf.af.mil

I am writing to comment on the P-JARC EIS. I support the No Action Alternative. I am very concerned that the plan vastly increases the area of training operations and that the plan will allow training as low as 500 ft. The expanded training area would greatly impact both the Lake Louise area and the Talkeetna area. Residents, businesses, and property owners in Lake Louise and in Talkeetna oppose the expansion. The increased noise, the increased impact on wildlife, and the increased danger to civilian flyers are significant factors that have not been adequately addressed.

I don't think the Military has done sufficient study and research to determine how to mitigate the impacts to wildlife, or, indeed, whether the impacts can be mitigated. Wildlife is important to residents who depend on caribou and moose for subsistence. Wildlife is important to tourism businesses and hunting guide businesses. Wildlife is important for maintaining ecosystems. Wildlife from large mammals to migratory birds would be impacted. What will be the impacts to wildlife from increased noise and how does the military plan to mitigate for them?

The 500 foot flying limit for F-22s and other military jet flights is unacceptable primarily for safety reasons and secondarily for increased noise. There are a lot of private pilots, flight-service companies, recreational users that access the area. Small planes fly at low altitudes and low speeds. Military jets fly at high speeds and belong at high altitudes. If military pilots need to train to fly jets at high speeds at low altitudes it needs to be done in places where there are no civilian planes in the air and no wildlife on the ground. Low altitude training in the proposed area is an accident waiting to happen, and the civilian public should not be put in such jeopardy.

The Mat-Su Borough is the fastest growing area of the state in terms of population increase. I am concerned that the Military is considering increases in restricted airspace without consideration of conflicts that might arise if the projected increases in population occur.

Thank you for this opportunity to comment.

Sincerely,

Ruth D. Wood
[REDACTED]

I0186

From: Pete Stokes [REDACTED]
Sent: Monday, July 09, 2012 6:38 PM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

Dear Sir or Madame,

I am a private pilot flying out of Lake Hood Strip in Alaska. Below are my comments regarding the Joint Pacific Alaska Range Complex EIS and how they will affect my flying and other GA pilots.

The proposed Fox 3 MOA additions extend laterally and vertically in to an area of Alaska highly used by the general public for business and recreation, due to its close proximity to major population centers of the MatSu Valley, Anchorage and Fairbanks. Lowering the ceiling to 500ft increases the probability of mid-air collisions for commercial pilots conducting tour activities and general aviation pilots engaging in hunting, mining, recreation or other activities.

The low-altitude portion of the proposed Paxson MOA includes a major VFR route connecting northern Alaska with the south central and eastern regions of the state. Other portions of this proposed MOA are used for mining and recreation. Confining VFR traffic to corridors through this area concentrates traffic, potentially creating an unsafe condition for civil aviation. This area is not conducive for a low altitude MOA.

Under current FAA rules, active MOAs block access by IFR aircraft, other than emergency and lifeguard flights. This lack of access limits economic viability and reduces safety to pilots and the public in the communities that our underneath or near this airspace. Establishing MOAs that block IFR airways is directly counter to the work done by the FAA in recent years to increase IFR access with GPS approaches and airways. No new MOAs should be approved that block IFR airways until the FAA and military have developed procedures to allow IFR access to civil aircraft.

The military constructed the Battle Area Complex south east of Delta Junction knowing that this area is important to civil aviation to access Isabel Pass. No restricted airspace should be established over this complex.

Restricted areas west of Delta (2202 and 2211) already limit access between Delta, Fairbanks and the Richardson Highway corridor. We oppose alternatives that completely connect these existing restricted areas, and further block access for mining, hunting and recreation.

Allowing Unmanned Aerial Vehicles (UAV's) to transit between Ft. Wainwright, Eielson and Ft. Greely and the restricted areas where they conduct training limits access, potentially creating a safety hazard for civil aircraft operating to and from Fairbanks, Delta and the Richardson Highway corridor. No segregated airspace should be established in these areas.

The recently proposed relocation of the F-16's from Eielson AFB to JBER appears to have a direct impact on the airspace and airports in Anchorage and the Mat Su Valley. This needs to be quantified and addressed as part of the cumulative impact of the Draft EIS.

Existing MOAs including Susitna, Stony, Naknek and Galena, are not addressed. They should be studied to see if they fit the purpose and need of the JPARC mission.

Please address the above concerns to ensure that general aviation safety is not compromised.

I0186

Very Truly Yours,

Peter Stokes, Private Pilot [REDACTED]
[REDACTED]
[REDACTED]

I0187

[REDACTED]

From: John Murry [REDACTED]
Sent: Tuesday, June 26, 2012 11:39 PM
To: ALCOM J08 Admin Box
Subject: Joint Pacific Alaska Range Complex EIS

Dear Sir,

I am opposed to the addition of the Fox 3 MOA in South Central Alaska. I have flown in Alaska for thirty years as a recreational pilot. The proposed addition affects areas that I have used for recreation for my thirty years of flying. The proposal is unreasonable and burdensome to the general aviation users.

Please consider my comments,

John Murry
[REDACTED]

I0188

Submittal ID	Commenter	Title	Organization	Topic List	Comment
I0188	Eli Cook			General (to the EIS)	page 10-1 line 31... change Cooper to Copper. It's the Copper Valley.

I0189

**Joint Pacific Alaska Range Complex Modernization and Enhancement
DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Written Comment Form

For more information and to submit comments online, please go to:
www.jparceis.com

Public comments are requested pursuant to the National Environmental Policy Act, 42 United States Code 4321, et seq. All written comments received during the comment period will be considered during Final EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Final EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Final EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

Name (First and Last): Carolyn (Cari) Sayre Date: 7/8/12

Title: _____

Organization: _____

Is this a government agency (choose one): yes no

Comment submitted on behalf of (choose one):
 your organization/business/agency
 yourself as a private citizen

Email: _____

Phone: _____

Mailing Address: _____

If you know, please check the boxes below that relate to your comment. This will assist us in organizing and reviewing your comment.

Comment Topic(s):

- | | |
|--|--|
| <input checked="" type="checkbox"/> General (to the EIS)
<input type="checkbox"/> NEPA Process
<input type="checkbox"/> Purpose/Need
<input type="checkbox"/> Description of Proposed Actions and Alternatives (DOPAA)
<input type="checkbox"/> Cumulative Impacts
<input type="checkbox"/> Mitigations | <p>Proposed Actions:</p> <input type="checkbox"/> All proposed actions
<input checked="" type="checkbox"/> 1 - Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA
<input type="checkbox"/> 2 - Realistic Live Ordnance Delivery
<input type="checkbox"/> 3 - Battle Area Complex Restricted Area Addition
<input type="checkbox"/> 4 - Expansion of R-2205 Restricted Area
<input type="checkbox"/> 5 - Night Joint Training
<input type="checkbox"/> 6 - Unmanned Aerial Vehicle Access
<input type="checkbox"/> 7 - Enhanced Access to Ground Maneuver Space Areas
<input type="checkbox"/> 8 - Tanana Flats Training Area Access Road
<input type="checkbox"/> 9 - Joint Air-Ground Integration Complex
<input type="checkbox"/> 10 - Intermediate Staging Bases
<input type="checkbox"/> 11 - Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska
<input type="checkbox"/> 12 - Joint Precision Airdrop System Drop Zones |
|--|--|

Resource Areas:

- All resource areas
- Airspace Management
- Noise
- Safety (Airspace)
- Safety (Ground)
- Air Quality
- Physical Resources
- Land Use
- Infrastructure and Transportation
- Water Resources
- Hazardous Materials
- Biological Resources
- Cultural Resources
- Socioeconomics
- Subsistence
- Environmental Justice

Please provide your comment(s) on the back of this form and turn it in at a public hearing, or submit by July 9, 2012, to: ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506; Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

I0189

Comment(s):

I attended both the Scoping meeting and the Public Hearing for this JPARC-EIS. Both times I felt uneasy and even intimidated by the sheer number of uniformed individuals in the very small Swiss Alaska Inn in Talkeetna. The space was congested, even over-crowded, and I know of several people who did not attend because of the chosen venue. If the purpose is truly to HEAR from the public, the hearing should take place in a Public Space — a school, for instance. Even then, is it really necessary to bring so many military personnel?

I urge you to make No Changes to FOX 3. The only alternatives left in the draft EIS both allow overflights as low as 500 feet AGL. This is simply unacceptable. The minimum level for overflights should remain at 5000' AGL. Low-flying aircraft are much louder, and at the speed they're flying, can come over a ridge and be upon hikers/fishermen/wildlife very suddenly with their ear-splitting noise. This is not anyone's idea of a pleasant wilderness experience.

Natural (i.e. QUIET) soundscapes are increasingly rare, even in Alaska. There is an innate value to quietude, and we cannot, as a species, afford to lose it.

In Appendix K, Table K-1, Existing Mitigations, Ref ID 438, it states, "Raise the minimum altitude to 5000 feet AGL for FOX 1 & 2." This is to mitigate biological, recreation, land use & subsistence issues. It should be the same for FOX 3 — apply this same mitigation to FOX 3.

I understand that the No Action Alternative would require more distant travel for JBER trainees. But what about all the people from Anchorage & the Valley who are looking for "accessible wilderness" and who, if changed, were made to lower flights to 500' AGL, would have to drive much farther to arrive at suitable quiet destinations?

Use additional sheets as needed.

July 9
Please turn in this form at a public hearing or submit by June 7, 2012, to:
ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506
Fax: 907-552-5411; Email: alcom.j08@elmendorf.af.mil

Thank you for your input.

see P. 2

I0189

P.2 Carolyn Sayre JPARC-EIS
Comments

In the big picture, the military may save some money, but the fuel would be spent — perhaps even more than was saved — by the public.

The Talkeetna Mountains are a gem of accessible wilderness. People love to recreate there.

Businesses in Talkeetna guide trips there; air services drop off/pick up clients.

The dangers imposed by military overflights down to 500' are too great.

Last but not least, think of the impacts on wildlife. No adequate study has been done on noise impacts to the health & well-being of wildlife in Fox 3. Please do not make any changes until studies have been done. Humans can label, make sense of, or rationalize the noise that bothers them. Not so for birds, animals, even fish. They will be impacted. If noise is a known stressor for humans, it follows that the same noise level will create stress for wildlife.

Thank you for your time. CS

N.3 GOVERNMENT RESPONSES TO COMMENTS

Table N-5. Government Responses to Comments

Submittal ID	Comments	Responses
G0001-1	<p>I have begun review of the draft EIS for the JPARC Modernization and Enhancement. The comment and request for clarification was determined to require a response, ideally, before the borough proceeds with comments on the effects of the proposed alternatives. Many of the tables in Chapter 3 that include various information on the extent and effects of the Alternatives appear to fail to list the extent and effects of the Alternative E Fox 3 MOA as a standalone alternative. Many Chapter 3 tables list three Fox 3 proposal areas: 1 = Existing Fox 3 MOA 2 = Fox 3 MOA Alternative A and E 3= Fox 3 MOA Alternative A Review of Figure 2-1 and Figure 2-2 suggests that Fox 3 MOA Alternative A completely encompasses Fox 3 MOA Alternative E. These two figures lead one to believe that proposal area 2 is the same as proposal area 3. Please clarify how the reader can discern the extent and effects of Alternative E in Chapter 3. A reader could assume a typo in the footnotes and that the third proposal area is Alternative E. However, there are several tables that show the third proposal area to include items not included in proposal area 2. Therefore, it does not appear to be a simple typographic error. Respectfully, Emerson Krueger Planner CF: Warren Keogh, District 1 Assembly Member John Moosey, Manager Eileen Probasco, Acting Director, Planning and Land Use</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Final EIS will be revised to remove the potential for misunderstanding or confusion discussed in the comment, regarding the Fox 3/Paxon MOA Addition proposal in Chapter 3, Affected Environment and Environmental Consequences.</p>
G0002-1	<p>Lt. Gen Hoog, Please find attached the request to extend by 60 days the public comment period on the JARC draft EIS. The four mayors have strong concerns that the F-16 move has not been included in this document. Therefore our request is made to extend this comment period.</p>	<p>Given the feedback provided during the public hearings and Draft EIS review process, the U.S. Army and U.S. Air Force, on behalf of ALCOM, extended the Draft EIS comment period from 70 days to 102 days. This extension took place on May 31, 2012. The comment period, originally scheduled to close on June 7, 2012, was extended to July 9, 2012. The proponents of the proposals considered the extension carefully in an effort to balance military training requirements with the importance of ensuring adequate time for citizens and organizations to thoroughly review the Draft EIS.</p> <p>The F-16 Aggressor Squadron proposed relocation from Eielson AFB to Joint Base Elmendorf-Richardson is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. The airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower altitude airspace to reflect the types of combat in which fifth generation F-22 fighters would be</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>engaged. The F-22s have the capability to initiate combat at greater distances than fourth generation fighters, such as the F-16, so fourth generation fighters must apply diverse tactics which require airspace expansion in distance and altitude. The F-22s must train to combat all such threats regardless of where the aggressor aircraft are based.</p> <p>The location of the F-16 Aggressor Squadron within Alaska is not a connected action to the JPARC proposals. The majority of the JPARC proposals that involve Eielson AFB are Army proposals and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft. The details of the proposed F-16 relocation and training, including Major Flying Exercises such as RED FLAG Alaska, will be worked out in the coming months. An environmental analysis will be prepared to address the environmental consequences of the proposed F-16 relocation within Alaska.</p>
G0002-2	<p>The Mayors of Fairbanks North Star Borough (FNSB), City of Fairbanks and City of North Pole respectfully requests the extension of the comment period of the Joint Pacific Alaska Range Complex draft EIS comment period for an additional 60 days to allow for further comment and analysis based on recent proposals and basing decisions the USAF proposed for Alaskan installations in February of 2012. The Air Force, by this force restructuring action which is not considered in the current EIS draft of shifting the Eielson F-16s, associated military and civilian personnel and possible the Alaska Red Flag mission from Eielson to JBER has created undetermined impacts on Alaska air space and Alaska's population that are more than sufficient to warrant an extended period for analysis and comment by the local governments, businesses, organizations and individuals negatively affected by, as yet, unidentified impacts and Alaska's land, water and air space.</p>	<p>See Response G0002-1.</p>
G0003-1	<p>1. Caribou herd & other wildlife - impacts?</p>	<p>The effects of the proposed action on caribou herds and other wildlife are addressed and mitigations identified as applicable throughout the document for both definitive and programmatic actions. Sections 3.1.8.3 and 3.1.8.4 provide impact analysis and mitigations with regard to aircraft overflight and noise (Fox/Paxon MOAs). Sections 3.2.8.3 and 3.2.8.4 provide impact analysis and mitigation with respect to aircraft overflight of existing training areas and live ordnance delivery (RLOD). Sections 3.3.8.3 and 3.3.8.4 provide impact analysis and mitigation with respect to ground training activities (BAX and CACTF). Sections 3.4.8.3 and 3.4.8.4 provide impact analysis and mitigation with respect to combined air and ground training activities (DMTR). Sections 3.5.8.3 and 3.5.8.4 provide impact analysis and</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>mitigation with respect to night joint training. Impact analyses and conceptual mitigation are provided at a more general level in the equivalent sections for the programmatic alternatives. Additionally, Appendix E provides for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p> <p>The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection.</p>
G0003-2	2. Troop movement throughout area in future - will it happen & then what restrictions are in place?	Units will continue to transition through the Wasilla/Matanuska Valley en route to the Donnelly and Fort Wainwright Training Areas. All unit movements will comply with directives of the Alaska Department of Transportation and all Army regulations concerning unit movements along public transportation routes. The number of unit movements may increase as the training OPTEMPO adjusts from a war footing to an Army preparing to respond to National Command Authority directives. From time to time, the Army may utilize those areas for which it has agreements with the State to use lands currently withdrawn from public use. The Army will remain compliant with the Sykes Act to allow recreation on lands not being actively used to support military training events.
G0003-3	3. What changes to the current plan are expected within the next 30 years? If you don't have a plan for the future - in light of the ever changing training needs & equipment - and potential OPFOR, why not? And supposing you do - then disclose the possible scenarios -	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force have prepared plans for future training needs and facilities. Advance planning for the JPARC proposals currently in the JPARC EIS have been under way for a number of years. A master planning and requirements development process formally began in 2009, was completed with the preparation of the JPARC Master Plan in July 2011, and was approved by the Joint Range Strategic Working Group (JRSWG). The JRSWG manages and oversees range and airspace within the military commands in Alaska. The plan's purpose is to guide the development of JPARC for the next 30 years by coordinating the efforts of the Army and Air Force and championing joint training (including the Navy and other service components). The Master Plan was a precursor to the JPARC EIS and is a living document that will evolve with military requirements, changes in the baseline, and input from all stakeholders throughout the EIS process. Neither the Master Plan nor the EIS is structured to assess possible training or exercise scenarios.
G0004-1	So I will be submitting written comments that would be much more	Thank you for your comment on the JPARC Draft EIS. This comment is

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>extensive. I don't have those formulated at this time. I do want to state though that I am disappointed that this public hearing is on a Saturday, has been scheduled here in Fairbanks, one of the major -- the second largest community in Alaska, that it was scheduled for Saturday. There are two sessions, I understand that, but Saturday night is not a good time to have a public hearing. So I'm hoping that if there are further public hearings held in this overall process that they are scheduled in Fairbanks. We have the best turnout and information dissemination on weekdays and I would ask that that please be put into any further scheduling. I don't think it's appropriate to have a -- as I said, a public hearing on this issue on Saturday noon, especially in the summer.</p>	<p>duly noted. The Army and Air Force did everything feasible to try and schedule the public hearings in a timely and equitable manner to meet the needs of the public. Please understand that public hearings had to be scheduled in 10 locations. To stay on schedule, public hearing venues had to be selected during the beginning of the tourist season and a number of venues in Fairbanks were unavailable during the week.</p>
G0005-1	<p>As Governor of the State of Alaska, I fully support the modernization and enhancement of the Joint Pacific Alaska Range Complex (JPARC). As the largest military training range in the United States, JPARC is critical to securing and defending our nation. In this heightened threat environment, it is vital that we make every effort to maximize the training opportunities for the brave men and women who serve in our Armed Forces.</p> <p>I take seriously my constitutional duty as Governor to ensure the safety and security of Alaska's citizens and communities. Our Administration will continue to support the military industrial complex in Alaska while doing everything in our power to protect Alaska's pristine environment. For this reason, I believe the JPARC Environmental Impact Statement is an important and welcomed process.</p> <p>I am confident that the State of Alaska and the United States Armed Forces will partner together in identifying a course of action that will allow for the expansion of military training capabilities, as well as the continued protection of our beautiful, natural environment.</p>	<p>Thank you for your comment on the JPARC Draft EIS. Your comment has been duly noted. The Army and Air Force units based within the state of Alaska face an exceptional challenge to meet compelling and increasingly urgent needs borne out of fighting wars. In an era of persistent combat operations, the Army and Air Force must continue to generate new technologies, learn from battlefield experiences, update tactics, and train intensively to face a committed and agile enemy. Each of these challenges drives the purpose and the need for modernization and enhancements to the range and airspace infrastructure that replicate the modern battlefield for training and testing in Alaska. In preparing the Final Environmental Impact Statement, the Army and Air Force will make every effort to harmonize mission requirements and community needs to avoid user conflicts or mitigate conflicts to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century. The modernization and enhancement of JPARC provides the Army and Air Force a unique opportunity to conduct state-of-the-art training in diverse terrain and large airspace areas to meet the national security requirements of the United States in the twenty-first century.</p>
G0006-1	<p>One of the things I'd like the folks to address is the issue of the proposed floor for the Fox 3 MOA. Currently it's proposed to go to 500 feet AGL and in talking to a number of the air taxi operators, the pilots, for the record I am a commercial pilot with 17 years of bush flying experience here in Alaska. I'm very familiar with the Talkeetna mountains and essentially the rest of the Fox 3 MOA and do fly through it on a regular basis just in doing this job.</p> <p>The area that really gets the most general aviation traffic is the area sort of --</p>	<p>Thank you for your suggestions. A good portion of Alphabet Hills and those areas south noted in the comment are located within the proposed Paxon MOA airspace where flight activities below 14,000 feet MSL would only occur during major flying exercises (MFEs). The six annual MFEs are only permitted during specified months of the year, which does not include the September hunting season. The proposed Alternative E configuration, more limited use of the Paxon MOA lower altitudes, and those existing and proposed safety measures discussed in the FEIS Airspace Management and</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>if you draw a line from about the Susitna River across to the Alphabet Hills and south that area seems to have the most -- the densest amount of general aviation traffic, you know, mostly Supercubs and Cessnas and whatnot, small float planes getting in and out of hunting cabins. It's primarily during the non-winter months where you see a lot of that traffic. It's during the, you know, primarily May to October with a lot more activity occurring in the late August through mid-October timeframe. It's kind of the highlight of hunting season.</p> <p>If that floor were to be raised to say 1,500 feet AGL or at least a -- perhaps a new sector created within the MOA that can be left off most of the time but only turned on when absolutely necessary I think that would go a long way to reducing some of the general aviation pilots' concerns about basically getting run over by an F-16 or something larger. So I'd ask that the folks putting this proposal together go ahead and take a good long look at that.</p> <p>I think alternative E where the southern boundary of the Fox 3 MOA was -- instead of being south of Lake Louise it was moved a little bit to the north so it only covered Tyone or Lake Tyone or Lake Susitna I believe. Even if you move that southern boundary in that sector to the outlet of Lake Susitna at the very mouth of Tyone Creek that would be another good point to put in there that would, again, relieve some of the concerns that folks in the Lake Louise area have.</p>	<p>Flight Safety sections should help alleviate some of the concerns pilots have expressed over the airspace proposals.</p>
G0006-2	<p>One of the things I'd like the folks to address is the issue of the proposed floor for the Fox 3 MOA. Currently it's proposed to go to 500 feet AGL and in talking to a number of the air taxi operators, the pilots, for the record I am a commercial pilot with 17 years of bush flying experience here in Alaska. I'm very familiar with the Talkeetna mountains and essentially the rest of the Fox 3 MOA and do fly through it on a regular basis just in doing this job.</p> <p>The area that really gets the most general aviation traffic is the area sort of -- if you draw a line from about the Susitna River across to the Alphabet Hills and south that area seems to have the most -- the densest amount of general aviation traffic, you know, mostly Supercubs and Cessnas and whatnot, small float planes getting in and out of hunting cabins. It's primarily during the non-winter months where you see a lot of that traffic. It's during the, you know, primarily May to October with a lot more activity occurring in the late August through mid-October timeframe. It's kind of the highlight of hunting</p>	<p>See comment response G0006-1.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>season.</p> <p>If that floor were to be raised to say 1,500 feet AGL or at least a -- perhaps a new sector created within the MOA that can be left off most of the time but only turned on when absolutely necessary I think that would go a long way to reducing some of the general aviation pilots' concerns about basically getting run over by an F-16 or something larger. So I'd ask that the folks putting this proposal together go ahead and take a good long look at that.</p> <p>I think alternative E where the southern boundary of the Fox 3 MOA was -- instead of being south of Lake Louise it was moved a little bit to the north so it only covered Tyone or Lake Tyone or Lake Susitna I believe. Even if you move that southern boundary in that sector to the outlet of Lake Susitna at the very mouth of Tyone Creek that would be another good point to put in there that would, again, relieve some of the concerns that folks in the Lake Louise area have.</p>	
G0007-1	<p>And the city of Delta Junction wants to state that we made a memorandum of agreement with the Army in '06 and upon investigation it was essentially omitted from the full JPARC Draft EIS and as a result we feel the EIS is -- the Draft EIS is defective. There -- will there be an amended version of this before a final version -- of the EIS before a final version comes out is something that we're concerned about. Because we think, again, it should be available for public comments after we see -- after you've heard what people are concerned with. We will object JPARC -- to JPARC moving the Final EIS without this opportunity for review and comment. We note that JPARC was provided with a copy of the '06 MOA by -- at the scoping meetings and still failed to address it in the Draft EIS. Numerous commitments contained in the '06 MOA are violated by the proposed changes in the Donnelly training area and other portions of training ranges near Delta and Gulkana. A partial listing of the violations will be included in our written comments which will be coming. The failure to discuss these violations and the necessity for them makes the EIS incomplete and inaccurate. The proposed changes violate many of the concerns underlying the '06 MOA, including, but not limited to, danger from wildfire which is a big concern in this area, danger from flooding, public safety arising from increased levels of activities and increased noise in the area. The issues are more critical given the higher intensity levels of training, the broader types of training and greater expanded use of the training area. These issues are not addressed or</p>	<p>Thank you for your comments on the JPARC Draft EIS. Your comments are duly noted.</p> <p>The proponent consulted with Delta Junction as a local government, specifically the Mayor of Delta Junction, Mary Leith-Dowling. Also, Air Force and Army leadership met with Delta Junction community leaders during both public scoping meetings (see Appendix A, Table A-2 in Volume 2 of the Draft EIS) and public hearing meetings. During scoping, the following attendees joined Air Force and Army leadership at the Delta Junction City Hall: Delta Junction Mayor Mary Leith-Dowling, Delta Junction City Administrator Mike Tvenge, and Delta Junction Mayor Pro Tem Pete Hallgren. During public hearings, Air Force and Army leadership met with Delta Junction City Administrator Mike Tvenge.</p> <p>The Draft EIS mentions the Memorandum of Agreement between USARAK and the city of Delta Junction on Page 3-206. However, additional language will be added to the Final EIS. The paragraph will be changed to read:</p> <p>"Delta Junction, directly north of Fort Greely at the junction of the Richardson and Alaska Highways, does not have a comprehensive plan for land use but has established municipal ordinances governing land use and subdivision layout and approvals. The City Planning Commission serves as both an advisory body (prepares plans) and enforcing body of city</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>inadequately addressed in the Draft EIS. When the city acquiesced to the inadequate use or ac -- Donnelly range expansion EIS in '06 it did so with the commitment by USARAK that training at the Caktif (ph) and Backs (ph) would be limited to those described in the supplemental EIS prepared by USARAK. The city pressed for those facilities to be located at the south end of the Donnelly training area. USARAK pressed for a location at the north end of the Donnelly training area immediately joining city limits. We did much of this based upon our own experience with fire only a little bit prior to that. The compromise described in the 2006 MOA is that the city would acquiesce to the closer, more dangerous location, but only with safeguards and with the Army's assurance that the training activities would be limited to those described in the supplemental Draft EIS. The JPARC Draft EIS fails to address that bargain or JPARC's reasons for violating the bargain. Which we searched it, there -- it was never mentioned once. These comments to the public hearing are not a complete list of our concerns. Complete written comments will be submitted to you by June 7th, 2012, but unless these issues are fully addressed in a supplemental Draft EIS it's more likely than not that the city will challenge the adequacy of the JPARC Draft EIS leaving aside any claim by the city for breach of the '06 MOA. And if we have any -- like I say, we really do expect to see again the Draft EIS so that -- you know, amended one so that we can indeed see if that is finally remembered that we did have a mem -- an MOA with everybody.</p>	<p>ordinances. The Commission approves all plat plans, variances, and conditional use requests. The "keyhole" area is essentially undeveloped and wooded, with one or two existing residences. There is an existing Memorandum of Agreement (USARAK-MOA-029), signed 16 May 2006, between USARAK and the City of Delta Junction. The agreement lays out specific operational actions and restrictions that apply to the use and management of the existing BAX and CACTF in DTA-East (USARAK 2006-3). Mitigations as outlined in the BAX and CACTF Final EIS (dated June 2006) and ROD (signed 19 July 2006) remain in effect and will not be superseded unless a better practice, enhanced, stringent mitigation is implemented as part of this EIS."</p> <p>Page 3-191 of the Draft EIS referenced Section 3.2.3.1, which discusses range safety and control, unexploded ordnance and munitions safety, public access control, and fire and emergency response.</p> <p>There are no plans to construct any structures. Should construction be needed in the future, the Army will conduct necessary environmental analyses. The BAX proposal does not have a hydrologic impact, since this action affects only airspace.</p> <p>The anticipated overall increase in munitions expenditures is expected to be minimal. The training days considered in the BAX proposal were based on full allocation outlined by the Standards in Training Commission (STRAC DA PAM 350-38). These are based on estimated utilization rates, and commanders are not required to use one facility to execute their annual ammunition allocation. The munitions referenced were analyzed in the overall area of concern during development of previous NEPA documents; those munitions are currently fired in the DTA.</p> <p>There is nothing in USARAK-MOA-029 to eliminate the Army's requirement to place special use airspace over the BAX and CACTF. The Army stated that should there be a requirement for expansion alteration on the BAX or CACTF, the Army would conduct the appropriate NEPA action and proceed accordingly. The JPARC EIS is the correct venue for the Army to move forward to adapt to emerging mission requirements.</p> <p>USARAK Regulation 95-1 and Army SOPs stipulate those safety practices that aircrews must follow when planning and conducting flight missions,</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>including altitude restrictions for avoiding noise-sensitive areas, populated areas, livestock, dwellings, and other sensitive areas.</p> <p>Time-averaged and peak noise levels reflecting baseline munitions training do not exceed 62 dB CDNL and 115 dB PK 15(met), respectively, in areas outside of range boundaries. Flying operations are not conducted at a frequency sufficient to result in time-averaged noise levels exceeding 65 dB DNL.</p>
G0007-2	<p>The proposed changes violate many of the concerns underlying the '06 MOA, including, but not limited to, danger from wildfire which is a big concern in this area, danger from flooding, public safety arising from increased levels of activities and increased noise in the area. The issues are more critical given the higher intensity levels of training, the broader types of training and greater expanded use of the training area. These issues are not addressed or inadequately addressed in the Draft EIS.</p>	<p>Page 3-191 of Draft EIS references Section 3.2.3.1 (Page 3-117 – Page 3-119), which discusses range safety and control, unexploded ordnance and munitions safety, public access control, and fire and emergency response.</p> <p>There are no plans to construct any structures. Should future construction be needed, the Army will conduct necessary environmental analyses. The BAX proposal does not have a hydrologic impact since this action affects only the airspace.</p> <p>The anticipated overall increase in munitions expenditures is expected to be minimal. The training days considered in the BAX proposal were based on full allocation outlined by the Standards in Training Commission (STRAC DA PAM 350-38). These are based upon estimated utilization rates, and commanders are not required to use one facility to execute their annual ammunition allocation. The munitions referenced were analyzed in the overall area of concern during development of previous NEPA documents; those munitions are currently fired in the DTA.</p> <p>There is nothing in USARAK-MOA-029 to eliminate the Army's requirement to place special use airspace over the BAX and CACTF. The Army stated that should there be a requirement for expansion alteration on the BAX or CACTF, the Army would conduct the appropriate NEPA action and proceed accordingly. The JPARC EIS is the correct venue for the Army to move forward to adapt to emerging mission requirements.</p>
G0007-3	<p>The proposed changes violate many of the concerns underlying the '06 MOA, including, but not limited to, danger from wildfire which is a big concern in this area, danger from flooding, public safety arising from increased levels of activities and increased noise in the area. The issues are more critical given the higher intensity levels of training, the broader types of training and greater expanded use of the training area. These issues are</p>	<p>Page 3-191 Draft EIS references Section 3.2.3.1 (Page 3-117 – Page 3-119), which discusses range safety and control, unexploded ordnance and munitions safety, public access control, and fire and emergency response.</p> <p>There are no plans to construct any structures. Should there be future requirements for construction, the Army will conduct necessary</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	not addressed or inadequately addressed in the Draft EIS.	<p>environmental analyses. The BAX proposal does not have a hydrologic impact since this action affects only the airspace.</p> <p>The anticipated overall increase in munitions expenditures is expected to be minimal. The training days considered in the BAX proposal were based on full allocation outlined by the Standards in Training Commission (STRAC DA PAM 350-38). These are based on estimated utilization rates, and commanders are not required to use one facility to execute their annual ammunition allocation. The munitions referenced were analyzed in the overall area of concern as a function of previous NEPA documents; those munitions are currently fired in the DTA.</p> <p>There is nothing in USARAK-MOA-029 to eliminate the Army's requirement to place special use airspace over the BAX and CACTF. The Army stated that should there be a requirement for expansion alteration on the BAX or CACTF, the Army would conduct the appropriate NEPA action and proceed accordingly. The JPARC EIS is the correct venue for the Army to move forward to adapt to emerging mission requirements.</p> <p>USARAK Regulation 95-1 and Army SOPs stipulate those safety practices aircrews must follow when planning and conducting flight missions. They include altitude restrictions for avoiding noise-sensitive areas, populated areas, livestock, dwellings, and other sensitive areas.</p> <p>Time-averaged and peak noise levels reflecting baseline munitions training do not exceed 62 dB CDNL and 115 dB PK 15(met), respectively, in areas outside of range boundaries. Flying operations are not conducted at a frequency sufficient to result in time-averaged noise levels exceeding 65 dB DNL.</p>
G0007-4	The proposed changes violate many of the concerns underlying the '06 MOA, including, but not limited to, danger from wildfire which is a big concern in this area, danger from flooding, public safety arising from increased levels of activities and increased noise in the area. The issues are more critical given the higher intensity levels of training, the broader types of training and greater expanded use of the training area. These issues are not addressed or inadequately addressed in the Draft EIS.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>impacts and locations of the proposals in this EIS.</p> <p>Prior to implementing any of the programmatic proposals considered in this EIS that could expand training (e.g., higher intensity levels of training, or broader types of training and expanded use of the training areas), proponents would undertake further evaluation and an appropriate level of NEPA analysis, permitting, and agency coordination.</p> <p>At a minimum, this proposal incorporates all of the provisions from the 2006 MOA.</p>
G0008-1	<p>The Mayors of Fairbanks North Star Borough (FNSB), City of Fairbanks and City of North Pole respectfully requests the extension of the comment period of the Joint Pacific Alaska Range Complex draft EIS comment period for an additional 60 days to allow for further comment and analysis based on recent proposals and basing decisions the USAF proposed for Alaskan installations in February of 2012.</p> <p>The Air Force, by this force restructuring action which is not considered in the current EIS draft of shifting the Eielson F-16s, associated military and civilian personnel and possible the Alaska Red Flag mission from Eielson to JBER has created undetermined impacts on Alaska air space and Alaska's population that are more than sufficient to warrant an extended period for analysis and comment by the local governments, businesses, organizations and individuals negatively affected by, as yet, unidentified impacts and Alaska's land, water and air space.</p>	<p>Given the feedback provided during the public hearings and Draft EIS review process, the U.S. Army and U.S. Air Force, on behalf of ALCOM, extended the Draft EIS comment period from 70 days to 102 days. This extension took place on May 31, 2012. The comment period, originally scheduled to close on June 7, 2012, was extended to July 9, 2012. The proponents of the proposals considered the extension carefully in an effort to balance military training requirements with the importance of ensuring adequate time for citizens and organizations to thoroughly review the Draft EIS.</p> <p>The F-16 Aggressor Squadron proposed relocation from Eielson AFB to Joint Base Elmendorf-Richardson is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. The airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower altitude airspace to reflect the types of combat in which fifth generation F-22 fighters would be engaged. The F-22s have the capability to initiate combat at greater distances than fourth generation fighters, such as the F-16, so fourth generation fighters must apply diverse tactics which require airspace expansion in distance and altitude. The F-22s must train to combat all such threats regardless of where the aggressor aircraft are based.</p> <p>The location of the F-16 Aggressor Squadron within Alaska is not a connected action to the JPARC proposals. The majority of the JPARC proposals that involve Eielson AFB are Army proposals and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft. The details of the proposed F-16 relocation and training, including Major Flying Exercises such as RED FLAG Alaska, will be worked out in the</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		coming months. An environmental analysis will be prepared to address the environmental consequences of the proposed F-16 relocation within Alaska.
G0009-1	The TLO's scoping comments dated January 28, 2011, appear to have had no influence on development of the draft EIS. Because of this I am incorporating the TLO's previous objections by reference in this review to the draft EIS. Our earlier objection to remotely piloted aircraft (RPA)/unmanned aerial vehicle (UAV) corridors identified over Trust land needs to be corrected and expanded. The lack of spatial references in the scoping documents resulted in an underestimation of the amount of Trust land that will be impacted by unmanned aerial vehicle overflights. The following table shows specifically the number of Trust parcels involved and the total acreage for each of the proposed corridors. Area Parcels Acres Eielson R-2205 12 1,034 Eielson R-2211 31 1,898 Ft. Wainwright R-2205 20 3,363 Ft. Wainwright R-2211 87 3,532 Total Acres 9,827 Establishment of these corridors with RPA/UAV overflights can be expected to diminish value of these Trust lands for residential and/or recreational development; although difficult to quantify, any reduction in land value from these plans is unacceptable.	The noise levels generated by UAVs at altitudes greater than the "floor" altitude of 1,200 feet above ground level would be similar to or less than that generated by common civilian aircraft that fly in the same areas, and noise impacts would be expected to be minimal. UAV corridors would be used for transit (i.e., not loitering) less than four times per day, two days per week. Although individual overflights might be noticed, overall time-averaged aircraft noise levels beneath the transit corridors would remain well below generally recognized thresholds for significant impacts, and no reduction in land value would be expected to result from the proposed overflight noise. The notes for Table 3-64 are revised in the Final EIS to clarify that State lands include TLO land.
G0009-2	Establishment of these corridors with RPA/UAV overflights can be expected to diminish value of these Trust lands for residential and/or recreational development; although difficult to quantify, any reduction in land value from these plans is unacceptable.	Potential impacts to property values due to noise concerns associated with Unmanned Aerial Vehicles is addressed in Section 3.6.12.1. As stated in Section 3.6.12.3.1, "The noise levels generated under the proposed action are comparable to the noise levels generated by common civilian aircraft and are below the threshold in which adverse noise effects to human populations are expected. Thus, minimal impacts to the population from noise are anticipated under the proposed action. In addition, the complex nature of property valuation factors makes any estimation of the potential effects of noise on land values highly speculative. Other socioeconomic factors, such as business activity, employment, interest rates, land scarcity (or availability), and the nature of the local housing market are much more likely to affect property values than noise levels generated by UAV operations."
G0009-3	The TLO continues to object to inclusion of live fire on the west and northwest boundaries of the Yukon Training Area.	Training and live fire exercises will not change greatly from what has been experienced in the past. The expansion of special use airspace does not currently include additional range construction projects. It does allow the military to expand training, safely, during limited visibility and ceiling conditions. It further allows the Army to incorporate all its assets in a training environment as it must once deployed into an active operational area.
G0009-4	The TLO continues to object to inclusion of live fire on the west and northwest boundaries of the Yukon Training Area.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
G0009-5	The TLO continues to object to expansion of any use of the Yukon 1 MOA that could interfere with mineral development of the Trust Salcha Block of land.	Your objection is noted. The only proposal that overlaps with the Salcha Block lands under the Yukon 1 MOA is the Night Joint Training proposal. None of the proposed actions will affect surface or air access to mineral resources in the Salcha Block of land.
G0010-1	As stated in the previous comment period the airspace starting at 500 AGL throughout the MOA along with no restrictions on the scheduling of active use is unacceptable. This type of unrestricted activity is a serious hazard to wildland fire fighting and fire detection is flown in this area throughout the summer months. Simply raising the ceiling would create a safety buffer for all civilian aircraft and would allow Part 135 aircraft to operate legally within the airspace.	The Final EIS will be modified to state that coordination will occur between Air Force personnel and wildland fire fighting personnel regarding fire detection and response.
G0010-2	As stated in the previous comment period the airspace starting at 500 AGL throughout the MOA along with no restrictions on the scheduling of active use is unacceptable. This type of unrestricted activity is a serious hazard to wildland fire fighting and fire detection is flown in this area throughout the summer months. Simply raising the ceiling would create a safety buffer for all civilian aircraft and would allow Part 135 aircraft to operate legally within the airspace.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0011-1	On behalf of the Copper Basin Fish And Game Advisory Committee I am formally opposing the expansion of the Fox 3 MOA and more specifically the lowering of the floor of these areas from 5,000 feet to 500 feet for military operations with high speed aircraft. There are many reasons but the main reason we oppose this is for safety purposes for the countless flights that are flown for game counts, surveys, predator control, radio collar tracking of game, and for the thousands of hours of recreational flights for hunting, fishing and other outdoor activities. By mixing high speed jets with slow and hard to see private aircraft in the same airspace, we feel safety would be severely compromised and it would be unacceptable. There are thousands of hours flown each year by hundreds of folks in these areas, and a mid-air collision would be inevitable at some point in time if these changes are made.	The flight safety concerns the Committee and other aviation interests have expressed over the airspace proposals were of utmost importance throughout the planning processes and are addressed in the associated FEIS resource area discussions. While existing advisory services and initiatives have been successful in maintaining a safe flying environment for all civil and military airspace uses, the FEIS notes how these may be expanded with additional mitigation measures considered, as necessary, to further ensure the safe and compatible use of this airspace. As a key stakeholder, the Committee is strongly encouraged to participate in the Alaska Civil-Military Aviation Council meetings and communicate with the 11th Air Force Airspace Management Office to discuss any concerns you may have now or in the future regarding military flight activities in the State of Alaska.
G0012-1	A RESOLUTION BY THE DENALI BOROUGH ASSEMBLY SUPPORTING THE NO ACTION ALTERNATIVE CONCERNING THE	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Denali

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>JOINT PACIFIC ALASKA RANGE COMPLEX (JPARC)</p> <p>WHEREAS, the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Environmental Impact Statement proposes extending training, including live ordnance delivery, within the confines of the Denali Borough; and</p> <p>WHEREAS, the Denali Borough Assembly is the governing body of the Denali Borough; and</p> <p>WHEREAS, the areas in question are important to Denali Borough residents for a variety of uses including hunting, recreation, and access to private property; and</p> <p>WHEREAS restrictive and constraining uses of Denali Borough lands have been identified by the extension of the in-place bombing and military lands identified in the JPARC Environmental Impact Study.</p> <p>NOW THEREFORE BE IT RESOLVED: that the Denali Borough Assembly supports the “No Action” alternative concerning proposed realistic live ordnance delivery.</p>	<p>Borough and Alaskan resources. As explained in Sections 1.2 and 1.3 of the Draft EIS, the decision on which alternatives the Army and Air Force will pursue will be made in light of the Purpose and Need by Army and Air Force representatives following the review of all relevant facts, impact analyses, and comments received via the JPARC EIS public participation process.</p>
G0013-1	<p>VIA ELECTRONIC MAIL: NO HARD COPY TO FOLLOW National Park Service Alaska Regional Office 240 W. 5th Avenue Anchorage, AK 99501 ALCOM Public Affairs 9480 Pease Avenue, Suite 120 JBER, AK 99506 The following comments are provided for the draft environmental impact statement (DEIS) for proposed U.S. Department of Defense military training for the Joint Pacific Alaska Range Complex (JPARC) in Alaska:</p> <p>While the JPARC does not include park areas directly, it is near the Wrangell-St. Elias National Park and Preserve (WRST). Impacts on subsistence in one area necessarily influence subsistence in nearby areas. For this reason, there is concern regarding the effects of training operations on subsistence users within Alaska Game Management Unit 13, especially along the Denali and Richardson Highways. The subsistence analysis for the expanded Fox 3 and new Paxon MOAs is incomplete in terms of the communities analyzed, the data upon which the analysis is based, and how the communities are classified with regard to their dependence on subsistence. Limiting the subsistence analysis to the eight communities within 20 nautical miles of the MOAs does not accurately represent patterns</p>	<p>The Air Force recognizes that there are many individuals and communities who rely on the subsistence resources under the proposed Fox 3 and Paxon MOAs. The Region of Influence for this proposed action focused on those communities directly beneath or within 20 nautical miles of the proposed airspace in order to provide the characteristics of those communities who depend on the affected subsistence resources and may have fewer opportunities to find alternative subsistence resources. The 20 nautical miles was used as a best estimate of a maximum distance traveled without the use of aircraft. Text in the EIS has been revised to clarify the purpose and origin of the Region of Influence. Text has also been added to note that while the communities listed in Table 3-24 depend on the affected subsistence resources, there are individuals from other communities who also harvest subsistence resources in the area who could be also be adversely affected by potential impacts.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>of resource use and distribution in the Nelchina Basin/Copper Basin area. Many communities beyond those addressed in the analysis rely on resources in the impacted areas and consequently will be negatively impacted by the proposed actions. Resources are spread across the local landscape, and local residents go to where the resources are. Sometimes that means driving substantial distances. Instead of the handful of communities included in the draft EIS, the analysis should be expanded to all those communities with a positive customary and traditional use determination (C&T) under the Federal Subsistence Program for moose, caribou or both on lands within the Fox and Paxon MOAs. Customary and traditional use determinations are based on an analysis of all available data regarding patterns of resource use and provide a more realistic basis for identifying impacted communities than the 20 nautical mile rule.</p>	
G0013-2	<p>. . . In what follows, the phrase “potentially affected rural communities” refers to the communities that have C&T for moose or caribou in the MOAs.</p> <p>Also, community harvest data that is over twenty years old is not adequate to evaluate impacts to contemporary subsistence livelihoods (To those familiar with this data, the “most representative year” referred to in the analysis is identifiable as the most recent year for which comprehensive subsistence survey data are available.). JPARC could follow the lead of the Alaska Gas Pipeline Project and base its analysis on updated comprehensive community subsistence data, providing funding to support updated surveys where needed. The Susitna-Watana Hydroelectric Project is similarly considering the need to conduct updated comprehensive subsistence surveys as part of its planning process. As a first step, the list of potentially affected rural communities (as discussed above) could be examined in terms of when the most recent comprehensive harvest survey took place and whether an update is scheduled in the next year or two. For those potentially affected rural communities that are five or more years out from the most recent update and not on the list for an update, funding could be provided to the Alaska Department of Fish and Game Subsistence Division or a similarly qualified independent organization to collect this information. A decision on the project should be delayed until up-to-date subsistence information for the potentially affected rural communities can be incorporated into the subsistence impact analysis.</p>	<p>Section 3.1.13.1 of the Draft EIS acknowledges the community harvest data by the Alaska Department of Fish and Game (ADFG) is dated; however, it is the best data available per Council of Environmental Quality (CEQ) Section 1502.22 at the time the EIS was being developed. Text has been added to the Final EIS to clarify the reason for the dated information but no updated data is available to incorporate into the Final EIS.</p> <p>The Air Force evaluated the Alaska Stand Alone Pipeline EIS for updated data as suggested in the comment. The Draft Pipeline EIS was released for review in January 2012 and the subsistence analysis also uses dated information for community harvests (see http://www.asapeis.com/joomla/index.php/draft-eis). The Air Force also reviewed information on the Susitna-Watana Hydroelectric Project for subsistence information. The Federal Energy Regulatory Commission is in the early stages of the environmental impact analysis process. Scoping was completed earlier this year and data collection, including possible updates to subsistence data, is underway. However, it is not anticipated that this data would be available for use by the Air Force in the Final EIS.</p>
G0013-3	<p>Finally, limiting the communities with high dependence on subsistence to only those with majority Alaska Native populations fails to recognize the</p>	<p>An emphasis on Alaska Native culture was made in the impact analysis methodology because of the central role subsistence plays in that culture.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>importance of subsistence to other local residents. While it is appropriate for predominately Alaska Native communities to fall in the “high dependence” category, there are other rural communities in the area that should also be classified as such. Once up-to-date information is obtained regarding the harvest and use of subsistence resources (as described in the previous paragraph), this question should be revisited for all the potentially affected rural communities. Communities in which 80 percent or more of the households report using subsistence resources should be classified as high dependence regardless of the community’s composition.</p> <p>Thank you for the opportunity to comment, and for extending the comment period.</p> <p>If you have questions, you may contact Barbara A. Cellarius, Ph.D., Cultural Anthropologist/Subsistence Specialist, Wrangell-St. Elias National Park and Preserve, [deleted for privacy].</p>	<p>Alaska Native communities are likely to have higher sensitivity to any impact due to reduced employment opportunities and increased economic importance of harvest, and considerations of the social/cultural effects due to potential disruption in subsistence. It is not meant to downplay the importance of subsistence to rural non-Native residents. Community ranking is used to determine the significance of any potential impacts. The subsistence analysis in the Final EIS has been updated to note that communities with more than 80 percent of the population participating in subsistence activities are ranked as having a high dependence on subsistence resources as suggested in the comment.</p> <p>See also response to comment G0013-2.</p>
G0014-1	<p>The following are the Alaska Department of Natural Resources’ (DNR) comments and recommendations on the Definitive Action described in the EIS related to the Realistic Live Ordinance Delivery proposal. The first part of this response identifies issues related to clarity of the proposal and provides additional background information pertinent to the closure of state land. The second identifies proposed changes to the Realistic Live Ordinance Delivery option, and a final section focuses on those actions that may be required by the state to ensure public safety when live fire exercises are underway. These comments assume that either the Donnelly Training Area or the Blair Lakes Training Area are available and that the actual delivery of ordinance occurs within a limited area within each of these training areas. (1) It is also assumed that the military can or should be able to identify specific portions of the overall target area that may be affected at specific periods of the year.</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.</p>
G0014-2	<p>Clarity of Proposal. Table 2-5 identifies Airspace Designation and the annual days of use. In the case of R-2202A, B, C and D the number of days of use is approximately 250. In the case of R-2211 it is 170. However, on page 2-12, line 27, use days are identified as 150 annually. The text needs to be clarified to explain why R-2211 cannot be used more frequently, and there needs to be discussion, if Alternative B is selected, on the distribution of use days between the two Training Areas. It would seem that a more even distribution would result if alternative training sites were available.</p>	<p>The text will be clarified in the Final EIS to state the annual number of days for use in R-2211 is 170 days vice 150, as stated in Table 2-5. The days of use for R-2211 are correct as stated. As stated in DEIS Section 2.1.2.1.2, Alternative B, Lines 22-24, "The Blair Lakes Impact Area would provide for the use of inert ordnance only, given its current use by the Air Force, as well as its current configuration and hazard zone safety requirements." The Oklahoma Impact Area and the proposed inert targets (see Figure 2-4) in R-2202, on the other hand, will be used to a greater degree with the use of both</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		live and inert ordnance.
G0014-3	There also needs to be some discussion as to whether there is the ability by the military to shift the sortie approach from one attack angle/area to another in order to avoid the public recreation and hunting. This is important since the public uses particular areas at specific times of the year, and the avoidance of these areas through the selection or specific attack vectors would mitigate impacts.	The approach and release point for RLOD is only possible from the area between R2202 and R2211 due to the type of airspace required (restricted area). Due to land ownership near the other boundaries of the existing restricted areas, as well as existing routes for non-military aircraft, the expansion of R2202 is limited to the west side for the purpose of this proposal. Any further divisions to the proposed expansion areas (for individual activation) would result in airspaces too small to accomplish the task.
G0014-4	Based on discussions with JPARC personnel, the delivery of ordinance occupies a specific horizontal and vertical portion of the Drop Areas. For example, a delivery could use the area of R-2202A, as depicted in Figure 2-4. It would seem, then, that this horizontal and vertical airspace could be managed in such a way that during periods of the year when a sensitive public activity occurred near the impact zone, that the vector furthest away from this site could be selected for use at that time.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The management of the airspace as discussed in the comment will be further analyzed and a determination made in the Final EIS.
G0014-5	In general, then, the principal use of the ground evacuation area is related to moose hunting, but this hunting occurs during two periods, as noted above. The EIS identifies only the September period for moose hunting and it uses different dates than those actually associated with this hunting activity. Mitigation measures should therefore focus on this period of time. Moreover, this pattern is also likely to continue in the future; there are no additional state land disposals that are planned and the area lacks access and economically usable resources.	Revisions in the Final EIS include changes addressing concerns or additional information provided in this comment. The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0014-6	Changes to Mitigation Measures. While the state is very much interested in providing a training area for the military that permits the continuation of the current forces in the Fairbanks area, this must be weighted against the impact of the Realistic Live Ordinance Delivery option upon the public and, specifically, their use of state land. Our interest is in minimizing that impact. We also believe that the use of both the Blair Lake and Donnelly impact areas is appropriate since this alternative (B) minimizes adverse effects to public activity on state land during high use periods, which tend to	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	occur during the fall hunting season.	prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0014-7	The number of actual days that the ground evacuation area is closed under the Definitive Actions needs to be clarified. The text on pg 2-12 line 27 states activities would be conducted 150 days annually, while the table 2-5 presented just prior indicates 250 days of annual use.	Please see response to comment G0014-2.
G0014-8	Information provided by ALCOM planners indicates that no training activities will occur during Saturday and Sunday throughout the year. Additionally, pg 6 line 29 indicates that no training activities will occur after 7:00 pm on Friday including Saturday and Sunday. In recognition of use patterns by hunters, the year round restriction on training activities on weekends should be extended to include Friday afternoon. People using the ground evacuation area often gear up, travel to the area, and start using these areas beginning in the early afternoon on Friday. It is therefore appropriate to accommodate this activity since it is directly related to the weekend use of this area. Openings on Fridays should be restricted to 0700 to 1400 hours.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0014-9	The period when no training exercises will occur related to moose hunting season should be changed, to reflect the actual current pattern of use. Closure should occur from August 15 to September 15, November 15 to December 15, and January 15 to February 28. These dates may change over time and it is recommended that the military review the closure dates with the ADF&G at the beginning of the year (or another time that may be appropriate for the parties. The closure of the ground evacuation area between June 27 and July 11 is considered appropriate.	Revisions in the Final EIS include changes addressing concerns or additional information provided in this comment. The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0014-10	Include alternatives and/or recommendations for the horizontal/vertical stratification of the attack vectors, to provide for diversity of approach and to minimize impacts on the public.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0014-11	During the moose hunting periods, sorties should be directed to the Blair Training Area for inert ordinance and to the use of attack vectors that are more distant from Wood River. During the same period inert and live ordinance may use the Donnelly Training Area. Our preference is that the more northerly/easterly attack vectors be used during this period within this area.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0014-12	At other times of the year, operations are appropriate in either training area, although our preference is to use attack vectors that are to the north and east and that avoid the Wood River and Rex Trail areas in the Blair Lakes Impact Area and to use attack vectors with a similar orientation for the Oklahoma Impact Area, to avoid use areas to the west.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0014-13	In addition to these measures it is recommended that the military publish, at the beginning of the calendar year, proposed closure areas and the dates associated with this use. This will allow the public to know in advance which areas are to be avoided, especially if it is ultimately determined that both military training areas are to be used and that specific attack vectors are to be used. This information should be displayed on maps that are easy for the public to understand.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
G0014-14	The military should coordinate with local government and the Alaska Department of Natural Resources on an annual basis, or as needed, to provide information and maps that identify closures and public access restrictions.	The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.
G0014-15	<p>State to Prepare Regulations. As we have indicated in both discussion with military staff and in correspondence, since the military must have control over the surface at the times of ordinance delivery, the state will be obliged to develop a special use designation (SUD) for the impacted areas as well as implementing regulations. Without the use of these methods the federal government will not be able to ensure control over this area and therefore meet federal requirements for the control of surface activities in areas that it does not own.</p> <p>From our perspective, the SUD and its regulations must be developed in such a way that maximum public use of the ground evacuation areas is retained while closing such areas for the minimum period of time necessary to conduct such operations. The SUD will have to identify areas and dates of closure and will have to indicate which activities are affected. (We presume that all public access to and uses within the ground evacuation areas may not be precluded.) To ensure that we meet the test of minimizing impacts to the public, the mitigation measures that are identified above must be given careful consideration and incorporated where feasible. We also recommend Alternative B as described on p. 2-16 as the preferable option. The regulations must reflect the access recommendations contained in the SUD.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force proponent will work closely throughout the SUD process to provide detailed information on locations and durations of closures and a proposed safety and access control plan.</p>
G0014-16	I need to emphasize that DNR has also serious concerns with the proposed Military Operating Area (for aircraft) and specifically with the probable impacts of that proposal on public access, including both land access and aircraft movement. These concerns and the state's response to these issues are to be provided, however, by the Atlanta Department of Transportation and Public Facilities in separate correspondence.	Your concerns are noted. Please refer to responses to Alaska Department of Transportation and Public Facilities comments.
G0014-17	I need to emphasize that DNR has also serious concerns with the proposed Military Operating Area (for aircraft) and specifically with the probable impacts of that proposal on public access, including both land access and aircraft movement. These concerns and the state's response to these issues are to be provided, however, by the Atlanta Department of Transportation and Public Facilities in separate correspondence.	The FEIS Airspace Management and Land Use discussions address those potential impacts relating to air and land access for the MOA and other proposals in Chapter 3 of the Draft EIS; and Appendix K notes those existing and proposed mitigations that would be pursued with government agencies and other stakeholders along with other viable options for minimizing these impacts. The Air Force and the Army proponents for the different proposed actions will meet with affected agencies through the appropriate forums to

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		help find solutions to those issues and concerns that will support both military and agency needs.
G0014-18	Should you wish to discuss this further or require clarification of issues that are identified here, please contact Bruce Phelps, Chief, Resource Assessment and Development Section at 269-8592 or bruce.phelps@alaska.gov.	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.
G0015-1	<p>The Department of the Interior has reviewed the March 2012 Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Draft Environmental Impact Statement (Draft EIS). The Draft EIS analyzes twelve military training improvement actions proposed on military range lands, maritime training areas, and airspace units of the U.S. Department of Defense (DoD) in Alaska.</p> <p>Our comments and recommendations are made in accordance with the National Environmental Policy Act, Endangered Species Act, Fish and Wildlife Coordination Act, Bald and Golden Eagle Protection Act, Migratory Bird Treaty Act, Wild and Scenic Rivers Act, and Federal Land Policy and Management Act. Our general comments are below; specific comments are provided in Attachment 1. We believe these comments need to be addressed in the Final EIS.</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.</p>
G0015-2	<p>The short-tailed albatross (<i>Phoebastria albatrus</i>) is listed as endangered under the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq: 87 stat 884, as amended). Short-tailed albatross is a pelagic seabird whose range includes the Gulf of Alaska in the Temporary Maritime Activities Area during the months of April through October. In February 2010, the U.S. Navy (Navy) produced a Biological Evaluation (BE) for the Gulf of Alaska Navy Training Activities (referenced in Navy 2011). The BE assessed potential effects of Navy training activities on short-tailed albatross and described effective protective measures for the species. Information on potential effects of the proposed training activities and mitigation measures that will be used to avoid adverse impacts to short-tailed albatross in the Gulf of Alaska need to also be included in the Final EIS.</p> <p>The proposed programmatic action for “Missile Live Fire for AIM-9 and AIM-120” occurs in the summer range of the short-tailed albatross in the Gulf of Alaska. Therefore, the Final EIS needs to state that DoD will initiate consultation with the Fish and Wildlife Service (FWS) for short-tailed albatross, if the “Missile Live Fire for AIM-9 and AIM-120” action is developed into a “Definitive Action.”</p>	<p>As stated in the Impact Section 3.11.8.3, the Navy is already training with these weapons in this area, so the programmatic proposal would represent an increase in operations but not a completely new effect for this area. No new impacts to biological organisms are expected. In-depth discussions on all species effects from military activities in the Gulf of Alaska were provided in the Gulf of Alaska Navy Training Activities Final Environmental Impact Statement/ Overseas Environmental Impact Statement (Navy 2011). If the Missile Live-Fire for AIM-9 and AIM-120 proposal is developed into a ‘Definitive Action,’ Section 3.11.8.3.1 of the DEIS states, “because of the presence of endangered and threatened species in the project area, compliance with ESA Section 7 requirements are necessary including formal or informal consultation with NOAA Fisheries and USFWS.”</p> <p>The recommended text will be added to the FEIS, “DoD will initiate consultation with the Fish and Wildlife Service (FWS) for short-tailed albatross, if the Missile Live-Fire for AIM-9 and AIM-120 action is developed into a ‘Definitive Action.’ Appropriate coordination and consultation will be initiated with the National Marine Fisheries Service (NOAA Fisheries) to meet requirements of the Endangered Species Act and</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		Marine Mammals Protection Act as they pertain to listed marine species and marine mammals in the Gulf of Alaska."
G0015-3	<p>Migratory Birds and Bald and Golden Eagles</p> <p>As discussed below, existing data and additional information for eagles need to be presented and analyzed in the Final EIS. For example, the number of bald and golden eagles that inhabit the proposed Fox 3 and Paxson Military Operations Areas (MOAs) needs to be included and analyzed in the Final EIS. FWS maintains a geospatial database with historic eagle nest locations (see Attachment 2). These data, which represent nests easily observed from roads and highways, are available for public and agency use. It should be noted that, although not a complete depiction of all eagles in the area, the map indicates records of approximately 1,074 bald and golden eagle nest sightings within the JPARC Region of Influence as described in the Draft EIS. The Final EIS also needs to more clearly identify the number of bald and golden eagles potentially at risk during nesting periods due to DoD activities along the definitive low-level flight paths.</p>	<p>A mitigation measure has been included for all the definitive proposals that may include ground disturbance: "Consult with USFWS with regard to compliance with Bald and Golden Eagle Protection Act and MBTA. As required, conduct bald and golden eagle nest surveys in proposed Fox 3 and Paxson MOAs over previously unsurveyed areas. Coordinate the results with USFWS."</p> <p>Since the DEIS, we have obtained more mapping data for eagles and will incorporate relevant results.</p>
G0015-4	<p>The Final EIS also needs to analyze mitigation measures to help ensure all nesting and/or molting migratory birds are not adversely impacted by low-level flights. Scientific literature indicates human-caused disturbance can change behavior and spatial distribution of waterfowl (Manci et al. 1988, Dalhlgren and Korschgen 1992). Effects include interruption of feeding (Madsen 1985, Ward et al. 1994), displacement from feeding areas (Kramer et al. 1979, Belanger and Bedard 1989, Conomy et al. 1998), and increased energy expenditure resulting from escaping behaviors (Korschgen et al. 1985, Jensen 1990). If disturbances are sufficiently frequent, disturbance may result in reduction of energy reserves (White-Robinson 1982, Belanger and Bedard 1990, Miller et al. 1994) important for migration (Owen and Black 1989), molt (Taylor 1993, 1995), and survival (Haramis et al. 1986). The Draft EIS acknowledges significant bird migration routes in Interior Alaska and identifies high-density areas of nesting waterfowl that underlie the Expanded Fox 3 and Paxson MOAs; page 3-47 notes "Habitat used by ducks, geese and trumpeter swans is especially important under the southwestern part of the Fox 3 expansion area and the southern part of the proposed Paxson MOA, coinciding with the larger river systems and marshy areas." The combined Fox 3 and Paxson MOAs cover more than 2 million acres of nationally-significant waterfowl nesting habitat. Most migratory bird nesting (and the associated post-nesting molt of adult birds) occurs in</p>	<p>Mitigation measures, best management practices (BMPs), and standard operating procedures (SOPs) that currently exist are given in Appendix G, with the intention that their language will be adapted to apply to specific JPARC actions subsequent to internal review.</p> <p>Given the potential for loss or injury to aircrews and aircraft as a result of a bird-aircraft strike, extensive efforts are made by the military to avoid areas with high concentrations of birds, which are published in a handbook. Pilots are aware of and attempt to avoid migratory bird congregation areas for their own safety (e.g., to avoid bird strikes) as well as to minimize disturbance to the animals.</p> <p>Text will be added to include additional information from the literature to address nesting and molting migratory birds, including waterfowl.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Interior Alaska between April 15 and August 1. Prohibiting low-level flights (i.e., flights below 1,600 feet) between April 15 and August 1 (USFWS(2) 2007) could help reduce or eliminate the potential impact to nesting and molting migratory birds.</p>	
G0015-5	<p>Moreover, the Final EIS needs to provide and analyze information on the potential effects of aircraft overflights on nesting birds. While some studies have been conducted in Alaska on potential effects of aircraft on migratory birds; as noted below, the effects appear to differ widely among species of birds, and their potential habituation to aircraft disturbance. For example, Palmer et al. (2003) studied the effect of jet aircraft overflights on the parental care of peregrine falcons (<i>Falco peregrinus</i>) breeding along the Tanana River in Alaska during 1995-1997. Military jets flying at or below 150 meters (about 500 feet) in the vicinity of specific nest cliffs within established Military Training Routes caused only subtle differences in peregrine parental behavior, no significant differences in nest attendance patterns, and no reduction in productivity of nesting pairs (Nordmeyer 1999). Ward et al. (1999) observed the behavioral response of fall-staging flocks of Pacific Brant (<i>Branta bernicla nigricans</i>) and Canada geese (<i>B. canadensis taverneri</i>) to a variety of aircraft and found 75 percent of brant flocks and 9 percent of Canada goose flocks flew in response to overflights, with an inverse relation between altitude and response and with the greatest response occurring at aircraft altitudes between 305 and 760 meters (1,000 to 2,500 feet). In that study, lateral distance was a more consistent predictor of response than altitude, with the greatest disturbance occurring when aircraft were within a lateral distance of 1.6 kilometer (about 1 mile) to the flock. Please refer to Attachment 3 for citations of studies we believe will help facilitate analysis of the potential impacts of aircraft overflights on nesting birds. The resulting analysis needs to be included in the Final EIS.</p>	<p>We will review the additional references and add text to the FEIS, Appendix E, which contains a review of research on effects, primarily from aircraft overflights, on wildlife species.</p>
G0015-6	<p>We are concerned the newly proposed low-altitude MOA, extending from 500 to 5,000 feet above ground level (AGL) in both the Fox 3 and Paxson MOAs, could result in significant adverse impacts to nesting migratory birds. The “Definitive Actions” in the Draft EIS are vague and do not provide specific actions to protect a given resource. For example, the Proposed Mitigation for the Fox 3 and Paxson MOAs (Table K-2 on page K-9), states: “Consult with the USFWS with regard to compliance with Bald and Golden Eagle Act and MBTA. As required, conduct bald and golden eagle surveys in proposed Fox 3 and Paxson MOAs over previously unsurveyed areas.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>Coordinate the results with USFWS.” The Final EIS needs to clarify and specify proposed mitigation measures for “Biological Resources,” including nesting migratory birds. The most commonly-recommended best management practice for protecting nesting swans, other waterbirds, and raptors (as well as other wildlife) in the vicinity of aircraft overflight is to maintain aircraft operating guidelines limiting helicopter and fixed-wing overflights to a minimum of 400-500 meters (approximately 1,300-1,600 feet AGL) with no circling over nests or aggregations (Komenda-Zehnder et al. 2003, and Churchill and Holland 2003). The National Bald Eagle Management Guidelines (USFWS 2007) recommend helicopters and fixed-winged aircraft avoid eagle nests by 1,000 feet during the breeding season, except where eagles have demonstrated tolerance for that activity. DoD needs to consult with the FWS prior to completing the Final EIS to determine what specific protective mitigation will need to be included in the Final EIS to protect nesting migratory birds.</p>	<p>actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will be consulting with the USFWS prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect nesting raptors and other migratory birds. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of waterfowl concentration areas.</p>
G0015-7	<p>We recommend that the footprint of the Fox 3 MOA, as described in Alternative E, be moved to the north by approximately 20 nautical miles to help reduce the negative effects on opportunities for solitude in the Lake Louise area.</p>	<p>Alternative E was created in response to public comments, in order to avoid impacts to the Lake Louise area. This comment is duly noted.</p>
G0015-8	<p>We are concerned that the flight ceiling for both the FOX 3 and Paxson MOAs in both Alternatives A and E has been lowered from 5,000 feet AGL to 500 feet AGL. It should be noted that the Bureau of Land Management (BLM), through its recreation program, has documented over the years, numerous encounters by recreational users of BLM-managed lands with military overflights. These encounters have included low level overflights in the current Fox 3 MOA on the Upper Tangle Lakes and Delta River; some of these encounters included shockwaves and loud noise associated with aircraft breaking the sound barrier. We believe a lower flight ceiling in the Fox 3 MOA, combined with the same lower flight ceiling in the proposed new Paxson MOA, would likely reduce opportunities for solitude on many of the lands BLM manages. With recreational visitation to developed facilities and backcountry trails on BLM-managed lands in this area and on the Gulkana and Delta Wild and Scenic Rivers annually exceeding 150,000 visitors, the Final EIS needs to include avoidance areas and mitigation measures that will preserve opportunities for solitude on the nationally-designated Gulkana and Delta Wild and Scenic Rivers and associated developed facilities for the Fox 3 and Paxson MOAs in both Alternatives A and E.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
G0015-9	<p>We recommend that the Final EIS identify a mechanism (e.g., telephone number or web site) for providing the public and land managers at least annually, or more often as appropriate, information on flights and maneuvers. This mechanism should be structured so that it offers the opportunity for recreational users to provide feedback to DoD, such as reports of non-compliance and/or complaints. This could also be used by both DoD and BLM for tracking issues and documenting successful mitigation.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
G0015-10	<p>Under the proposed action #6, newly created “corridors” between Eielson Air Force Base (AFB) to R-2211; Eielson AFB to R-2205; Allen Airfield to R-2202; R-2202 to R2211; R2205 to R2202; Fort Wainwright to R-2211; and Fort Wainwright to R-2205 would, in essence, create a virtual “wall” extending nearly 90 air miles from Fairbanks and Fort Greely. This virtual “wall” would go from 1,200 AGL to 17,999 AGL. DoD has indicated that these corridors would be in operation from 07:00-19:00 Monday through Friday, or as extended by a Notice to Airmen. It is our understanding that the purpose of these corridors is to allow operation of Unmanned Aircraft Systems (UAS). According to the Draft EIS, if the Army meets all Federal Aviation Administration requirements for UAS use in the National Air Space, the Certificate of Authorization process, as it currently stands, would shut down the airspace in these proposed corridors. However, even if military Unmanned Aerial Vehicle aircraft were outfitted with Mode-C transponders, most of the BLM Alaska Fire Service (AFS) air fleet and contracted aircraft do not have Traffic Collision Avoidance avionics.</p> <p>A virtual “wall” of this magnitude, as described in the Draft EIS, would likely result in significant negative effects on the BLM AFS and Alaska Department of Natural Resources Division of Forestry (DOF) joint aviation operations for fire management by cutting off access to the east for AFS and DOF, and cutting off access for DOF to the west. Three of the five wildland fire air tanker bases located in Alaska are on either side of this virtual “wall” in addition to all of the helitack and smokejumper bases. Furthermore, 1,200 to 17,999 AGL cuts off all Visual Flight Rules (VFR) traffic heading in either direction. As a result, only pressurized aircraft (the majority of which are not part of the BLM air fleet or their contracted fire management aircraft)</p>	<p>Many comments have been received regarding the potential for significant impacts the proposed UAV corridors may have on VFR and IFR aircraft transit through the affected areas when these corridors are active. EIS Sections 3.6.1 and 3.6.3 address those concerns and note that the potential impacts on other airspace uses would be a key consideration in scheduling only those corridors/altitude layers required to support individual Unmanned Aerial Vehicle (UAV) mission needs. As noted in the EIS Section 2.1.6, the FAA, DoD, and other agencies continue to collaborate on those near , mid-, and long-term solutions for integrating UAV operations and supporting ground elements into the National Airspace System while ensuring they do not present any flight risks to other airspace users. Pending overall decisions on how this can be done and further evaluation by the FAA on the JPARC corridor proposals, it is imperative that the military proceed with identifying and evaluating those corridor options that would be required to support Army UAV missions. For that reason a Restricted Area designation was assessed for the proposal as the most restrictive option each may have on other airspace uses.</p> <p>Regarding your concern that the UAV proposal would create a virtual “wall” from 1,200 AGL to 17,999 MSL and result in significant negative effects on the BLM Alaska Fire Service (AFS) and Alaska Department of Natural Resources Division of Forestry (DOF) joint aviation operations for fire management by cutting off access to the east for AFS and DOF, and cutting off access for DOF to the west, please allow us to clarify the UAV proposal and demonstrate that access for fire safety will be available at all times. Corridors 8 nautical miles (NM) wide with proposed altitudes up to 17,999 feet MSL would be segmented into three altitude layers for use of only those</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>could make the east-west transition, since only pressurized aircraft are capable of flying at altitudes of 18,000 and above.</p> <p>We believe DoD needs to include in the Final EIS, an alternative approach to UAS use of air space and corridors that does not negatively impact AFS/DOF aviation operations for fire management, which are essential to helping protect life and property during wildland fires. In order to eliminate this virtual “wall,” we recommend DoD continue the practice of moving UAS between MOAs and other special use air space via ground transportation.</p>	<p>altitudes required for specific UAV types/missions: 1,200 feet to 2,999 feet AGL, 3,000 feet AGL to 8,999 feet MSL, and 9,000 feet to 17,999 feet MSL. UAV operations could be conducted between 7:00 a.m. and 7:00 p.m., Monday-Friday with other times as stipulated by a Notice to Airmen (NOTAM). However, the Army intends only to activate the altitude layer(s) needed to support the individual UAV mission, turning off the restricted airspace once the UAV has transitioned through the corridor. These segmentations will allow AFS/DOF aviation operations for fire management, along with civilian pilots, to pass through at those altitudes not required for UAV missions. For example, if the 9,000 feet to 17,999 feet MSL segmentation is active, AFS/DOF, along with civilian pilots, can use the airspace in that area at any altitude below 8,999 feet MSL or above 18,000 feet MSL. If the 3,000 feet AGL to 8,999 feet MSL segmentation is active, ASF/DOF, along with civilian pilots, can use the airspace in that area at any altitude below 2,999 feet AGL or above 9,000 feet MSL. If the 1,200 feet to 2,999 feet AGL segmentation is active, ASF/DOF, along with civilian pilots, can use the airspace in that area at any altitude below 1,199 feet AGL or above 3,000 feet AGL.</p>
G0015-11	<p>We appreciate the opportunity to comment on this document. For technical assistance or questions regarding threatened/endangered species or migratory birds (including bald and golden eagles), please contact Jewel Bennett at the Fairbanks FWS Field Office at 907-456-0324. For technical assistance or questions regarding BLM-managed lands, wildfire activities, or Wild and Scenic Rivers, please contact Serena Sweet at the Anchorage BLM State Office at 907-271-4543.</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.</p>
G0015-12	<p>Page 1-36, Line 42, Section 1.6.4.3.1 Federal Agencies with Jurisdiction by Law, United States Fish and Wildlife Service: The jurisdictional responsibility of the FWS for administration of the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act needs to be added to this section.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The information noted in the comment will be added as part of the Final EIS.</p>
G0015-13	<p>Pages 2-6 and 2-7, Section 2.1.1.1. Alternative A: The Draft EIS states that the flight ceiling for routine training exercises in Alternative E for the Paxson MOA would be limited to 13,000 feet Mean Sea Level (MSL) and above (see page 2-7), while the flight ceiling for routine training exercises in Alternative A is 14,000 feet MSL and above (see page 2-6). The Final EIS needs to clarify why the flight ceiling is lower in Alternative E than Alternative A, given that Alternative E was designed to “provide a greater separation from the airways, jet routes, and airfields located south of the</p>	<p>Thank you for noting this error as this was discovered after the DEIS was published and has been corrected to reflect 14,000 feet MSL for both alternatives.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	proposed airspace boundaries” (page 2-7). We believe the flight ceiling for routine training exercises in the Paxson MOA for Alternative E needs to at least match the flight ceiling for routine training exercises for the Paxson MOA in Alternative A at 14,000 feet MSL and above, and that this information needs to be included in the Final EIS.	
G0015-14	Page 3-13, Line 13, Section 3.1.1.3.1 Alternative A: To ensure accuracy, the reference to “fire” needs to be changed here, and throughout the Final EIS, to “wildland fire.”	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The word usage will be updated to reflect the appropriate terminology.
G0015-15	Page 3-30, Lines 23-26, Section 3.1.3.3.1 Alternative A, Bird/Wildlife-Aircraft Strike Hazards: The Draft EIS does not specify the “consideration of additional means for monitoring...heightened risks of bird strikes” in the Fox 3 and Paxson MOAs zones. The Final EIS needs to specify “limits that would be placed on low-altitude flight activities.” The BLM-managed lands within these proposed MOA expansions provide habitat for populations of sensitive species (e.g., trumpeter swan and golden eagle) that may be adversely affected due to bird strikes caused by military aircraft between the 500 to 2,500 foot AGL. The Final EIS also needs to include information on what scientific means would be used to track migrations of birds, since “anecdotally observing lots of birds” is insufficient. As identified in Bruderer (1997) and Gauthreaux and Belser (2003), use of radar equipment can help in determining when large flights of birds are traveling north before and/or during Major Flying Exercise (MFEs) and regular training events. In addition, monitoring weather systems, especially wind speed and direction, can also help determine when to expect higher frequencies of migrations (Gauthreaux and Belser 2003).	Because bird/wildlife-aircraft strikes can present a serious hazard to all aircraft operations, the military will use the necessary means available as part of their BASH programs to detect and avoid those areas where there may be a potential flight safety risk. Additional details were included in the FEIS to reflect the information noted in the comment, as applicable.
G0015-16	Page 3-31, Line 4, Section 3.1.3.3.1 Alternative A, Ground Safety: The phrase “wildlife fires” needs to be corrected in the Final EIS to read “wildland fire” and “wildfire management” needs to be corrected to read “wildland fire management.”	The text will be changed in the Final EIS to address the comment.
G0015-17	Page 3-31, Line 6, Section 3.1.3.3.1 Alternative A, Ground Safety: The phrase “fire management” needs to be corrected in the Final EIS to read “wildland fire management.”	The text will be changed in the Final EIS to address the comment.
G0015-18	Page 3-49, Lines 25-29, Section 3.1.8.3.1 Alternative A: The Final EIS needs to ensure that the proposed Fox 3 and Paxon MOAs include the 3,000-foot AGL overflight buffer over the Nelchina Caribou Herd Calving Grounds (represented in Figure 3.5 on page 3-41) annually from May 15 to June 15. This also corresponds with Wolfe et al. 2000, who recommends	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	minimizing disturbance during critical stages (i.e., calving season) when cows were the most susceptible to elevated energy requirements.	<p>and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will be consulting with the ADF&G prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>
G0015-19	Page 3-50, Lines 2-3, Section 3.1.8.3.1 Alternative A: We recommend maintaining in the Final EIS, a limitation of supersonic operations at altitudes of 5,000 feet AGL, or 12,000 feet MSL to help minimize noise disturbance to wildlife inhabiting the area when operations take place.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The limitation on supersonic operations noted in this comment is the current restriction for the Fox 3 MOA and would apply to the expanded MOA.</p>
G0015-20	Page 3-50, Line 35, Section 3.1.8.4 Mitigations: In addition to all mitigation measures listed, the Final EIS needs to include an extension of “established noise sensitive areas” (see Figure D-3 on page D-13) that encompasses the west fork of the Gulkana National Wild and Scenic River. This extension is necessary due to the high number of active Bald Eagle nests located in that area, as identified by BLM productivity surveys conducted there every three years.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>The Final EIS incorporates additional eagle nesting data that was available. The Air Force will complete consultation with the U.S. Fish and Wildlife Service prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect nesting raptors and other migratory birds. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of waterfowl concentration areas.</p>
G0015-21	<p>Page 3-50, Line 35, Section 3.1.8.4 Mitigations: The Final EIS needs to include the Dall sheep lambing area within the Clearwater Mountains and establish a noise sensitive area in that identified location. Identified Dall sheep spring mineral licks also need to be included in the established seasonal flight avoidance areas within the Clearwater Mountain area and upper Susitna drainages.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will consult with the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>
G0015-22	<p>Page 3-99, Lines 17-18, Section 3.1.13.4 Mitigations, first bullet: We believe that use of aircraft, which has been determined as a customary and traditional use for all federal subsistence communities affected by the Fox 3 and Paxson MOAs expansion/creation, may be significantly affected during open federal subsistence hunting from August 1 through August 31, October 1 through November 30, and January 1 through March 31 (caribou season). Therefore, we recommend in the Final EIS, an extension of the time frame for “No MFES” to cover the period of August 1 through September 30 in the Fox 3 and Paxson MOAs to avoid the federal subsistence moose season and the first half of the federal subsistence caribou season, the most intensively hunted season. Since the Fox 3 and Paxson MOAs encompass most of unencumbered BLM lands open to federal subsistence hunting, this would help ensure that potential adverse effects on federal subsistence use would be</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	minimized.	management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.
G0015-23	Page 3-99, Lines 26-29, Section 3.1.13.4 Mitigations, fourth bullet: The Final EIS needs to (1) specify the time frames for this proposed mitigation; i.e., “Conduct regular meetings with regulating agencies...” and (2) identify what thresholds would be required for the USAF to “adjust flight avoidance locations, or to add new ones.”	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0015-24	Page 3-237, Line 15, Section 3.4.8.1 Affected Environment, Table 3-50: This table references a U.S. Geological Survey (USGS) 2011 publication; however, the publication is not included in the list of references in Section 6. This needs to be corrected in the Final EIS.	This appears to be a typo and needs to be changed to “USGS 1991”, which refers to the vegetation land cover GIS data that we used to generate all vegetation tables.
G0015-25	Page 3-330, Lines 23-24, Section 3.7.6.1 Affected Environment: The Draft EIS references USGS surface-water discharge data (USGS 2011-1); however, the data publication is not included in the list of references in Section 6. This needs to be corrected in the Final EIS.	The USGS 2011-1 reference will be added to Section 6 in the Final EIS.
G0015-26	Page 4-27, Line 3, Section 4.8.8 Biological Resources: The Final EIS needs to more fully discuss cumulative impacts to biological resources in the Fox 3 and Paxson MOAs and adjacent areas. With new mineral exploration, large hydropower projects (e.g., the Susitna-Watana project), new oil/gas pipelines, and various other land developments in place or reasonably foreseeable, the cumulative effects of all of these land decisions, in addition to these airspace/temporary ground structures, could have a significant and synergistic effect on many biological resources. Therefore, we believe both direct and indirect cumulative effects issues; geographic scope; timeframe; and past, present, and reasonably foreseeable actions, need to be more fully analyzed for the proposed expansion of Fox 3 and Paxson MOAs.	The FEIS includes additional projects and actions identified during the public comment period, including the Susitna-Watana project, that may overlap with the JPARC region of activities. Additional evaluation of potential cumulative effects is included in Chapter 4 of the FEIS, particularly for the area coinciding with the proposed expanded Fox 3 and Paxson MOAs. The analysis acknowledges that this area will come under increasing pressures from human activities, and these could have potentially significant impacts on multiple resources including wildlife, qualities of solitude, hunting and recreational opportunities and access for various productive uses.
G0015-27	Pages D-15 and 16, Table D-6 Flight Avoidance Areas: The Table D-6 Flight Avoidance Area entry for row #36 is incorrect. This needs to be corrected in the Final EIS to read “Gulkana” and not “Juliana” National Wild and Scenic River.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The noted entry will be corrected in the Final EIS.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
G0015-28	<p>While we agree with the Flight Avoidance Areas depicted in Table D-6 for both the Delta and Gulkana National Wild and Scenic River areas (row 19 and row 36 [as corrected], respectively); we believe that the flight ceiling for those areas needs to be changed in the Final EIS to 5,000 feet AGL, rather than 5,000 feet MSL. Because much of the land underneath the Fox 3 and Paxson MOAs is at an elevation of approximately 1,500 to 3,000 feet above sea level (e.g., Paxson is approximately 2,500 feet above sea level), a 5,000 feet MSL ceiling is effectively only 2,000 to 3,500 feet AGL. To preserve the opportunity for solitude, overflight operations in the vicinity of the Gulkana and Delta Wild and Scenic Rivers would need to occur at least 5,000 feet AGL.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
G0015-29	<p>In addition, we believe the flight avoidance times of year need to be expanded to include the busy summer recreation and fall hunting seasons. Therefore, the proposed avoidance time of year for the Gulkana and Delta Wild and Scenic Rivers needs to be changed in the Final EIS from June 27 through July 11 to May 15 through September 30. These dates more closely match many of the dates for the other avoidance areas listed, and would offer more opportunities for solitude, since most of BLM’s busiest recreational facilities, as well as the Gulkana Wild and Scenic River, would be underneath the new Paxson MOA.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0015-30	<p>Pages K-19, 23, and 24, Table K-2 Proposed Mitigations: We believe “Land Use-Recreation” and “Land Use” mitigations identified to occur from June 27 to July 11 and from August 20 to September 30 for MFE operations in the Fox 3 and Paxson MOAs need to be changed in the Final EIS to include the dates of May 15 through September 30. The May 15 through September 30 timeframe dates more closely match many of the dates for the other avoidance areas listed, and offer more opportunities for solitude since most of BLM’s busiest recreational facilities as well as the Gulkana Wild and Scenic River would be contained underneath the new Paxson MOA.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0015-31	<p>Page K-20, Table K-2 Proposed Mitigations: While we support the avoidance area extending five nautical miles on either side of both the Gulkana and Delta Wild and Scenic River areas, in order to preserve solitude, a 5,000-foot AGL (rather than a 5,000 foot MSL) flight ceiling needs to be included in the Final EIS. We also believe the Final EIS needs to indicate that the expanded avoidance area will be in effect from May 15 through September 30 annually.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
G0015-32	<p>Page K-21, Table K-2 Proposed Mitigations: The Final EIS needs to identify a flight ceiling of 5,000 feet AGL, an avoidance area extending 5 nautical miles, and a timeframe to include May 15 through September 30 for the “Land Use-Recreation” mitigation. This will ensure consistency with previous comments regarding BLM-managed lands and subsistence use areas.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0015-33	<p>Page K-25, Table K-2 Proposed Mitigations: Because of the importance of reducing or eliminating the potential to ignite wildfires on BLM (and other) lands within these MOAs, we support the mitigations for the release of flares</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	and chaff in the Fox 3 and Paxson MOAs, and recommend specifying in the Final EIS, a release altitude of at least 2,000 feet AGL between October and May, and 5,000 feet AGL between June and September.	<p>recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0015-34	<p>Attachment 2 Map of Historic Eagle Nest Locations [Map]</p> <p>NOTE: GIS shape files and maps to be used in analysis for the Final EIS are available through the Fairbanks Fish and Wildlife Service Field Office. Please contact Jewel Bennett at 907-456-0324.</p>	We have received additional eagle nest data and will analyze with regard to the definitive proposals in the Final EIS.
G0015-35	<p>Attachment 3 References</p> <p>Belanger, L., and J. Bedard. 1989. Responses of staging greater snow geese to human disturbance. <i>Journal of Wildlife Management</i> 53:713-719.</p> <p>Belanger, L., and J. Bedard. 1990. Energetic cost of man-induced disturbance to staging snow geese. <i>Journal of Wildlife Management</i> 54:36-41.</p> <p>Bruderer, B. 1997. The study of bird migration by radar, part 2: major achievements. <i>Naturwissenschaften</i> 84: 45–54.</p> <p>Churchill, B., and B. Holland. 2003. Wildlife and aircraft operation: assessment of impacts, mitigation and recommendations for best management practices in the Peace Region. Peace Region, Ministry of Water, Land and Air Protection. Fort St. John B.C. 77 pp.</p> <p>Conomy, John T., J.A. Dubovsky, J.A. Collazo, and W.J. Fleming. 1998.</p>	<p>Thank you for the references; approximately 40 percent of those listed were reviewed along with many more and presented in Appendix E as a review of research on noise effects, primarily from aircraft overflights, on wildlife species. DEIS Sections 3.1.8.3 and 3.1.8.4 provide the most thorough impact analysis and mitigations with regard to low-level aircraft overflight and noise (Fox/Paxon MOAs).</p> <p>Text will be added to include additional information from the literature to address nesting and molting migratory birds, including waterfowl, in the Final EIS.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>Do Black Ducks and Wood Ducks Habituate to Aircraft Disturbance? The Journal of Wildlife Management, Vol. 62, No. 3 (Jul., 1998), pp. 1135-1142.</p> <p>Dahlgren, R. B., and C. E. Korshgen. 1992. Human disturbances to waterfowl: an annotated bibliography. U.S. Fish and Wildlife Service Biological Report 188.</p> <p>Gauthreaux, S.A. and Belser, C.G. 2003. Radar ornithology and biological conservation. Auk 120: 266-77.</p> <p>Haramis, G. M., J. D. Nichols, K. H. Pollock, and J. E. Hines. 1986. The relationship between body mass and survival of wintering canvasbacks. Auk 103:506-514.</p> <p>Jensen, K. C. 1990. Responses of molting Pacific black brant to experimental aircraft disturbance in the Teshekpuk Lake Special Area, Alaska. Dissertation, Texas A&M University, College Station, Texas, USA.</p> <p>Komenda-Zehnder, Susanna, M. Cevallos, and B. Bruderer, Prof. Dr. 2003. Effects of Disturbance by Aircraft Overflight on Waterbird – An Experimental Approach. International Bird Strike Committee. Warsaw 5-9, May. 12 pp.</p> <p>Korschgen, C. E., L. S. George, and W. L. Green. 1985. Disturbance of diving ducks by boaters on a migrational staging area. Wildlife Society Bulletin 13:290-296.</p> <p>Kramer, G. W., L. R. Rauen, and S. W. Harris. 1979. Populations, hunting mortality, and habitat use of black brant at San Quintin Bay, Baja California, Mexico. Pages 242-254 in R. L. Jarvis and J. C. Bartonek, editors. Management and biology of Pacific Flyway geese: a symposium. OSU Book Stores, Corvallis, Oregon, USA.</p> <p>Madsen, J. 1985. Impact of disturbance on field utilization of pink-footed geese in west Jutland, Denmark. Biological Conservation 33:53-63.</p> <p>Manci, K. M., D. N. Gladwin, R. Vilella, and M. G. Cavendish. 1988. Effects of aircraft noise and sonic booms on domestic animals and wildlife: a literature synthesis. U.S. Fish and Wildlife Service Report</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>88/29.</p> <p>Miller, M. W, K. C. Jensen, W. E. Grant, and M. W. Weller. 1994. A simulation model of helicopter disturbance of molting Pacific black brant. <i>Ecological Modeling</i> 73:293-309.</p> <p>Navy 2011. Gulf of Alaska Navy Training Activities Environmental Impact Statement/Overseas Environmental Impact Statement.</p> <p>Nordmeyer, D.L. 1999. Effects of jet aircraft overflights and other potential disturbances on behavioral responses and productivity of nesting peregrine falcons. Thesis, United States Geological Survey-Oregon Cooperative Fish and Wildlife Research Unit and Department of Fisheries and Wildlife, Oregon State University, Corvallis, USA.</p> <p>Owen, M., and D J. Black. 1989. Factors affecting the survival of barnacle geese on migration from the breeding grounds. <i>Journal of Animal Ecology</i> 58: 603-617.</p> <p>Palmer, Angela G., D.L. Nordmeyer, and D.D. Roby. 2003. Effects of Jet Aircraft Overflights on Parental Care of Peregrine Falcons. <i>Wildlife Society Bulletin</i>, Vol. 31, No. 2. pp. 499-509.</p> <p>Taylor, E. J. 1993. Molt and bioenergetics of Pacific black brant (<i>Branta bernicla nigricans</i>) on the Arctic Coastal Plain, Alaska. Dissertation, Texas A&M University, College Station, Texas, USA.</p> <p>Taylor, E. J. 1995. Molt of black brant (<i>Branta bernicla nigricans</i>) on the Arctic Coastal Plain, Alaska. <i>Auk</i> 112:904-919.</p> <p>USFWS. U.S. Fish and Wildlife Service. 2007. National Eagle Management Guidelines. 23 pp. http://alaska.fws.gov/eaglepermit/pdf/national_guidelines.pdf</p> <p>USFWS (2). U.S. Fish and Wildlife. 2007. ADVISORY: Recommended Time Periods for Avoiding Vegetation Clearing in Alaska in order to Protect Migratory Birds at http://alaska.fws.gov/fisheries/fieldoffice/anchorage/pdf/vegetation_clearing.pdf</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Ward, David H.; R.A. Stehn, W.P. Erickson, and D.V. Derksen. 1999. Response of Fall-Staging Brant and Canada Geese to Aircraft Overflights in Southwestern Alaska. <i>The Journal of Wildlife Management</i>, Vol. 63, No. 1. pp. 373-381.</p> <p>Ward, D.H., R. A. Stehn, and D. V. Derksen. 1994. Response of staging brant to disturbance at the Izembek Lagoon, Alaska. <i>Wildlife Society Bulletin</i> 22:220-228.</p> <p>White-Robinson, R. 1982. Inland and saltmarsh feeding of wintering brant geese in Essex. <i>WildFowl</i> 33:113-118.</p> <p>Wolfe, S.C., Griffith, B., and Gray Wolfe, C.A. 2000. Response of reindeer and caribou to human activities. <i>Polar Research</i> 19:63-73.</p>	
G0016-1	<p>The City of North Pole (CONP) would like to take this opportunity to comment on the Draft Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the joint Pacific Alaska Range Complex (JPARC) in Alaska.</p> <p>The City of North Pole supports the U.S. Air Force and Army and their missions in Alaska and recognizes the need for expanding JPARC to accommodate current and future training needs. The CONP supports the increased use of JPARC, and the planned expansion as it represents no overall negative impact on the community. However, the analysis of the environmental impacts assumes the current force structure at Eielson Air Force Base and Fort Wainwright as a baseline and does not consider an alternative force structure basing scenario identified in the Air Force’s proposed fiscal year (FY) 2013 budget.</p> <p>The JPARC ranges and facilities far surpass the quality and quantity of similar range functions found in other locations within the continental United States and Hawaii. The large size of the JPARC ranges allow for the use of live ammunition from all Army, Air Force, and Navy platforms and weapons systems; allows the Air Force to fly at combat speeds well over Mach 1; allows for joint exercises between the Army, Air Force, Marines, Navy, Coast Guard and our Allies in weather conditions ranging from sub-zero arctic temperatures to hot humid summer days; and results in the finest training opportunities in the United States for our soldiers, sailors, and airmen. The CONP is proactive in addressing military concerns on JPARC</p>	<p>Thank you for your comment highlighting the capabilities proposed for the JPARC in this EIS. The Army and Air Force will continue to work closely and cooperatively with the State of Alaska to enhance both the JPARC and State resources for the benefit of the state and its citizens.</p> <p>The proposed relocation of the F-16 Aggressor Squadron from Eielson AFB to Joint Base Elmendorf-Richardson (JBER) is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. Therefore, the relocation of the F-16 Aggressor Squadron is not included in the JPARC Modernization and Enhancement EIS. This move is a completely separate NEPA action, and a separate NEPA document will be prepared to address the impacts of the restructuring program. The airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower-altitude airspace to reflect the types of combat in which fifth-generation F-22 fighters would be engaged. The F-22s can initiate combat at greater distances than fourth-generation fighters, such as the F-16, so fourth-generation fighters must apply diverse tactics that require airspace expansion in distance and altitude. The F-22s must train to combat all such threats, regardless of AGL, where the aggressor aircraft are based.</p> <p>The location of the F-16 Aggressor Squadron within Alaska is not a connected action to the JPARC proposals. The majority of the JPARC proposals that involve Eielson AFB are Army proposals, and ALCOM does</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>utilization and strives to lead the nation in willingness and ability to ensure that the military can conduct world class training missions and significantly improve readiness status.</p> <p>The CONP believes it is necessary for the State of Alaska and the Department of Defense to continue working closely and cooperatively in order to enhance both the use of the JPARC and the development of the natural resources located within the JPARC, and surrounding environs, for the benefit of the State and its citizens.</p> <p>The proposal by the Air Force to move the F-16 Aggressor squadron from Eielson Air Force Base(Eielson) to Joint Base Elmendorf-Richardson (JBER) could change the dynamics of JPARC training scenarios and conduct, and could affect our community’s support for JPARC use and expansion. The CONP’s comments will be divided into two broad sections - comments dealing directly with the current Draft EIS and existing Alaska force structure locations, and additional comments on the potential impacts resulting from the Air Force’s proposed Aggressor Squadron movement to JBER.</p> <p>Review and Comments on the movement of the F-16 Aggressor Squadron to JBER and the impacts on the JPARC Draft EIS</p> <p>While not analyzed as an alternative in the JPARC Draft EIS, the Air Force announced plans to relocate the F-16 Aggressor Squadron, currently based at Eielson AFB in support of military training activities, to JBER. The stated purpose of the proposed move is to reduce operating costs. Statements in the Draft EIS indicate that part of the justification for expanding the FOX MOA airspace to the south, is to reduce operational costs of training exercises, by lowering the amount of fuel required to reach the training airspace from JBER. These two statements seem to be in conflict with one another. It is also not clear what the impacts of relocation of the F-16 squadron might have on airspace and the corresponding civil facilities in Anchorage, including Anchorage International Airport. The objective of the following review is to determine what facts and findings within the draft EIS require greater review for this alternative, and which impacts would invalidate or contradict the stated reasons for planned move.</p> <p>The JPARC EIS was prepared for anticipated scenarios exclusive of the</p>	<p>not anticipate those being impacted by the proposed move of the F-16 aircraft. The details of the proposed F-16 relocation and training, including major flying exercises such as RED FLAG Alaska, will be worked out in the coming months. An environmental analysis will be prepared to address the environmental consequences of the proposed F-16 relocation within Alaska.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>proposed Aggressor Squadron move. The relocation of the Aggressors is only briefly mentioned in the Draft EIS. However, discussion of the proposed FOX3 MOA expansion and creation of the PAXON MOA are predicated on reducing travel time to useable airspace from JBER and creating a common ground for JBER-assigned aircraft and the Aggressors.</p> <p>The following concerns arise based on the proposed airspace expansions:</p> <ol style="list-style-type: none"> 1. Cost for "dry targets" in the new airspace. 2. Transit distance for Aggressors to the YUKON range airspace. 3. Travel time vs. play time in the proposed airspace. 4. Erroneous assumption that airspace entry equates to effective airspace use. <p>The following considerations arise related to environmental analysis and aircraft relocation:</p> <ol style="list-style-type: none"> 1. It appears precedent exists for Environmental Analysis (EA) for aircraft relocation and beddown in Alaska (F-22, C-17, C-130s); however, none of these beddowns involved introduction of new aircraft to a geographical area and airspace. 2. The JPARC EIS in no way considers the relocation of the Aggressors. 3. The assumptions and justifications for the JPARC expansion rest heavily on the Aggressors' Eielson basing. 4. The EIS does not consider the increased utilization of the FOX areas versus YUKON areas due to proximity to JBER. 5. The southern YUKON MOA/ATCAAs are currently utilized approximately 160 days annually. 6. The proposed PAXON MOA will be limited to 60 days utilization below 14,000 ft MSL. <p>The following considerations arise concerning estimated cost savings:</p> <ol style="list-style-type: none"> 1. Increased travel time by fighter aircraft result in either more support sorties (air refueling) or reduced effective training time per sortie. 2. The center points of the existing FOX3 airspace and the proposed PAXON airspace are closer to Eielson than JBER via direct routing or normally 	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>utilized ATC routing.</p> <p>3. Recovery routings/procedures may be less efficient and more flight time consuming due to airspace congestion and weather requirements at JBER.</p> <p>4. Weather requirements for additional reserve fuel demand reduced training time or refueling support for JBER-based aircraft.</p> <p>Primarily, the justification for the expansion of the FOX/PAXON airspaces is fuel savings based on current usage of FOX3, PAXON and STONY. The EIS reasons that FOX3/PAXON usage will reflect current usage plus half of the STONY sorties, totaling 11,237 sorties per year compared to 9,987 sorties as reported in 2010. Either the Aggressors will commute from JBER to the YUKON1/2 areas, where over 8,000 sorties occurred in 2010, or the FOX/PAXON/STONY airspaces will see a substantially higher utilization rate than the 2010 baseline identified by the EIS for its estimated utilization rates of the proposed expanded airspace.</p> <p>In an effort to provide a comprehensive review of the JPARC EIS and better understand related Alaskan military airspace issues, a review was completed of the Letters of Agreement regarding Red Flag-Alaska airspace and recovery procedures, Description of Military Airspace (DOMA), Alaskan Military Procedures and ATC Service, and FAA 7400.8U, Special Use Airspace. The review revealed no additional significant factors related specifically to the relocation of the Aggressor Squadron.</p> <p>In summary, the JPARC EIS related to the FOX3/PAXON expansion faces practical challenges related to the relative inaccessibility of the YUKON areas for JBER-based aircraft without substantially reduced training time or additional refueling support.</p> <p>Expanded Data Points</p> <p>Airspace Expansions:</p> <p>1. According to the EIS, page 2-3 lines 14-17, the dry targets will be added to both new MOAs and utilized six times annually for 10 days each occurrence. Dry targets occupy approximately 1 acre and are either emitters or simulated threat vehicles (page 1-24, lines 25-32). The proposed dry targets are temporary in nature and will be placed on military lands, federal</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>lands or private property with landowner concurrence. Civilian contractors manage the threat emitters, placing, maintaining and operating them for the Air Force. Either additional threats will be required or threats from other ranges will be relocated. In either case, it appears additional expense would be incurred.</p> <p>2. Transit distance for the Eielson-based Aggressors to either YUKON or FOX airspace is negligible. Multiple Standard Instrument Departures (SIDs) exist for Eielson AFB and were analyzed for purposes of transit distance. The distances discussed below relate to the nearest entry gate to the airspace and do not equate to effective fight airspace or the scheduled "play areas." MOAs and ATCAAs are accessed through entry gates – points on the boundaries of the airspace where ATC can initiate or terminate IFR/VFR clearances and issue airspace clearances. These gates can be likened to the ticket counters at a sports arena. Everybody enters through the limited access/egress points, but may wander freely once cleared into the arena.</p> <p>The FOX-FIVE departure from Eielson delivers aircraft to the AXEM gate (western corner of YUKON1/2 MOAs) in 52 nautical miles (NM), and the FALCO FOUR arrival return routes aircraft from YUKON2 via the EYEGO gate in 49NM. Access to this airspace from JBER via the EEEGL TWO departure would require 287NM to reach the AXEM gate and a similar distance to return. The STOON gate to the STONY airspace is approximately 85 miles from JBER, though one can assume the STONY airspace is less desirable airspace by reviewing the 2010 utilization figures compared to the FOX or PAXON ATCAAs referenced on page 2-5 in Table 2-2. Additionally, the justification for the enhanced FOX/PAXON airspace includes the desire to utilize closer airspace as discussed on lines 14 and 26 of page 2-5.</p> <p>The possible solutions to the issue of transit distance include, but are not limited to:</p> <p>1) extended sortie durations permitted by limited maneuvering 2) extended sorties through additional air refueling requirements 3) greater reliance on FOX/PAXON airspace than is forecast in the March 2012 Draft JPARC EIS.</p> <p>3. Transit time diminishes "play time", or opportunities to execute training events due primarily to lost fuel efficiencies. Foregoing discussions related to transit distance reveal transit times approaching 30 minutes each way to enter the YUKON airspace, while access to the existing FOX3 MOA via the HOJOE gate/EEEGL TWO SID from JBER requires approximately 15</p>	

Table N-5. Government Response to Comments (continued)

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	<p>minutes, with anticipated return legs of similar duration. Contrast the travel distance with an Eielson-based aircraft utilizing the ARUNY ONE departure to enter the DICEMAN Airspace package (EIELSON MOA/ATCAA, FOX1 MOA/ATCAA, FOX2 ATCAA, FOX3 MOA/ATCAA as described in the 11th AF Airspace Handbook, 29 Dec 2010). The Eielson aircraft would be in the FOX3 ATCAA in approximately 10 minutes and could reach HOJOE (the southernmost gate in FOX3 and an entry gate for JBER aircraft) in approximately the same time as a JBER-based aircraft of the same make.</p> <p>4. While transit time to the airspace is a justification for expansion of the FOX3 MOA and creation of the PAXON MOA as outlined in the Draft JPARC EIS, transit time is only part of the efficiency equation. Traditionally, and unless revised once the airspace is expanded, the air combat (ACBT) for Large Force Exercises (LFEs) occurs in airspace centered slightly north of Eielson. The expectation of realized efficiencies is seemingly blind to the utilization patterns of the airspace by participants both north and south of the Alaska Range.</p> <p>Environmental Study:</p> <p>1. Table 4-2 summarizes a variety of environmental research related to prior DoD actions including relocation or initial beddown of Air Force aircraft. An accepted precedent exists for environmental research limited to an Environmental Assessment (EA) in conjunction with aircraft relocation. Included in the table are the relocation of the 176th Wing from Kullis ANGB to JBER AFB (20 aircraft), F-22A beddown at JBER (including construction of support facilities), C-17 initial beddown at JBER (replacing C-130s), and the F-22A plus up (replacement of F-15s). Every instance cited, with the exception of the Kullis relocation, involved replacement of some or all aircraft, with minimal changes in overall assigned aircraft with similar mission capabilities/sets. The Kullis relocation is most disruptive to the movement toward an EIS requirement for the Aggressor relocation since it involved moving 20 aircraft, construction, renovation and reassignment of personnel. However, the Kullis relocation did not alter airspace utilization on the broader scale considering the relocated aircraft remained in the same terminal area (the Anchorage local air traffic area).</p> <p>2. Chapter 4, Cumulative Impacts and Secondary Effects, paragraph 4.8.1, page 4-19, lines 25-34 expressly states, "Any future basing of a new aircraft type in Alaska, or the relocation of F-16s from Eielson AFB to JBER, as is</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>now being considered, would require that the appropriate environmental impact analysis processes be completed to include the potential impacts of such actions on all military and civil aviation airspace uses." Furthermore, the primary justification for the expansions of the FOX3 airspace and creation of the PAXON MOA is centralization of training airspace for the Aggressors and JBER based aircraft (paragraphs 1.5.1.1 and 1.5.1.2, Table 1-3 and page 2-2, lines 5-10,15).</p> <p>3. The relocation of the Aggressors not only requires its own assessment of environmental effects, but consideration of the alternative substantially changes the character of the Draft JPARC EIS. As cited in the previous paragraph, the Draft EIS assumes the F-16s operate from Eielson. Justifications for airspace expansion, including utilization rates and efficiencies are predicated on Aggressors originating and recovering to Eielson. No mention of F-16 relocation exists in the Draft JPARC EIS with the exception of the requirement for additional study should such a relocation occur.</p> <p>4. The Draft JPARC EIS predicates its MOA/ATCAA usage on status quo basing for JBER and Eielson. Appendix D to the Draft JPARC EIS, Table D-2, Description and Representative Annual Use of Alaska Training Airspace, reflects FOX3 sortie totals of 9,877. STONY ATCAA reflects 2,500 and the YUKON1/2 ATCAA show 8,034 and 7,076 respectively. Table 2-2 on page 2-5 of the Draft EIS reflects a new estimated usage of the FOX3/PAXON airspace under the proposed changes of 11,237 per year. The assumptions reflect a relocation of prior STONY missions but no relocation of the over 8,000 sorties in the YUKON airspace to the north. While approximately 3,600 of the FOX3 sorties were F-16s (not including F-16CJs) in 2010 according to Table 2-3, similar numbers for the YUKON airspace are not available. Assuming a similar ratio in the north, an additional 2,400 F-16 sorties may either lose training effectiveness or require relocation to the southern airspaces. Additionally, skewing the results are the over 2,700 F-22A sorties in the FOX3 airspace since these aircraft rarely access the YUKON airspace.</p> <p>5. According to Appendix D, Table D-2, the YUKON1/2 airspace is actively utilized 163 days and 104 days annually, respectively. The FOX3 airspace is utilized approximately 211 days annually. As detailed in the previous paragraph, the Draft JPARC EIS does not consider the shift in sorties associated with the relocation of the F-16s.</p>	

Table N-5. Government Response to Comments (continued)

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	<p>6. As detailed on page 2-6, the PAXON MOA low sector (below 14,000' MSL) would only be available for Major Flying Exercises (MFEs) for up to 60 days annually, consisting of 6, ten-day windows. This is of interest primarily to air-to-ground assets and has limited applicability to the Aggressors as they complete their training sorties. It may, however, continue to force other participants in nonMFE training events to utilize Interior ranges. The Aggressors, in their efforts to penetrate defensive air sovereignty assets to eliminate adversary combat air support (CAS), will continue to operate in the airspace centered over Eielson AFB.</p> <p>Cost savings:</p> <p>1. As discussed previously, the additional transit time/distance will erode cost benefits that may be claimed through relocation of the Aggressors to JBER. The accounting methods associated with determining cost savings are incongruous at times. The arguments related to cost savings seldom consider the quality of the flight time for the cost expended. Flight hours are allocated to units to complete their required training events to maintain a combat ready or mission ready status. The flight hour totals may remain unchanged or even diminish due to constrained budgets. This constraint will demand more training/proficiency events per flight hour expended. Virtually no recurrent training requirements for Air Force pilots are accomplished during en route cruise flight. To combat this loss of training time due to fuel/flight hours expended in transit, fighter aircraft require additional fuel to expend during high performance maneuvers in the reserved airspace. The unrecognized/hidden cost is the air refueling sorties generated to meet the fighter training requirement. While it is true that air refueling aircrews also require recurrency training, the potential volume of additional refueling sorties required may exceed the maximum training events required by air refueling assets and detract from other aircrew training by demanding extended loiter times and larger offloads.</p> <p>2. The center points of the PAXON and FOX3 ATCAAs, as currently published, are closer to Eielson than JBER. The center point of the PAXON ATCAA is 106NM from Eielson via the HAWGG departure to the SLICK gate. The same point is 179NM via the EEEGL TWO departure, HOJOE gate in FOX3, then direct to the PAXON center point. The center point of the FOX3 ATCAA is 100NM from Eielson via the ARUNY ONE departure transiting through the EIELSON MOA and the FOX1ATCAA/MOA. The</p>	

Table N-5. Government Response to Comments (continued)

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	<p>same point is 153NM from JBER via the EEEGL TWO departure and HOJOE gate.</p> <p>One should note the air combat for MFEs occurs in an area centered over Eielson and its aircraft can be in the airspace within a couple minutes of departure.</p> <p>3. According to the FAA Administrator's Factbook, March 2011, Anchorage TRACON (Terminal Radar Control) ranked 36th busiest nationwide in calendar year 2009 with over 261,000 aircraft operations. CY2010 reported over 277,000 operations according to the Administrator (pg. 14). Fairbanks TRSA (Terminal Radar Service Area) is not listed in the report. However, according to the Alaska DOT website and the FAA data sheet for Fairbanks International Airport, Fairbanks experienced over 133,000 aircraft operations in CY2009. The congested nature of the Anchorage airspace in contrast to the relatively unencumbered access to the ranges enjoyed by Interior aircraft bears further research. A deeper analysis may reveal appreciable minutes of time lost due to required spacing for IFR aircraft and deconfliction in the Anchorage terminal area in contrast to the ease of recovery to Eielson AFB.</p> <p>4. Weather considerations plague both locations. Eielson suffers from the bitter cold of winter while Anchorage experiences strong winds and occasional IFR conditions. Aircraft operating in the JPARC require fuel reserves - greater reserves for IFR terminal weather - and subsequently lose training time. Due to the distances discussed previously, JBER aircraft will lose even more of the already reduced play time when the requirement to carry fuel for an alternate field exists.</p> <p>Thank you for the opportunity to offer comment on the Draft Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska. The CONP looks forward to continuing our productive relationship with Alaska Command, the U.S. Air Force, and the U.S. Army.</p> <p>References:</p> <p>Air Force (U.S. Air Force). 2010. 11th Air Force Airspace Handbook. 29 December.</p> <p>ALCOM (Alaskan Command). 2012. Joint Pacific Alaska Range Complex</p>	

Table N-5. Government Response to Comments (continued)

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	<p>Environmental Impact Statement, Joint Base Elmendorf Richardson, Alaska. March.</p> <p>FAA (Federal Aviation Administration). 2011. Administrator’s Fact Book, U.S. Department of Transportation. March.</p> <p>FAA (Federal Aviation Administration). 2012. Form 5010, Airport Master Record, Fairbanks, U.S. Department of Transportation. May. Website http://www.gcr1.com/5010web/REPORTS/AFD05312012FAI.pdf. Accessed June 2012.</p>	
G0016-2	<p>Review and Comments from the CONP on the Draft JPARC EIS</p> <p>The CONP joins with the Fairbanks North Star Borough (FNSB) in the following comments. We understand that four factors are driving the need for enhanced and modernized training and testing facilities at JPARC. These four factors are technological advances; changes in combat tactics and techniques; the need to achieve diversified realistic training in an efficient, effective manner within the tightening budget of the Department of Defense (DoD); and the potential joint training to leverage synergies that better meet the mission training needs of Service components. The JPARC EIS separates the major actions into stand-alone activities; the CONP’s comments are arranged in a similar format.</p> <p>Proposed Paxon MOA Addition and Proposed Fox 3 Military Operations Area Expansion</p> <p>Proposed Fox 3 MOAs: The proposed expansion of the Fox 3 MOA is a significant increase in both lateral extent and vertical dimension, lowering the floor from 5,000 ft above ground level (agl) to 500 ft agl. This is a direct conflict with areas that are frequently used by general aviation pilots and air taxi operators to support hunting camps and mining operations; to conduct air tour operations; to access recreational areas or to make other uses of this region. Due to its proximity to population centers in Anchorage, the Mat-Su Borough and Fairbanks, this airspace is heavily used by civil aviation, which results in an increased collision potential with high-speed military aircraft executing training maneuvers on MOA airspace. The civil aviation community within the FSNB is very active and large, and is a crucial part of our lifestyle.</p>	<p>Both the Army and Air Force appreciate the support both North Pole and the North Star Borough have shown the military. The concerns and recommendations presented in the comment are greatly appreciated and would all be taken into account while trying to find the solutions that would best serve both civil and military aviation needs. The Air Force recognizes the need to enhance communications to better inform all public interests of the airspace uses; identify means for ensuring safe passage of VFR aircraft through those areas where terrain, weather, and other conditions may be a concern when the proposed airspace is active; and seek means for transiting IFR flights through this active airspace when necessary. All these concerns will also be considered by the FAA in their study of the preferred airspace actions noted in the FEIS, while determining how each proposal can be implemented and managed with minimal adverse effects on other airspace uses and the Air Traffic Control system. The Army and Air Force will continue to work with commercial and general aviation constituents to resolve those concerns raised during both the scoping and DEIS public comment periods.</p>

Table N-5. Government Response to Comments (continued)

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	<p>The aviation community has experience with similar operations in the existing MOAs in the JPARC that also have low altitude floors. The Special Use Airspace Information Service (SUAIS), created as a result of the mid-1990's expansion of the MOAs that today comprise the JPARC, was a direct result of similar concerns at that time. In areas where radio coverage has been provided by the Air Force, this service has greatly reduced the potential for mid-air collision between civil and military aircraft. It has also undoubtedly reduced loss of training time when non-participating aircraft would have otherwise interrupted training activities. This service has an economic impact on military training.</p> <p>While both civil and military organizations generally agree on the value that SUAIS provides for deconflicting aircraft, to date -- fifteen years after the MOAs were expanded -- aviation organizations are continuing to ask for adequate VHF radio coverage in the eastern portions of the existing JPARC complex. Correspondingly, the complaints that are received from civil aviation pilots are normally in regions of the airspace that lack adequate communication.</p> <p>Recommendation: Due to the importance of the airspace for access to the southern Alaska Range, Denali Highway and Talkeetna Mountains, and to minimize the risk of mid-air collision, expansion of the Fox MOA should be limited to 5,000 feet agl, and to the smallest possible lateral extent to minimize the risk of mid-air collision.</p> <p>Recommendation: Any expansion of MOA airspace must have accompanying radio coverage, staffing and other elements of the SUAIS infrastructure to allow civil pilots to communicate with U.S. Air Force Range Control during times the MOAs are active. It is also essential that the tape-recorded message, broadcast during hours when Range Control is unmanned, be more uniformly broadcast across the JPARC complex. While the current language in the Draft EIS indicates that "funding will be pursued," given that we still do not have adequate communication in the existing airspace, it is essential that:</p> <p>(a) Radio repeaters to provide adequate coverage for any expanded airspace be installed and operational before airspace is granted and,</p> <p>(b) Mitigations include raising the floor any time a station is down or the</p>	

Table N-5. Government Response to Comments (continued)

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	<p>system is otherwise not fully operational, to allow general aviation or commercial pilots to operate without unanticipated encounters with high-speed military traffic.</p> <p>Implementation of this recommendation would greatly increase safety, better coordinate air traffic, and probably result in more efficient and frequent use of air space by the civil aviation community. The CONP is actively working on expanding its hub status for communities throughout the State and upgrades of aviation communication and navigation systems.</p> <p>Paxson MOA Low Altitude Structure: The military has proposed a Paxson MOA, which covers Isabel Pass and portions of the eastern Alaska Range. The pass is a major VFR route which links northern Alaska with south central and south east regions of the State. Along the southern flanks of the Alaska Range are mining operations, recreational cabins, airstrips and lakes which experience high levels of use, which are not compatible with high speed, low level military aircraft. While the concept of VFR corridors has been discussed, the variable weather in this area is not conducive to identifying a single corridor which concentrates VFR traffic and increases the mid-air collision risk.</p> <p>Recommendation: The proposed Paxson MOA should be limited to high altitude usage near and over Isabel Pass and the air traffic routes extending from the interior south to Gulkana and beyond for civil aviation.</p> <p>IFR Access to MOA airspace</p> <p>Considerable public investment is being made to expand airways, instrument approaches, weather reporting and remote communication outlets across Alaska. The CONP has supported these investments for several years now through support of federal funding requests and authorizing language in various FAA bills. A corresponding private investment will be made by aircraft owners to utilize these facilities. Expansion of MOAs over IFR airways precludes civil access to the airways when the MOAs are active, except for emergency and lifeguard flights. Experience gained over recent years with the Delta MOAs, which overlay V-444 between Fairbanks, Delta, Tok and Northway, have continued to demonstrate difficulties for lifeguard repositioning flights and other uses such as wild fire suppression logistical flights. Asking these operators to fly VFR is a potential reduction in safety.</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>The loss of IFR access also impacts the economy of communities within and beyond the boundaries of the proposed airspace.</p> <p>Recommendation: We would like to ensure that provisions are made to provide real-time IFR access through active MOAs. While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities both inside and adjacent to MOA airspace given the critical role that civil aviation plays in the Alaskan transportation system. The relatively low volumes of IFR operations suggest that the impact to military training would be minimal. As more military actions across the globe are conducted around civil flight operations, learning how to dynamically allocate airspace will also help the military "train like they fight." The JPARC provides an ideal test bed to develop this capability, which will require cooperation with FAA and military agencies.</p> <p>When military exercises are planned that would close either MOA, the CONP would like to ensure that planners contact the state concerning hunting and fishing seasons and schedule around those time periods. CONP residents access the lands and waters within these MOAs by air and we want to ensure this access and use can continue.</p> <p>Proposed Realistic Live Ordnance Delivery in proposed restricted area</p> <p>The military has proposed to establish restricted airspace for live ordnance delivery impact access between Fairbanks, Delta, the Richardson Highway corridor, and the recreational and mineralized areas in the Alaska Range to the south. Further restriction of airspace limits access to these areas.</p> <p>Recommendation: The existing Restricted Areas (2211 and 2202) already limit access between the road corridor communities in the region. We oppose any option that connects these two restricted areas making an overall ground barrier to access in this area. We do understand limiting ,access during exercises; however a ground corridor must be available for access to cabins and traditional hunting, fishing, and food gathering grounds. We also want to ensure that when the ranges are not in use, civil aviation can use the current corridor between 2211 and 2202.</p> <p>The CONP supports Alternative B. Alternative B allows for greater</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>flexibility in ranges and gives pilots a more diverse array of targets for ordnance drops.</p> <p>Proposed Battle Area Complex Restricted Area</p> <p>The proposal to establish restricted airspace over the Battle Area Complex southeast of Delta Junction is of particular concern to the civil aviation community. Existing Restricted Area 2202 to the west already forces civil traffic out of the most desirable terrain route to and from Isabel Pass, a major VFR corridor connecting the northern half of the state to south central and south eastern Alaska. Winds and highly variable weather associated with the Alaska Range and the mountain pass make it impractical to confine civil traffic to a single, narrow corridor in this area. Five years ago, during an EIS process, the aviation community raised the issue about the possible need for restricted airspace, given that there were other locations available to site the military training facilities that already offered this type of airspace.</p> <p>Recommendation: Continue to work with the aviation community as currently many local pilots oppose the addition of restricted airspace as proposed in this area, given the need to access the mountain pass, unique weather and terrain, and presence of existing restricted airspace.</p> <p>The CONP supports Alternative B, as the proposed boundaries meet the current and future expansion needs for new firing points, range impact areas and targets required for the action. Alternative B will allow the Army the necessary time for training that regulations require.</p>	
G0016-3	<p>...</p> <p>The loss of IFR access also impacts the economy of communities within and beyond the boundaries of the proposed airspace. Recommendation: We would like to ensure that provisions are made to provide real-time IFR access through active MOAs. While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities both inside and adjacent to MOA airspace given the critical role that civil aviation plays in the Alaskan transportation system.</p>	<p>The importance of civilian aviation as a key industry to the economy of the area surrounding the proposed airspace is recognized in Section 3.1.12.1. The economic impacts of commercial and other civil aviation impacts from the Fox 3 Expansion/New Paxon proposed actions are addressed in Section 3.1.12.3. The recommendation made will be considered as a potential mitigation. In addition, the Air Force will continue to coordinate with the FAA and other regulatory agencies to address stakeholder concerns further.</p>
G0016-4	<p>...</p> <p>When military exercises are planned that would close either MOA, the CONP would like to ensure that planners contact the state concerning hunting and fishing seasons and schedule around those time periods. CONP</p>	<p>As noted in Section 3.2.10.3 of the EIS, due to safety regulations, the proponent would restrict ground access to all nonparticipating individuals and would provide evacuation notice to all persons with surface interests in the areas under the expanded airspace, outside of DoD boundaries during periods</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>residents access the lands and waters within these MOAs by air and we want to ensure this access and use can continue.</p> <p>Proposed Realistic Live Ordnance Delivery in proposed restricted area The military has proposed to establish restricted airspace for live ordnance delivery impact access between Fairbanks, Delta, the Richardson Highway corridor, and the recreational and mineralized areas in the Alaska Range to the south. Further restriction of airspace limits access to these areas. Recommendation: The existing Restricted Areas (2211 and 2202) already limit access between the road corridor communities in the region. We oppose any option that connects these two restricted areas making an overall ground barrier to access in this area. We do understand limiting access during exercises; however a ground corridor must be available for access to cabins and traditional hunting, fishing, and food gathering grounds. We also want to ensure that when the ranges are not in use, civil aviation can use the current corridor between 2211 and 2202. The CONP supports Alternative B. Alternative B allows for greater flexibility in ranges and gives pilots a more diverse array of targets for ordnance drops</p>	<p>of hazardous operations. Section 3.2.10.4 of the EIS lists mitigation measures that could be implemented to reduce the impacts to hunting, including suspension of Air Force MFE operation during January, September, and December and between June 27 and July 11 within the proposed restricted areas associated with the Realistic Live Ordinance proposal to allow access for public use and recreation. The Air Force would publish advance notification of the schedule and where and when ground access restrictions occur, in order for individuals to plan for these closures.</p> <p>Your opposition to any option that connects Restricted Areas 2211 and 2202 and support for Alternative B are noted.</p>
G0016-5	<p>Proposed Expansion of R-2205 Restricted Area, including the DMPTR The CONP supports the expansion of the R-2205 Restricted Area; the airspace and ground access to DMPTR and YTA are already recognized as training areas and are avoided.</p> <p>Proposed Night Joint Training in all military special use airspace The CONP supports Alternative B and feels the JPARC draft EIS adequately addresses all the concerns with extension of training hours.</p> <p>.....</p> <p>Proposed Enhanced Access to Ground Maneuver Space Areas The CONP supports enhanced access to the Ground Maneuver Space areas and feels the draft JPARC EIS adequately addresses the issue. The CONP played a very active role in securing funds to construct the Tanana River Bridge, seeking construction funds from federal and state appropriations processes. All told the CONP was able to secure nearly \$100 million for construction of the bridge. We support year-round access to the training grounds and improvements to the ranges.</p> <p>Proposed Tanana Flats Training Area Access Road The CONP supports construction of the Tanana Flats Training Access Road to access the Ground</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. This comment is duly noted.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Maneuver Space areas and we are satisfied the draft JPARC EIS adequately addresses the issue. We support year-round access to the training grounds and improvements to the ranges.</p> <p>Proposed Joint Air-Ground Integration Complex The CONP supports development of the JAGIC and feels the draft JPARC EIS adequately addresses the various components of the issue.</p> <p>Proposed Intermediate Staging Bases The CONP supports development of the proposed Intermediate Staging Bases and believes the draft JPARC EIS adequately addresses the various components of developing the four sites. Development of the staging areas is an exciting development as the staging areas will decrease military traffic during exercises and allow the military to spend less time in transit and more time in training. Construction of the staging bases is a win-win for all parties and will strengthen the operational utility of JPARC.</p> <p>Proposed Missile Live Fire for AIM-9 and AIM-120 in Gulf of Alaska The CONP supports use of the Gulf of Alaska for training with AIM-9 and AIM-120 missiles.</p> <p>Proposed Joint Precision Airdrop System The CONP supports development of the JPADS and feels the draft JPARC EIS adequately addresses the various components of the issue.</p>	
G0016-6	<p>Proposed Unmanned Aerial Vehicle (UAV) Corridors</p> <p>The CONP is actively supporting efforts to greatly expand the use of UAVs within the interior of Alaska. We have met with FAA personnel, the congressional delegation, state legislators, and the Governor to try and secure the region as a national UAV testing, development, and deployment center. There is no doubt that unmanned aerial vehicles play an important role in today's military, and that training is required. Integrating these vehicles into the National Airspace System is currently a topic of discussion at the national level. Restricting civil airspace to accommodate UAV transits next to the second largest air transportation hub in the state is a concern for the civil aviation community and as such the CONP would like the final JPARC EIS to develop other options besides segregated airspace.</p> <p>Recommendation: While awaiting development of a FAA-certified sense-</p>	<p>Your active participation in supporting those means that can best accommodate UAV test and training efforts in our regions is greatly appreciated. The potential effects each proposed corridor may have on other aircraft would be a key consideration in scheduling only those corridors/altitude layers required to support individual UAV mission needs. As noted in the FEIS Section 2.1.6, the FAA, DoD, and other agencies continue to collaborate on those near-, mid-, and long-term solutions for integrating UAV operations and supporting ground elements into the National Airspace System while ensuring they do not present any flight risks to other airspace users. Pending overall decisions on how this can be done and further evaluation by the FAA on the JPARC corridor proposals, it is imperative that the military proceed with identifying and evaluating those corridor options that would be required to support Army UAV missions. Restricted areas designations were proposed and assessed as the most restrictive option each</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>and-avoid capability that will allow full integration of unmanned aerial vehicles into the National Airspace System, we must rely on other means to separate unmanned from manned aircraft without necessarily segregating airspace. Corridors that are proposed would interfere with the safe and efficient access between Fairbanks, the Richardson Highway Corridor and the Alaska Range. Other means to separate UAV from civil aircraft should be pursued and completely developed within the final JPARC EIS.</p> <p>The CONP supports Alternative B's establishment of corridors via a Certificate of Authorization (COA). The CONP is more than willing to participate in the COA process. COAs are only activated for the period at which a UAV is transiting a corridor. The CONP is confident that the COA process will work to the benefit of both the military and the civilian aviation communities.</p>	<p>corridor may have on other airspace uses.</p>
G0016-7	<p>Proposed Paxon MOA Addition and Proposed Fox 3 Military Operations Area Expansion</p> <p>Proposed Fox 3 MOAs: The proposed expansion of the Fox 3 MOA is a significant increase in both lateral extent and vertical dimension, lowering the floor from 5,000 ft above ground level (agl) to 500 ft agl. This is a direct conflict with areas that are frequently used by general aviation pilots and air taxi operators to support hunting camps and mining operations; to conduct air tour operations; to access recreational areas or to make other uses of this region. Due to its proximity to population centers in Anchorage, the Mat-Su Borough and Fairbanks, this airspace is heavily used by civil aviation, which results in an increased collision potential with high-speed military aircraft executing training maneuvers on MOA airspace. The civil aviation community within the FSNB is very active and large, and is a crucial part of our lifestyle.</p> <p>The aviation community has experience with similar operations in the existing MOAs in the JPARC that also have low altitude floors. The Special Use Airspace Information Service (SUAIS), created as a result of the mid-1990's expansion of the MOAs that today comprise the JPARC, was a direct result of similar concerns at that time. In areas where radio coverage has been provided by the Air Force, this service has greatly reduced the potential for mid-air collision between civil and military aircraft. It has also undoubtedly reduced loss of training time when non-participating aircraft would have otherwise interrupted training activities. This service has an</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will seek funds, as available, to expand and improve the SUAIS as a recommended and proven method for managing military and civilian air operations. The Final EIS specifies other mitigations for providing safe access and use of airspace for civilian air operations.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>economic impact on military training.</p> <p>While both civil and military organizations generally agree on the value that SUAIS provides for deconflicting aircraft, to date -- fifteen years after the MOAs were expanded -- aviation organizations are continuing to ask for adequate VHF radio coverage in the eastern portions of the existing JPARC complex. Correspondingly, the complaints that are received from civil aviation pilots are normally in regions of the airspace that lack adequate communication.</p> <p>Recommendation: Due to the importance of the airspace for access to the southern Alaska Range, Denali Highway and Talkeetna Mountains, and to minimize the risk of mid-air collision, expansion of the Fox MOA should be limited to 5,000 feet agl, and to the smallest possible lateral extent to minimize the risk of mid-air collision.</p> <p>Recommendation: Any expansion of MOA airspace must have accompanying radio coverage, staffing and other elements of the SUAIS infrastructure to allow civil pilots to communicate with U.S. Air Force Range Control during times the MOAs are active. It is also essential that the tape-recorded message, broadcast during hours when Range Control is unmanned, be more uniformly broadcast across the JPARC complex. While the current language in the Draft EIS indicates that "funding will be pursued," given that we still do not have adequate communication in the existing airspace, it is essential that:</p> <p>(a) Radio repeaters to provide adequate coverage for any expanded airspace be installed and operational before airspace is granted and,</p> <p>(b) Mitigations include raising the floor any time a station is down or the system is otherwise not fully operational, to allow general aviation or commercial pilots to operate without unanticipated encounters with high-speed military traffic.</p> <p>Implementation of this recommendation would greatly increase safety, better coordinate air traffic, and probably result in more efficient and frequent use of air space by the civil aviation community. The CONP is actively working on expanding its hub status for communities throughout the State and</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>upgrades of aviation communication and navigation systems.</p> <p>Paxson MOA Low Altitude Structure: The military has proposed a Paxson MOA, which covers Isabel Pass and portions of the eastern Alaska Range. The pass is a major VFR route which links northern Alaska with south central and south east regions of the State. Along the southern flanks of the Alaska Range are mining operations, recreational cabins, airstrips and lakes which experience high levels of use, which are not compatible with high speed, low level military aircraft. While the concept of VFR corridors has been discussed, the variable weather in this area is not conducive to identifying a single corridor which concentrates VFR traffic and increases the mid-air collision risk.</p> <p>Recommendation: The proposed Paxson MOA should be limited to high altitude usage near and over Isabel Pass and the air traffic routes extending from the interior south to Gulkana and beyond for civil aviation.</p> <p>IFR Access to MOA airspace</p> <p>Considerable public investment is being made to expand airways, instrument approaches, weather reporting and remote communication outlets across Alaska. The CONP has supported these investments for several years now through support of federal funding requests and authorizing language in various FAA bills. A corresponding private investment will be made by aircraft owners to utilize these facilities. Expansion of MOAs over IFR airways precludes civil access to the airways when the MOAs are active, except for emergency and lifeguard flights. Experience gained over recent years with the Delta MOAs, which overlay V-444 between Fairbanks, Delta, Tok and Northway, have continued to demonstrate difficulties for lifeguard repositioning flights and other uses such as wild fire suppression logistical flights. Asking these operators to fly VFR is a potential reduction in safety. The loss of IFR access also impacts the economy of communities within and beyond the boundaries of the proposed airspace.</p> <p>Recommendation: We would like to ensure that provisions are made to provide real-time IFR access through active MOAs. While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities both inside and adjacent to MOA airspace given the critical role that civil aviation plays in the</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Alaskan transportation system. The relatively low volumes of IFR operations suggest that the impact to military training would be minimal. As more military actions across the globe are conducted around civil flight operations, learning how to dynamically allocate airspace will also help the military "train like they fight." The JPARC provides an ideal test bed to develop this capability, which will require cooperation with FAA and military agencies.</p> <p>When military exercises are planned that would close either MOA, the CONP would like to ensure that planners contact the state concerning hunting and fishing seasons and schedule around those time periods. CONP residents access the lands and waters within these MOAs by air and we want to ensure this access and use can continue.</p>	
G0016-8	<p>Proposed Realistic Live Ordnance Delivery in proposed restricted area</p> <p>The military has proposed to establish restricted airspace for live ordnance delivery impact access between Fairbanks, Delta, the Richardson Highway corridor, and the recreational and mineralized areas in the Alaska Range to the south. Further restriction of airspace limits access to these areas.</p> <p>Recommendation: The existing Restricted Areas (2211 and 2202) already limit access between the road corridor communities in the region. We oppose any option that connects these two restricted areas making an overall ground barrier to access in this area. We do understand limiting access during exercises; however a ground corridor must be available for access to cabins and traditional hunting, fishing, and food gathering grounds. We also want to ensure that when the ranges are not in use, civil aviation can use the current corridor between 2211 and 2202.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0016-9	<p>Proposed Unmanned Aerial Vehicle (UAV) Corridors</p> <p>The CONP is actively supporting efforts to greatly expand the use of UAVs within the interior of Alaska. We have met with FAA personnel, the congressional delegation, state legislators, and the Governor to try and secure the region as a national UAV testing, development, and deployment center. There is no doubt that unmanned aerial vehicles play an important role in today's military, and that training is required. Integrating these</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>vehicles into the National Airspace System is currently a topic of discussion at the national level. Restricting civil airspace to accommodate UAV transits next to the second largest air transportation hub in the state is a concern for the civil aviation community and as such the CONP would like the final JPARC EIS to develop other options besides segregated airspace.</p> <p>Recommendation: While awaiting development of a FAA-certified sense-and-avoid capability that will allow full integration of unmanned aerial vehicles into the National Airspace System, we must rely on other means to separate unmanned from manned aircraft without necessarily segregating airspace. Corridors that are proposed would interfere with the safe and efficient access between Fairbanks, the Richardson Highway Corridor and the Alaska Range. Other means to separate UAV from civil aircraft should be pursued and completely developed within the final JPARC EIS.</p> <p>The CONP supports Alternative B's establishment of corridors via a Certificate of Authorization (COA). The CONP is more than willing to participate in the COA process. COAs are only activated for the period at which a UAV is transiting a corridor. The CONP is confident that the COA process will work to the benefit of both the military and the civilian aviation communities.</p>	<p>prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Army will coordinate with FAA on details of implementation for this proposal. Because the issues concerning UAVs are arising across the National Airspace System, FAA is giving careful consideration to how to provide a safe environment for this growing need. Their final approval will likely reflect a comprehensive approach.</p>
G0017-1	<p>As Mayor of the Fairbanks North Star Borough (FNSB) I would like to take this opportunity to comment on the Draft Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the joint Pacific Alaska Range Complex (JPARC) in Alaska.</p> <p>The FNSB wholeheartedly supports the U.S. Air Force and Army and their missions in Alaska and welcomes the expansion of the JPARC to accommodate current and future training needs. The FNSB supports the increased use of JPARC, and the planned expansion as this action is beneficial to the community, Alaska Command, and the U.S. Military with no overall negative impact on the community.</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. This comment is duly noted.</p>
G0017-2	<p>However, the analysis of the environmental impacts assumes the current force structure at Eielson Air Force Base and Fort Wainwright as a baseline and does not consider an alternative force structure basing scenario identified in the Air Force's proposed fiscal year (FY) 2013 budget.</p>	<p>This JPARC EIS does not propose any changes to "force structure." All proposals in this EIS assume status quo for overall aircraft and sortie counts and no change in personnel at the two Air Force bases. Any significant change to basing or operations will require additional environmental actions.</p>
G0017-3	<p>The JPARC ranges and facilities located within the FNSB far surpass the</p>	<p>Thank you for taking part in the public and agency review process for the</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>quality and quantity of similar range functions found in other locations within the continental United States and Hawaii. The large size of the JPARC ranges allow for the use of live ammunition from all Army, Air Force, and Navy platforms and weapons systems; allows the Air Force to fly at combat speeds well over Mach 1; allows for joint exercises between the Army, Air Force, Marines, Navy, Coast Guard and our Allies in weather conditions ranging from sub-zero arctic temperatures to hot humid summer days; and results in the finest training opportunities in the United States for our soldiers, sailors, and airmen. The FNSB is proactive in addressing military concerns on JPARC utilization and strives to lead the nation in willingness and ability to ensure that the military can conduct world class training missions and significantly improve readiness status.</p>	<p>JPARC Draft EIS. This comment is duly noted.</p>
G0017-4	<p>The proposal by the Air Force to move the F-16 Aggressor squadron from Eielson Air Force Base (Eielson) to Joint Base Elmendorf-Richardson (JBER) could change the dynamics of JPARC training scenarios and conduct, and could affect our community's support for JPARC use and expansion.</p>	<p>The location of the F-16 Aggressor Squadron within Alaska is not connected to the JPARC proposals. The Air Force restructuring action to move the F-16 Aggressor Squadron from Eielson AFB to JBER is not included in the JPARC Modernization and Enhancement EIS. This action would require a separate NEPA document to address the impacts of the restructuring program. An F-16 relocation is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. The details of any F-16 relocation and military training adjustments, including Major Flying Exercises such as RED FLAG Alaska, are under consideration in the coming months, but there are no current proposals. The majority of the JPARC proposals that involve Eielson AFB are Army proposals and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft.</p>
G0017-5	<p>The FNSB's comments will be divided into two broad sections - comments dealing directly with the current Draft EIS and existing Alaska force structure locations, and additional comments on the potential impacts resulting from the Air Force's proposed Aggressor Squadron movement to JBER.</p> <p>Review and Comments from the FNSB on the Draft JPARC EIS techniques; the need to achieve diversified realistic training in an efficient, effective manner within the tightening budget of the Department of Defense (DoD); and the potential joint training to leverage synergies that better meet the mission training needs of Service components. The JPARC EIS separates the major actions into stand-alone activities; the FNSB's comments are arranged in a similar format.</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. This comment is duly noted.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
G0017-6	<p>Proposed Paxon MOA Addition and Proposed Fox 3 Military Operations Area Expansion</p> <p>Proposed Fox 3 MOAs: The proposed expansion of the Fox 3 MOA is a significant increase in both lateral extent and vertical dimension, lowering the floor from 5,000 ft above ground level (agl) to 500ft agl. This is a direct conflict with areas that are frequently used by general aviation pilots and air taxi operators to support hunting camps and mining operations; to conduct air tour operations; to access recreational areas or to make other uses of this region. Due to its proximity to population centers in Anchorage, the Mat-Su Borough and Fairbanks, this airspace is heavily used by civil aviation, which results in an increased collision potential with high-speed military aircraft executing training maneuvers on MOA airspace. The civil aviation community within the FSNB is very active and large, and is a crucial part of our lifestyle.</p> <p>The aviation community has experience with similar operations in the existing MOAs in the JPARC that also have low altitude floors. The Special Use Airspace Information Service (SUAIS), created as a result of the mid-1990's expansion of the MOAs that today comprise the JPARC, was a direct result of similar concerns at that time. In areas where radio coverage has been provided by the Air Force, this service has greatly reduced the potential for mid-air collision between civil and military aircraft. It has also undoubtedly reduced loss of training time when non-participating aircraft would have otherwise interrupted training activities. This service has an economic impact on military training.</p> <p>While both civil and military organizations generally agree on the value that SUAIS provides for deconflicting aircraft, to date -- fifteen years after the MOAs were expanded -- aviation organizations are continuing to ask for adequate VHF radio coverage in the eastern portions of the existing JPARC complex. Correspondingly, the complaints that are received from civil aviation pilots are normally in regions of the airspace that lack adequate communication.</p>	<p>Many concerns have been expressed over the potential impacts the proposed Fox 3 and Paxon MOAs may have on all current users of this airspace as noted in the comment. The Air Force would be giving full consideration to those mitigation measures noted in the FEIS and other viable options needed for minimizing these impacts while serving both civil aviation and military airspace needs. The Air Force will strive to identify solutions to accomplish the objectives to include SUAIS and other communications enhancements within those areas where this coverage may be lacking.</p>
G0017-7	<p>Recommendation: Due to the importance of the airspace for access to the southern Alaska Range, Denali Highway and Talkeetna Mountains, and to minimize the risk of mid-air collision, expansion of the Fox MOA should be limited to 5,000 feet agl, and to the smallest possible lateral extent to</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>minimize the risk of mid-air collision.</p> <p>Recommendation: Any expansion of MOA airspace must have accompanying radio coverage, staffing and other elements of the SUAIS infrastructure to allow civil pilots to communicate with U.S. Air Force Range Control during times the MOAs are active. It is also essential that the tape-recorded message, broadcast during hours when Range Control is unmanned, be more uniformly broadcast across the JPARC complex. While the current language in the Draft EIS indicates that "funding will be pursued," given that we still do not have adequate communication in the existing airspace, it is essential that:</p> <p>(a) Radio repeaters to provide adequate coverage for any expanded airspace be installed and operational before airspace is granted and,</p> <p>(b) Mitigations include raising the floor any time a station is down or the system is otherwise not fully operational, to allow general aviation or commercial pilots to operate without unanticipated encounters with high-speed military traffic.</p> <p>Implementation of this recommendation would greatly increase safety, better coordinate air traffic, and probably result in more efficient and frequent use of air space by the civil aviation community. The FNSB is actively working on expanding its hub status for communities throughout the State and upgrades of aviation communication and navigation systems.</p>	<p>and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will seek funds, as available, to expand and improve the SUAIS as a recommended and proven method for managing military and civilian air operations. The Final EIS specifies other mitigations for providing safe access and use of airspace for civilian air operations.</p>
G0017-8	<p>Paxson MOA Low Altitude Structure: The military has proposed a Paxson MOA, which covers Isabel Pass and portions of the eastern Alaska Range. The pass is a major VFR route which links northern Alaska with south central and south east regions of the State. Along the southern flanks of the Alaska Range are mining operations, recreational cabins, airstrips and lakes which experience high levels of use, which are not compatible with high speed, low level military aircraft. While the concept of VFR corridors has been discussed, the variable weather in this area is not conducive to identifying a single corridor which concentrates VFR traffic and increases the mid-air collision risk.</p>	<p>Concerns with the potential impacts of the different airspace proposals on the Isabel Pass and other areas would be addressed through the proposed mitigations and ongoing communications with civil aviation interest groups to find those solutions that would best serve civil and military needs. Such concerns will also be examined by the FAA in their study of the preferred alternative to determine if and how each airspace action can be implemented and managed to minimize impacts on air traffic and their Air Traffic Control system capabilities.</p>
G0017-9	<p>Recommendation: The proposed Paxson MOA should be limited to high altitude usage near and over Isabel Pass and the air traffic routes extending from the interior south to Gulkana and beyond for civil aviation.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0017-10	<p>IFR Access to MOA airspace</p> <p>Considerable public investment is being made to expand airways, instrument approaches, weather reporting and remote communication outlets across Alaska. The FNSB has supported these investments for several years now through support of federal funding requests and authorizing language in various FAA bills. A corresponding private investment will be made by aircraft owners to utilize these facilities. Expansion of MOAs over IFR airways precludes civil access to the airways when the MOAs are active, except for emergency and lifeguard flights. Experience gained over recent years with the Delta MOAs, which overlay V-444 between Fairbanks, Delta, Tok and Northway, have continued to demonstrate difficulties for lifeguard repositioning flights and other uses such as wild fire suppression logistical flights. Asking these operators to fly VFR is a potential reduction in safety. The loss of IFR access also impacts the economy of communities within and beyond the boundaries of the proposed airspace.</p>	<p>Pending the FAA's study of the preferred airspace proposals and conclusions for implementing these airspace actions, the Air Force would help seek those means that would minimize adverse effects on lifeguard repositioning flights, wildfire suppression logistical flights, and other air traffic requiring priority IFR access through the active airspace. In preparing the Final Environmental Impact Statement (FEIS) the Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible.</p>
G0017-11	<p>Recommendation: We would like to ensure that provisions are made to provide real-time IFR access through active MOAs. While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities both inside and adjacent to MOA airspace given the critical role that civil aviation plays in the Alaskan transportation system. The relatively low volumes of IFR operations suggest that the impact to military training would be minimal. As more military actions across the globe are conducted around civil flight operations, learning how to dynamically allocate airspace will also help the military "train like they fight." The JPARC provides an ideal test bed to develop this capability, which will require cooperation with FAA and military agencies.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
G0017-12	<p>When military exercises are planned that would close either MOA, the FNSB would like to ensure that planners contact the state concerning hunting and fishing seasons and schedule around those time periods. FNSB residents</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	access the lands and waters within these MOAs by air and we want to ensure this access and use can continue.	<p>recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0017-13	<p>Proposed Realistic Live Ordnance Delivery in proposed restricted area</p> <p>The military has proposed to establish restricted airspace for live ordnance delivery impact access between Fairbanks, Delta, the Richardson Highway corridor, and the recreational and mineralized areas in the Alaska Range to the south. Further restriction of airspace limits access to these areas.</p>	<p>Section 3.2.10.1 of the EIS acknowledges that recreational and mineralized areas occur within the project area for the Realistic Live Ordinance proposal. Section 3.2.10.3 of the EIS acknowledges that due to safety regulations, the proponent would restrict ground access to all nonparticipating individuals and would provide evacuation notice to all persons with surface interests in the areas under the expanded airspace, outside of DoD boundaries during periods of hazardous operations.</p>
G0017-14	<p>Recommendation: The existing Restricted Areas (2211 and 2202) already limit access between the road corridor communities in the region. We oppose any option that connects these two restricted areas making an overall ground barrier to access in this area. We do understand limiting access during exercises; however a ground corridor must be available for access to cabins and traditional hunting, fishing, and food gathering grounds. We also want to ensure that when the ranges are not in use, civil aviation can use the current corridor between 2211 and 2202.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
G0017-15	<p>The FNSB supports Alternative B. Alternative B allows for greater flexibility in ranges and gives pilots a more diverse array of targets for ordnance drops.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
G0017-16	<p>Proposed Battle Area Complex Restricted Area</p> <p>The proposal to establish restricted airspace over the Battle Area Complex southeast of Delta Junction is of particular concern to the civil aviation community. Existing Restricted Area 2202 to the west already forces civil traffic out of the most desirable terrain route to and from Isabel Pass, a major VFR corridor connecting the northern half of the state to south central and south eastern Alaska. Winds and highly variable weather associated with the Alaska Range and the mountain pass make it impractical to confine civil traffic to a single, narrow corridor in this area. Five years ago, during an EIS process, the aviation community raised the issue about the possible need for restricted airspace, given that there were other locations available to site the military training facilities that already offered this type of airspace.</p>	<p>Your concerns over VFR aircraft transit through the Isabel Pass and the effects that weather and other conditions can have on VFR passage through this area were acknowledged in the FEIS analysis of the Battle Area Complex proposal. The potential impacts this proposed restricted area could have on this corridor would be further examined by the FAA and the Army in their review of this proposal. Flight safety is of utmost importance in all the JPARC airspace proposals and all options would be explored to prevent any flight risks to all users of this airspace environment.</p>
G0017-17	<p>Recommendation: Continue to work with the aviation community as currently many local pilots oppose the addition of restricted airspace as proposed in this area, given the need to access the mountain pass, unique weather and terrain, and presence of existing restricted airspace.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0017-18	<p>The FNSB supports Alternative B, as the proposed boundaries meet the current and future expansion needs for new firing points, range impact areas and targets required for the action. Alternative B will allow the Army the necessary time for training that regulations require.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
G0017-19	<p>Proposed Expansion of R-2205 Restricted Area, including the DMPTR</p> <p>The FNSB supports the expansion of the R-2205 Restricted Area; the</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	airspace and ground access to DMPTR and YTA are already recognized as training areas and are avoided.	includes full consideration of all comments provided during the public comment period of the Draft EIS.
G0017-20	<p>Proposed Night Joint Training in all military special use airspace</p> <p>The FNSB supports Alternative B and feels the JPARC draft EIS adequately addresses all the concerns with extension of training hours.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
G0017-21	<p>Proposed Unmanned Aerial Vehicle (UAV) Corridors</p> <p>The FNSB is actively supporting efforts to greatly expand the use of UAVs within the interior of Alaska. We have met with FAA personnel, the congressional delegation, state legislators, and the Governor to try and secure the region as a national UAV testing, development, and deployment center. There is no doubt that unmanned aerial vehicles play an important role in today's military, and that training is required. Integrating these vehicles into the National Airspace System is currently a topic of discussion at the national level. Restricting civil airspace to accommodate UAV transits next to the second largest air transportation hub in the state is a concern for the civil aviation community and as such the FNSB would like the final JPARC EIS to develop other options besides segregated airspace.</p>	<p>As noted in our response to Mayor Isaacson's comment on the UAV corridor proposals, the FNSB's interest and support of the UAV test and training programs are greatly appreciated. Recognizing that the FAA and DoD are still exploring those means for safely and effectively integrating UAV operations into the National Airspace System, the military must proceed with identifying and assessing those airspace needs required to support UAV training requirements. The FEIS examined restricted area designations as the most restrictive option in having potential impacts on other airspace uses in the affected areas. Pending the FAA's study of each corridor proposal, the Army would consider those FEIS mitigations and other viable options for minimizing effects on other air traffic, to include scheduling use of only those corridors/altitudes required to support each UAV mission activity.</p>
G0017-22	<p>Recommendation: While awaiting development of a FAA-certified sense-and-avoid capability that will allow full integration of unmanned aerial vehicles into the National Airspace System, we must rely on other means to separate unmanned from manned aircraft without necessarily segregating airspace. Corridors that are proposed would interfere with the safe and efficient access between Fairbanks, the Richardson Highway Corridor and the Alaska Range. Other means to separate UAV from civil aircraft should be pursued and completely developed within the final JPARC EIS.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Army will coordinate with FAA on details of implementation for this proposal. Because the issues concerning UAVs are arising across the National Airspace System, FAA is giving careful consideration to how to provide a safe environment for this growing need. Their final approval will likely reflect a comprehensive approach.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
G0017-23	The FNSB supports Alternative B's establishment of corridors via a Certificate of Authorization (COA). The FNSB is more than willing to participate in the COA process. COAs are only activated for the period at which a UAV is transiting a corridor. The FNSB is confident that the COA process will work to the benefit of both the military and the civilian aviation communities.	This comment is duly noted. As explained in Chapter 1, Purpose and Need for the Proposed Actions, Sections 1.2 and 1.3 of the Draft EIS, the decision on which alternatives the Army and Air Force will pursue will be made in light of the Purpose and Need by Army and Air Force representatives following the review of all relevant facts, impact analyses, mitigations, and comments received via the JPARC EIS public participation process.
G0017-24	Proposed Enhanced Access to Ground Maneuver Space Areas The FNSB supports enhanced access to the Ground Maneuver Space areas and feels the draft JPARC EIS adequately addresses the issue. The FNSB played a very active role in securing funds to construct the Tanana River Bridge, seeking construction funds from federal and state appropriations processes. All told the FNSB was able to secure nearly \$100 million for construction of the bridge. We support year-round access to the training grounds and improvements to the ranges.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
G0017-25	Proposed Tanana Flats Training Area Access Road The FNSB supports construction of the Tanana Flats Training Access Road to access the Ground Maneuver Space areas and we are satisfied the draft JPARC EIS adequately addresses the issue. We support year-round access to the training grounds and improvements to the ranges.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
G0017-26	Proposed Joint Air-Ground Integration Complex The FNSB supports development of the JAGIC and feels the draft JPARC EIS adequately addresses the various components of the issue.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
G0017-27	Proposed Intermediate Staging Bases The FNSB supports development of the proposed Intermediate Staging Bases and believes the draft JPARC EIS adequately addresses the various components of developing the four sites. Development of the staging areas is an exciting development as the staging areas will decrease military traffic during exercises and allow the military to spend less time in transit and more time in training. Construction of the staging bases is a win-win for all parties and will strengthen the operational utility of JPARC.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
G0017-28	Proposed Missile Live Fire for AIM-9 and AIM-120 in Gulf of Alaska The FNSB supports use of the Gulf of Alaska for training with AIM-9 and	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	AIM-120 missiles.	includes full consideration of all comments provided during the public comment period of the Draft EIS.
G0017-29	<p>Proposed Joint Precision Airdrop System</p> <p>The FNSB supports development of the JPADS and feels the draft JPARC EIS adequately addresses the various components of the issue.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
G0017-30	<p>Review and Comments on the movement of the F-16 Aggressor Squadron to JBER and the impacts on the JPARC Draft EIS</p> <p>While not analyzed as an alternative in the JPARC Draft EIS, the Air Force announced plans to relocate the F-16 Aggressor Squadron, currently based at Eielson AFB in support of military training activities, to JBER. The stated purpose of the proposed move is to reduce operating costs. Statements in the Draft EIS indicate that part of the justification for expanding the FOX MOA airspace to the south, is to reduce operational costs of training exercises, by lowering the amount of fuel required to reach the training airspace from JBER. These two statements seem to be in conflict with one another. It is also not clear what the impacts of relocation of the F-16 squadron might have on airspace and the corresponding civil facilities in Anchorage, including Anchorage International Airport. The objective of the following review is to determine what facts and findings within the draft EIS require greater review for this alternative, and which impacts would invalidate or contradict the stated reasons for planned move.</p> <p>The JPARC EIS was prepared for anticipated scenarios exclusive of the proposed Aggressor Squadron move. The relocation of the Aggressors is only briefly mentioned in the Draft EIS. However, discussion of the proposed FOX3 MOA expansion and creation of the PAXON MOA are predicated on reducing travel time to useable airspace from JBER and creating a common ground for JBER-assigned aircraft and the Aggressors.</p> <p>The following concerns arise based on the proposed airspace expansions:</p> <ol style="list-style-type: none"> 1. Cost for "dry targets" in the new airspace. 2. Transit distance for Aggressors to the YUKON range airspace. 3. Travel time vs. play time in the proposed airspace. 	<p>Thank you for your time, thought, and effort into the analysis of the proposed relocation of the F-16 Aggressor Squadron from Eielson AFB to JBER. The Air Force has determined, however, the relocation of the F-16 Aggressor Squadron within Alaska is not connected to the JPARC proposals. The Air Force restructuring action to move the F-16 Aggressor Squadron from Eielson AFB to JBER is not included in the JPARC Modernization and Enhancement EIS. This move is a completely separate NEPA action and a separate NEPA document will be prepared to address the impacts of the restructuring program. The F-16 proposed relocation is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. The airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 and fifth generation fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower altitude airspace to reflect the types of combat in which fifth generation fighters would be engaged. These fighters have the capability to reach out at greater distances than fourth generation fighters, so fourth generation fighters must apply diverse tactics which require airspace expansion in distance and altitude that the existing MOAs do not provide. These aircraft must train to combat all such threats regardless of where the aggressor aircraft are based. The details of the proposed F-16 relocation and military training, including Major Flying Exercises such as RED FLAG Alaska, will be worked out in the coming months. The location of the F-16 Aggressor Squadron within Alaska is not connected to the JPARC proposals. The majority of the JPARC proposals that involve Eielson AFB are Army proposals and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft. An environmental analysis will be prepared to address the potential environmental consequences of the proposed F-16 relocation within Alaska.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>4. Erroneous assumption that airspace entry equates to effective airspace use.</p> <p>The following considerations arise related to environmental analysis and aircraft relocation:</p> <ol style="list-style-type: none"> 1. It appears precedent exists for Environmental Analysis (EA) for aircraft relocation and beddown in Alaska (F-22, C-17, C-130s); however, none of these beddowns involved introduction of new aircraft to a geographical area and airspace. 2. The JPARC EIS in no way considers the relocation of the Aggressors. 3. The assumptions and justifications for the JPARC expansion rest heavily on the Aggressors' Eielson basing. 4. The EIS does not consider the increased utilization of the FOX areas versus YUKON areas due to proximity to JBER. 5. The southern YUKON MOA/ATCAAs are currently utilized approximately 160 days annually. 6. The proposed PAXON MOA will be limited to 60 days utilization below 14,000 ft MSL. <p>The following considerations arise concerning estimated cost savings:</p> <ol style="list-style-type: none"> 1. Increased travel time by fighter aircraft result in either more support sorties (air refueling) or reduced effective training time per sortie. 2. The center points of the existing FOX3 airspace and the proposed PAXON airspace are closer to Eielson than JBER via direct routing or normally utilized ATC routing. 3. Recovery routings/procedures may be less efficient and more flight time consuming due to airspace congestion and weather requirements at JBER. 4. Weather requirements for additional reserve fuel demand reduced training time or refueling support for JBER-based aircraft. <p>Primarily, the justification for the expansion of the FOX/PAXON airspaces is fuel savings based on current usage of FOX3, PAXON and STONY. The EIS reasons that FOX3/PAXON usage will reflect current usage plus half of the STONY sorties, totaling 11,237 sorties per year compared to 9,987 sorties as reported in 2010. Either the Aggressors will commute from JBER</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>to the YUKON1/2 areas, where over 8,000 sorties occurred in 2010, or the FOX/PAXON/STONY airspaces will see a substantially higher utilization rate than the 2010 baseline identified by the EIS for its estimated utilization rates of the proposed expanded airspace.</p> <p>In an effort to provide a comprehensive review of the JPARC EIS and better understand related Alaskan military airspace issues, a review was completed of the Letters of Agreement regarding Red Flag-Alaska airspace and recovery procedures, Description of Military Airspace (DOMA), Alaskan Military Procedures and ATC Service, and FAA 7400.8U, Special Use Airspace. The review revealed no additional significant factors related specifically to the relocation of the Aggressor Squadron.</p> <p>In summary, the JPARC EIS related to the FOX3/PAXON expansion faces practical challenges related to the relative inaccessibility of the YUKON areas for JBER-based aircraft without substantially reduced training time or additional refueling support.</p> <p>Expanded Data Points</p> <p>Airspace Expansions:</p> <ol style="list-style-type: none"> 1. According to the EIS, page 2-3 lines 14-17, the dry targets will be added to both new MOAs and utilized six times annually for 10 days each occurrence. Dry targets occupy approximately 1 acre and are either emitters or simulated threat vehicles (page 1-24, lines 25-32). The proposed dry targets are temporary in nature and will be placed on military lands, federal lands or private property with landowner concurrence. Civilian contractors manage the threat emitters, placing, maintaining and operating them for the Air Force. Either additional threats will be required or threats from other ranges will be relocated. In either case, it appears additional expense would be incurred. 2. Transit distance for the Eielson-based Aggressors to either YUKON or FOX airspace is negligible. Multiple Standard Instrument Departures (SIDs) exist for Eielson AFB and were analyzed for purposes of transit distance. The distances discussed below relate to the nearest entry gate to the airspace and do not equate to effective fight airspace or the scheduled "play areas." MOAs and ATCAAs are accessed through entry gates - points on the 	

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>boundaries of the airspace where ATC can initiate or terminate IFR/VFR clearances and issue airspace clearances. These gates can be likened to the ticket counters at a sports arena. Everybody enters through the limited access/egress points, but may wander freely once cleared into the arena.</p> <p>The FOX-FIVE departure from Eielson delivers aircraft to the AXEM gate (western corner of YUKON1/2 MOAs) in 52 nautical miles (NM), and the FALCO FOUR arrival return routes aircraft from YUKON2 via the EYEGO gate in 49NM. Access to this airspace from JBER via the EEEGL TWO departure would require 287NM to reach the AXEM gate and a similar distance to return. The STONON gate to the STONY airspace is approximately 85 miles from JBER, though one can assume the STONY airspace is less desirable airspace by reviewing the 2010 utilization figures compared to the FOX or PAXON ATCAAs referenced on page 2-5 in Table 2-2. Additionally, the justification for the enhanced FOX/ PAXON airspace includes the desire to utilize closer airspace as discussed on lines 14 and 26 of page 2-5.</p> <p>The possible solutions to the issue of transit distance include, but are not limited to: 1) extended sortie durations permitted by limited maneuvering 2) extended sorties through additional air refueling requirements 3) greater reliance on FOX/PAXON airspace than is forecast in the March 2012 Draft JPARC EIS.</p> <p>3. Transit time diminishes "play time", or opportunities to execute training events due primarily to lost fuel efficiencies. Foregoing discussions related to transit distance reveal transit times approaching 30 minutes each way to enter the YUKON airspace, while access to the existing FOX3 MOA via the HOJOE gate/EEEEGL TWO SID from JBER requires approximately 15 minutes, with anticipated return legs of similar duration. Contrast the travel distance with an Eielson-based aircraft utilizing the ARUNY ONE departure to enter the DICEMAN Airspace package (EIELSON MOA/ATCAA, FOX1 MOA/ATCAA, FOX2 ATCAA, FOX3 MOA/ATCAA as described in the 11th AF Airspace Handbook, 29 Dec 2010). The Eielson aircraft would be in the FOX3 ATCAA in approximately 10 minutes and could reach HOJOE (the southernmost gate in FOX3 and an entry gate for JBER aircraft) in approximately the same time as a JBER-based aircraft of the same make.</p> <p>4. While transit time to the airspace is a justification for expansion of the FOX3 MOA and creation of the PAXON MOA as outlined in the Draft JPARC EIS, transit time is only part of the efficiency equation.</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Traditionally, and unless revised once the airspace is expanded, the air combat (ACBT) for Large Force Exercises (LFEs) occurs in airspace centered slightly north of Eielson. The expectation of realized efficiencies is seemingly blind to the utilization patterns of the airspace by participants both north and south of the Alaska Range.</p> <p>Environmental Study:</p> <ol style="list-style-type: none"> 1. Table 4-2 summarizes a variety of environmental research related to prior DoD actions including relocation or initial beddown of Air Force aircraft. An accepted precedent exists for environmental research limited to an Environmental Assessment (EA) in conjunction with aircraft relocation. Included in the table are the relocation of the 176th Wing from Kullis ANGB to JBER AFB (20 aircraft), F-22A beddown at JBER (including construction of support facilities), C-17 initial beddown at JBER (replacing C-130s), and the F-22A plus up (replacement of F-15s). Every instance cited, with the exception of the Kullis relocation, involved replacement of some or all aircraft, with minimal changes in overall assigned aircraft with similar mission capabilities/sets. The Kullis relocation is most disruptive to the movement toward an EIS requirement for the Aggressor relocation since it involved moving 20 aircraft, construction, renovation and reassignment of personnel. However, the Kullis relocation did not alter airspace utilization on the broader scale considering the relocated aircraft remained in the same terminal area (the Anchorage local air traffic area). 2. Chapter 4, Cumulative Impacts and Secondary Effects, paragraph 4.8.1, page 4-19, lines 25-34 expressly states, "Any future basing of a new aircraft type in Alaska, or the relocation of F-16s from Eielson AFB to JBER, as is now being considered, would require that the appropriate environmental impact analysis processes be completed to include the potential impacts of such actions on all military and civil aviation airspace uses." Furthermore, the primary justification for the expansions of the FOX3 airspace and creation of the PAXON MOA is centralization of training airspace for the Aggressors and JBER based aircraft (paragraphs 1.5.1.1 and 1.5.1.2, Table 1-3 and page 2-2, lines 5-10,15). 3. The relocation of the Aggressors not only requires its own assessment of environmental effects, but consideration of the alternative substantially changes the character of the Draft JPARC EIS. As cited in the previous paragraph, the Draft EIS assumes the F-16s operate from Eielson. 	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Justifications for airspace expansion, including utilization rates and efficiencies are predicated on Aggressors originating and recovering to Eielson. No mention of F-16 relocation exists in the Draft JPARC EIS with the exception of the requirement for additional study should such a relocation occur.</p> <p>4. The Draft JPARC EIS predicates its MOA/ATCAA usage on status quo basing for JBER and Eielson. Appendix D to the Draft JPARC EIS, Table D-2, Description and Representative Annual Use of Alaska Training Airspace, reflects FOX3 sortie totals of 9,877. STONY ATCAA reflects 2,500 and the YUKON1/2 ATCAA show 8,034 and 7,076 respectively. Table 2-2 on page 2-5 of the Draft EIS reflects a new estimated usage of the FOX3/PAXON airspace under the proposed changes of 11,237 per year. The assumptions reflect a relocation of prior STONY missions but no relocation of the over 8,000 sorties in the YUKON airspace to the north. While approximately 3,600 of the FOX3 sorties were F-16s (not including F-16CJs) in 2010 according to Table 2-3, similar numbers for the YUKON airspace are not available. Assuming a similar ratio in the north, an additional 2,400 F-16 sorties may either lose training effectiveness or require relocation to the southern airspaces. Additionally, skewing the results are the over 2,700 F-22A sorties in the FOX3 airspace since these aircraft rarely access the YUKON airspace.</p> <p>5. According to Appendix D, Table D-2, the YUKON1/2 airspace is actively utilized 163 days and 104 days annually, respectively. The FOX3 airspace is utilized approximately 211 days annually. As detailed in the previous paragraph, the Draft JPARC EIS does not consider the shift in sorties associated with the relocation of the F-16s.</p> <p>6. As detailed on page 2-6, the PAXON MOA low sector (below 14,000' MSL) would only be available for Major Flying Exercises (MFEs) for up to 60 days annually, consisting of 6, ten-day windows. This is of interest primarily to air-to-ground assets and has limited applicability to the Aggressors as they complete their training sorties. It may, however, continue to force other participants in non-MFE training events to utilize Interior ranges. The Aggressors, in their efforts to penetrate defensive air sovereignty assets to eliminate adversary combat air support (CAS), will continue to operate in the airspace centered over Eielson AFB.</p> <p>Cost savings:</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>1. As discussed previously, the additional transit time/distance will erode cost benefits that may be claimed through relocation of the Aggressors to JBER. The accounting methods associated with determining cost savings are incongruous at times. The arguments related to cost savings seldom consider the quality of the flight time for the cost expended. Flight hours are allocated to units to complete their required training events to maintain a combat ready or mission ready status. The flight hour totals may remain unchanged or even diminish due to constrained budgets. This constraint will demand more training/proficiency events per flight hour expended. Virtually no recurrent training requirements for Air Force pilots are accomplished during en route cruise flight. To combat this loss of training time due to fuel/flight hours expended in transit, fighter aircraft require additional fuel to expend during high performance maneuvers in the reserved airspace. The unrecognized/hidden cost is the air refueling sorties generated to meet the fighter training requirement. While it is true that air refueling aircrews also require recurrency training, the potential volume of additional refueling sorties required may exceed the maximum training events required by air refueling assets and detract from other aircrew training by demanding extended loiter times and larger offloads.</p> <p>2. The center points of the PAXON and FOX3 ATCAAs, as currently published, are closer to Eielson than JBER. The center point of the PAXON ATCAA is 106NM from Eielson via the HAWGG departure to the SLICK gate. The same point is 179NM via the EEEGL TWO departure, HOJOE gate in FOX3, then direct to the PAXON center point. The center point of the FOX3 ATCAA is 100NM from Eielson via the ARUNY ONE departure transiting through the EIELSON MOA and the FOX1ATCAA/MOA. The same point is 153NM from JBER via the EEEGL TWO departure and HOJOE gate.</p> <p>One should note the air combat for MFEs occurs in an area centered over Eielson and its aircraft can be in the airspace within a couple minutes of departure.</p> <p>3. According to the FAA Administrator’s Factbook, March 2011, Anchorage TRACON (Terminal Radar Control) ranked 36th busiest nationwide in calendar year 2009 with over 261,000 aircraft operations. CY2010 reported over 277,000 operations according to the Administrator (pg. 14). Fairbanks TRSA (Terminal Radar Service Area) is not listed in the report. However, according to the Alaska DOT website and the FAA data</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>sheet for Fairbanks International Airport, Fairbanks experienced over 133,000 aircraft operations in CY2009. The congested nature of the Anchorage airspace in contrast to the relatively unencumbered access to the ranges enjoyed by Interior aircraft bears further research. A deeper analysis may reveal appreciable minutes of time lost due to required spacing for IFR aircraft and deconfliction in the Anchorage terminal area in contrast to the ease of recovery to Eielson AFB.</p> <p>4. Weather considerations plague both locations. Eielson suffers from the bitter cold of winter while Anchorage experiences strong winds and occasional IFR conditions. Aircraft operating in the JPARC require fuel reserves -- greater reserves for IFR terminal weather -- and subsequently lose training time. Due to the distances discussed previously, JBER aircraft will lose even more of the already reduced play time when the requirement to carry fuel for an alternate field exists.</p>	
G0017-31	<p>Thank you for the opportunity to offer comment on the Draft Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska. The FNSB looks forward to continuing our productive relationship with Alaska Command, the U.S. Air Force, and the U.S. Army. The FNSB point of contact for this action is Jeff Jacobson, Chief of Staff, jjacobson@fnsb.us 907-459-1300.</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.</p>
G0018-1	<p>Thank you for the opportunity to comment on the Joint Pacific Alaska Range Complex (JPARC) Modernization & Enhancement Draft Environmental Impact Statement (DEIS). The Alaska Department of Transportation and Public Facilities' (DOT&PF) mission is to Get Alaska Moving through service and infrastructure. We do this by providing for the safe and efficient movement of people and goods and delivery of state services. In this regard we will comment on safe access and the potential impact on aviation by the proposed actions. Other State of Alaska departments are providing comments on various aspects of the DEIS that fall within their purview. It is in this context that I provide comments to you on the JPARC DEIS.</p> <p>Alaska and the military have a long and mutually beneficial history, and the State of Alaska wants to preserve and expand our relationship wherever possible. Alaska's unique and spacious environment already provides superb military training opportunities and we support and endorse modernization and enhancement of this unique capability to support the Department of Defense (DoD) for the next century. It is in Alaska's best</p>	<p>We appreciate the support the Alaska DOT&PF and others have given the military over the years and welcome your assistance in seeking those means that would accommodate the safe, compatible use of those Alaska resources required to serve both military and civilian needs. Both the Air Force and the Army will continue to work with government agencies and other stakeholders to pursue those EIS mitigation measures and other viable options required to meet those needs. The EIS acknowledges the significance of the general aviation sector in Alaska and the many concerns it has with potential impacts of the airspace proposals on high use areas such as the Isabel Pass. Flight safety is of utmost importance to the military and both the Air Force and the Army will consider all means possible, including those recommendations noted in your comments, for ensuring a safe operating environment for all concerned. This includes seeking the funding necessary to expand and enhance communications capabilities within those areas where this coverage may be lacking. As airspace needs for Unmanned Aerial Vehicle operations continue to be explored by the FAA, DoD, and other interests, the Army and Air Force will seek viable and feasible solutions to support the test and</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>interest to seek creative methods to share the combination of air, ground, and sea resources that provide a realistic training environment for the military. While we desire to be both a gracious host and a partner with the military in Alaska, we have concerns about some of the proposed actions in the JPARC DEIS that must be addressed in the National Environmental Policy Act (NEPA) process.</p> <p>Importance of Aviation in Alaska</p> <p>We like to say that in Alaska, the general-aviation small aircraft is the equivalent to the mini-van for people living in the contiguous 48 states. There are over 10,000 aircraft in Alaska and over six times as many pilots per capita when compared to the rest of the U.S.A. Furthermore aviation is a major economic force by contributing more than \$3.5 billion annually to our economy, or about 8% of gross state product. Aviation is the fifth largest employment sector in Alaska, with over 47,000 aviation related jobs. Perhaps most importantly, aviation is the essential means of access to rural Alaska because of our expansive geography.</p> <p>Safe Access</p> <p>Providing for the safe transportation of the flying public in Alaska is a very important part of the State’s responsibility. We want to help create a culture of safe travel in Alaska. The number of aircraft mid-air collisions is disturbingly high, which we want to eliminate or at least reduce the potential causes of whenever possible.</p> <p>We believe it would be beneficial for the DoD to articulate and explain the on-board sensing capability possessed by military aircraft, as well as help Alaska stakeholders understand the relative frequency of military operations below 5,000 agl. These explanations should go a long way towards addressing concerns of Alaska general aviation and commercial operators.</p> <p>These explanations are especially important due to the need for access to the southern Alaska Range, Denali Highway, and Talkeetna Mountains. Furthermore Isabel Pass is a major VFR “highway in the sky” that connects the northern half with the south central and southeastern portions of Alaska. The proposal to establish restricted air space over the Battle Area Complex (BAX) southeast of Delta Junction is of notable concern to state stakeholders</p>	<p>training needs in Alaska without adversely affecting other airspace uses. The military also wants to build upon their history and successes in Alaska and will work closely with all concerned in seeking those cooperative solutions that will help us achieve our mutual needs while not jeopardizing the safe, beneficial use of Alaska’s air, ground, and sea resources.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>as well. The concept of “turn on/turn off” airspace has been articulated by the DoD in past discussion. How might this concept apply to the BAX restricted airspace?</p> <p>Enhance Communications for Safety</p> <p>DoD created the Special Use Airspace Information Service (SUAIS) in the mid-1990’s to address deconfliction of air space use. SUAIS greatly reduced the potential for mid-air collisions between civil and military aircraft. While both civil and military organizations generally agree upon the value SUAIS provides for deconflicting aircraft, to date aviation organizations continue to ask for adequate VHF radio coverage in the eastern portions of the existing JPARC complex. Correspondingly, the complaints that are received from civil aviation pilots are normally in regions of the airspace that lack adequate communication.</p> <p>Any expansion of MOA airspace should have accompanying radio coverage, staffing, and other elements of the SUAIS infrastructure to allow civil pilots to communicate with US Air Force Range Control during times the MOAs are active. It is also important that the audio recorded message, broadcast during hours when Range Control is unmanned, be more uniformly broadcast across the JPARC complex.</p> <p>Unmanned Aerial Vehicles</p> <p>We provided comments for the scoping phase of the JPARC EIS regarding Unmanned Aerial Vehicles (UAVs), and want to reiterate our concerns. UAVs clearly represent an important and growing technology for the military and other agencies. We think now is the time to address how UAVs might be employed in a training environment while simultaneously ensuring safe separation from traditional aircraft. We believe an Alaska-as-prototype methodology is possible in meeting the challenge if all stakeholders work together to achieve the best approach. We look forward to participating with Department of Defense (DoD) planners in this area. The University of Alaska is working to secure a UAV training area under the auspices of the FAA. Perhaps DoD and the University of Alaska could work together to improve UAV safety.</p> <p>Conclusion</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Alaska has a long, productive and collaborative history with the U.S. military. We want to build upon our history and continue to provide the remarkable environment for realistic military training opportunities so that our military can continue to be the best trained forces in the world. It is in both Alaska's and DoD's best interests to seek cooperative solutions to be able to share the unique combination of air, ground, and sea resources found in Alaska in a safe and mutually beneficial way.</p> <p>The State of Alaska wants to continue to be both a gracious host and a full partner with the DoD in Alaska; however we have concerns and needs that must be addressed in the EIS and Record of Decision. I believe we can meet both the military's need for realistic training while ensuring that Alaskans continue to have reliably safe access to the areas within the proposed expanded MOAs.</p>	
G0018-2	<p>Importance of Aviation in Alaska</p> <p>We like to say that in Alaska, the general-aviation small aircraft is the equivalent to the mini-van for people living in the contiguous 48 states. There are over 10,000 aircraft in Alaska and over six times as many pilots per capita when compared to the rest of the U.S.A. Furthermore aviation is a major economic force by contributing more than \$3.5 billion annually to our economy, or about 8% of gross state product. Aviation is the fifth largest employment sector in Alaska, with over 47,000 aviation related jobs. Perhaps most importantly, aviation is the essential means of access to rural Alaska because of our expansive geography</p>	<p>The importance of aviation in Alaska and the contribution general aviation makes toward the economy of Alaska is discussed in Section B.12.3.3, Key Industries in the EIS Study Area. The Air Force would continue to coordinate with the FAA and other regulatory agencies to address stakeholder concerns further and develop mitigations to minimize any potential impacts.</p>
G0019-1	<p>July 06, 2012</p> <p>ALCOM Public Affairs 9480 Pease Avenue, Suite 120 Joint Base Elmendorf-Richardson, Alaska 99506</p> <p>Re: Joint Pacific Alaska Range Complex Modernization and Enhancement Draft Environmental Impact Statement Comments of City of Delta Junction, Alaska Our File No. 11025.020</p> <p>Gentlemen:</p> <p>We are city attorneys for the City of Delta Junction, Alaska. We submit these</p>	<p>Thank you for your comments on the JPARC Draft EIS. Your comments are duly noted.</p> <p>The proponent consulted with Delta Junction as a local government, specifically the Mayor of Delta Junction, Mary Leith-Dowling. Also, Air Force and Army leadership met with Delta Junction community leaders during both public scoping meetings (see Table A-2 in Volume 2 of the Final EIS) and public hearing meetings. During scoping, the following attendees joined Air Force and Army leadership at the Delta Junction City Hall: Delta Junction Mayor Mary Leith-Dowling, Delta Junction City Administrator Mike Tvenge, and Delta Junction Mayor Pro Tem Pete Hallgren. During public hearings, Air Force and Army leadership met with Delta Junction City</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>comments to the Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska ("JPARC DEIS"). The comments submitted here are in addition to the City's claims for breach of the Memorandum of Agreement USARAK-MOA-029 of May 16, 2006 ("the 2006 Agreement"). Neither these comments nor the City's participation in the JPARC DEIS process is a waiver by the City of those breaches.</p> <p>The City believes that the context for its comments is critical and will provide background. The U.S. Army has admitted that changes in staffing at the U.S. Army have cost the Army its historical context.</p> <p>I. BACKGROUND</p> <p>The City of Delta Junction ("Delta") is a general law city located immediately to the north of the Donnelly Training Area East and Ft. Greely. The surrounding area along the Richardson Highway and the Alaska Highway, outside of Delta, is home to several thousand additional citizens ("Deltana").</p> <p>Beginning in 2001, United States Army Alaska ("USARAK") sought to develop two training facilities in the Eddy Drop Zone of the Donnelly Training Area East, the Combined Arms Collective Training Facility ("CACTF") and the Battle Area Complex ("BAX"). The proposed location for the CACTF and BAX was immediately adjoining the southern city limits of Delta and a considerable stretch of Deltana along the Alaska Highway. Through a series of disputes in the context of the National Environmental Policy Act, Delta objected to and resisted the location of the CACTF and BAX so close to populated areas. Some of the history of those objections and the background to their resolution are described in Delta Ordinance 2006-06 ("the 2006 Ordinance"), attached as Exhibit A, and Memorandum of Agreement USARAK-MOA-029 of May 16, 2006 ("the 2006 Agreement"), attached as Exhibit B. More detailed discussion and analyses can be found in the City's comments to the various environmental impact documents, the pleadings filed in federal court and the working papers leading to the 2006 Agreement.</p> <p>The City argued strongly for an alternate location for the CACTF and BAX, at the south end of the Donnelly Drop Zone, described as "Alternative 3" in</p>	<p>Administrator Mike Tvenge.</p> <p>A detailed summary of the scoping process, the public involvement process, and agency coordination is contained in Appendix A, Public Scoping Summary.</p> <p>On page 3-206, the Draft EIS mentions the Memorandum of Agreement between USARAK and the City of Delta Junction. However, additional language will be added to the Final EIS. The paragraph in the Final EIS will read:</p> <p>"Delta Junction, directly north of Fort Greely at the junction of the Richardson and Alaska Highways, does not have a comprehensive plan for land use but has established municipal ordinances governing land use and subdivision layout and approvals. The City Planning Commission serves as both an advisory body (prepares plans) and enforcing body of city ordinances. The Commission approves all plat plans, variances, and conditional use requests. The "keyhole" area is essentially undeveloped and wooded, with one or two existing residences. There is an existing Memorandum of Agreement (USARAK-MOA-029), signed 16 May 2006, between USARAK and the City of Delta Junction. The agreement lays out specific operational actions and restrictions that apply to the use and management of the existing BAX and CACTF in DTA-East (USARAK 2006-3). Mitigations as outlined in the BAX and CACTF Final EIS (dated June 2006) and ROD (signed 19 July 2006) remain in effect and will not be superseded unless a better practice, enhanced, stringent mitigation is implemented as part of this EIS."</p> <p>Section 3.2.3.1 discusses range safety and control, unexploded ordnance and munitions safety, public access control, and fire and emergency response.</p> <p>There are no plans to construct any structures. Should construction be needed in the future, the Army will conduct necessary environmental analyses. The BAX proposal does not have a hydrologic impact, since this action affects only airspace.</p> <p>The anticipated overall increase in munitions expenditures is expected to be minimal. The training days considered in the BAX proposal were based on full allocation outlined by the Standards in Training Commission (STRAC</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>the Supplemental Draft Environmental Impact Statement for the Construction and the operation of a Battle Area Complex and a Combined Arms Collective Training Facility within U.S. Army Training Lands in Alaska dated March 2006 ("the 2006 SDEIS").(1) USARAK objected to Alternative 3 because of added costs of construction, as detailed in the 2006 SDEIS. USARAK insisted on Alternative 2 in the 2006 SDEIS, the "preferred alternative," which adjoins Delta and Deltana.(2)</p> <p>An agreement was reached: Delta would withdraw its objections to Alternative 2 in exchange for commitments from USARAK for public safety, and USARAK's agreement that use of the CACTF and BAX would not be further expanded without the consent of Delta. The agreement was reduced to the writing attached as Exhibit B, and approved by the City under Ordinance 2006-06, attached as Exhibit A.</p> <p>Note that to interpret the 2006 Agreement you must have at hand both Exhibit A to the 2006 Agreement and the 2006 SDEIS itself, which both the 2006 Agreement and Exhibit A to the 2006 Agreement reference.</p> <p>-----</p> <p>1. 2006 SDEIS, Vol. 2, Figure 2.f. 2. 2006 SDEIS, Vol. 2, Figure 2.e.</p> <p>-----</p> <p>Much of the activity described in the JPARC DEIS is removed from the Delta and Deltana area, although the JPARC DEIS is vague about many of the impacts. However, many parts of the JPARC DEIS are specific to the Donnelly Training Area and to the BACX and CACTF in particular. Generally, Delta's comments to the JPARC DEIS go to the environmental impacts on the Donnelly Training Area East. To the extent that other aspects of the JPARC Modernization and Enhancement carry the potential to impact Delta and Deltana, those comments are intended to extent to those changes as well.</p> <p>II. COMMENTS</p>	<p>DA PAM 350-38). These are based on estimated utilization rates, and commanders are not required to use one facility to execute their annual ammunition allocation. The munitions referenced were analyzed in the overall area of concern during development of previous NEPA documents; those munitions are currently fired in the DTA.</p> <p>There is nothing in USARAK-MOA-029 to eliminate the Army's requirement to place special use airspace over the BAX and CACTF. The Army stated that should there be a requirement for expansion alteration on the BAX or CACTF, the Army would conduct the appropriate NEPA action and proceed accordingly. The JPARC EIS is the correct venue for the Army to move forward to adapt to emerging mission requirements.</p> <p>USARAK Regulation 95-1 and Army SOPs stipulate those safety practices aircrews must follow when planning and conducting flight missions. They include altitude restrictions for avoiding noise-sensitive areas, populated areas, livestock, dwellings, and other sensitive areas.</p> <p>Time-averaged and peak noise levels reflecting baseline munitions training do not exceed 62 dB CDNL and 115 dB PK 15(met), respectively, in areas outside of range boundaries. Flying operations are not conducted at a frequency sufficient to result in time-averaged noise levels exceeding 65 dB DNL.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>A. Comments Related to Memorandum of Agreement USARAK-MOA-029.</p> <p>It is very frustrating to Delta to have to discuss and review all of these issues again.</p> <p>1. The JPARC DEIS Is Defective Because JPARC Failed to Consult with Delta As a Local Government Impacted by the Proposed Activity.</p> <p>As the JPARC DEIS acknowledges, consultation with local governments impacted or potentially impacted by the proposed activities is mandatory.(3) That simply did not happen. Indeed, Delta did not even make the distribution list for local agencies impacted.(4) Given the troubled history of range expansion between USARAK and Delta, the omission is inexcusable. Delta and Deltana are the areas most likely to be impacted by increased activities in the Donnelly Training Area. The failure to contact and consult with Delta is an astonishing oversight.</p> <p>Delta has litigated the adequacy of NEPA documents with USARAK. Delta has vigorously participated in NEPA proceedings on the 2001 Environmental Assessment for the CACTF and BAX, forcing USARAK to a full environmental impact statement process. Delta’s comments to the Draft Environmental Impact Statement for the CACTF and BAX contributed to USARAK’s decision to issue a Supplemental EIS. Delta, without question, is the municipality with the most at stake in any expansion of activities in the Donnelly Training Range.</p> <p>The failure to consult with a major stakeholder, with a record of active participation in prior range expansions, makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>-----</p> <p>3. JPARC DEIS, Vol. 1, p. 1-33. 4. JPARC DEIS, Vol. 2, p. A-45.</p> <p>-----</p> <p>2. The JPARC DEIS Is Defective Because JPARC Failed to Discuss the 2006 Agreement.</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>At no point in the JPARC DEIS that we can find does JPARC even mention the specific terms of the 2006 Agreement.(5) The omission is astonishing, because city council member Pete Hallgren handed a copy of the 2006 Agreement to JPARC at a scoping meeting. JPARC had actual notice of the existence of the 2006 Agreement, quite apart from USARAK being a party to it.</p> <p>Yet JPARC failed to acknowledge the consequences of the 2006 Agreement, let alone discuss the impact of the commitments made in that agreement to Delta and Deltana. Because of that omission, substantial portions of the discussion of proposed changes to the BAX in the JPARC DEIS ignore the contractual commitments made in the 2006 Agreement.(6) Among other issues, the proposed level of increased activities ignores the restrictions on training under specific weather conditions because of fire hazards, ignores known flood plain risks and ignores restrictions and limitations on noise and training activities.</p> <p>This omission is separate from the breaches of the 2006 Agreement. The 2006 Agreement is a part of the scope of the proposed range enhancements. It is an issue to be addressed as a part of any environmental impact statement. The omission of the 2006 Agreement from the JPARC DEIS makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>-----</p> <p>5. The JPARC DEIS briefly acknowledges the existence of the 2006 Agreement; JPARC DEIS p. 3-206, lines 31-33. The reference cites to the wrong USARAK number. Nowhere in the hundreds of pages of the JPARC DEIS are the terms of the 2006 Agreement discussed, or analyzed in relation to the JPARC DEIS.</p> <p>6. JPARC DEIS, Vol. 1, 3-178 to 220</p> <p>-----</p> <p>B. Comments Relating to Fire Danger.</p> <p>As Delta demonstrated in the negotiations and litigation over the BAX and</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>CACTF Ranges, the risks associated with wildfire are a critical concern. Very strong winds gust through the Black Rapids Canyon, Deltana and Delta routinely. Hot, dry conditions can extend for weeks at a time. A wildfire in those conditions is uncontrollable. Delta experienced just such a wildfire in 1999, when a wind-driven fire originating in the Donnelly Training Area East burned buildings on Ft. Greely and blew hot cinders several miles downwind. Uncontrollable wildfire originating from training activities is a critical concern.</p> <p>The presence of unexploded ordinance in portions of Donnelly Training Area East exacerbates the dangers from wildfire in training areas. Where a danger of unexploded ordinance is present, ground crews cannot be used to attempt to control the wildfire. Only aerial systems (air drops of water and fire retardant) can be used. Thus, efforts to control wildfire may be further hampered.</p> <p>The importance of those concerns is reflected in the 2006 Agreement. Substantial portions of that agreement address mitigating the risk of wildfire and providing for immediate, on-site control if a fire is started. The mitigation and control requirements demonstrate the significance both USARAK and Delta attach to this risk.(7)</p> <p>Note that under extreme fire conditions, no training would occur at the BAX except for troops scheduled for immediate deployment and then only after prior consultation with Delta.(8) For lower levels of fire conditions, specific levels of staffing and staffing locations are provided.</p> <p>By contrast, the discussion of fire danger associated with the proposed JPARC Range Enhancement is incomplete and inadequate. The only consideration given to wildfire is fires ignited by munitions and incendiaries, and even that inadequate discussion is cast as nearly meaningless generalities.(9) Wildfires can also be ignited by careless smoking, exhaust manifolds on vehicles, escaped campfires and many other sources. The failure to address other man-made causes of wildfire makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>-----</p> <p>7. See 2006 Agreement, pp. 3.4.</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>8. Ibid, p. 3. 9. See, e.g., JPARC DEIS 3-118 to 119.</p> <p>-----</p> <p>The proposal to increase training activities from 106 days annually to 238 days annually(10) is effectively an impossibility without violating the 2006 Agreement or greatly increasing training activities during the harsh Interior Alaska winter. A 225% increase is not feasible.</p> <p>Because wildfire is uncontrollable in high and extreme weather conditions, and because those kinds of weather conditions prevail in the Donnelly Training Area for days and sometimes weeks at a time, the goals of the BAX Range Expansion cannot be met without extremely high jeopardy of wildfire. The failure of the JPARC DEIS to address these environmental realities makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>Delta notes that the solution to the wildfire risk is not to offer more staffing or more equipment, or even more removal of vegetation. Under high and extreme fire conditions, wildfire is uncontrollable. The only means of "controlling" wildfire risk in high and extreme conditions is to sharply curtail human activity in the Donnelly Training Area. That single solution is contradicted by the overly ambitious training days goal described in the JPARC DEIS. The failure by the JPARC DEIS to directly address that contradiction makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>C. Comments Relating to Flooding.</p> <p>As Delta demonstrated from historical records and from the work of an independent hydrologist, the area where USARAK chose to locate the BAX and CACTF are prone to sheet flooding and aufeis-generated seasonal flooding. Those risks were addressed in the 2006 Agreement and Exhibit A to the Memorandum.(11)</p> <p>"Sheet flooding" is an unusual condition that occurs in the Donnelly Training Area East in which instead of channelized flow, water flows over the entire area. Man-made structures disrupt and channelize that sheet flow, creating</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>very serious downstream risks. Delta, and the Deltana region, are downstream.</p> <p>-----</p> <p>10. JPARC DEIS, p. 6. 11. 2006 Agreement, p. 4; Exhibit A, pp. 2-3.</p> <p>-----</p> <p>"Aufeis-generated seasonal flooding" occurs in the Jarvis Creek channel, which flows south to north through the Donnelly Training Area East. The risk is mentioned but not assessed in the JPARC DEIS.(12) In the Executive Summary, the JPARC DEIS ultimately concluded that the BAX will have no adverse impact on the flood plain.(13) That unsupported claim stands in sharp contrast to events on the ground. In the spring of 2006, an aufeis event occurred on Army land, that caused a massive diversion of spring runoff from Jarvis Creek, overland through the BAX site and then more than 10 miles through the Delta and Deltana area north to ultimately discharge into the Tanana River. This rapidly rising floodwater ran down the street in front of the Delta High School as volunteer crews using heavy equipment dug emergency ditching to keep the water from flowing into residential neighborhoods and downtown Delta, while miles to the north State of Alaska Department of Transportation deliberately breached Tanana Loop Extension road in several places to allow the floodwater to more quickly drain into the Tanana River. A number of residents were stranded for several days in their homes due to this action. Anything that alters the topography in Donnelly Training Area East, including the range expansions contemplated by the JPARC DEIS, carries the risk of worsening the risk of aufeis-generated flooding, disruption of the sheet flow flooding or both.</p> <p>USARAK acknowledged these risks and partially addressed them in the 2006 Agreement.(14) The unspecified enhancements to the BAX contemplated by the JPARC DEIS involve a careful assessment of what changes will be made to the Jarvis Creek channel, the alternate flood channel and the areas prone to sheet flooding. The failure of the JPARC DEIS to meaningfully discuss these risks makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>In the case of both sheet flow and aufeis-generated flooding, it is important that vegetation remain in place to slow and impound the velocity of the water. Delta notes that this important requirement is inconsistent with removal of that vegetation to manage the risk of wildfire. The failure of the JPARC DEIS to address this inconsistency makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>Because the area in which the BAX is located is in a known flood plain, Executive Order 11988 bars construction unless there is no practicable alternative.</p> <p>-----</p> <p>12. JPARC DEIS, §3.3.6.1 at p. 3-195. 13. JPARC DEIS, Vol. 1, p. 12, Table ES-1. 14. 2006 Agreement, p. 4.</p> <p>-----</p> <p>A word search of the JPARC DEIS demonstrates that Executive Order 11988 is never mentioned in the discussion of the BAX, and only briefly acknowledged to exist in Volume 2 of the JPARC DEIS.(15) There is no discussion of the relationship of Executive Order 11988 to the proposed BAX range expansions. The failure by the JPARC DEIS to meaningfully discuss the risks of construction in a floodplain and the impact of EO 11988 makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>Aufeis occurs throughout the flatter areas in Donnelly Training Area East. As Delta has demonstrated previously, any structures that impede the flow of water, even relatively small amounts of water, create potential for aufeis formation during the winter. Over the course of the long Alaska winter, that aufeis can thicken into layers many feet thick. That aufeis not only jeopardizes whatever structures may have been created; it also impacts the flow of water during spring runoff in unpredictable ways.</p> <p>The JPARC DEIS baldly claims that the BAX range expansions will have no adverse impact on water resources or flood plains.(16) The assertion is simply wrong. These cumulative risks identified by Delta as far back as 2005</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>demonstrate that there are very serious hydrologic risks. These are risks, which USARAK acknowledged to exist in the 2006 Agreement. For the JPARC DEIS to claim otherwise now makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>D. Comments Relating to Public Safety.</p> <p>The Donnelly Training Area East directly abuts the southern boundary of Delta and, along the Richardson and Alaska Highways, the Deltana region. Delta and Deltana will bear significantly increased safety risks from the proposed range enhancements. The risks go beyond the wildfire and flood risks described earlier in this letter. The increased overflights, increased air-to-ground and ground-to-air weapon activity, increased unmanned aerial vehicle activity and increased night training all pose safety risks for Delta and Deltana.</p> <p>-----</p> <p>15. JPARC DEIS, Vol. 2, p. B-48. This omission is particularly frustrating to Delta. In 2005-2006, in the discussions regarding the adequacy of the Supplemental Draft Environmental Impact Statements, it was Delta that had to point out the existence of Executive Order 11988 to USARAK. It is frustrating, even alarming, that JPARC has apparently already forgotten its existence.</p> <p>16. JPARC DEIS, §3.3.6 at p. 3-195.</p> <p>-----</p> <p>Yet Delta was not meaningfully consulted. And to the extent that Delta participated in the scoping meetings, by providing a copy of the 2006 Agreement, for example, it was simply ignored. The failure by the task force charged with drafting the JPARC DEIS to even consult with Delta makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>The JPARC DEIS acknowledges that existing activities generate munitions-related rubble in the BAX.(17) Munitions-related rubble contains hazardous materials. The JPARC DEIS concludes that there will be no increased adverse impact. Delta is at a loss to understand how a proposed 225% increase in training activities can fail to substantially increase the amount of</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>munitions-related rubble. That rubble, apparently, is stored on the Donnelly Training Area, at or near the BAX. As such, it presents a risk to Delta in the event of a flood event, to give just one example. Unless JPARC can show that Delta’s assumptions are in error, the failure by the JPARC DEIS to address this issue makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>Finally, it is deeply troubling to Delta that JPARC is using the location of the CACTF and the BAX as a basis for increased air activity over inhabited areas. As described earlier in this letter, the basis for Delta’s entry into the 2006 Agreement was the agreement that in exchange for acquiescing in the BAX and the CACTF being at the north end of the Donnelly Training Area East, as opposed to the south end favored by the City, the use of those ranges would not be expanded without the agreement of Delta. The failure by the JPARC DEIS to meaningfully discuss the breach of that bargain and the increased risk to Delta and Deltana makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>E. Comments Relating to Noise.</p> <p>The importance of noise and noise management is evident in the 2006 Agreement: the agreement was predicated on a demonstration of the noise from a 105mm Stryker Mobile Gun System immediately prior to the public hearing on the ordinance to adopt the 2006 Agreement. Additionally, the JPARC DEIS concluded that there is a potential adverse impact</p> <p>As Delta understands the JPARC DEIS, the BAX range expansion contemplates a 225% increase in training days, greatly increased amounts of fixed and rotary wing air traffic, some of it jet traffic, immediately above and along the southerly boundary of Delta.</p> <p>-----</p> <p>17. JPARC DEIS, §3.3.7 at pp. 3-196 to 3-197.</p> <p>-----</p> <p>The hours during which the activity would occur are greatly increased. Night</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>training would be added, creating noise issues into the evening.</p> <p>This would not be as great an issue if USARAK had agreed to locate the BAX and CACTF at the south end of Donnelly Training Range East. But USARAK insisted on the very northern end, abutting the City limits, and promised noise would not be an issue. Now, apparently, residents of Delta and Deltana can expect helicopter traffic 500 feet overhead at 10 PM two-thirds or more of the year.</p> <p>The JPARC DEIS admits that the EPA has determined noise levels above 55 dB are annoying to adjoining property owners.(18) Further, the JPARC DEIS recognizes that the noise from the BAX will potentially have an adverse impact on the environment surrounding it.(19) But the JPARC DEIS goes on to assert, without citation to authority, that levels of 65 dB are permissible, even though it means that 12% or more of the population will be highly annoyed.(20) The activities described in the JPARC DEIS also represent a substantial increase in noise levels for residents of Delta and Deltana. Under the 2006 Agreement, Delta agreed to tolerate noise below 65 dB.21 Now Delta residents are being told to expect noise "that would not be expected to exceed 65 dB."(22) Delta knows from experience that changes in phrasing like this are a wedge to much higher activity levels. The proposed increase in tolerated levels of noise is a breach of the 2006 Agreement. No justification is offered for this breach of the 2006 Agreement. The failure by the JPARC DEIS to address the unilateral increase in noise levels and noise duration makes the JPARC DEIS inadequate, incomplete and deficient as a matter of law.</p> <p>F. Relationship Between City of Delta Junction and U.S. Army.</p> <p>Delta prides itself on a long, mutually cordial and mutually beneficial relationship with the U.S. Army. Many Delta and Deltana residents are veterans, most of whom were stationed at Ft. Greely during their military careers. Delta values that relationship and does not want to unnecessarily damage it.</p> <p>-----</p> <p>18. JPARC DEIS, Vol. 2, pp. E-14 to E-15. 19. JPARC DEIS, Vol. 1, p. 12, Table ES-1.</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>20. JPARC DEIS, Vol. 2, pp. E-14 to E-15. 21. 2006 Agreement, Exhibit A, pp. 5-6.</p> <p>22. JPARC DEIS, Vol. 11 pp. 3-187 to 3-188.</p> <p>Delta is also mindful of the risk that Eielson Air Force Base may be reduced in size, or even realigned, and understands the importance of adequate training facilities and conditions to the continued operation of the Base.</p> <p>-----</p> <p>Finally, Delta is mindful of the importance of adequate training to our troops, for their safety and security, and to allow them to perform the missions that may be assigned to them.</p> <p>Delta took those considerations in mind when it made the settlement described in the 2006 Agreement. Some of the factors that led to Delta's agreement in 2006 were the very considerations described above.</p> <p>Now, however, in the face of the U.S. Army's apparent abandonment of the 2006 Agreement, it is difficult for Delta to once again make concessions that jeopardize its safety and values. It is deeply troubling that, despite having a copy of the 2006 Agreement provided at the scoping meeting, JPARC chose to completely ignore its existence and the contractual obligations made by USARAK under that agreement. From the point of view of Delta, the U.S. Army has breached and proposes to further breach its agreement with the City.(23)</p> <p>G. Conclusion.</p> <p>In light of these circumstances, a further issue that the JPARC DEIS should address is how a level of trust and confidence between the U.S Army and Delta may be restored. Delta would strongly prefer to resolve these issues by compromise and agreement, but is understandably concerned that USARAK, JPARC and the U.S. Army will not abide by whatever agreement might be made. The City of Delta Junction invites the U.S. Air Force and the U.S. Army to suggest ways in which some settlement can be made.</p> <p>As drafted, Delta believes the DEIS is inadequate as a matter of law. A</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Supplemental Environmental Impact Statement, with further notice and comment periods, is very likely required. Separately, the City and Delta Junction must resolve the very serious breaches of the 2006 Agreement.</p> <p>-----</p> <p>23. At the public hearing in Delta Junction, the military suggested that because the JPARC DEIS is a joint effort of the Air Force and Army, the 2006 Agreement might not apply. The claim is wrong as a matter of law. Donnelly Training Area East was USARAK land at the date of the 2006 Agreement. Whatever rights the Air Force may have can only derive from those the Army has. Those rights are limited by the 2006 Agreement.</p> <p>-----</p> <p>Otherwise, the important objectives of the JPARC DEIS will be delayed, at least as to the BAX modifications, while the NEPA requirements are satisfied, and, at least potentially, an action for breach of the 2006 Agreement ensues. Delta strongly urges meeting to resolve these issues without another five year cycle of environmental and contract litigation.</p> <p>Sincerely yours.</p> <p>GUESS & RUDD P.C. /James D. DeWitt/ James D. DeWitt</p> <p>cc: Mary Leith, Mayor City of Delta Junction</p> <p>Mike Tvenge, City Administrator City of Delta Junction</p> <p>Dennis Dunn, (via email only, [deleted for privacy]) USARAK G3, TSS Chief</p>	
G0020-1	<p>NOW, THEREFORE, BE IT RESOLVED, that the Matanuska-Susitna Borough Assembly prefers the two EIS alternatives with smaller lateral and vertical footprints; either the “No Action Alternative” that maintains the current Fox 3 MOA or “Alternative E” for the Fox 3 and Paxon MOAs because it moves the proposed southern boundary of “Alternative A” 20</p>	<p>Alternative E was created in response to public comments, in order to avoid impacts to the Lake Louise area. This comment is duly noted.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	nautical miles to the north.	
G0020-2	BE IT FURTHER RESOLVED, that if Alternative E is the selected alternative, an Overflight Avoidance Area be established twenty (20) nautical miles north of the parallel to the southern boundary of Alternative E, with flight altitude minimums of 5,000 feet AGL.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0020-3	BE IT FURTHER RESOLVED, that the Matanuska-Susitna Borough Assembly opposes lowering the minimum flight training altitude to 500 feet for the Fox 3 MOA and the Paxson MOA due to potential impacts on wildlife, civilian aircraft traffic, and recreational uses.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
G0020-4	BE IT FURTHER RESOLVED, that the Matanuska-Susitna Borough Assembly opposes lowering the minimum flight training altitude to 500 feet for the Fox 3 MOA and the Paxson MOA due to potential impacts on wildlife, civilian aircraft traffic, and recreational uses.	The concerns expressed in the Matanuska-Susitna Borough Resolution Serial No. 12076 and by others over lower altitudes of the proposed Fox 3 and Paxson MOAs are addressed in the FEIS. The potential impacts these lower altitude operations may have on wildlife, nonparticipating air traffic, recreation, hunting and other interests were considered in the mitigations and other viable options that will be pursued with stakeholders and other interests to find those solutions that will best serve everyone's needs.
G0020-5	BE IT FURTHER RESOLVED, that the Matanuska-Susitna Borough Assembly opposes lowering the minimum flight training altitude to 500 feet for the Fox 3 MOA and the Paxson MOA due to potential impacts on wildlife, civilian aircraft traffic, and recreational uses.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
G0020-6	BE IT FURTHER RESOLVED, that the Air Force conduct all supersonic operations in the Fox and Paxson MOAs at or above 5,000 feet AGL or 12,000' MSL, whichever is higher, to reduce sonic boom intensity and its effects on the surface.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The limitation on supersonic operations noted in this comment is the current restriction for the Fox 3 MOA and would apply to the expanded MOA.</p>
G0020-7	<p>BE IT FURTHER RESOLVED, that the Department of Defense delineate and establish seasonal flight avoidance areas and overflight/operational restrictions over wildlife areas underlying any new or expanded MOAs consistent with the current restrictions identified in the 1997 Alaska MOA EIS.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will complete consultations with the USFWS and ADF&G prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and ROD to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of waterfowl concentration areas.</p>
G0020-8	<p>BE IT FURTHER RESOLVED, that these restrictions would include, but not be limited to, minimum overflight altitudes over wildlife areas, including waterfowl, raptor and other migratory bird nesting/breeding/concentration areas, Dall sheep lambing areas, caribou and moose critical season habitat areas, etc., be reviewed, identified and, if necessary, expanded, with the cooperative assistance of the Alaska Department of Fish and Game and the U.S. Fish and Wildlife Service.</p>	<p>The proponent is coordinating with other land and resource management agencies to acquire best available data for planning mitigations and avoidance procedures. These will reduce effects of aircraft overflight and noise on sensitive wildlife locations and human activities. The decisionmakers will consider all available information prior to making a decision.</p> <p>The Air Force will consult with the U.S. Fish and Wildlife Service and the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		(2008) and include seasonal avoidance of waterfowl concentration areas.
G0020-9	BE IT FURTHER RESOLVED, that spatial and temporal management options (time and area restrictions) be evaluated and established to facilitate the public's use of the area and to ensure the sustainability of the area's natural resources	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0020-10	BE IT FURTHER RESOLVED, that there be no Major Flying Exercises (MFE) and overflight of popular subsistence areas, hunting areas, campgrounds, and trails (5,000 feet AGL and halfmile lateral distance) during peak use periods between June 27 and July 11, from mid-August through September, and during other important hunting seasons determined by the Alaska Department of Fish and Game.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0020-11	BE IT FURTHER RESOLVED, that the Department of Defense shall provide detailed maps, aeronautical charts and information to the public, especially in the communities near the Fox 3 and Paxson MOAs, identifying	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	flight corridors, restricted or closure areas, and dates of training use.	<p>recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will update published charts and maps to identify the new airspace and operational restrictions.</p>
G0020-12	BE IT FURTHER RESOLVED, that the Matanuska Susitna Borough Assembly encourages mitigation measures be taken to minimize the impacts on VFR and IFR air traffic in the proposed Fox 3 and Paxson MOAs and urges funds be secured for communication enhancements to SUAIS and expand coverage within the proposed Fox3 and Paxson MOAs prior to the issuance of any airspace.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will seek funds, as available, to expand and improve the SUAIS as a recommended and proven method for managing military and civilian air operations. The Final EIS specifies other mitigations for providing safe access and use of airspace for civilian air operations.</p>
G0020-13	BE IT FURTHER RESOLVED, should SUAIS not be expanded or become inoperable, the floor of the Fox 3 MOA reverts from 500 feet AGL to 5,000 feet AGL to preserve safety for civil VFR operations.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		The Air Force will seek funds, as available, to expand and improve the SUAIS as a recommended and proven method for managing military and civilian air operations. The Final EIS specifies other mitigations for providing safe access and use of airspace for civilian air operations.
G0020-14	BE IT FURTHER RESOLVED, that the Assembly opposes the establishment of the Paxson MOA between 500 AGL to 14,000 MSL be eliminated due to the importance of the Richardson Highway Corridor.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
G0020-15	BE IT FURTHER RESOLVED, that the Assembly opposes any additional Military Operations Areas unless the Federal Aviation Administration and military provide real-time access by IFR aircraft to MOAs to preserve access and safety that are associated with the IFR infrastructure for these parts of Alaska.	IFR flight through an active MOA in a non-radar environment is not currently feasible. On the other hand, the proposed Fox 3 and Paxson MOAs will only inhibit IFR traffic in the Paxson MOA during military flying exercises(MFEs). These exercises would only close the IFR airways for 2.5 hours twice a day for up to 60 days per year. MFEs are scheduled months in advance, so that any IFR flight could easily be planned around the military exercise times.
G0020-16	Good Afternoon: Attached to this email you will find a copy of Matanuska-Susitna Borough Resolution Serial No. 12-076, providing comment on the March 12, 2012, Joint Pacific Alaska Range Complex Environmental Impact statement. If you have any questions please let us know through the contact information provided below. Thank you. Brenda J. Henry Clerk's Office Matanuska-Susitna Borough 350 E. Dahlia Avenue Palmer, AK 99645 www.matsugov.us brenda.henry@matsugov.us 745-9684 direct line 745-9845 fax	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.
G0020-17	WHEREAS, the United States Air Force and United States Army are proposing to modernize, enhance, and expand the Joint Pacific Alaska Range Complex, (JPARC); and WHEREAS, the Matanuska-Susitna Borough is supportive of the United States military presence in Alaska and recognizes its needs for training; and WHEREAS, much of the existing Fox 3 Military Operation Area (MOA) is situated within the external boundaries of the Matanuska-Susitna Borough; and WHEREAS, the United States Air Force and the United States Army are requesting public comment on its a draft Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska; and WHEREAS, the Matanuska-Susitna Borough is the fastest growing area in the state of Alaska; and WHEREAS, the Matanuska-Susitna Borough population is expected to double in the next 20 to 25 years; and WHEREAS, all the proposed alternatives, except the No Action Alternative, consist of increases in combat flight training exercises within airspace above the Matanuska-Susitna Borough; and WHEREAS, the	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources. The Army and the Air Force are required by Federal and State of Alaska public statutes to comply with applicable regulations to protect, conserve, and preserve the environment and prevent and remediate pollution on lands within their jurisdiction. Once the Army and Air Force select the preferred alternatives for each proposal, specific measures will be developed in order to avoid, minimize, and, in some cases, fully mitigate adverse impacts to the environment, natural resources, and public communities to the extent feasible and practicable. Such measures are required in accordance with the implementation regulations the Army and Air Force were required to develop to adopt the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] 4321 et seq.) and the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>proposed Fox 3 MOA and Paxson MOA would expand the existing training airspace southerly, extending to much of the Talkeetna Mountains areas adjacent to the growing communities of Lake Louise, Wasilla, Palmer, Sutton, Chickaloon, and Glacier View; and WHEREAS, expansion of the existing Fox 3 MOA and Paxson MOA airspace easterly could encompass the community of Lake Louise and the adjacent areas of Lake Susitna, Lake Tyone, and Crosswind Lake; and WHEREAS, there are approximately 500 private property parcels and 80 year round residents in the greater Lake Louise area; and WHEREAS, the Lake Louise Community Non-Profit Corporation, that represents property owners and residents of the greater Lake Louise area has expressed its many concerns about noise impacts on the local economy, lifestyle, wildlife, recreational use, aviation, etc., by letter correspondence dated February 11, 2011, to the Borough Assembly, and June 2, 2012, to the Alaskan Command; and WHEREAS, the Talkeetna Community Council has expressed its concerns about civilian aviation safety and the undesired impacts of noise on the tourism industry and wildlife by letter correspondence dated June 4, 2012; and WHEREAS, many Matanuska-Susitna Borough residents and visitors depend upon the airspace within the proposed expanded airspace, as well as the natural resource rich lands and waters below, for accessing private and public lands via aircraft, for commercial enterprise such as air taxi operations, outfitting, hunter /hiker guiding, operating lodges, operating mines, etc., and for various non-commercial, recreational, and subsistence activities, such as hunting, hiking, food gathering, sightseeing, etc.; and WHEREAS, there exists an abundance of wildlife resources within the area proposed for expansion; and WHEREAS, the proposed expansion of the Fox MOA airspace would cover the Nelchina caribou herd calving grounds, all of which is located within the boundaries of the Matanuska-Susitna Borough; and WHEREAS, the proposed lateral expansion of the current Fox 3 MOA would enlarge the military operating area within Borough boundaries by an estimated 5,500 square miles in Alternative "A" and by an estimated 3,500 square miles in Alternative "E;" and WHEREAS, the United States Air Force, in its August, 1995, "Final Environmental Impact Statement Alaska Military Operations Areas," and Record of Decision that followed in April, 1997, diminished the Fox MOA by 910 square miles to its present location and dimension due to undesirable impacts of noise; and WHEREAS, the proposals will expand airspace vertically to include training areas between 500 feet Above Ground Level (AGL) and 18,000 feet above Mean Sea Level (MSL); and</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>WHEREAS, the United States Air Force, in its August, 1995, “Final Environmental Impact Statement Alaska Military Operations Areas,” and Record of Decision that followed in April, 1997, raised the proposed minimum flight altitude from 3,000 feet AGL to 5,000 feet AGL due to undesirable noise impacts and in order to "preclude the potential for direct over flight of sensitive resources"; and WHEREAS, proposed lateral and vertical expansions of training airspace would increase the probability of conflict between civilian and military aircraft; and WHEREAS, the potential for near misses or midair collisions between military and civil aviation within the proposed Fox 3 and Paxson MOA, is significant and will impact general aviation pilots, air taxi pilots, and air charter pilots who use these areas for hunting, fishing and other recreational and subsistence activities who travel at low altitudes under Visual Flight Rules (VFR); and WHEREAS , general aviation, air taxi, and air charter pilots flying under Instrument Flight Rules (IFR) conditions would be prohibited from travel through an active MOA, the Richardson Highway is a major aviation transportation corridor for civil aviation traveling north-south, and IFR air travel will be impacted during military operations in the proposed Paxson MOA where the low sector airspace is proposed to extend from 500 feet AGL up to 14,000 feet MSL; and WHEREAS, the existing communication system in the northern MOA’s, Special Use Airspace Information Service (SUAIS), is vital for pilots to receive real time information on all military airspace uses and for the military to receive real time information on civilian aeronautical activity.</p>	
G0021-1	<p>As the comment period on the DEIS closes my office has not been given the opportunity to review the comments submitted by stakeholders. Accordingly I will reserve judgment on the various alternatives presented by the DEIS at this time. I do believe, however, that the “No Action” alternative should not be adopted. The world class JPARC is a key attribute of Alaska’s value to the military in the 21st Century. No place else in America does the military have the opportunity to conduct state of the art training in diverse terrains without risk of encumbrance.</p> <p>Alaska has been proud to share its lands and airspace with the military for generations. However, it is important for our military leaders to appreciate that this is an earned privilege rather than a right. Military operations must be conducted in harmony with the needs of other uses and users of Alaska’s lands and airspace. General aviation is particularly important in Alaska as a</p>	<p>Thank you, Senator, for your comments. In accordance with the National Environmental Policy Act, the Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>means of commerce, subsistence, recreation and emergency transportation. In preparing the Final Environmental Impact Statement (FEIS) every effort should be undertaken to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible .</p> <p>Alaskans stand among the most patriotic people in America and have long been willing to sacrifice personal convenience in order to ensure that our military is the best trained and best equipped fighting force in the world. Alaskans have a long track record of supporting our military families like none other.</p> <p>For decades the military has proven to be a good partner through its significant year-round contributions to Alaska’s economy. In recent months, as the Interior Alaska community has been forced to come to grips with the prospect of a devastating possible downsizing of Eielson Air Force Base, this longstanding trust has been tested.</p> <p>I fully expect that the people of Alaska will once again rise to support the military’s needs in JPARC. However it is also appropriate that the military provide Alaskans with a modicum of certainty that in return our Armed Forces will continue to be good stewards of Alaska’s economy.</p> <p>Over the next few months, as the DEIS team reviews stakeholder comments and formulates a FEIS leading to a Record of Decision the opportunity to rebuild the critical social contract between Alaskans and their Armed Forces presents anew. I sincerely hope that our military leaders take advantage of the upcoming opportunity to expand and modernize JPARC in harmony with Alaska’s values and the way of life we hold dear.</p>	
G0022-1	<p>Please find attached the JPARC comments being submitted on behalf of the Alaska Department of Fish and Game by Deputy Commissioner Craig Fleener. If you need clarification or additional information regarding these comments please contact:</p> <p>Brad Palach 333 Raspberry Rd Anchorage, AK 99516 Alaska Department of Fish and Game (907)267-2145</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
G0022-2	Alaska Department of Fish and Game (Department) reviewed the March 2012 Draft Environmental Impact Statement (DEIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC). The Department understands and is supportive of the need of the military to conduct training exercises to prepare personnel for defense missions across the globe.	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.
G0022-3	We appreciate the efforts the military has taken to provide information in the development of this planning process. This is especially important since the area under consideration is one of the most accessible and heavily used areas for outdoor activities in the State. However, we are disappointed that federal law and policy restricts the military’s training efforts on the many millions of acres of nearby federally administered National Wildlife Refuges, National Parks and BLM lands and instead forces it onto State lands which are highly desired by the general public for outdoor activities. With this in mind, the comments developed below are intended to accommodate the need of the military to use these State public lands while at the same time maintaining public use and access consistent with the desires of the public and the intent of the Constitution of the State of Alaska.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
G0022-4	We appreciate the intentions of numerous mitigation measures calling for increased communication and coordination with the Department and members of the public, including subsistence and other resource users. To ensure these meetings take place, we recommend this intent be specifically recognized in the Record of Decision and be scheduled to take place on a biannual basis, or as issue specific items emerge so that adaptive management strategies may be more easily developed to address issues as they develop. This action would ensure that the important discourse between the responsible State managers and various user groups and the representatives of the military take place in a timely manner. This is particularly important as uses by the public alter from year to year, resources change in frequency, abundance and location, and as the uses of the military are better understood as the plan is implemented.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0022-5	We recognize that minimum over flight of 5,000 ft above ground level (AGL) is proposed as mitigation for many areas with identified populations	The Air Force understands the potential effects use of those required lower mission altitudes could have on other aviation activities, to include important

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>of fish and wildlife, popular hunting and fishing areas, trails, and campgrounds. The sustainability of the fish and wildlife and the popularity of these areas is dependent on plentiful fish and wildlife that is intensively managed by the Department. Through active management, which includes frequent aerial surveys and other flights, we are able to provide opportunities that drive the popularity of these areas with the public, which includes residents of the two largest cities in Alaska, Anchorage and Fairbanks, as well as the Matanuska-Susitna Borough and North Star Borough and other smaller communities near the affected areas. These surveys entail numerous flight hours and flight days, for example, the Department estimates roughly 400 hours of flight time annually in the Proposed Paxson and Fox 3 MOAs for wildlife surveys alone. Without the ability to conduct comprehensive aerial survey work, we will find it exceedingly difficult, if not nearly impossible, to manage populations of fish and wildlife for sustained yield and maintain the current levels of subsistence and other hunting and fishing opportunities.</p>	<p>wildlife surveys. Those existing and proposed mitigation measures noted for this proposal in FEIS Appendix K along with other reasonable options would be pursued to the extent possible to help accommodate such flight activities. As discussed in the FEIS Sections 2.1.1 and 3.1.1, the lower Paxson MOA altitudes would only be used during those six annual, two-week timeframes major flying exercises are conducted. Air Force representatives are committed to working with your Department and other stakeholders through meetings and other means to help find those solutions that would best serve both military training and civilian aviation needs.</p>
G0022-6	<p>To accommodate the Department's need for aerial survey work, we recommend the following mitigating measure:</p> <ul style="list-style-type: none"> • Throughout the area covered by this planning process, establish a 5,000 ft above ground level (AGL) over annually identified areas as necessary to accommodate the need of Department staff to conduct aerial survey work. Recognize that flexibility and close coordination with the Department will be necessary to accommodate the conduct of this essential work, while respecting the needs of the military for training. (Additional comments provided below will identify some specific dates of use, and locations that staff consider essential for aerial operations or for the conservation of fish, wildlife and habitat, as well as to provide a separation between military operations and the public, both on the ground and in the air.) 	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0022-7	<p>The following mitigation measures are intended to identify specific concerns and actions that can be taken to mitigate them. Please be aware that as our knowledge and understanding of the actions of military exercises increases, alterations may be necessary to reduce impacts to fish, wildlife and the public, or to reduce constraints on the military. To support the development</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>of information related the military’s use of the area, we request the JPARC planning process consider additional funding for future studies by the Department to help determine if and how military activities affect fish, wildlife, habitat and public uses. Specific localized knowledge of some uses is limited and additional studies may assist in the development of effective mitigation measures, or allow for additional training opportunities. This is consistent with the language in Chapter 4.8.14, Environmental Justice, which notes the need for additional studies regarding cumulative impacts to “airspace management and use, noise, biological resources, cultural resources, land use, socioeconomics, and subsistence.”</p>	<p>and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Draft EIS identified mitigation measures for definitive projects under Biological Resources as: "Monitor effects of military training including overflights on select wildlife species (especially herd animals, waterfowl, and raptors) and fisheries during critical seasons such as breeding, young-rearing, and migration. Use knowledge to develop and implement strategies to minimize disturbance to priority wildlife in existing and new SUAs and restricted airspace. This would help natural resources and range managers to coordinate training schedules that minimize impacts on wildlife populations."</p>
G0022-8	<p>Of special note, one aspect of these studies should be to consider if closures of airspace or areas are reducing subsistence opportunities or causing disproportionate effects through displacement of users.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will consider appropriate follow-on studies, monitoring, and continued coordination to avoid disproportionate effects to subsistence opportunities.</p>
G0022-9	<p>While the EIS (4.8.14, page 4-36) notes that disproportionate effects due to access restrictions are not expected for subsistence since access to other subsistence resources is available in the vicinity, it does not evaluate the costs in monetary terms or effort that could be involved by having to focus on those alternate resources, or the problems that may be associated with displacement of users into areas where resources may already be fully allocated. For subsistence users, including those on low, fixed incomes, minor alterations in expenditures necessary to access alternate resources may</p>	<p>As stated in Section 3.8.13.1, "The proposed road alignments in TFTA would be entirely within the TFTA boundaries. TFTA is within a State nonsubsistence area and a Federal nonrural area, as depicted in Figure 3-22. USAG-FWA does allow access to these ranges for recreational use (described in Section 3.7.10); however, resources are not managed or prioritized for subsistence." Since the area is not managed or prioritized for subsistence, a change in public access for recreation would not result in subsistence users incurring expenditures from accessing alternate resources.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	be barriers to realistic participation.	
G0022-10	<p>Nelchina Caribou Herd and Moose Calving</p> <p>Because low level flight operations can drive caribou off their calving and post calving areas, leading to increased calf mortality, we request extending the 5,000 ft AGL from May 15 through July 15 throughout the entire Fox3 MOA. This would reduce stress for a significant portion of the period when the Nelchina Caribou Herd are pre and post calving. Without this mitigation, we would have significant concerns for caribou because of their sensitivity to loud human activities, such as low level jet aircraft, at this early life stage. In addition, a 5000 ft AGL floor will allow for safe conduct of the Departments late May parturition surveys and late June/early July population surveys that are essential to management of this important and heavily utilized caribou herd. These surveys also require a great amount of flexibility in survey timing as they are dependent on favorable conditions to cause caribou to aggregate.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will consult with the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and ROD to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>
G0022-11	<p>A similar situation exists for moose calving. During the moose calving period of May 15 to July 15, a 5,000 ft AGL will be necessary across the entire Fox 3 and the Proposed Paxon MOAs.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>While it is possible to avoid well-established and mapped parturition areas for some species (e.g., caribou calving areas), moose don't tend to use established areas but calve in dispersed areas, so specific avoidance may not be possible for this species. Restrictions put in place for other resources (e.g., wild and scenic rivers) may also benefit moose.</p>
G0022-12	<p>Unlike caribou, moose do not have concentrated calving areas and spread out to calve, but are also susceptible to intense, low flying aircraft noise.</p>	<p>Section 3.1.8.3 in the DEIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low level flights as</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		low as 500 ft AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies reviewed included some with moose. Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights and sonic booms, on wildlife species.
G0022-13	Twinning surveys and calf mortality and survival studies are also conducted during this period from low-level fixed and rotor-wing aircraft. These surveys cannot be safely conducted with a 500 ft AGL floor to the MOAs.	As noted previously, those FEIS mitigation measures noted for the Fox 3/Paxon MOA proposal would be pursued to the extent possible, along with other reasonable options, to help accommodate survey flight activities. Air Force representatives are committed to working with the Alaska Department of Fish and Game and other agencies through coordination meetings and other means to find those solutions that would best meet both military training and civilian aviation needs.
G0022-14	<p>We recommend the following mitigations to reduce stress on caribou and moose calves from low flying military aircraft during an important life stage.</p> <ul style="list-style-type: none"> • Establish a 5,000 ft above ground level (AGL) over annually identified pre and post calving areas for moose and caribou from May 15 to July 15 in the Fox3 MOA and the proposed Paxson MOA <p>Delta Caribou Herd</p> <p>We recommend increasing the height and extending the duration of the minimum over flight altitude to reduce stress on Delta Caribou calves during the important pre and post calving period of their lifecycle. The following modification to this mitigation will also allow for our annual count/census and composition surveys necessary to maintain herd sustainability and provide a popular hunting opportunity.</p> <p>Protect Conserve the Delta caribou herd by establishing a minimum overflight altitude of 35,000 feet AGL over annually identified pre and post calving areas (nominally from May 15 to July 15).</p> <p>Talkeetna Dall Sheep</p> <p>Similar to mitigation provided for Dall sheep in the Delta River Corridor, we request minimum overflight altitudes in the Eastern Talkeetna Mountains for conservation of Dall sheep populations from May 15 to July 15 in the following areas:</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will be consulting with the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<ul style="list-style-type: none"> • The mountains north and east of Chickaloon River, • The block of land generally between the Upper Talkeetna River, northeast to Mt. Watana (just west of Lower Kosina Creek), • The mountain block from the Parks Highway (Talkeetna up to Healy) then east over to Brushkana Creek, and east over to Jay/Coal Creek. <p>Delta Bison</p> <p>Proposed actions in the Donnelly Training Area Battle Area Complex Restricted Area (BAX RA) could have an impact on Delta bison movements and behavior, and cause bison to move toward the Delta Agricultural Project area earlier in the year, or discourage them from moving through the BAX RA during migration back to the Delta River in the spring. We recommend that the existing restrictions on disturbance to bison habitat areas under the U.S. Army Garrison Fort Wainwright, Alaska Special Interest Management Area be maintained.</p> <p>Moose Hunting, Fox 2 and Eielson MOAs: The principal use in the identified ground evacuation areas within Eielson and Fox 2 MOA's is moose hunting, conducted during two general periods of the year - fall and winter. The fall period extends from August 15 to September 25, with the highest use period occurring from September 1 to 15. Hunting during the fall season occurs on every day of the week, including weekends. The winter hunt is primarily conducted during two time frames, early winter (November 15 to December 15), and late winter (January 15 to February 28), and are generally conducted on weekend days when weather conditions permit. The time period between December 15 and January 15 is generally avoided by hunters due to seasonally low temperatures. Hunting access in the fall is generally conducted through ORV trails, rivers, and airstrips and tends to be concentrated near or along these access points. Access in the winter is more dispersed due to snowmobile use. Of the areas affected by the "Definitive Actions", the foothills on the south flank of the Alaska Range are more extensively used than the adjacent low-lying wetlands. This is because the foothills support a diversity of high quality moose habitats and generally have higher densities of moose. Furthermore, the foothills offer vantage points for use by hunters in pursuit of game.</p> <p>As a mitigating measure, we recommend that low level flights (below 5000 AGL) and ground based use not occur in the Fox 2 or Eielson MOAs during</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>scheduled hunting seasons. Additionally, we request that low level flights not occur during the May 15 to July 15 pre and post calving period for caribou, moose and Dall sheep.</p>	
<p>G0022-15</p>	<p>Wildlife Mortalities</p> <p>Throughout the training areas, we request that all known wildlife mortalities caused by military activities be reported within 72 hours to the Department's Area Wildlife Staff.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Army manages natural resources within the spirit and letter of environmental laws, particularly the Sikes Act, which calls for preparation and implementation of installation-specific Integrated Natural Resources Management Plans (INRMPs). The U.S. Army Garrison - Fort Wainwright (USAG-FWA) Garrison Commander is responsible for compliance with laws in Alaska, including implementation and enforcement of the INRMP, which is periodically reviewed and updated.</p>
<p>G0022-16</p>	<p>Habitat Enhancement and Stream Crossings</p> <p>If it is determined by the military that, stream crossings, habitat enhancement or alteration in any of the MOAs is a desired mitigation, we request consultation with the responsible Area Wildlife and Habitat Biologists to avoid unintended consequences and to obtain necessary permits. Recommended contacts are the Regional Supervisor's for the Division of Habitat, and Division of Wildlife Conservation based in the Departments Fairbanks area office.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>Prior to implementing any of the programmatic proposals considered in this EIS that could expand training (e.g., higher intensity levels of training, or broader types of training and expanded use of the training areas), proponents would undertake further evaluation and an appropriate level of NEPA</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>analysis, permitting, and agency coordination.</p> <p>The proponent will undertake all required consultation and will obtain necessary permits prior to undertaking any projects that would directly alter stream crossings or habitat enhancement areas. The U.S. Army Garrison - Fort Wainwright (USAG-FWA) Integrated Natural Resources Management Plan (INRMP) 2007-2011 Vol III contains many watershed management procedures.</p>
G0022-17	<p>Bears</p> <p>Human generated waste products, primarily discarded or improperly stored food, from 1000 troops during field maneuvers could pose a wildlife attractant, particularly to bears. We previously noted that the DEIS did not address management actions to prevent wildlife from becoming habituated to human generated food and its associated negative impacts. A review of the draft document shows that there remains the need for the development of a comprehensive program to educate military personnel on how to manage human waste that may attract bears that could cause them to become habituated to human waste.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>It is standard practice for U.S. Army Garrison - Fort Wainwright (USAG-FWA) to protect wildlife species and Soldiers through soldier education on conflict avoidance measures. U.S. Army Alaska Range Regulation 350-2 (SD3.1) includes policing waste disposal on all training areas before, during, and after use.</p>
G0022-18	<p>Update the current SUAIS to include information on MOA activation and provide advanced notice of MFES to communities and management agencies that use and access lands underlying the Fox 3 MOA, the Fox 3 expansion areas, and the new Paxon MOA.</p>	<p>One of the FEIS proposed Airspace Management mitigations is to pursue funding for enhancing use of the SUAIS and other communications capabilities within areas where this coverage may be lacking so as to keep the civilian aviation community informed on the scheduled and real-time MOA uses.</p>
G0022-19	<p>Conduct annual or biannual meetings with regulating agencies and with communities dependent on subsistence resources under new airspace with a view to monitor impacts of Air Force activities on subsistence. Information would be used to adjust flight avoidance locations, or to add new ones.</p>	<p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p> <p>The proponent is coordinating with other land and resource management agencies to acquire best available data for planning mitigations and avoidance</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>procedures. These will reduce effects of aircraft overflight and noise on sensitive wildlife locations and human activities. The decisionmakers will consider all available information prior to making a decision.</p>
G0022-20	<p>Page K-25, Subsistence. We support these approaches, but request that the final Record of Decision commit to regularly scheduled annual or biannual meetings with the Department to monitor and review issues related to airspace.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0022-21	<p>Page K-24, Subsistence. We support modifying the existing Letter of Agreement in the following areas.</p> <p>Modify existing Letter of Agreement with ADFG to avoid overflight of caribou and moose calving areas, and sheep lambing, mineral licks and rutting areas in Fox 3 expansion areas and new Paxon MOA.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will consult with ADFG prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>
G0022-22	<p>Page K-24, Subsistence. Biannual coordination meetings with the</p>	<p>The JPARC proponents have carefully considered a variety of alternatives</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Department to review and determine the efficacy of avoidance areas and flight restrictions are essential to conservation and management activities.</p> <p>Delineate and establish seasonal flight avoidance areas and overflight/operational restrictions over Wildlife and other areas underlying new MOAs consistent with current restrictions identified in the 1997 Alaska MOA EIS. These restrictions would include minimum overflight altitudes over Dall sheep lambing areas, spring mineral licks, and limiting overflights of wildlife in critical life periods as determined in coordination with ADFG.</p>	<p>and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0022-23	<p>Page K-24, Subsistence. The period prohibiting MFEs should encompass the period from 10 August – 30 September and 21 October - 31 November, instead of 20 August - September 20. This change will protect the most important subsistence hunting seasons for caribou and moose. We request the following modification,</p> <p>No MFEs conducted during 10 August – 30 September and 21 October – 31 November 20 August – 20 September in Fox 3 and expansion areas and new Paxon MOA. This restriction does not apply to US Army training or testing.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0022-24	<p>Avoid overflight of popular hunting areas, campgrounds, and trails (5,000 feet AGL and half-mile lateral distance) during peak use periods between June 27 and July 11, and from mid August 10 through September 20, and October 21 to November 30, and other important hunting seasons determined annually with ADFG. Locations to avoid include:</p>	<p>Revisions in the Final EIS include changes addressing concerns or additional information provided in this comment. The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<ul style="list-style-type: none"> • Brushkana Creek campground, • Tangle Lakes campground, • Paxson Lake campground, • Clearwater Wayside, • One Mile Creek/Wolverine Mountain, • Tangle Lakes trail, • Gulkana River Raft trail, • Castner Glacier trail, • Sourdough campground, • Lake Louise State Recreation Area, • MacLaren Summit Trail, • Glacier Lake/Sevenmile Lake/MacLaren River Trail System, • West Fork MacLaren River Trail, • Swede Lake trail, • Middle Fork Trail, • Round Top Trail, • Haggard Creek Trail, • Ewan Lake Trails, • Lake Louise/Crosswind Trail, • Tolsona Lake/Crosswind Trail, • Butte Lake Trail, • Coal Creek trail, • Moore’s Camp Trail, • Top of the World Trail, • Chistochina River Trail, • Mankomen Lake Trail, • Indian River Trail, • Slana River Trail, • Nelchina Public Use Area Trail System, • Eureka/Little Nelchina Trails, 	<p>tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<ul style="list-style-type: none"> • Oshetna/Black River/Goose Creek/Busch Creek/Clarence Lake Trail, • Moore Lake/Gravling Lake/Marie Lake Trail. 	
G0022-25	<p>Page K-21, Land Use Recreation. The list of areas to avoid currently appears to consist primarily of BLM campgrounds. However, many additional popular trails for hunting and other recreating in the area exist and merit inclusion. Several trails exist up and down the Maclaren River, including the Maclaren Summit Trail to the north, and trails on both sides going generally north, and a trail on the west side going south. Another trail system extends through the Glacier lake/Sevenmile lake/Maclaren River, with an additional trail up the West Fork Maclaren River for xx miles. Other known popular trails include:</p> <p>Swede Lake Trail, Middle Fork Trail (heads west of Meier's lake), Round Top trail which heads east of the Richardson Highway towards Round Top Mtn, Haggard Creek Trail, Ewan Lake Trails (one from the east and one from the south of the lake), Lake Louise/Crosswind Trail, Tolsona Lake/Crosswind Trail, Butte Lake Trail, Coal Creek trail (starts east of Butte Lake), Moore's Camp Trail (starts at Mile 51 on Denali Highway goes south over the mountain and down to a Maclaren River crossing), Top of the World Trail near Paxson/Black Rapids, Chistochina River Trail, Mankomen lake Trail, Indian River Trail, Slana River Trail.</p> <p>There is a huge network of trails all through the Nelchina Public Use Area, dozens, starting with the Eureka/Little Nelchina Trails, north to the Oshetna/Black River/Goose Creek/Busch Creek/Clarence Lake, and east over to the Moore Lake/Grayling Lake/Marie Lake areas west of Lake</p>	<p>Revisions in the Final EIS include changes addressing concerns or additional information provided in this comment. The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Louise/Susitna.</p> <p>To accommodate the use of additional popular trails in the area, we request the following modifications to the fifth proposed mitigation measure shown on page K-21.</p>	
G0022-26	<p>New Public Overflight Restriction Area</p> <p>We appreciate the development of Alternative A. This Alternative does not expand R-2202 to the west or R-2211 to the East, and therefore leaves a popular area for hunting open for the public and for the Department’s use on a regular basis. This area is one of the highest utilized hunting areas in GMU 20A (Figure 3-11, Page 3-58). Closing this area through the expansion of restricted areas R-2211 and R- 2202 would have created a significant access hardship for the public and the Department.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
G0022-27	<p>Harvest of Wildlife for Subsistence and other uses</p> <p>The discussion in Chapter 3.1.13.1 Impact Assessment Methodology contains confused and incorrect definitions of public lands and Conservation System Units (CSUs), as well as erroneous descriptions and ratings of community dependence on subsistence based on racial criteria.</p> <p>Federal Public lands are defined in Section 102(3) of ANILCA as “...land situated in Alaska which, after the date of enactment of this Act, are federal lands...”. Conservation system units (CSUs) are defined in ANILCA at 102(4) as... “any unit in Alaska of the National Park System, National Wildlife Refuge System, National Wild and Scenic Rivers Systems, National Trails System, National Wilderness Preservation System, or a National Forest Monument...” Because of the legal application of subsistence to federal public lands it is important to properly define these legal terms.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The discussion in Chapter 3.1.13.1, Impact Assessment Methodology, will be reviewed in accordance with the comment during the preparation of the Final EIS, as applicable.</p>
G0022-28	<p>Safety</p> <p>The mitigation, “Notify Alaska press outlets of the annual MFE schedule for release in publications such as the Milepost, visitor and travel guides, and various newspapers” will help keep the public informed. We recommend development of a specific website devoted to this information, as well as publishing in local outlets such as the Valley Frontiersmen and Delta News</p>	<p>The public and private airfield listing in Appendix D was compiled from available information contained in aeronautical charts and other published sources. It is acknowledged that there are also many uncharted private airstrips in the affected region that could be affected by the airspace proposals. Again, the proposed mitigation measures and other options would be considered to minimize any impacts on those “off-field” areas used for survey flights and other such purposes. Funding would be pursued to</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>(web and hard copy) in addition to the Fairbanks News Miner and Anchorage Daily News, and physically posting notices at public and impromptu access points along the road system. In addition, the DEIS should recognize that hunters, trappers, fisherman, landowners, miners, agency personnel, and other users employ float, ski, and tundra tire equipped aircraft and light helicopters to access these popular and high-use areas. Private airfields (See Appendix D) do not capture the vast number of “off-field” areas used for access with this equipment. Avoidance by military aircraft, as well as SUAIS radio-coverage, must be implemented with recognition of these uses if public safety is to be maintained.</p> <p>We also recommend that the training schedules with associated area or airspace restrictions be published as early as possible in the calendar year to allow residents, subsistence and recreation visitors to the area to coordinate plans for use of the area. Many hunting and other outdoor use plans are made many months in advance so that this type of information would be useful to visitors and reduce conflicts.</p>	<p>enhance communications capabilities for informing the public of the scheduled and real-time use of the existing and proposed training airspace. Scheduled RED FLAG-Alaska and other major flying exercises are publicized through various website and news media resources well in advance to keep all concerned informed of when these operations will occur.</p> <p>The Special Use Airspace Information Service (SUAIS) is a 24-hour service provided to civilian pilots. The SUAIS’s primary function is to provide civilian pilots with information regarding Air Force flight operations in the MOAs and Restricted Air space within central Alaska, so they may better plan their flights through and around the SUA. The service provides “near real time” information on Air Force flight activity in the Fairbanks and Delta Junction areas. SUAIS also provides information on Army artillery firing and known helicopter operations. Pilots can call SUAIS at 1-800-758-8723 or (372-6913 from the Fairbanks areas). If airborne, contact Eielson Range Control, VHF 125.3. SUAIS information can also be found on the Joint Base Elmendorf-Richardson home page at: http://www.jber.af.mil/11af/alaskaairspaceinfo then select “Special Use Airspace Information Service”. Beyond SUAIS radio range, Flight Service Stations can give status of special use airspace, to include Military Training Routes (MTR).</p> <p>The public and private airfield listing in Appendix D was compiled from available information contained in aeronautical charts and other published sources. It is acknowledged that there are also many uncharted private airstrips in the affected region that could be affected by the airspace proposals. Again, the proposed mitigation measures and other options would be considered to minimize any impacts on those “off-field” areas used for survey flights and other such purposes. Funding would be pursued to enhance communications capabilities for informing the public of the scheduled and real-time use of the existing and proposed training airspace. Scheduled RED FLAG-Alaska and other major flying exercises are publicized through various website and news media resources well in advance so that all concerned are informed of when these operations will occur.</p> <p>The Special Use Airspace Information Service (SUAIS) is a 24-hour service provided to civilian pilots. The SUAIS’s primary function is to provide civilian pilots with information regarding Air Force flight operations in the Military Operations Areas and restricted airspace within central Alaska, so</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>they may better plan their flights through and around the Special Use Airspace. The service provides “near real time” information on Air Force flight activity in the Fairbanks and Delta Junction areas. SUAIS also provides information on Army artillery firing and known helicopter operations. Pilots can call SUAIS at 1-800-758-8723 or (372-6913 from the Fairbanks areas). If airborne, contact Eielson Range Control, VHF 125.3. SUAIS information can also be found on the Joint Base Elmendorf-Richardson home page at http://www.jber.af.mil/11af/alaskaairspaceinfo (select “Special Use Airspace Information Service.” Beyond SUAIS radio range, Flight Service Stations can give status of special use airspace, to include Military Training Routes.</p> <p>The Notice to Airmen (NOTAM) system immediately disseminates time-critical aeronautical information that is either of a temporary nature or not sufficiently known in advance for publication on aeronautical charts or in other operational publications. NOTAM information is aeronautical information that could affect a pilot’s decision to make a flight. It includes details on airport or aerodrome primary runway closures, airspace, radar service availability, and other information essential to planned en route, terminal, or landing operations. It is every pilot’s responsibility to check the NOTAMs for pertinent information for that specific flight prior to departure.</p>
G0022-29	<p>Watana - Susitna hydroelectric Project</p> <p>The DE IS fails to recognize the Watana-Susitna Hydroelectric Project in the Fox 3 MOA. This major effort includes numerous engineering, wildlife, fisheries and habitat studies that all use small aircraft for access, surveys, aerial radio-telemetry, and mapping that will greatly increase VFR traffic for many years. For example, wildlife studies alone will approximately double the flight hours in the Fox 3 MOA to over 800 hours per year. The study areas for this project compose up to 500 square miles in the existing Fox 3 MOA. While a 5000 ft AGL floor poses little safety concerns, the high level of traffic associated with this project creates serious potential airspace conflicts at the lower 500 ft AGL floor. Close coordination with the Alaska Energy Authority and associated agencies and contractors will be crucial to maintaining safety.</p>	<p>The Alaska Airspace Manager for the Air Force has reviewed the documents on your website and has identified an area where your project and the Air Force’s operations may impact one another.</p> <p>If you pursue instrument approaches to your runways for inclement weather operations (Instrument Flight Rules [IFR]), you will require changes to the FAA-designated airspace to use them. When the Air Force is operating in the FOX 3 Military Operations Area (MOA) above the airfields, you will not have the necessary IFR access to the instrument approaches. Prior planning is the easiest way to avoid delays and diversions due to active military airspace.</p> <p>Outside of days with low visibility or clouds, we suspect that the majority of your operations would be under Visual Flight Rules (VFR) and, therefore, not require the instrument procedures. During VFR flights, your aircraft would not be restricted from flying in the MOA with the Air Force aircraft. When we share airspace, the best way to avoid conflicts is through communication, which will be enhanced with our Special Use Airspace Information Service</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>(SUAIS). We will provide a radio frequency to talk to our Range Controller; he can assist with aircraft locations to keep our operations separate. Ensuring your aircraft are transponder equipped (this transmits a signal from the aircraft) will assist the SUAIS, as the aircraft are easier to see on radar by the range controller and the fighter aircraft in the area.</p> <p>Finally, your transmission lines are most likely low enough to be of no concern to the Air Force operations, as 500 feet above ground level is the proposed floor of the new FOX 3 MOA.</p> <p>The 11th Air Force chairs an Alaska Civil-Military Aviation Council, which meets twice annually to discuss shared airspace issues and ways to avoid conflicts. Military, FAA, Alaska Department of Fish and Game, Aircraft Owners and Pilots Association, Alaska Airmen, and other community groups attend this meeting to enhance the safety of all users of the National Airspace System.</p> <p>Alaska Energy Authority contact information has been added to the list of invitees for the next meeting, tentatively scheduled for November 2012.</p> <p>A summary of the information on the Susitna-Watana Hydroelectric Project and an analysis of potential cumulative effects have been added to the EIS (see Section 4.8).</p>
G0022-30	<p>Civilian Airspace Management</p> <p>We recommend meetings be scheduled on an annual or biannual basis and include ADFG staff participation. A commitment in the Record of Decision to conduct these meetings on a regularly scheduled basis would assist in ensuring that public input and the development of adaptive management is employed in this high public use area.</p> <p>Coordinate with the FAA, ADFG, and local civilian aviation interests/stakeholders through the ACMAC, the U.S. Army Alaska Aviation Safety Standard Council, and other such forums to discuss and resolve issues of mutual interest affecting military and civilian airspace uses for existing and new SUA and restricted airspace on an annual or biannual basis.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		compromising the quality of training and safety.
G0022-31	<p>Major Fighting Exercises (MFEs)</p> <p>We recognize that expanded MFEs are integral to training needs in the JPARC; however, the September, December, January prohibition against MFEs will not adequately mitigate their affect on caribou and moose calving areas, sheep lambing and rutting areas, and popular hunting seasons. We recommend the following mitigation:</p> <p>Conduct no MFEs during May 15 to July 15, August 10 to September 30, October 21 to November 31, and December, and January</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will be consulting with the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>
G0022-32	<p>Spelling</p> <p>We recommend a word search be performed to address spelling issues throughout the plan. For example Goodness River should be Goodnews River, and Paxon MOA should be Paxson MOA.</p>	<p>Thank you for your comment. A spelling and grammatical check will be made on the EIS before the Final version is released. "Goodness River" will be changed to "Goodnews River" as indicated. The Military Operating Area (MOA) is officially called the Paxson MOA, not to be confused with the census-designated place of Paxson, Alaska. A global check will be performed to ensure the two are not interchanged anywhere in the EIS.</p> <p>Paxon is the official name of the Air Traffic Control Assigned Airspace above the proposed MOA, so to avoid airspace name confusion, Paxson is the proposed name of the MOA.</p>
G0022-33	<p>Page 3-71. Hunting. Add ptarmigan to the primary species hunted in the area and revise the document to show that Dall sheep and goat seasons are not short, with the sheep season 40 days long and encompassing other high use seasons. There are no goat seasons within the proposed MOAs (there are few goats within the area).</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Final EIS will be revised in accordance with the comment.</p>
G0022-34	<p>Page 3-82: line 4. The vast majority of fish and wildlife surveys in the Proposed MOAs are conducted by the Department and not the land management agencies. The statement on line 6 regarding survey timing</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Final EIS will be revised in accordance with the comment.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>(“Mostly these occur in late summer/early fall and before the first snow”) is incorrect. The routine survey schedule is as follows (surveys marked with asterisks are essential surveys that are conducted every year):</p> <p>May 15 - June 10: Caribou parturition surveys*; moose twinning*, calf survival and periodic mortality surveys; occasional bear surveys.</p> <p>June 20-July 10: Caribou population estimate’ and composition surveys*</p> <p>Mid summer: Dall sheep surveys*</p> <p>October 1-10: Caribou composition survey*</p> <p>Following first adequate snow cover (~mid-October) and before Dec. 7: Moose population estimates*</p> <p>May 5-June 5: Ptarmigan surveys (aircraft access)</p> <p>Late March-Early April: Watana Su-Hydro winter range moose surveys* (scheduled for the next several years).</p> <p>Monitoring of moose and caribou movements via aerial radio-telemetry: Year-around.</p>	
G0022-35	<p>Page 3-82: Line 14. We appreciate that the DEIS recognizes the significant impacts of reduced access on livelihoods. It is important to also recognize that most of the Departments wildlife surveys are charter flights flown by small air taxi operators from around the region. Most of these operators also generate revenue from the transport of hunters, fishermen and other recreationists. A reduction in this economic activity could result in reduced availability of local air taxi operators for fish and wildlife surveys and monitoring, hindering the Departments ability to successfully manage fish and wildlife.</p>	<p>The Air Force understands the potential effects the required lower mission altitudes could have on other aviation activities, to include important wildlife surveys. Those existing and proposed mitigation measures noted for this proposal in the FEIS Appendix K along with other reasonable options would be pursued to the extent possible to help accommodate such flight activities. As discussed in the FEIS Sections 2.1.1 and 3.1.1, the lower Paxon MOA altitudes would only be used during those six annual, two-week timeframes major flying exercises are conducted. Air Force representatives are committed to working with your Department and other stakeholders through meetings and other means to help find those solutions that would best serve both military training and civilian aviation needs.</p>
G0022-36	<p>Page 3-82: Lines 22-24: It is misleading to state that avoidance of 1 or 3 NM allows access to private and public airports, respectively. Consider that, to avoid military training activities, aircraft will have to operated below 500’ AGL enroute to the airport avoidance area. Many pilots will choose to avoid prolonged operation at below 500 ft AGL for safety purposes. Furthermore,</p>	<p>There are many concerns over how the lower altitudes and restrictions imposed by the JPARC airspace proposals may affect civil aviation operations within the affected regions. While the proposed mitigations and other options would be pursued to minimize these impacts, it is acknowledged that cooperative efforts would be needed to promote the safe,</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	mountainous terrain and windy conditions may further preclude safe flight at those low altitudes. These airports, as well as numerous “off-field” landing areas are critical for wildlife survey and animal capture activities.	compatible use of this airspace by all concerned. The need to conduct wildlife survey and animal capture activities would certainly be a key factor in seeking those solutions. The FAA will be evaluating the different preferred airspace alternatives to determine if/how each can be implemented and managed without impacting air traffic flows and air traffic control system capabilities. Pending those study results, the Air Force and the Army would be working with all stakeholders through the Alaska Civil-Military Aviation Council and other forums to address these concerns.
G0022-37	Also consider that “planning around military schedules” will likely have economic effects on aviation related business through reduction in overall activity and the generation of fees	The Air Force recognizes that there will potentially be economic impacts to aviation from the proposed action. Existing SUAIS communication systems have proven effective at maximizing access using real-time notifications and advisories. Upgrades and improved communication systems to pilots for a wider area could minimize potential impacts from delays or re-routing due to military schedules.
G0022-38	Page 3-84: Alternative E: Most of the comments above also apply to all action alternatives.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
G0022-39	Page 3-97: Line 38. Harvesting subsistence resources is not a certain event. Thus a delays result in lost opportunity.	Referenced sentence has been revised to note that delays in harvesting subsistence resources result in lost opportunity.
G0022-40	Page 3-97: Line 41. The stated intent of allowing for administrative survey flights to be conducted with minimal disruption is appreciated. Because of its importance and to ensure that it will be implemented in an agreed to manner, we request that date-specific mitigation efforts and agreements be specifically noted in the ROD for ease of reference.	<p>Date-specific mitigations or agreements are not always appropriate. For instance, the current aerial survey work done by Alaska Department of Fish and Game (ADFG) is a last-minute plan due to activity of the wildlife. The coordination with Air Force range controllers keeps the military advised of the survey aircraft locations on a real-time basis.</p> <p>Additionally, the Air Force is considering reconvening the Resource Protection Council (RPC) that was established for several years after the Alaska MOA EIS in the 1990s. The RPC would be the venue where mitigation efforts and their effectiveness and/or need for more analysis would be discussed. Flight deconfliction for aerial surveys could be accomplished at these periodic meetings.</p> <p>The Army has always accommodated ADFG and other agencies in the conduct of wildlife surveys. However, military training has priority and will not be disrupted for non-military purposes. The Army has a long-standing record of cooperation with aerial surveys for wildlife surveys and this will continue in the future.</p>
G0022-41	Page 3-97: Line 43: See comments above for page 3-82, lines 22-24 above	As noted for the previous comments, a cooperative effort would be needed

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		among all concerned to achieve the safe, compatible use of this airspace to include the Department’s need to conduct wildlife survey and animal capture flight activities.
G0022-42	<p>Page 3-99 (Section 3.2.13.4 and elsewhere) Mitigations:</p> <ul style="list-style-type: none"> • No MFEs August 10 - September 30 and October 21- November 30. • No training activities below 5000 ft AGL to allow for essential wildlife surveys during the following periods: <ul style="list-style-type: none"> o May 15 - June 10 o June 20 - July 10 o October 1-10 o After first adequate snow cover (~mid-October) and before Dec. 7 (this request will vary from year to year depending on snowfall and can take 5 to 10 days to complete depending on weather conditions. This effort can be coordinated on a seasonal basis. <p>To improve coordination between the military and local subsistence users, we request the final document commit to scheduling annual or biannual meetings in effected communities to determine and seek solutions to identified issues related to the subsistence use of the area. We request the following changes to this mitigation measure.</p> <p>The preceding analysis of effects on this resource has identified potential adverse impacts. The following preliminary mitigation is under consideration as possible ways to reduce these impacts.</p> <ul style="list-style-type: none"> • All alternatives: <p>Expand consultation efforts with subsistence parties in the affected area on an annual or biannual basis to determine current subsistence use levels and areas on USAG-FWA lands as input into scheduling. Expand tribal consultation efforts with subsistence users about hunting and fishing programs on USAG FWA land. Continue to use a newsletter to provide information to subsistence users about existing and new military activities and the changes in access for subsistence users. Expand research and cooperative studies with Tribes to address possible effects of Air Force and Army-activities on subsistence resources both directly within USAG-FWA installation boundaries and those outlying resources that may also be affected by military activities on DTA West, DTA East, YTA, and TFTA.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
G0022-43	<p>Appendix I</p> <p>Page 1-2. It appears that several plans in this appendix are outside the area of the plan and we question their inclusion in this plan. For example: Draft Revised Special Use land Designation for the Togiak National Wildlife Refuge and lower Goodnews River State DNR Hatcher Pass Planning, Chugach State Park, Nancy lake State Recreational Area, BIM Bay proposed Resource Management Plan and Final EIS.</p>	<p>The extraneous plans addressing areas outside the JPARC EIS area of effect have been removed from the Final EIS Appendix I.</p>
G0022-44	<p>Appendix K, Mitigation Measures</p> <p>Page K-11, Biological, 4th Proposed Mitigation. This mitigation measure should also apply to Fox3 MOA and the Proposed Paxson MOA. We also request a start date for this study.</p> <p>Expand effort to conduct a detailed study to assess the impacts and effects of noise on wildlife, particularly key species, such as caribou and bison during critical life cycle seasons. Use information to include protection requirements within a noise management plan.</p> <p>Page K-19, Land Use-Recreation. GMU 13 is an important moose and caribou hunting area, likely the most heavily used area in the state due to accessibility of the area to residents from Anchorage, the Matanuska Susitna Borough, and Fairbanks. In 2010, 5,015 individual moose hunters reported hunting in GMU 13, a number that has been steadily increasing since 2002. This increase is partially credited to the current active management programs which the state has invested significant time and energy to increase moose abundance for the benefit of consumptive users. Current objectives for moose are being achieved, with some additional increases planned. The overall management objective is to maintain a high level of harvestable moose with sufficient hunter participation annually to avoid habitat impacts. Caribou hunting is also highly popular with 4,887 hunters reporting hunting this area in 2010, with a peak participation of 19,397 hunters in 1996. As shown by the above discussion, GMU 13 is an important moose and caribou hunting area.</p> <p>Currently, the EIS only lists Crosswind Lake and the Matanuska Valley Moose Range as hunting areas to avoid. However, the additional areas listed below support intense hunting for moose and caribou on a seasonal basis and should be added to the list. To accommodate this continued and important</p>	<p>Revisions in the Final EIS include changes addressing concerns or additional information provided in this comment. The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>Included in the Draft EIS mitigation measures for definitive projects under Biological Resources was the following: "Monitor effects of military training including overflights on select wildlife species (especially herd animals, waterfowl, and raptors) and fisheries during critical seasons such as breeding, young-rearing, and migration. Use knowledge to develop and implement strategies to minimize disturbance to priority wildlife in existing and new SUAs and restricted airspace. This would help natural resources and range managers to coordinate training schedules that minimize impacts on wildlife populations."</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>use, we request the following modifications to the first proposed mitigation measure shown on page K-19</p> <p>Avoid overflight of popular hunting areas, campgrounds, and trails (5,000 feet AGL and half-mile lateral distance) during peak use periods between June 27 and July 11, and from mid August 10 through September 20, and October 21 to November 30, and other important hunting seasons determined in annual consultation with ADFG. Locations to avoid include:</p> <ul style="list-style-type: none"> • Crosswind Lake, and • Matanuska Valley Moose Range, • Denali Highway between Cantwell and Paxson. • Richardson Highway between Gulkana and Black Rapids, • Tok Cutoff (Glenn Highway) between Gakona and Mentasta. • The Gakona/Chistochina River drainages. • Upper Susitna River drainage (above Tyone R). • Brushkana River drainage. • Coal Creek drainage. • Watana Creek drainage. • Upper Nenana River/Wells Creek area. • Lake Louise/Susitna/Tyone Lake system. • Maclaren River drainage. • Tangle Lake system. • Hungry Hollow/Paxson/Summit/Fielding Lake areas. • Swede Lake drainage in Hungry Hollow down to the Alphabet Hills (bordered on the south by the W Fork Gulkana River), • Gillespie/June/Nita/Dick Lakes along the Richardson Highway south of Paxson, • Nelchina Public Use Area from the Glenn Highway near Eureka north to the Susitna River, <p>Page K-21, Land Use Recreation. The list of areas to avoid currently appears to consist primarily of BLM campgrounds. However, many additional popular trails for hunting and other recreating in the area exist and merit</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>inclusion. Several trails exist up and down the Maclaren River, including the Maclaren Summit Trail to the north, and trails on both sides going generally north, and a trail on the west side going south. Another trail system extends through the Glacier lake/Sevenmile lake/Maclaren River, with an additional trail up the West Fork Maclaren River for xx miles. Other known popular trails include:</p> <p>Swede Lake Trail, Middle Fork Trail (heads west of Meier’s lake), Round Top trail which heads east of the Richardson Highway towards Round Top Mtn, Haggard Creek Trail, Ewan Lake Trails (one from the east and one from the south of the lake), Lake Louise/Crosswind Trail, Tolsona Lake/Crosswind Trail, Butte Lake Trail, Coal Creek trail (starts east of Butte Lake), Moore’s Camp Trail (starts at Mile 51 on Denali Highway goes south over the mountain and down to a Maclaren River crossing), Top of the World Trail near Paxson/Black Rapids, Chistochina River Trail, Mankomen lake Trail, Indian River Trail, Slana River Trail.</p> <p>There is a huge network of trails all through the Nelchina Public Use Area, dozens, starting with the Eureka/Little Nelchina Trails, north to the Oshetna/Black River/Goose Creek/Busch Creek/Clarence Lake, and east over to the Moore Lake/Grayling Lake/Marie Lake areas west of Lake Louise/Susitna.</p> <p>To accommodate the use of additional popular trails in the area, we request the following modifications to the fifth proposed mitigation measure shown on page K-21.</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Avoid overflight of popular hunting areas, campgrounds, and trails (5,000 feet AGL and half-mile lateral distance) during peak use periods between June 27 and July 11, and from mid August 10 through September 20, and October 21 to November 30, and other important hunting seasons determined annually with ADFG. Locations to avoid include:</p> <ul style="list-style-type: none"> • Brushkana Creek campground, • Tangle Lakes campground, • Paxson Lake campground, • Clearwater Wayside, • One Mile Creek/Wolverine Mountain, • Tangle Lakes trail, • Gulkana River Raft trail, • Castner Glacier trail, • Sourdough campground, • Lake Louise State Recreation Area, • MacLaren Summit Trail, • Glacier Lake/Sevenmile Lake/MacLaren River Trail System, • West Fork MacLaren River Trail, • Swede Lake trail, • Middle Fork Trail, • Round Top Trail, • Haggard Creek Trail, • Ewan Lake Trails, • Lake Louise/Crosswind Trail, • Tolsona Lake/Crosswind Trail, • Butte Lake Trail, • Coal Creek trail, • Moore's Camp Trail, • Top of the World Trail, • Chistochina River Trail, 	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<ul style="list-style-type: none"> • Mankomen Lake Trail, • Indian River Trail, • Slana River Trail, • Nelchina Public Use Area Trail System, • Eureka/Little Nelchina Trails, • Oshetna/Black River/Goose Creek/Busch Creek/Clarence Lake Trail, • Moore Lake/Gravling Lake/Marie Lake Trail. <p>Page K-24, Subsistence. The period prohibiting MFEs should encompass the period from 10 August – 30 September and 21 October - 31 November, instead of 20 August - September 20. This change will protect the most important subsistence hunting seasons for caribou and moose. We request the following modification,</p> <p>No MFEs conducted during 10 August – 30 September and 21 October – 31 November 20 August – 20 September in Fox 3 and expansion areas and new Paxon MOA. This restriction does not apply to US Army training or testing.</p> <p>Page K-24, Subsistence. Biannual coordination meetings with the Department to review and determine the efficacy of avoidance areas and flight restrictions are essential to conservation and management activities.</p> <p>Delineate and establish seasonal flight avoidance areas and overflight/operational restrictions over Wildlife and other areas underlying new MOAs consistent with current restrictions identified in the 1997 Alaska MOA EIS. These restrictions would include minimum overflight altitudes over Dall sheep lambing areas, spring mineral licks, and limiting overflights of wildlife in critical life periods as determined in coordination with ADFG.</p> <p>Page K-24, Subsistence. We support modifying the existing Letter of Agreement in the following areas.</p> <p>Modify existing Letter of Agreement with ADFG to avoid overflight of caribou and moose calving areas, and sheep lambing, mineral licks and rutting areas in Fox 3 expansion areas and new Paxon MOA.</p> <p>Page K-25, Subsistence. We support these approaches, but request that the</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>final Record of Decision commit to regularly scheduled annual or biannual meetings with the Department to monitor and review issues related to airspace.</p> <p>Conduct annual or biannual meetings with regulating agencies and with communities dependent on subsistence resources under new airspace with a view to monitor impacts of Air Force activities on subsistence. Information would be used to adjust flight avoidance locations, or to add new ones.</p> <p>Update the current SUAIS to include information on MOA activation and provide advanced notice of MFEs to communities and management agencies that use and access lands underlying the Fox 3 MOA, the Fox 3 expansion areas, and the new Paxon MOA.</p>	
G0022-45	<p>Appendix G</p> <p>Page G-2, No. 9, Caribou – Overflights. Fox1 MOA, Fox2 MOA, and Proposed Paxon MOA should be included in this mitigation. We recommend increasing altitude and extending the minimum duration of the period to conserve the Delta Caribou calves during an important period of their life cycle and ensure their sustainability. The following modification to this mitigation measure will also allow for annual count/census and composition surveys necessary for us to continue to provide a popular hunting opportunity,</p> <p>Protect Conserving the Delta caribou herd by establishing a minimum overflight altitude of 35,000 feet above ground level (AGL), over calving and post calving areas, in appropriate areas of the Fox1, Fox2, proposed Paxon, Birch, and Eielson MOAs from May 15 to Julyune 15. Annually contact ADF&G to determine specific areas of avoidance.</p> <p>Page G-2, No. 10 Dall Sheep - Overflights. We recommend adding the proposed Paxon MOA to the list of areas establishing a minimum overflight altitude. This is needed to conserve Dall sheep in the mountainous region north of the Black Rapids. Similar to mitigation provided for Dall sheep in the Delta River Corridor, we request minimum overflight altitudes in the Eastern Talkeetna Mountains for conservation of Dall sheep populations. In particular:</p> <ul style="list-style-type: none"> • The mountains north and east of Chickaloon River, 	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>No changes are proposed for Fox 1 and 2, Birch and Eielson MOAs. Existing mitigations and flight avoidances for wildlife underlying these MOAs will continue. The Air Force will consult with ADFG prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas not covered under past mitigations. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<ul style="list-style-type: none"> • The block of land generally between the Upper Talkeetna River, northeast to Mt. Watana (just west of Lower Kosina Creek), • The mountain block from the Parks Highway (Talkeetna up to Healy) then east over to Brushkana Creek, and east over to Jay/Coal Creek. <p>To encompass these concerns, we recommend the following mitigation measure be implemented:</p> <p>Protect Conserve Dall sheep by establishing a minimum overflight altitude of 5,000 feet AGL over lambing areas and spring mineral licks, in appropriate areas of Yukon 1, 2, 3, and 4, Buffalo, Eielson, Paxson, and Fax MOAs (nominally May 15 to July 15), and over rutting areas (nominally from November 15 to December 15). These areas will be identified during annual consultation with ADF&G prior to the May 15 and November 15 dates stated above.</p> <p>Page G-3, No. 22 Aircraft, Habitat Protection. The document provides a good discussion of this important mitigation measure to protect important wildlife habitat in JPARC; however, to provide a more comprehensive list we request an annual meeting to update it. For example, we recommend adding the Oshetna River caribou calving grounds, Watana Creek caribou calving grounds, and the Eastern Talkeetna Mountains for Dall sheep populations. In particular, the mountains north and east of Chickaloon River, the mountain block between the Upper Talkeetna River northeast to Mt. Watana (west of Lower Kosina Creek), and the mountain block from the Parks Highway (Talkeetna up to Healy) then east over to Brushkana, and east over to Jay/Coal Creek. We request the following change to this mitigation.</p> <p>Avoiding the creation of aircraft noise around the Gulkana and Delta National Wild and Scenic Rivers, Tangle Lakes area, Richardson Highway, and trumpeter swan nesting areas within the Fox MOA eastern boundary. These areas will be updated during annual consultation with ADF&G prior to May 15.</p>	
G0022-46	<p>Page 1-43. The June 27 to July 11 flight avoidance area along the Delta River is inadequate to conserve Dall sheep lambing and rutting habitat. We recommend the flight avoidance period include May 15 to July 15 for lambing areas, and from November 15 to December 15 over rutting areas.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	We request annual contact with the Department to ensure these locations have not shifted or need adjustment.	<p>comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will consult with the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas not covered under past mitigations. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>
G0022-47	Page 1-48. We question the need to include game management units outside the area of the plan. These include GMU 9, 16, 17, and 19.	<p>The EIS analyses focus on Game Management Units within the JPARC area of operations. Units that lie outside the footprint of military use airspace and DoD training areas are not evaluated as they would remain accessible and unaffected by changes in overflight.</p> <p>GMUs 9, 16, 17, and 19 partially lie underneath distant MOAs that were addressed in the 1997 Alaska MOA EIS, and fall within the footprint for changes proposed for Night Joint Training. The analyses in Section 3.5 of the EIS focus on the MOAs (and underlying lands) used during RED FLAG-Alaska exercises for which this capability is needed. This smaller area of operations does not overlap with these listed GMUs.</p>
G0022-48	On July 9, 2012, the Alaska Department of Fish and Game submitted comments on the March 2012 Draft Environmental Impact Statement (DEIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC). In reviewing the comments submitted, we determined that the comment on page 5, regarding the New Public Overflight Restriction Area (R-2202 and R-2211), had important information that was unintentionally omitted. At this time I am requesting that you accept the revised, corrected comment provided below in place of the previously submitted comment.	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your revised, corrected comment has been accepted and added to the record as an addendum to the comments submitted on July 9, 2012.
G0022-49	New Public Overflight Restriction Area Both alternatives A and B considerably expand R-2202 and/or R-2211 into areas of private and public land that receives high public use and is heavily	The Air Force is considering configurations that both meet training needs and contain surface dangers zones within the boundaries of military land and existing restricted airspace to the extent possible. The north-south run-in headings for inert ordnance delivery is part of both Alternatives A and B,

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>used by the Departments for administrative activities for management and research purposes. The solution is to consider the most recent alternative written into the EIS, called the "North-South Run-In Headings for Inert Ordnance Delivery." This alternative does not expand R-2202 to the west or R-2211 to the East, and therefore leaves that area open for public and Department use on a regular basis. Closing the area between R-2211 and R-2202 would create a significant access hardship for the public and the Department.</p> <p>To effectively resolve this concern, we request that a new alternative be developed for live ordnance that is similar to the new inert ordnance alternative. It appears that the proposed live ordnance target could be relocated so that the drop area and ground exclusion area would be located entirely within the Donnelly Training Area. This would limit air restrictions and ground exclusion areas exclusively to the Donnelly Training Area, does not expand live ordnance restricted areas R-2202 or R-2211, and would reduce the impact to the public and the Department.</p>	<p>which both also include the primary requirement for live ordnance delivery.</p> <p>Current Department of Defense (DoD) policies prohibit developing new live ordnance impact areas; therefore, developing new live munitions impact areas is not an available option. Using the existing live impact areas on Donnelly Training Area (DTA) West, the Air Force is unable to accomplish all run-ins and delivery profiles required for this training capability and contain the surface danger zones within DTA-West.</p> <p>Under both alternatives, some portion of operations would require exclusive use of airspace and areas within surface danger zones that extend onto state land. The proponent will continue to work with the Alaska Department of Natural Resources (ADNR) to more accurately define the locations, frequency, and timing of live-fire training that would impact access and use of non-DoD land. The decision to select Alternative A or B will consider methods to minimize the effect of creating a large continuous block of restricted airspace that will cause access impacts on the public use and ADNR management of the underlying and surrounding areas. The Air Force would coordinate essential management tasks with ADNR annually to accommodate these as much as possible.</p>
G0022-50	<p>New Public Overflight Restriction Area</p> <p>Both alternatives A and B considerably expand R-2202 and/or R-2211 into areas of private and public land that receives high public use and is heavily used by the Departments for administrative activities for management and research purposes. The solution is to consider the most recent alternative written into the EIS, called the "North-South Run-In Headings for Inert Ordnance Delivery." This alternative does not expand R-2202 to the west or R-2211 to the East, and therefore leaves that area open for public and Department use on a regular basis. Closing the area between R-2211 and R-2202 would create a significant access hardship for the public and the Department.</p> <p>To effectively resolve this concern, we request that a new alternative be developed for live ordnance that is similar to the new inert ordnance alternative. It appears that the proposed live ordnance target could be relocated so that the drop area and ground exclusion area would be located entirely within the Donnelly Training Area. This would limit air restrictions</p>	<p>This comment proposes a modification to the Alternative B for Realistic Live Ordnance Delivery that would require moving live ordnance targets such that the proposed activity could be contained within existing R-2202 boundaries. The cost and impacts of relocating live ordnance targets would more than likely exceed the impacts of an expanded restricted area that requires no changes to the land underneath it. Modifications/mitigations are being considered that would carve out access routes and/or restrict the times/days the proposed airspace could be activated.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	and ground exclusion areas exclusively to the Donnelly Training Area, does not expand live ordnance restricted areas R-2202 or R-2211, and would reduce the impact to the public and the Department.	
G0022-51	<p>The discussion related to the dependence of subsistence by communities and their ratings is also flawed by the inclusion of the criteria "...whether the communities are predominately Alaska Native." Neither the Alaska Constitution or federal law regarding subsistence in Alaska differentiates subsistence use along racial lines, unless specifically permitted by Congress (re: Marine Mammal Protection Act, Endangered Species Act, etc.). While it is recognized that the Alaskan Native community has a long history of subsistence use, we request that the EIS revise this section to properly include existing State and Federal law regarding subsistence use and participation.</p> <p>It should also be noted that through interpretation of the Alaska Constitution, under state law, all Alaska residents are considered eligible to conduct subsistence activities where that activity is allowed. The discussion as presented in the referenced section should be recognized as having no bearing on the allocation of fish and wildlife, which is under the purview of the Alaska Boards of Fisheries and Game, and the Federal Subsistence Board.</p>	See comment response G0013-3.
G0022-52	<p>Also related to subsistence and other uses,</p> <p>We appreciate the proposed mitigation to not conduct major flying exercises (MFEs) during the fall hunting season; however, the proposed September prohibition does not encompass all of the most important use periods, when over 5000 hunters and their households rely on this area for subsistence harvest of moose and caribou. Big game hunting in the area for subsistence and general uses begins with the August 10 opening for caribou and reaches a peak during the September 11 to September 20 period. Hunters are also in the field throughout the Proposed Paxson MOA and the Fox 3 MOA during the winter season - most heavily between October 21 and the end of November, after which use is reduced as caribou migrate from the area and winter weather sets in. The Proposed Paxson MOA and the Fox 3 MOA also constitute the most popular and highly used areas in the state for small game hunting. This hunting occurs year-around with peak activity in August-October and February-March. To encompass these periods, we recommend the following mitigation:</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<ul style="list-style-type: none"> • Conduct no MFEs from August 10 to September 30 and October 21 to November 31 in the Fox 3 MOA and the proposed Paxson MOA, and minimize MFEs during the February-March period to avoid disturbance or displacement of small game hunters. 	
G0024-1	<p>Thank you for the opportunity to provide comment on the JPARC Modernization and Enhancement EIS. As the Alaska Department of Natural Resources Large Project Coordinator for the proposed Susitna-Watana Hydroelectric Project, I am forwarding the attached letter from the Alaska Energy Authority (AEA), the proponent for the Susitna-Watana project. Please reply with confirmation that the comments have been received by your offices. The Susitna-Watana project information is relative to the JPARC Modernization and Enhancement EIS as the hydroelectric project anticipates construction of a 7000-foot long runway to accommodate Boeing 737 aircraft and construction of transmission lines connecting into the existing Railbelt transmission system. The attached letter provides information on the project area, the anticipated activities, transportation corridor alternatives, and the estimated project schedule for the Susitna-Watana Hydroelectric Project. Please do not hesitate to contact myself or the Susitna-Watana AEA Project Manager, Mr. Wayne Dyok, if you need any further information. Marie Steele, Large Project Coordinator Office of Project Management and Permitting Alaska Department of Natural Resources 550 W. 7th Ave., Suite 1430 Anchorage, Alaska 99501-3577 Office: (907) 269-8473</p>	<p>The Alaska Airspace Manager for the Air Force has reviewed the documents on your website and has identified an area where your project and the Air Force's operations may impact one another.</p> <p>If you pursue instrument approaches to your runways for inclement weather operations (Instrument Flight Rules [IFR]), you will require changes to the FAA-designated airspace to use them. When the Air Force is operating in the FOX 3 Military Operations Area (MOA) above the airfields, you will not have the necessary IFR access to the instrument approaches. Prior planning is the easiest way to avoid delays and diversions due to active military airspace.</p> <p>Outside of days with low visibility or clouds, we suspect that the majority of your operations would be under Visual Flight Rules (VFR) and, therefore, not require the instrument procedures. During VFR flights, your aircraft would not be restricted from flying in the MOA with the Air Force aircraft. When we share airspace, the best way to avoid conflicts is through communication, which will be enhanced with our Special Use Airspace Information Service (SUAIS). We will provide a radio frequency to talk to our Range Controller; he can assist with aircraft locations to keep our operations separate. Ensuring your aircraft are transponder equipped (this transmits a signal from the aircraft) will assist the SUAIS, as the aircraft are easier to see on radar by the range controller and the fighter aircraft in the area.</p> <p>Finally, your transmission lines are most likely low enough to be of no concern to the Air Force operations, as 500 feet above ground level is the proposed floor of the new FOX 3 MOA.</p> <p>The 11th Air Force chairs an Alaska Civil-Military Aviation Council, which meets twice annually to discuss shared airspace issues and ways to avoid conflicts. Military, FAA, Alaska Department of Fish and Game, Aircraft Owners and Pilots Association, Alaska Airmen, and other community groups attend this meeting to enhance the safety of all users of the National Airspace System.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>Alaska Energy Authority contact information has been added to the list of invitees for the next meeting, tentatively scheduled for November 2012.</p> <p>A summary of the information on the Susitna-Watana Hydroelectric Project and an analysis of potential cumulative effects have been added to the EIS (see Section 4.8).</p>
G0024-2	<p>Thank you for the opportunity to provide comment on the JPARC Modernization and Enhancement EIS. As the Alaska Department of Natural Resources Large Project Coordinator for the proposed Susitna-Watana Hydroelectric Project, I am forwarding the attached letter from the Alaska Energy Authority (AEA), the proponent for the Susitna-Watana project.</p> <p>The Susitna-Watana project information is relative to the JPARC Modernization and Enhancement EIS as the hydroelectric project anticipates construction of a 7000-foot long runway to accommodate Boeing 737 aircraft and construction of transmission lines connecting into the existing Railbelt transmission system. The attached letter provides information on the project area, the anticipated activities, transportation corridor alternatives, and the estimated project schedule for the Susitna-Watana Hydroelectric Project.</p> <p>In addition to the points raised by the AEA, it is important to note an increased level of public recreational use is expected due to the reservoir behind the dam, as well as lighting and electrical “noise” due to the hydroelectrical power generation.</p> <p>Further information relating to Alaska’s long range electrical generation capital improvement projects can be found in the Regional Integrated Resource Plan (RIRP), at http://www.akenergyauthority.org/regionalintegratedresourceplan.html.</p> <p>Please do not hesitate to contact myself, or the Susitna-Watana AEA Project Manager, Mr. Wayne Dyok, if you need any further information.</p>	<p>The Alaska Airspace Manager for the Air Force has reviewed the documents on your website and has identified an area where your project and the Air Force’s operations may impact one another.</p> <p>If you pursue instrument approaches to your runways for inclement weather operations (Instrument Flight Rules [IFR]), you will require changes to the FAA-designated airspace to use them. When the Air Force is operating in the FOX 3 Military Operations Area (MOA) above the airfields, you will not have the necessary IFR access to the instrument approaches. Prior planning is the easiest way to avoid delays and diversions due to active military airspace.</p> <p>Outside of days with low visibility or clouds, we suspect that the majority of your operations would be under Visual Flight Rules (VFR) and, therefore, not require the instrument procedures. During VFR flights, your aircraft would not be restricted from flying in the MOA with the Air Force aircraft. When we share airspace, the best way to avoid conflicts is through communication, which will be enhanced with our Special Use Airspace Information Service (SUAIS). We will provide a radio frequency to talk to our Range Controller; he can assist with aircraft locations to keep our operations separate. Ensuring your aircraft are transponder equipped (this transmits a signal from the aircraft) will assist the SUAIS, as the aircraft are easier to see on radar by the range controller and the fighter aircraft in the area.</p> <p>Finally, your transmission lines are most likely low enough to be of no concern to the Air Force operations, as 500 feet above ground level is the proposed floor of the new FOX 3 MOA.</p> <p>The 11th Air Force chairs an Alaska Civil-Military Aviation Council, which meets twice annually to discuss shared airspace issues and ways to avoid conflicts. Military, FAA, Alaska Department of Fish and Game, Aircraft Owners and Pilots Association, Alaska Airmen, and other community groups attend this meeting to enhance the safety of all users of the National Airspace</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>System.</p> <p>Alaska Energy Authority contact information has been added to the list of invitees for the next meeting, tentatively scheduled for November 2012.</p> <p>A summary of the information on the Susitna-Watana Hydroelectric Project and an analysis of potential cumulative effects have been added to the EIS (see Section 4.8).</p>
G0024-3	<p>The Susitna-Watana Project would be located in the FOX 3 Military Operations Area (MOA). There is a potential for conflicts particularly because of AEA’s need for and use of an airstrip to construct and operate the hydropower project and the military’s need for low-altitude threat training, as well as other activities. AEA would like to ensure that the military’s proposed actions would not adversely affect the construction and operation of the Susitna-Watana Project and vice versa. AEA proposes to meet with the Department of Defense (DOD) to discuss how both programs can coexist.</p>	<p>Revisions in the Final EIS include changes addressing concerns or additional information provided in this comment. The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
G0024-4	<p>We request further that the DOD consider the cumulative effects of the Susitna-Watana Project in the Final EIS.</p>	<p>The Alaska Airspace Manager for the Air Force has reviewed the documents on your website and has identified an area where your project and the Air Force’s operations may impact one another.</p> <p>If you pursue instrument approaches to your runways for inclement weather operations (Instrument Flight Rules [IFR]), you will require changes to the FAA-designated airspace to use them. When the Air Force is operating in the FOX 3 Military Operations Area (MOA) above the airfields, you will not have the necessary IFR access to the instrument approaches. Prior planning is the easiest way to avoid delays and diversions due to active military airspace.</p> <p>Outside of days with low visibility or clouds, we suspect that the majority of your operations would be under Visual Flight Rules (VFR) and, therefore, not require the instrument procedures. During VFR flights, your aircraft would not be restricted from flying in the MOA with the Air Force aircraft. When we share airspace, the best way to avoid conflicts is through communication,</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>which will be enhanced with our Special Use Airspace Information Service (SUAIS). We will provide a radio frequency to talk to our Range Controller; he can assist with aircraft locations to keep our operations separate. Ensuring your aircraft are transponder equipped (this transmits a signal from the aircraft) will assist the SUAIS, as the aircraft are easier to see on radar by the range controller and the fighter aircraft in the area.</p> <p>Finally, your transmission lines are most likely low enough to be of no concern to the Air Force operations, as 500 feet above ground level is the proposed floor of the new FOX 3 MOA.</p> <p>The 11th Air Force chairs an Alaska Civil-Military Aviation Council, which meets twice annually to discuss shared airspace issues and ways to avoid conflicts. Military, FAA, Alaska Department of Fish and Game, Aircraft Owners and Pilots Association, Alaska Airmen, and other community groups attend this meeting to enhance the safety of all users of the National Airspace System.</p> <p>Alaska Energy Authority contact information has been added to the list of invitees for the next meeting, tentatively scheduled for November 2012.</p> <p>A summary of the information on the Susitna-Watana Hydroelectric Project and an analysis of potential cumulative effects have been added to the EIS (see Section 4.8).</p>
G0024-5	<p>DESCRIPTION OF SUSITNA-WATANA PROJECT</p> <p>This section provides a brief overview of the Project location, facilities and proposed operational characteristics. For more detail regarding the Project facilities and operational characteristics, please refer to the PAD (AEA 2011; available on the Susitna-Watana Hydroelectric Project website, http://www.susitna-watanahydro.org). The proposed Project is located in the Southcentral region of Alaska, approximately 120 miles (mi) north-northeast of Anchorage and 110 mi south-southwest of Fairbanks. The Southcentral region of the state is geographically bounded by the Alaska Range to the north and west, the Wrangell Mountains to the east, and the Talkeetna Mountains to the south. This region encompasses 86,000 square mi of the total 586,000 square mi of the state. As proposed, the Project would include construction of a dam, reservoir and power plant on the Susitna River starting at river mile (RM) 184, approximately 34 mi upstream of Devils</p>	<p>The Alaska Airspace Manager for the Air Force has reviewed the documents on your website and has identified an area where your project and the Air Force's operations may impact one another.</p> <p>If you pursue instrument approaches to your runways for inclement weather operations (Instrument Flight Rules [IFR]), you will require changes to the FAA-designated airspace to use them. When the Air Force is operating in the FOX 3 Military Operations Area (MOA) above the airfields, you will not have the necessary IFR access to the instrument approaches. Prior planning is the easiest way to avoid delays and diversions due to active military airspace.</p> <p>Outside of days with low visibility or clouds, we suspect that the majority of your operations would be under Visual Flight Rules (VFR) and, therefore, not require the instrument procedures. During VFR flights, your aircraft would</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Canyon. Transmission lines connecting into the existing Railbelt transmission system and an access road would also be constructed.</p> <p>Transportation Access</p> <p>There would be both temporary and permanent site access facilities to provide a transportation system to support construction activities, and to facilitate orderly development and maintenance of the Project. The current planning assumes restricted public access during construction for safety considerations. Another goal is to co-locate access roads and transmission facilities, to the extent possible, in the same corridor to minimize environmental impacts</p> <p>Three possible alternatives for access roads and transmission lines have been identified for the Project (Figure 1). Two of the alternatives would accommodate east-west running transmission lines in combination with a new site access road connecting to the Anchorage-Fairbanks Intertie Transmission line and the Alaska Railroad. One of these corridors, designated as the Chulitna Corridor, would run north of the Susitna River, and extend to the Chulitna siding area. The other alternative, designated as the Gold Creek Corridor, would run south of the Susitna River, and extend to the Gold Creek area. A third corridor, designated as the Denali Corridor, would run due north, connecting the Project site to the Denali Highway by road over a distance of about 44 mi. If a transmission line is constructed along this corridor, it would be extended westward along the existing Denali Highway and connect to the Alaska Intertie near Cantwell.</p> <p>If the Denali Corridor is selected the affected sections of the Denali Highway will be upgraded in order to facilitate safe construction of the Project. The Denali Highway would not be a part of the Project.</p> <p>Regardless of which road is chosen, the majority of the new road will follow terrain and soil types that allow construction using side borrow techniques, resulting in a minimum of disturbance to areas away from the alignment. A berm type cross section will be formed, with the crown of the road being approximately 2 to 3 ft above the elevation of adjacent ground. To reduce the visual impact, the side slopes will be flattened and covered with excavated peat and other naturally occurring materials. A 200-foot right-of-way will be</p>	<p>not be restricted from flying in the MOA with the Air Force aircraft. When we share airspace, the best way to avoid conflicts is through communication, which will be enhanced with our Special Use Airspace Information Service (SUAIS). We will provide a radio frequency to talk to our Range Controller; he can assist with aircraft locations to keep our operations separate. Ensuring your aircraft are transponder equipped (this transmits a signal from the aircraft) will assist the SUAIS, as the aircraft are easier to see on radar by the range controller and the fighter aircraft in the area.</p> <p>Finally, your transmission lines are most likely low enough to be of no concern to the Air Force operations, as 500 feet above ground level is the proposed floor of the new FOX 3 MOA.</p> <p>The 11th Air Force chairs an Alaska Civil-Military Aviation Council, which meets twice annually to discuss shared airspace issues and ways to avoid conflicts. Military, FAA, Alaska Department of Fish and Game, Aircraft Owners and Pilots Association, Alaska Airmen, and other community groups attend this meeting to enhance the safety of all users of the National Airspace System.</p> <p>Alaska Energy Authority contact information has been added to the list of invitees for the next meeting, tentatively scheduled for November 2012.</p> <p>A summary of the information on the Susitna-Watana Hydroelectric Project and an analysis of potential cumulative effects have been added to the EIS (see Section 4.8).</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>sufficient for this type of construction.</p> <p>Permanent access to the Watana Dam site will connect with the existing Alaska Railroad either at Chulitna, Cantwell or Gold Creek, where at the chosen location a railhead and storage facility occupying up to 40 ac will be constructed alongside the existing passing bays. New sidings of a length up to 5,000 ft will be constructed so that off-loading and transfer of goods and materials can take place without interrupting the operations of the Alaska Railroad Corporation (ARRC). This facility will act as the transfer point from rail to road transport and as a backup or interim storage area for materials and equipment, and as an inspection and maintenance facility for trucks and their loads. Within the 40 ac would be a small residential camp for drivers trucking equipment to the construction site, for laborers and staff operating the transfer, and for support staff such as cooks and maintenance workers.</p> <p>If the Denali Corridor is chosen for road access, in the community of Cantwell the pavement on the first section of the Denali Highway will be extended for a distance of approximately 4 mi to eliminate any problem with dust and flying stones. In addition, the following measures will be taken:</p> <ul style="list-style-type: none"> • Speed restrictions will be imposed along appropriate segments; • Improvements will be made to the intersections including pavement markings and traffic signals. <p>Electric Transmission Facilities</p> <p>The transmission lines will begin at Watana Dam and consist of three single-circuit 230-kV lines. The same three corridors under consideration for the access road are also those under consideration to connect the Project primary transmission lines to the Alaska Intertie. Depending on which corridor is chosen, the transmission system will include a switching station in the point of tie in (either at Chulitna, Gold Creek or Cantwell). From the Watana substation, the transmission corridors are essentially co-located with the corridors for the access roads except for two specific areas:</p> <p>1) For the northern westward route (Chulitna Corridor), only the first five mi of the twin 230-kV transmission lines will not follow the coincident road corridor. The two lines will cross the river from the switch yard (together</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>with the line destined for the northern route) in a northerly direction for two mi, after which the two lines will turn northwesterly to cross Tsusena Creek and three mi later will intersect the Chulitna road corridor. At the extreme westerly end of the corridor, it will widen to facilitate the divergence of the road and the transmission line which will continue to a switching station on the Alaska Intertie.</p> <p>2) For the southern westward route (Gold Creek Corridor) the transmission lines would not follow the planned road corridor, rather the transmission lines can span the rough topography running more parallel to the Susitna River. Near the westerly end of the corridor, both the transmission lines and road can be co-located into one single corridor all the way to Gold Creek where the transmission lines would terminate in a new switching station on the existing Alaska Intertie.</p> <p>For the northern route, the only divergence between the road and transmission line corridor will occur at Deadman Lake, at which location the road will be aligned west of Deadman Hill, while the transmission will follow a lower elevation corridor on the east of the hill. Both corridors will rejoin some 9 mi later on the north side of the Deadman Hill. At the Denali Highway, the northern transmission corridor will turn west and continue along the Denali Highway to the Cantwell switching station.</p> <p>The right-of-way for the transmission lines within the corridors will consist of a linear strip of land. The width will depend on the number of lines. The transmission rights-of-way will be 200, 300, or 400 feet, depending on whether one, two, or three lines run in parallel.</p> <p>The switching and substations will occupy a total of approximately 16 ac.</p> <p>Rights-of-way for permanent access to switchyard and substations will be required linking back to the permanent site access road. These rights-of-way will be 100 ft wide.</p> <p>Access to the transmission line corridors will be:</p> <p>a) Via unpaved vehicle access track from the permanent access roads at intermittent points along the corridor. The exact location of these tracks will be established in the final design phase.</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>b) By helicopter, where there is no access road projected.</p> <p>Within the transmission corridor itself an unpaved vehicle access track 25 ft wide will run along the entire length of the corridor, except at areas such as major river crossings and deep ravines where an access track would not be utilized for the movement of equipment and materials.</p> <p>Dam and Reservoir</p> <p>As currently envisioned, the Project would include a large dam with a 20,000-acre (ac) reservoir. The type and height of dam construction are still being evaluated as part of ongoing engineering feasibility studies, but early comparisons have demonstrated that it will most likely be a roller compacted concrete structure. The dam has a nominal crest elevation at elevation (El.) 2,025 ft mean sea level (msl) corresponding with a maximum height of approximately 700 ft above the foundation and a crest length of approximately 2,700 ft. Following completion of the studies mentioned above, a nominal crest elevation up to El. 2,125 ft msl may be proposed in the license application, corresponding to a maximum dam height of up to 800 ft above the foundation.</p> <p>The Watana Reservoir, at normal operating level of El. 2,000 ft msl, will be approximately 39 mi long with a maximum width of approximately 2 mi. The total water surface area at normal operating level is approximately 20,000 ac. The minimum reservoir level will be 1,850 ft msl during normal operation, resulting in a maximum drawdown of 150 ft. However, a maximum drawdown of up to 200 feet is still being considered. The reservoir will have a total capacity of 4.3 million ac-ft, of which 2.4 million ac-ft will be active storage.</p> <p>Construction materials for the dam and appurtenant structures will utilize, as far as possible, rock from the structure excavations to minimize the quarry development. Stable excavations and rock cuts will be designed with suitable rock reinforcement and berms.</p> <p>Thick alluvial deposits will be removed from the river bed in order to found the dam on sound bedrock.</p> <p>Hydroelectric Facilities</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>The powerhouse will be located immediately downstream of the dam, and will house three generating units, each with a nominal capability of 200 MW unit output under average net head (which will be close to the design head) for a total plant capacity of 600 MW under average head. However, based on discussions with Railbelt utilities regarding electrical system reliability, AEA may propose four units with a nominal capacity of 150 MW and a total capacity of 600 MW. The capacity of the Project eventually proposed for licensing could extend up to 800 MW. The exact sizing and number of units may change as a result of further transmission system studies.</p> <p>The average annual energy of the project will be 2,500,000 megawatt hours. The powerhouse will be designed and constructed with an extra empty generating unit bay for the potential installation of a fourth unit at some future time. Optimization studies are ongoing.</p> <p>There would be two outlet works facility structures and four power intake structures (one corresponding to the extra unused powerhouse bay). The outlet works facility in conjunction with the three powerhouse units will be sized to allow discharge of a 50-year flood before flow would be discharged over the spillway.</p> <p>Ancillary Facilities</p> <p>Construction of the Watana Dam site development will require various facilities to support the construction activities throughout the entire construction period. Following construction, the operation of the Project will require a small permanent staff and facilities to support the permanent operation and maintenance (O&M) program.</p> <p>The most significant item among the temporary site facilities will be a construction camp (Figure 2). The construction camp will be a largely self-sufficient community normally housing approximately 800 persons, but with a peak capacity of up to 1,000 people during construction of the Project. After construction, it is planned to remove most of the camp facility, leaving only those aspects that are to be used to support the smaller permanent residential and operation and maintenance facilities.</p> <p>Other site facilities include contractor work areas, site power, services, and communications. Site power and fiber optic cabling will be brought either on</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>the transmission line route, or along the side of the access road. Items such as power and communications will be required for construction operations, independent of camp operations.</p> <p>Permanent facilities will include community facilities for O&M staff members and any families. Other permanent facilities will include maintenance buildings for use during operation of the power plant.</p> <p>AEA plans to construct a 7000-foot long runway that would accommodate Boeing 737 aircraft (Figure 2). The runway would like be constructed on the north side of the Susitna River, east of the proposed dam site.</p>	
G0025-1	<p>1. Page 2-20, Line 21-23, Section 2.1.3.1: The BAX (if approved) should only be usable on a daily basis from SFC to 5999 MSL. The airspace above should be with the same time parameters (if at all) as the Delta MOA. If released above 5999MSL on a daily basis, will result in a negative impact the National Airspace System as stated in the letter dated March 11, 2011.</p> <p>2. Page 2-4, Table: Alternative “A” for the proposed FOX 3 MOA extends too far south and west. As stated in the Letter from Anchorage Center on March 11, 2011. This would have a negative impact on the National Airspace System as well as Anchorage Center. This statement applies throughout the document where the proposed FOX 2 MOA is addressed.</p> <p>3. Page 2-32, Table: Transition between R2205 and R2202 – The altitudes on this transition are unrealistic. This would be a major impact to Customers of the National Airspace system and Anchorage Center. 7000 MSL would be the highest altitude Anchorage Center could recommend.</p> <p>5. Page 1-1, Line 12: The FAA is a cooperating agency based in part on the DoD FAA MOU found in Appendix 7 of FAA Order 7400.2 which state that “When the DoD proposes that the FAA establish, designate, or modify SUA, the FAA shall act as a cooperating agency for the evaluation of environmental impacts.” Suggest adding verbiage referring to the MOU in both Chapter 1 and in the Executive Summary.</p> <p>6. Page 1-32, Line 10, Section 1.6.1: Recommend rewording the sentence stating “FAA as a cooperating agency in accordance with its legal jurisdiction of the U.S. airways” to be in line with FAA Order 7400.2 Section 2, 1-2-1 which states: “The navigable airspace is a limited national resource that Congress has charged the Federal Aviation Administration (FAA) to administer in the public interest as necessary to ensure the safety of</p>	<p>Thank you for your comments on those issues and concerns that the Air Force and Army will both continue to discuss and resolve with the FAA as you review the Aeronautical Proposal for each preferred alternative. The FEIS preferred alternatives will act to alleviate some of the concerns expressed in your March 11, 2011 letter and ongoing discussions we have had with the FAA over the different JPARC airspace proposals. Many concerns were expressed by the public, government agencies, and other key stakeholders over these proposals that will also require further attention during the Aeronautical Study processes. As the FAA, DoD, and other interests continue to explore means for safely integrating UAV operations into the National Airspace System, we will be most interested in discussing those options the FAA will consider for supporting essential UAV training missions in Alaska. Be advised that the FEIS verbiage was modified where necessary to reflect the changes and corrections noted in the comment. The Army and Air Force look forward to continuing coordination with the FAA on how the JPARC airspace proposals can best be implemented to serve military, civilian, and FAA needs.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>aircraft and its efficient use.”</p> <p>8. Page 2-5, Line 20, Section 2.1.1.1: Other times by NOTAM is something that should be more clearly spelled out. Especially if this has the potential for being a daily event</p> <p>9. Page 2-6, Table 2-3: Add “ATCAA” to Paxton in the second section</p> <p>10. Page 2-6, Line 8, Section 2.1.1.1: Data is 4-6 years old now</p> <p>11. Page 3-32, Line 12, Section 3.1: Believe “no to” is a typo. The line does not make sense, please clarify.</p> <p>12. General comment: As per FAA comments given March 2011: The close proximity of the proposed Fox 3 & Paxon MOA remains a concern due to its close proximity to Anchorage Terminal Radar Approach Control’s airspace.</p> <p>13. Page 3-178, Line 1, Section 3.3: See comment 1 on the BAX</p> <p>15. Page 3-282, Line 1, Section 3.6, all: Currently is against FAA policy to establish or designate airspace solely for the use of UAV/UASs.</p>	
G0025-2	<p>4. Page ES-16, Lines 7 and 10: The word “mostly” is contained throughout the document. Suggest modifying the verbiage to more concise terms. Stating you will be mostly using existing targets and impact areas indicates additional impact areas will be impacted.</p> <p>5. Page 1-1, Line 12: The FAA is a cooperating agency based in part on the DoD FAA MOU found in Appendix 7 of FAA Order 7400.2 which state that “When the DoD proposes that the FAA establish, designate, or modify SUA, the FAA shall act as a cooperating agency for the evaluation of environmental impacts.” Suggest adding verbiage referring to the MOU in both Chapter 1 and in the Executive Summary.</p> <p>6. Page 1-32, Line 10, Section 1.6.1: Recommend rewording the sentence stating “FAA as a cooperating agency in accordance with its legal jurisdiction of the U.S. airways” to be in line with FAA Order 7400.2 Section 2, 1-2-1 which states: “The navigable airspace is a limited national resource that Congress has charged the Federal Aviation Administration (FAA) to administer in the public interest as necessary to ensure the safety of aircraft and its efficient use.”</p> <p>7. Pages – all: Suggest doing a “FIND” function and use nonparticipating instead of civilian throughout the document</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The requested revisions to the document noted in the comment will be included in the JPARC Final EIS.</p>
G0025-3	<p>14. Page 3-190, Figure 3-26: Noise contour levels indicate that currently there are no baseline peak blast noise levels in the 130dB contour and there</p>	<p>Proposed 115 dB and 130 dB peak (PK 15[met]) noise contours are shown in Figure 3-26. While the 115 dB contour (dashed pink line) does extend</p>

Table N-5. Government Response to Comments (*continued*)

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	<p>are several additions to that under the proposed action (pink contours). However, it is indicated in the verbiage on page 3-187 line 31 that there are no impact areas not already affected by current conditions. Please clarify.</p>	<p>beyond the boundaries of DoD-owned land in some places, the 130 dB contour (solid pink line) is entirely within DoD-owned land. Peak noise levels of between 115 dB and 130 dB are typically associated with a 'moderate' risk of complaints from affected persons while peak noise levels of 130 dB or higher are associated with a 'high' risk of complaints. The discussion on page 3-187 line 31 identifies 130 dB peak noise levels extending to non-DoD land as an impact that would have been of particular concern. However, analysis results indicate that 130 dB peak noise levels would not extend onto land not owned by the DoD, and peak noise level changes under the action alternatives would not result in noise impacts that would be expected to be considered significant.</p>
G0025-4	<p>Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace and Training Areas in the Joint Pacific Alaska Range Complex. Please note our ability to perform a detailed analysis of the Draft EIS is limited by the absence of an accompanying Draft Aeronautical Proposal for Modification of Special Use Airspace (SUA). Development and submittal of a Draft Aeronautical Proposal initiates an aeronautical study by the FAA to evaluate impacts to the National Airspace System (NAS), which can influence the ultimate configuration of the proposed airspace.</p> <p>SUA proposals are subject to both environmental and aeronautical processing requirements. Although they are distinct and separate actions, they require closely coordinated efforts. The aeronautical study can significantly impact the environmental study, leading to unnecessary costs and delay. Similarly, the environmental study can significantly impact the aeronautical study.</p> <p>We highly encourage your team to continue development of a Draft Aeronautical Proposal in coordination with Anchorage Air Route Traffic Control Center as well as Anchorage and Fairbanks Approach Controls.</p> <p>Attached are comments/concerns found during the review of the EIS.</p> <p>Thank you for the opportunity to comment. We look forwards to continuing the positive and long lasting relations the FAA has with the DoD.</p>	<p>Valuable input has been received from our FAA representatives during the drafting of this EIS. Indeed, several proposals have been modified in direct response to feedback from the Military Operations Specialist and Air Traffic Representative. Draft Aeronautical Proposals are pending decisions on preferred alternatives.</p>
G0026-1	<p>The Citizens' Advisory Commission on Federal Areas (CACFA) has reviewed the Joint Pacific Alaska Range Complex (JPARC) Modernization</p>	<p>Thank you for acknowledging the public comment extension on the Draft EIS. Given the feedback provided during the public hearings and Draft EIS review process, the Army and Air Force, on behalf of ALCOM, extended the</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>and Enhancement Draft Environmental Impact Statement (DEIS).</p> <p>The Citizens’ Advisory Commission on Federal Areas is a 12 member organization established by the State of Alaska in 1981 and reauthorized in 2007. Alaska Statute (AS) 41.37.220 directs the Commission to “consider, research, and hold hearings on the consistency with federal law and congressional intent on management, operation, planning, development, and additions to federal management areas in the state [and] on the effect of federal regulations and federal management decisions on the people of the state.”</p> <p>We appreciate the opportunity to provide comments on the important proposals contained in the JPARC EIS. We also are thankful for the extension of the public comment period. ALCOM has made a notable effort to reach out to the affected communities across Alaska with its public meeting schedule and through the ad hoc Working Group meetings since public scoping began for the DEIS. Extending the comment period also demonstrates a commitment to the public process and to the affected public by allowing more time to review and analyze a lengthy and complicated document. Please accept the following comments.</p>	<p>Draft EIS comment period from 70 days to 102 days. This extension took place on May 31, 2012. The comment period, originally scheduled to close on June 7, 2012, was extended to July 9, 2012. The proponents of the proposals considered the extension carefully in an effort to balance military training requirements with the importance of ensuring adequate time for citizens and organizations to thoroughly review the Draft EIS.</p>
G0026-2	<p>The Commission recognizes the crucial role the military plays in defending our nation. We support the Department of Defense’s mission and understand the need for training areas to ensure the readiness of our military forces. Commission members do, however, have concerns about the potential impacts from the proposed expansion of some of those training areas as well as other elements of the proposals outlined in the DEIS.</p> <p>The Commission fully understand the vital role the military plays in Alaska’s economy. At the same time, the civil aviation industry makes significant economic contributions to the state.</p> <p>According to the Aircraft Owners and Pilots Association, the civil aviation industry in Alaska contributes approximately \$3.5 billion to the state’s economy and supports an estimated 47,000 directly and indirectly related jobs). In addition, civil aircraft routinely provide the most economical and feasible means of travel for Alaskans as well providing the primary method of access for utilizing many of the resources of the state. It is essential that a balance be struck between the military’s operational and training needs and</p>	<p>The importance of aviation in Alaska and the contribution general aviation makes toward the economy of Alaska is discussed in Section B.12.3.3, Key Industries in the EIS Study Area. Army and Air Force representatives are committed to working with your Department and other stakeholders through meetings and other means to help find those solutions that would best serve both military training and civilian aviation needs.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>those of the civilian population as they are supported by the civil aviation industry.</p>	
<p>G0026-3</p>	<p>The Commission recognizes the crucial role the military plays in defending our nation. We support the Department of Defense’s mission and understand the need for training areas to ensure the readiness of our military forces. Commission members do, however, have concerns about the potential impacts from the proposed expansion of some of those training areas as well as other elements of the proposals outlined in the DEIS.</p> <p>The Commission fully understand the vital role the military plays in Alaska’s economy. At the same time, the civil aviation industry makes significant economic contributions to the state.</p> <p>According to the Aircraft Owners and Pilots Association, the civil aviation industry in Alaska contributes approximately \$3.5 billion to the state’s economy and supports an estimated 47,000 directly and indirectly related jobs). In addition, civil aircraft routinely provide the most economical and feasible means of travel for Alaskans as well providing the primary method of access for utilizing many of the resources of the state. It is essential that a balance be struck between the military’s operational and training needs and those of the civilian population as they are supported by the civil aviation industry.</p> <p>...</p> <p>The DEIS indicates that the proposed expansion of the FOX 3 MOA and designation of a new Paxon MOA have the potential for significant adverse impacts to airspace management and use, noise levels, flight safety, land management and use, recreation and socioeconomics and that management actions or mitigations are required to avoid or reduce impacts. The Commission agrees with this assessment. In addition, should the Fox 3 MOA be expanded and/or the Paxon MOA designated, we generally support the proposed mitigations outlined in Table K-2 of Appendix K.</p> <p>The public has expressed significant concern with the expansion of the FOX 3 MOA and the creation of the Paxon MOA. Of even greater concern is the proposal to lower the minimum altitude restriction for military aircraft from 5,000 feet AGL to 500 feet AGL. The area that would be included in the proposed expansion is used extensively by general aviation pilots, air taxi operators and transporters to support hunting camps and mining operations,</p>	<p>The Air Force appreciates the support of mission needs in Alaska and the concerns the Commission has expressed over the JPARC airspace proposals. As noted, the FEIS discusses the significant impacts the Fox 3 and Paxon MOA proposals may have on other land and airspace uses and includes those existing and proposed mitigations that would be pursued to address those impacts. The lower altitudes and expanded airspace proposed for those MOAs are essential in meeting those training requirements discussed in Chapters 1 and 2 for newer generation aircraft and advanced adversary tactics to be successful in a combat environment. However, the manner in which those lower altitudes may be used would be limited to the extent needed to meet those training requirements for both routine training in the Fox 3 MOA and major flying exercises in both the Fox 3 and Paxon MOAs. The potential adverse effects the JPARC airspace proposals may have on other aviation interests will be examined further by the FAA in cooperation with the Air Force and Army proponents for each proposal to determine if and how each can be implemented in a safe and efficient manner. The potential impacts the Fox 3 and Paxon airspace proposals may have on wildlife habitats, hunting seasons, and other such concerns noted in the comments are addressed in the FEIS Biological, Land Use, and other applicable analyses and associated mitigations along with separate responses to comments. Both the Air Force and Army will be working with all concerned government agencies and key stakeholders, as appropriate, to discuss and collaborate on those viable options that will best serve the mutual needs of all military and civilian interests. Your continued support of our mission needs and assistance in finding those reasonable solutions will be needed to help us achieve that important objective.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>conduct air tour operations, access recreational areas or make other uses of this region. Given its proximity to Fairbanks, Anchorage, the Mat Su Borough and the Copper River Basin, the airspace is heavily used by civilian aircraft throughout the year. Lowering the minimum altitude to 500 feet AGL greatly increases the collision potential with high-speed military aircraft engaged in training maneuvers in the Fox 3 MOA. Because of the heavy use of the proposed Fox 3 expansion area for access to the southern Alaska Range, the Denali Highway, the Nelchina Basin and the Talkeetna Mountains, and to minimize the risk of mid-air collision, expansion of the Fox MOA should be limited to no lower than 5,000 feet AGL, and to the smallest possible lateral extent to minimize the risk of mid-air collision.</p> <p>The Commission is disappointed that there is no high altitude only alternative for the proposed Paxon MOA which covers Isabel Pass and portions of the Eastern Alaska Range. During scoping, there was considerable public concern about the potential negative impacts to civilian air operations from military aircraft operating as low as 500' AGL if this MOA is designated. Isabel Pass is a major Visual flight Rules (VFR) route for civilian aircraft. It links northern and interior Alaska with south central and southeastern Alaska. As with the proposed Fox 3 expansion area, this route is used extensively by civilian aircraft to access hunting and fishing areas, private cabins and homesites, mining operations and small airstrips on the southern flanks of the Alaska Range. We do note that the low altitude Paxon MOA would extend from 500 feet AGL up to but not including 14,000 feet MSL and the MOA would only be used during major flying exercises (MFE).</p> <p>The DEIS (Appendix K, page K-9) proposes the following mitigation for the Fox 3 MOA and the proposed Paxon MOA is designated:</p> <p>“Establish or expand existing VFR flyway corridors as necessary to provide VFR aircraft transit through areas that may be affected by high density military flight activities within/near the proposed airspace.”</p> <p>While designation of specific VFR flyway corridors may be realistic in the Fox 3 MOA, the highly variable weather in the area of the proposed Paxon MOA makes designation of a single corridor unfeasible. It would also concentrate VFR traffic in an already limited area and increase the potential for a mid air collision between civilian and military aircraft. We strongly</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>suggest that if the Paxon MOA is designated, it should be limited to high altitude use only.</p> <p>...</p> <p>The DEIS lists an existing mitigation measure (Reference ID 429, Appendix K, pg. K-6) for the Delta Caribou Herd calving areas which established a minimum overflight altitude of 3,000 feet AGL from May 15 to June 15. The Commission suggests modifying the mitigation by increasing the minimum altitude to 5,000 feet AGL and extending it from May 15 to July 15.</p> <p>We also suggest adoption of the same May 15 to July 15 flight restriction of 5,000 feet AGL for moose in both the Fox 3 MOA and the proposed Paxon MOA. Even though moose do not have concentrated calving areas, they are susceptible to low level, high speed aircraft overflights during calving and post calving periods.</p> <p>The Commission supports the proposed mitigation for the FOX MOA and the proposed Paxon MOA to allow supersonic operations only above 5,000 feet AGL or 12,000 feet MSL, whichever is higher.</p> <p>Because of the high potential for adverse impacts to the resources in the MOAs, appropriate mitigation measures must be developed. In order to effectively identify, develop and implement necessary mitigation measures the Commission suggests the Alaskan Command establish a comprehensive program involving regular consultation and coordination with the Alaska Department of Fish and Game, the Alaska Department of Natural Resources, and Federal land management agencies. Consultation should also include public user groups, private property owners, and the civil aviation community. This consultation and coordination should continue through the FEIS and Record of Decision, the FAA review of the airspace proposals and the implementation of this plan as its impacts will continue to affect all parties.</p> <p>...</p> <p>To avoid significant adverse impacts to hunting activities regulated under the State of Alaska's general hunting regulations in the Fox 3 MOA (existing and proposed expansion area) and the proposed Paxon MOA, we recommend that no major flying exercises be conducted in these areas from August 10 to September 30 and October 21 to November 31. This will prevent disruption</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>of big game hunting in these areas during the peak seasons.</p> <p>Fox 2 MOA and Eielson MOA</p> <p>These areas are used extensively by moose hunters during the fall and winter. The fall hunt extends from August 15 to September 25, with most use occurring between September 1 and September 15. Winter hunting usually falls within two timeframes, November 15 to December 15 and January 15 to February 28. As a mitigating measure, the Commission recommends no major fly exercises during the fall and winter hunting periods and no flights below 5000 feet AGL.</p>	
G0026-4	<p>Special Use Airspace Information Service</p> <p>The Special Use Airspace Information Service (SUA IS) has been successful in making civilian pilots aware of planned and ongoing military aircraft activity in the JPARC airspace complex. AOPA has indicated that the SUAIS has greatly improved the situational awareness of both civil and military airspace users. However, also according to AOPA, pilots have reported that in the eastern portion of the existing complex communications are not adequate. The result has been difficulties with the mix of civil uses and military training flights.</p> <p>While we understand that the SUAIS recently has been upgraded to increase radio coverage by reactivating one of the VHF radio repeaters, any further expansion of the airspace complex will only increase problems unless radio coverage, staffing and other necessary components of the SUAIS are expanded proportionally to allow civilian pilots to communicate with Range Control when MOAs are active.</p> <p>The DEIS (Appendix K, page K-8) proposes the following mitigation measure:</p> <p>“Pursue funding for any communications enhancements that may be needed to expand coverage within those expanded SUA areas.”</p> <p>We suggest that committing only to “pursue funding” is not satisfactory. ALCOM should develop a plan to identify what is required for expansion of the SUAIS to ensure sufficient and reliable communication between civilian pilots and the military. A workable plan and funding to implement the plan</p>	<p>The SUAIS has been a most successful tool for informing the aviation community of the scheduled and real-time use of the training airspace and it would be important to expand these communications capabilities to those areas where this coverage is lacking. As with such government needs, the mitigation must state that funding will be pursued to make those enhancements pending the approved expansion of the proposed airspace. Effort will be made to obtain the funding needed for these essential communications enhancements, as applicable.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>should be in place before any expansion of the Fox 3 MOA or the designation of the Paxon MOA occurs.</p>	
G0026-5	<p>Unmanned Aerial Vehicle Corridors</p> <p>Under the proposed action in Alternative A, the DEIS proposes to establish seven FAA approved Unmanned Aerial Vehicle (UAV) corridors. Alternative B would establish the same seven UAV corridors via a Certificate of Authorization granted by the FAA. These corridors would extend from Eielson Air Force Base and Allen Army Field at Fort Wainwright to various restricted air space areas. These corridors would be located in and near the second most heavily used airspace in Alaska. The civilian aviation community has expressed significant concerns about the designation of restricted air airspace for operation of UAVs in this area.</p> <p>The Commission recommends the adoption of Alternative B as an interim measures until such time as the FAA complies with the provisions of Public Law 112-95 the FAA Modernization and Reform Act of 2012. Section 334, Public Unmanned Aircraft Systems, directs the Secretary of Transportation to issue “guidance regarding the operation of public (military and other government agency) unmanned aircraft systems to –</p> <ol style="list-style-type: none"> (1) expedite the issuance of a certificate of authorization process; (2) provide for a collaborative process with public agencies to allow for an incremental expansion of access to the national airspace system as technology matures and the necessary safety analysis and data become available, and until standards are completed and technology issues are resolved; (3) facilitate the capability of public agencies to develop and use test ranges, subject to operating restrictions required by the Federal Aviation Administration, to test and operate unmanned aircraft systems; and (4) provide guidance on a public entity’s responsibility when operating an unmanned aircraft without a civil airworthiness certificate issued by the Administration. <p>(b) STANDARDS FOR OPERATION AND CERTIFICATION.- Not later than December 31, 2015, the Administrator shall develop and implement operational and certification requirements for the operation of public unmanned aircraft systems in the national airspace system.</p>	<p>Pending future decisions on how the provisions of that Public Law will be implemented, the UAV corridor alternatives were proposed as restricted areas with the Certificate of Authorization alternative to examine those impacts the more restrictive airspace would have on other airspace uses in each corridor area. The manner in which these corridors would be established will be as determined by the FAA in their study of the JPARC airspace preferred alternatives. Regardless of their designation, all viable options would be explored to help meet UAV training requirements while minimizing adverse effects on nonparticipating air traffic in those areas.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Alternative B, designation of UAV corridors via a certificate of authorization, would still allow ALCOM to meet its mission and training requirements until such time as the Secretary of Transportation issues the necessary guidance and any necessary regulations for operating UAVs in the national airspace system. Under the provisions of Public Law, the Secretary should have already entered into an agreement with the military to simplify the process for issuing certificates of authorization. In addition, the certificate of authorization process should provide additional opportunities for public involvement before a final decision is made on designation of these corridors.</p>	
G0026-6	<p>FOX 3 MOA Expansion and New Paxon MOA</p> <p>The proposed expansion of the Fox 3 Military Operations Area (MOA) and designation of a new Paxon MOA represent a significant expansion in the amount of Alaskan airspace directly affected by military training activity. Under Alternative A the amount of airspace included within MOAs in this region of the state would more than double, increasing from 3,138,000 acres (4,903 sq. miles) to 7,531,000 acres (11,767 sq. miles). Under Alternative E, MOAs would increase in size to 6,401,000 acres (10,001 sq. miles).</p> <p>The Commission has heard from members of the public who are concerned that 2/3 (67%) of the lands affected by the existing MOA and the proposed expansion areas are State owned. They find it disconcerting that with 60% of the lands in Alaska federally owned, the lands most impacted by the proposals in the DEIS are state lands. Many Alaskans believe that it would be more appropriate to designate MOAs over federal lands.</p> <p>The information in Table 3-12 Land Status should be revised to more accurately reflect actual land status in the Fox 3 MOA and the proposed Paxon MOA. The Notes section for Table 3-12 defines State land as including State patented, State tentatively approved and State land disposals. State land disposals are not State lands; they are lands that have been placed in private ownership. They should be included in Table 3-12 under Private. Under Note 4, private lands should also include Native allotments. Also, by definition, there is no such thing as “privately owned BLM land.” We assume that this category would include homesites, trade and manufacturing sites, homesteads and patented federal mining claims that have been conveyed into private ownership.</p>	<p>The location of the Fox 3 expansion and new Paxon MOA were driven by factors and needs described in Section 1.3 of the DEIS and the JPARC Master Plan, and make use of existing military airspace. The notes for Table 3-12 have been revised in the FEIS to clarify the acreage of State land disposals and the relative increase in private land that this category represents. Similarly, the total acreage reported for Native land includes Native allotments. The commenter is correct that “privately owned BLM land” refers to lands that have been conveyed to private ownership. This is also clarified in the table notes in the FEIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
G0026-8	<p>The DEIS indicates that the proposed expansion of the FOX 3 MOA and designation of a new Paxon MOA have the potential for significant adverse impacts to airspace management and use, noise levels, flight safety, land management and use, recreation and socioeconomics and that management actions or mitigations are required to avoid or reduce impacts. The Commission agrees with this assessment. In addition, should the Fox 3 MOA be expanded and/or the Paxon MOA designated, we generally support the proposed mitigations outlined in Table K-2 of Appendix K.</p> <p>The DEIS states there is a potential for adverse impacts on biological resources, public access, and subsistence, but that impacts are not expected to be significant and that management actions or mitigations may be required to avoid or reduce impacts. The Commission believes that the potential exists for significant adverse impacts to these three resources. We suggest the development of mitigation measures for inclusion in the final EIS and Record of Decision.</p> <p>The DEIS acknowledges in the footnotes for Table 3-11 that while caribou are prevalent throughout the Fox 3 MOA, calving and breeding occur predominately in the proposed expansion area. The footnote for Dall sheep in Table 3-11 states that they are most prevalent in the Fox 3 expansion area and the proposed Paxon MOA, but that no "calving" (should be lambing) is identified. Table 3-11 contains similar information that habitat, including nesting habitat, for ducks, geese and trumpeter swans is also prevalent in the proposed Fox 3 expansion area and proposed Paxon MOA. There is little additional discussion of the use of the proposed Fox 3 expansion area for caribou calving and breeding in the affected environment section of the DEIS. More information should be included in the final EIS (FEIS).</p> <p>In spite of the proposal to include important caribou breeding and calving habitat, waterfowl nesting areas and other wildlife concentration areas in the proposed Fox 3 MOA extension and the proposed Paxon MOA, the DEIS (Appendix K, Page K-11) proposes only the following mitigation measure:</p> <p>"Continue to monitor effects of military training, including overflights on select wildlife species (especially herd animals, waterfowl, and raptors) and fisheries during critical seasons such as breeding, young-rearing, and migration. Use knowledge to develop and implement strategies to minimize disturbance to priority wildlife in existing and new SUAs. This would help</p>	<p>Revisions in the Final EIS include changes addressing concerns or additional information provided in this comment. The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will consult with the U.S. Fish and Wildlife Service and the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas that are not already included in mitigations. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of waterfowl concentration areas.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>natural resources and range managers to coordinate training schedules that minimize impacts on wildlife populations.”</p> <p>Because of the importance of this area and its wildlife resources for a wide range of uses and user groups, the Commission submits that simply monitoring the effects of training overflights is not sufficient to protect those resources. Previous studies and surveys have established the effects of these types of activities on biological resources.</p> <p>The FEIS and ROD should include specific mitigation measures for caribou and moose during calving and post-calving periods in the existing Fox 3 MOA and for the proposed expansion area, including the proposed Paxon MOA. Based on our discussions with ADF&G biologists and others, the Commission suggests that a minimum elevation of 5,000 feet AGL be maintained from May 15 through July 15 throughout the existing Fox 3 MOA, including any expansion area. This will reduce stress on the Nelchina Caribou Herd during critical calving and post-calving period.</p> <p>The DEIS lists an existing mitigation measure (Reference ID 429, Appendix K, pg. K-6) for the Delta Caribou Herd calving areas which established a minimum overflight altitude of 3,000 feet AGL from May 15 to June 15. The Commission suggests modifying the mitigation by increasing the minimum altitude to 5,000 feet AGL and extending it from May 15 to July 15.</p> <p>We also suggest adoption of the same May 15 to July 15 flight restriction of 5,000 feet AGL for moose in both the Fox 3 MOA and the proposed Paxon MOA. Even though moose do not have concentrated calving areas, they are susceptible to low level, high speed aircraft overflights during calving and post calving periods.</p> <p>The Commission supports the proposed mitigation for the FOX MOA and the proposed Paxon MOA to allow supersonic operations only above 5,000 feet AGL or 12,000 feet MSL, whichever is higher.</p> <p>Because of the high potential for adverse impacts to the resources in the MOAs, appropriate mitigation measures must be developed. In order to effectively identify, develop and implement necessary mitigation measures the Commission suggests the Alaskan Command establish a comprehensive program involving regular consultation and coordination with the Alaska</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Department of Fish and Game, the Alaska Department of Natural Resources, and Federal land management agencies. Consultation should also include public user groups, private property owners, and the civil aviation community. This consultation and coordination should continue through the FEIS and Record of Decision, the FAA review of the airspace proposals and the implementation of this plan as its impacts will continue to affect all parties.</p> <p>Special Use Airspace Information Service</p> <p>The Special Use Airspace Information Service (SUA IS) has been successful in making civilian pilots aware of planned and ongoing military aircraft activity in the JPARC airspace complex. AOPA has indicated that the SUAIS has greatly improved the situational awareness of both civil and military airspace users. However, also according to AOPA, pilots have reported that in the eastern portion of the existing complex communications are not adequate. The result has been difficulties with the mix of civil uses and military training flights.</p> <p>While we understand that the SUAIS recently has been upgraded to increase radio coverage by reactivating one of the VHF radio repeaters, any further expansion of the airspace complex will only increase problems unless radio coverage, staffing and other necessary components of the SUAIS are expanded proportionally to allow civilian pilots to communicate with Range Control when MOAs are active.</p> <p>The DEIS (Appendix K, page K-8) proposes the following mitigation measure:</p> <p>“Pursue funding for any communications enhancements that may be needed to expand coverage within those expanded SUA areas.”</p> <p>We suggest that committing only to “pursue funding” is not satisfactory. ALCOM should develop a plan to identify what is required for expansion of the SUAIS to ensure sufficient and reliable communication between civilian pilots and the military. A workable plan and funding to implement the plan should be in place before any expansion of the Fox 3 MOA or the designation of the Paxon MOA occurs.</p> <p>...</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>To avoid significant adverse impacts to hunting activities regulated under the State of Alaska’s general hunting regulations in the Fox 3 MOA (existing and proposed expansion area) and the proposed Paxon MOA, we recommend that no major flying exercises be conducted in these areas from August 10 to September 30 and October 21 to November 31. This will prevent disruption of big game hunting in these areas during the peak seasons.</p> <p>Fox 2 MOA and Eielson MOA</p> <p>These areas are used extensively by moose hunters during the fall and winter. The fall hunt extends from August 15 to September 25, with most use occurring between September 1 and September 15. Winter hunting usually falls within two timeframes, November 15 to December 15 and January 15 to February 28. As a mitigating measure, the Commission recommends no major fly exercises during the fall and winter hunting periods and no flights below 5000 feet AGL.</p>	
G0026-9	<p>Realistic Live Ordnance Delivery Area</p> <p>The Commission is concerned about this proposal which would affect 163,230 acres of State owned land under Alternative A and 234,600 acres of State owned land under Alternative B. As the DEIS points out, this area is located within State Game Management Unit (GMU) 20A and is extensively used for moose hunting, with over 4,000 moose permits issued annually. More than 1,100 moose were harvested from GMU 20 A over the last several years. Also harvested are brown bear, black bear, and Dall sheep. Trapping also occurs throughout the entire area. More importantly, this is a priority use area by residents from the Fairbanks area. Any reduction in use would have significant impacts on area hunters and trappers. Should this proposal be adopted under either alternative, specific mitigation measures must be developed in consultation with the Alaska Department of Natural Resources and the Alaska Department of Fish and Game.</p> <p>In addition, because this proposal would require action by the Alaska Department of Natural Resources to reclassify this area, the Commission will submit to the department any recommendations it may determine appropriate and to be within the scope of its responsibilities.</p>	<p>Revisions in the Final EIS include changes addressing concerns or additional information provided in this comment. The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
G0026-10	<p>The DEIS states there is a potential for adverse impacts on biological resources, public access, and subsistence, but that impacts are not expected</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>to be significant and that management actions or mitigations may be required to avoid or reduce impacts. The Commission believes that the potential exists for significant adverse impacts to these three resources. We suggest the development of mitigation measures for inclusion in the final EIS and Record of Decision.</p> <p>The DEIS acknowledges in the footnotes for Table 3-11 that while caribou are prevalent throughout the Fox 3 MOA, calving and breeding occur predominately in the proposed expansion area. The footnote for Dall sheep in Table 3-11 states that they are most prevalent in the Fox 3 expansion area and the proposed Paxon MOA, but that no "calving" (should be lambing) is identified. Table 3-11 contains similar information that habitat, including nesting habitat, for ducks, geese and trumpeter swans is also prevalent in the proposed Fox 3 expansion area and proposed Paxon MOA. There is little additional discussion of the use of the proposed Fox 3 expansion area for caribou calving and breeding in the affected environment section of the DEIS. More information should be included in the final EIS (FEIS).</p> <p>In spite of the proposal to include important caribou breeding and calving habitat, waterfowl nesting areas and other wildlife concentration areas in the proposed Fox 3 MOA extension and the proposed Paxon MOA, the DEIS (Appendix K, Page K-11) proposes only the following mitigation measure:</p> <p>“Continue to monitor effects of military training, including overflights on select wildlife species (especially herd animals, waterfowl, and raptors) and fisheries during critical seasons such as breeding, young-rearing, and migration. Use knowledge to develop and implement strategies to minimize disturbance to priority wildlife in existing and new SUAs. This would help natural resources and range managers to coordinate training schedules that minimize impacts on wildlife populations.”</p> <p>Because of the importance of this area and its wildlife resources for a wide range of uses and user groups, the Commission submits that simply monitoring the effects of training overflights is not sufficient to protect those resources. Previous studies and surveys have established the effects of these types of activities on biological resources.</p> <p>The FEIS and ROD should include specific mitigation measures for caribou and moose during calving and post-calving periods in the existing Fox 3</p>	<p>actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will consult with the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of waterfowl concentration areas.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>MOA and for the proposed expansion area, including the proposed Paxon MOA. Based on our discussions with ADF&G biologists and others, the Commission suggests that a minimum elevation of 5,000 feet AGL be maintained from May 15 through July 15 throughout the existing Fox 3 MOA, including any expansion area. This will reduce stress on the Nelchina Caribou Herd during critical calving and post-calving period.</p> <p>The DEIS lists an existing mitigation measure (Reference ID 429, Appendix K, pg. K-6) for the Delta Caribou Herd calving areas which established a minimum overflight altitude of 3,000 feet AGL from May 15 to June 15. The Commission suggests modifying the mitigation by increasing the minimum altitude to 5,000 feet AGL and extending it from May 15 to July 15.</p> <p>We also suggest adoption of the same May 15 to July 15 flight restriction of 5,000 feet AGL for moose in both the Fox 3 MOA and the proposed Paxon MOA. Even though moose do not have concentrated calving areas, they are susceptible to low level, high speed aircraft overflights during calving and post calving periods.</p> <p>The Commission supports the proposed mitigation for the FOX MOA and the proposed Paxon MOA to allow supersonic operations only above 5,000 feet AGL or 12,000 feet MSL, whichever is higher.</p> <p>Because of the high potential for adverse impacts to the resources in the MOAs, appropriate mitigation measures must be developed. In order to effectively identify, develop and implement necessary mitigation measures the Commission suggests the Alaskan Command establish a comprehensive program involving regular consultation and coordination with the Alaska Department of Fish and Game, the Alaska Department of Natural Resources, and Federal land management agencies. Consultation should also include public user groups, private property owners, and the civil aviation community. This consultation and coordination should continue through the FEIS and Record of Decision, the FAA review of the airspace proposals and the implementation of this plan as its impacts will continue to affect all parties.</p>	
G0026-11	The DEIS states there is a potential for adverse impacts on biological resources, public access, and subsistence, but that impacts are not expected to be significant and that management actions or mitigations may be required	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>to avoid or reduce impacts. The Commission believes that the potential exists for significant adverse impacts to these three resources. We suggest the development of mitigation measures for inclusion in the final EIS and Record of Decision.</p> <p>...</p> <p>Because of the high potential for adverse impacts to the resources in the MOAs, appropriate mitigation measures must be developed. In order to effectively identify, develop and implement necessary mitigation measures the Commission suggests the Alaskan Command establish a comprehensive program involving regular consultation and coordination with the Alaska Department of Fish and Game, the Alaska Department of Natural Resources, and Federal land management agencies. Consultation should also include public user groups, private property owners, and the civil aviation community. This consultation and coordination should continue through the FEIS and Record of Decision, the FAA review of the airspace proposals and the implementation of this plan as its impacts will continue to affect all parties.</p>	<p>recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
G0026-12	<p>The DEIS states there is a potential for adverse impacts on biological resources, public access, and subsistence, but that impacts are not expected to be significant and that management actions or mitigations may be required to avoid or reduce impacts. The Commission believes that the potential exists for significant adverse impacts to these three resources. We suggest the development of mitigation measures for inclusion in the final EIS and Record of Decision.</p> <p>...</p> <p>Because of the high potential for adverse impacts to the resources in the MOAs, appropriate mitigation measures must be developed. In order to effectively identify, develop and implement necessary mitigation measures the Commission suggests the Alaskan Command establish a comprehensive program involving regular consultation and coordination with the Alaska Department of Fish and Game, the Alaska Department of Natural Resources, and Federal land management agencies. Consultation should also include public user groups, private property owners, and the civil aviation community. This consultation and coordination should continue through the FEIS and Record of Decision, the FAA review of the airspace proposals and the implementation of this plan as its impacts will continue to affect all</p>	<p>Please see response to comment G0013-3.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>parties.</p> <p>...</p> <p>Subsistence</p> <p>The Commission is concerned about the Impact Assessment Methodology used in the DEIS to assess the level of dependence on subsistence resources by communities potentially affected by the proposed Fox 3 MOA expansion and the proposed Paxson MOA. In Section 3.1.13.3, Chistochina, Dot Lake and Gulkana are listed as having a high dependency and Cantwell, Gakona, Glennallen and Paxson are considered to have a medium dependency. Chickaloon is included in Table 3-24, but is assigned no ranking. We note that the 1982 harvest and use data for Chickaloon are also incorrect.</p> <p>We find no basis for making different high dependency - medium dependency rankings for these communities when all pertinent factors are considered. All of these communities are on the road system and have similar access to alternative resources. In addition, for the eight communities listed in Table 3-24, an average of 97.25% of households participated in subsistence, with no community having less than 92.7% participation. For the seven communities for which information was available, residents harvested an average of 158 pounds of subsistence resources per capita. Harvest for Paxson, which is ranked as having a medium dependence, harvested 289 pounds per capita. This is more than the amount of per capita harvest for Dot Lake (115 pounds) and Gulkana (152 pounds). However, both of those communities were ranked by the DEIS as having a high dependence on subsistence.</p> <p>A more realistic assessment of the subsistence harvest data for these communities would indicate that all of them have a high dependence on subsistence. As we did in our scoping comments, we point out that the preference for subsistence uses on Federal public lands in Alaska is provided to all rural residents, both Native and non-Native, under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Congress made that finding very clear in Section 80 I (4):</p> <p>“in order to fulfill the policies and purposes of the Alaska Native Claims Settlement Act and as a matter of equity, it is necessary for the Congress to invoke its constitutional authority over Native affairs and its constitutional</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>authority under the property clause and the commerce clause to protect and provide the opportunity for continued subsistence uses on the public lands by Native and non-Native rural residents;”</p> <p>Ranking a community’s dependency on subsistence resources on the basis of the percentage of Native or non-Native residents is inconsistent with both ANILCA Title VIII, as well as federal and state regulations. While it may be appropriate to rank an affected community’s dependency, other criteria should be used. We suggest that the discussion in Section 3.1.13 and any discussion of statutory or regulatory provisions in Section B.13.2 be revised accordingly.</p> <p>To avoid significant adverse impacts to hunting activities regulated under the State of Alaska’s general hunting regulations in the Fox 3 MOA (existing and proposed expansion area) and the proposed Paxon MOA, we recommend that no major flying exercises be conducted in these areas from August 10 to September 30 and October 21 to November 31. This will prevent disruption of big game hunting in these areas during the peak seasons.</p> <p>Fox 2 MOA and Eielson MOA</p> <p>These areas are used extensively by moose hunters during the fall and winter. The fall hunt extends from August 15 to September 25, with most use occurring between September 1 and September 15. Winter hunting usually falls within two timeframes, November 15 to December 15 and January 15 to February 28. As a mitigating measure, the Commission recommends no major fly exercises during the fall and winter hunting periods and no flights below 5000 feet AGL.</p>	
G0026-13	<p>Realistic Live Ordnance Delivery Area</p> <p>The Commission is concerned about this proposal which would affect 163,230 acres of State owned land under Alternative A and 234,600 acres of State owned land under Alternative B. As the DEIS points out, this area is located within State Game Management Unit (GMU) 20A and is extensively used for moose hunting, with over 4,000 moose permits issued annually. More than 1,100 moose were harvested from GMU 20 A over the last several years. Also harvested are brown bear, black bear, and Dall sheep. Trapping also occurs throughout the entire area. More importantly, this is a priority use area by residents from the Fairbanks area. Any reduction in use</p>	<p>Section 3.2.13.4 describes additional communication efforts under consideration in order to coordinate with regulatory agencies and affected individuals regarding potential impacts to subsistence resources as a result of the Realistic Live Ordnance proposed action.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>would have significant impacts on area hunters and trappers. Should this proposal be adopted under either alternative, specific mitigation measures must be developed in consultation with the Alaska Department of Natural Resources and the Alaska Department of Fish and Game.</p> <p>In addition, because this proposal would require action by the Alaska Department of Natural Resources to reclassify this area, the Commission will submit to the department any recommendations it may determine appropriate and to be within the scope of its responsibilities.</p> <p>We again appreciate the opportunity to comment on this project. Please maintain our contact information for future notifications, and contact our office if there are questions about our comments.</p>	
G0026-14	<p>To avoid significant adverse impacts to hunting activities regulated under the State of Alaska’s general hunting regulations in the Fox 3 MOA (existing and proposed expansion area) and the proposed Paxon MOA, we recommend that no major flying exercises be conducted in these areas from August 10 to September 30 and October 21 to November 31. This will prevent disruption of big game hunting in these areas during the peak seasons.</p> <p>Fox 2 MOA and Eielson MOA</p> <p>These areas are used extensively by moose hunters during the fall and winter. The fall hunt extends from August 15 to September 25, with most use occurring between September 1 and September 15. Winter hunting usually falls within two timeframes, November 15 to December 15 and January 15 to February 28. As a mitigating measure, the Commission recommends no major fly exercises during the fall and winter hunting periods and no flights below 5000 feet AGL.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>No changes in the use or structure of Fox 2 or Eielson MOAs are proposed. Existing mitigations will continue.</p>
G0026-15	<p>Realistic Live Ordnance Delivery Area</p> <p>The Commission is concerned about this proposal which would affect 163,230 acres of State owned land under Alternative A and 234,600 acres of State owned land under Alternative B. As the DEIS points out, this area is located within State Game Management Unit (GMU) 20A and is extensively used for moose hunting, with over 4,000 moose permits issued annually. More than 1,100 moose were harvested from GMU 20 A over the last several years. Also harvested are brown bear, black bear, and Dall sheep. Trapping also occurs throughout the entire area. More importantly, this is a</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>priority use area by residents from the Fairbanks area. Any reduction in use would have significant impacts on area hunters and trappers. Should this proposal be adopted under either alternative, specific mitigation measures must be developed in consultation with the Alaska Department of Natural Resources and the Alaska Department of Fish and Game.</p> <p>In addition, because this proposal would require action by the Alaska Department of Natural Resources to reclassify this area, the Commission will submit to the department any recommendations it may determine appropriate and to be within the scope of its responsibilities.</p>	<p>impacts and locations of the proposals in this EIS.</p>
G0027-1	<p>Thank you for the opportunity to review the Draft Environmental Impact Statement for the Alaskan Command's (ALCOM) Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex, Alaska (CEQ# 20120090). We have reviewed the EIS in accordance with our responsibilities under National Environmental Policy Act and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions as well as the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA. We appreciate ALCOM's effort to comprehensively evaluate all twelve actions (six projects and six programmatic actions) identified as appropriate for evaluation in the recently developed Joint Pacific Alaska Range Complex Master Plan. We believe this has added value to the consideration of cumulative impacts and provides for more complete disclosure of impacts for the decision maker as well as the public. However, we note that the complexity of multiple projects and actions without identification of preferred alternatives makes the review quite challenging. Because preferred alternatives are not identified, and because the potential intensity of impacts varies greatly from alternative to alternative, we have rated the impacts associated each alternative individually. Please see the table below identifying our ratings and rating justification. Definitions of our ratings are attached.</p>	<p>Thank you for your input and recommendations for improving the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.</p>
G0027-2	<p>Action: FOX 3 MOA Expansion and New Paxson Military Operating Area (MOA); Rating: EO [Environmental Objections]; Justification: Potentially serious impacts to noise receptors, land use, recreation and other socioeconomic resources, aviation and aviation safety; adverse impacts to air quality, biological resources, access, subsistence and environmental justice.</p>	<p>This comment is duly noted. The Army and Air Force have reviewed the U.S. Environmental Protection Agency's (EPA's) ratings for environmental impact of the proposed actions and Draft EIS adequacy.</p> <p>Because the proposed actions analyzed in this EIS are in various stages of development and have varying timelines for implementation, this EIS has two</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>levels of decisions: programmatic and definitive.</p> <p>Definitive (i.e., specific, project level) decisions will be included in the Record of Decision (ROD) for proposed actions that have sufficient definition to allow detailed EIS analysis of potential discrete impacts. Decisions may incorporate specific measures identified in the analysis to avoid, reduce, or mitigate impacts. This EIS will serve to support the decisions for this class of actions.</p> <p>Programmatic decisions will be included in the ROD for proposed actions that have adequate detail for analysis of a general capability but have flexibility relative to project definition, location, timing, programming, funding, or level of use. Also, actions that are currently not identified for funding of what would take many years to implement may also be decided programmatically. This class of decisions would form the basis for "tiering" future environmental analyses once actions are more fully defined or are closer to the time of implementation.</p> <p>For this definitive proposed action, the rating will be taken into consideration in providing additional information, choosing a preferred alternative, and preparing mitigations.</p>
G0027-3	<p>Action: Realistic Live Ordnance Delivery; Rating: EO [Environmental Objections]; Justification: Potentially serious impacts to noise receptors, land use, recreation and other socioeconomic resources, aviation and aviation safety.</p>	<p>This comment is duly noted. The Army and Air Force have reviewed the U.S. Environmental Protection Agency's (EPA's) ratings for environmental impact of the proposed actions and Draft EIS adequacy.</p> <p>Because the proposed actions analyzed in this EIS are in various stages of development and have varying timelines for implementation, this EIS has two levels of decisions: programmatic and definitive.</p> <p>Definitive (i.e., specific, project level) decisions will be included in the Record of Decision (ROD) for proposed actions that have sufficient definition to allow detailed EIS analysis of potential discrete impacts. Decisions may incorporate specific measures identified in the analysis to avoid, reduce, or mitigate impacts. This EIS will serve to support the decisions for this class of actions.</p> <p>Programmatic decisions will be included in the ROD for proposed actions that have adequate detail for analysis of a general capability but have flexibility relative to project definition, location, timing, programming,</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>funding, or level of use. Also, actions that are currently not identified for funding of what would take many years to implement may also be decided programmatically. This class of decisions would form the basis for "tiering" future environmental analyses once actions are more fully defined or are closer to the time of implementation.</p> <p>For this definitive proposed action, the rating will be taken into consideration in providing additional information, choosing a preferred alternative, and preparing mitigations.</p>
G0027-4	Action: Battle Area Complex Restricted Area; Rating: EC [Environmental Concerns]; Justification: Adverse impacts to aviation, noise receptors.	<p>This comment is duly noted. The Army and Air Force have reviewed the U.S. Environmental Protection Agency's (EPA's) ratings for environmental impact of the proposed actions and Draft EIS adequacy.</p> <p>Because the proposed actions analyzed in this EIS are in various stages of development and have varying timelines for implementation, this EIS has two levels of decisions: programmatic and definitive.</p> <p>Definitive (i.e., specific, project level) decisions will be included in the Record of Decision (ROD) for proposed actions that have sufficient definition to allow detailed EIS analysis of potential discrete impacts. Decisions may incorporate specific measures identified in the analysis to avoid, reduce, or mitigate impacts. This EIS will serve to support the decisions for this class of actions.</p> <p>Programmatic decisions will be included in the ROD for proposed actions that have adequate detail for analysis of a general capability but have flexibility relative to project definition, location, timing, programming, funding, or level of use. Also, actions that are currently not identified for funding of what would take many years to implement may also be decided programmatically. This class of decisions would form the basis for "tiering" future environmental analyses once actions are more fully defined or are closer to the time of implementation.</p> <p>For this definitive proposed action, the rating will be taken into consideration in providing additional information, choosing a preferred alternative, and preparing mitigations.</p>
G0027-5	Action: Expand Restricted Area R-2205; Rating: EC [Environmental Concerns]; Justification: Potentially moderate impacts to noise, air and land use, hazardous waste, and multiple socioeconomic resources.	<p>This comment is duly noted. The Army and Air Force have reviewed the U.S. Environmental Protection Agency's (EPA's) ratings for environmental</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>impact of the proposed actions and Draft EIS adequacy.</p> <p>Because the proposed actions analyzed in this EIS are in various stages of development and have varying timelines for implementation, this EIS has two levels of decisions: programmatic and definitive.</p> <p>Definitive (i.e., specific, project level) decisions will be included in the Record of Decision (ROD) for proposed actions that have sufficient definition to allow detailed EIS analysis of potential discrete impacts. Decisions may incorporate specific measures identified in the analysis to avoid, reduce, or mitigate impacts. This EIS will serve to support the decisions for this class of actions.</p> <p>Programmatic decisions will be included in the ROD for proposed actions that have adequate detail for analysis of a general capability but have flexibility relative to project definition, location, timing, programming, funding, or level of use. Also, actions that are currently not identified for funding of what would take many years to implement may also be decided programmatically. This class of decisions would form the basis for "tiering" future environmental analyses once actions are more fully defined or are closer to the time of implementation.</p> <p>For this definitive proposed action, the rating will be taken into consideration in providing additional information, choosing a preferred alternative, and preparing mitigations.</p>
G0027-6	Action: Night Joint Training; Rating: LO [Lack of Objections]; Justification: No or minimal adverse impacts to resources.	<p>This comment is duly noted. The Army and Air Force have reviewed the U.S. Environmental Protection Agency's (EPA's) ratings for environmental impact of the proposed actions and Draft EIS adequacy.</p> <p>Because the proposed actions analyzed in this EIS are in various stages of development and have varying timelines for implementation, this EIS has two levels of decisions: programmatic and definitive.</p> <p>Definitive (i.e., specific, project level) decisions will be included in the Record of Decision (ROD) for proposed actions that have sufficient definition to allow detailed EIS analysis of potential discrete impacts. Decisions may incorporate specific measures identified in the analysis to avoid, reduce, or mitigate impacts. This EIS will serve to support the</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>decisions for this class of actions.</p> <p>Programmatic decisions will be included in the ROD for proposed actions that have adequate detail for analysis of a general capability but have flexibility relative to project definition, location, timing, programming, funding, or level of use. Also, actions that are currently not identified for funding of what would take many years to implement may also be decided programmatically. This class of decisions would form the basis for "tiering" future environmental analyses once actions are more fully defined or are closer to the time of implementation.</p> <p>For this definitive proposed action, the rating will be taken into consideration in providing additional information, choosing a preferred alternative, and preparing mitigations.</p>
G0027-7	<p>Action: Unmanned Aerial Vehicle Access; Rating: EC [Environmental Concerns]; Justification: Potentially serious impacts to airspace use and aviation safety.</p>	<p>This comment is duly noted. The Army and Air Force have reviewed the U.S. Environmental Protection Agency's (EPA's) ratings for environmental impact of the proposed actions and Draft EIS adequacy.</p> <p>Because the proposed actions analyzed in this EIS are in various stages of development and have varying timelines for implementation, this EIS has two levels of decisions: programmatic and definitive.</p> <p>Definitive (i.e., specific, project level) decisions will be included in the Record of Decision (ROD) for proposed actions that have sufficient definition to allow detailed EIS analysis of potential discrete impacts. Decisions may incorporate specific measures identified in the analysis to avoid, reduce, or mitigate impacts. This EIS will serve to support the decisions for this class of actions.</p> <p>Programmatic decisions will be included in the ROD for proposed actions that have adequate detail for analysis of a general capability but have flexibility relative to project definition, location, timing, programming, funding, or level of use. Also, actions that are currently not identified for funding of what would take many years to implement may also be decided programmatically. This class of decisions would form the basis for "tiering" future environmental analyses once actions are more fully defined or are closer to the time of implementation.</p> <p>For this definitive proposed action, the rating will be taken into consideration</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>in providing additional information, choosing a preferred alternative, and preparing mitigations.</p>
G0027-8	<p>Action: Enhanced Ground Maneuver Space; Rating: EO [Environmental Objections]; Justification: Potentially serious impacts to aquatic, physical, and biological resources.</p>	<p>This comment is duly noted. The Army and Air Force have reviewed the U.S. Environmental Protection Agency's (EPA's) ratings for environmental impact of the proposed actions and Draft EIS adequacy.</p> <p>Because the proposed actions analyzed in this EIS are in various stages of development and have varying timelines for implementation, this EIS has two levels of decisions: programmatic and definitive.</p> <p>Definitive (i.e., specific, project level) decisions will be included in the Record of Decision (ROD) for proposed actions that have sufficient definition to allow detailed EIS analysis of potential discrete impacts. Decisions may incorporate specific measures identified in the analysis to avoid, reduce, or mitigate impacts. This EIS will serve to support the decisions for this class of actions.</p> <p>Programmatic decisions will be included in the ROD for proposed actions that have adequate detail for analysis of a general capability but have flexibility relative to project definition, location, timing, programming, funding, or level of use. Also, actions that are currently not identified for funding of what would take many years to implement may also be decided programmatically. This class of decisions would form the basis for "tiering" future environmental analyses once actions are more fully defined or are closer to the time of implementation.</p> <p>For this definitive proposed action, the rating will be taken into consideration in providing additional information, choosing a preferred alternative, and preparing mitigations.</p>
G0027-9	<p>Action: Tanana Flats Training Area Roadway Access; Rating: EO [Environmental Objections]; Justification: Potentially serious impacts to aquatic, physical, and biological resources.</p>	<p>This comment is duly noted. The Army and Air Force have reviewed the U.S. Environmental Protection Agency's (EPA's) ratings for environmental impact of the proposed actions and Draft EIS adequacy.</p> <p>Because the proposed actions analyzed in this EIS are in various stages of development and have varying timelines for implementation, this EIS has two levels of decisions: programmatic and definitive.</p> <p>Definitive (i.e., specific, project level) decisions will be included in the Record of Decision (ROD) for proposed actions that have sufficient</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>definition to allow detailed EIS analysis of potential discrete impacts. Decisions may incorporate specific measures identified in the analysis to avoid, reduce, or mitigate impacts. This EIS will serve to support the decisions for this class of actions.</p> <p>Programmatic decisions will be included in the ROD for proposed actions that have adequate detail for analysis of a general capability but have flexibility relative to project definition, location, timing, programming, funding, or level of use. Also, actions that are currently not identified for funding of what would take many years to implement may also be decided programmatically. This class of decisions would form the basis for "tiering" future environmental analyses once actions are more fully defined or are closer to the time of implementation.</p> <p>For this definitive proposed action, the rating will be taken into consideration in providing additional information, choosing a preferred alternative, and preparing mitigations.</p>
G0027-10	Action: Joint Air-Ground Integration Complex; Rating: EC [Environmental Concerns]; Justification: Potentially serious impacts to physical and biological resources.	<p>This comment is duly noted. The Army and Air Force have reviewed the U.S. Environmental Protection Agency's (EPA's) ratings for environmental impact of the proposed actions and Draft EIS adequacy.</p> <p>Because the proposed actions analyzed in this EIS are in various stages of development and have varying timelines for implementation, this EIS has two levels of decisions: programmatic and definitive.</p> <p>Definitive (i.e., specific, project level) decisions will be included in the Record of Decision (ROD) for proposed actions that have sufficient definition to allow detailed EIS analysis of potential discrete impacts. Decisions may incorporate specific measures identified in the analysis to avoid, reduce, or mitigate impacts. This EIS will serve to support the decisions for this class of actions.</p> <p>Programmatic decisions will be included in the ROD for proposed actions that have adequate detail for analysis of a general capability but have flexibility relative to project definition, location, timing, programming, funding, or level of use. Also, actions that are currently not identified for funding of what would take many years to implement may also be decided programmatically. This class of decisions would form the basis for "tiering" future environmental analyses once actions are more fully defined or are</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>closer to the time of implementation.</p> <p>For this definitive proposed action, the rating will be taken into consideration in providing additional information, choosing a preferred alternative, and preparing mitigations.</p>
G0027-11	<p>Action: Intermediate Staging Bases; Rating: EC [Environmental Concerns]; Justification: Potentially serious impacts to physical and biological resources.</p>	<p>This comment is duly noted. The Army and Air Force have reviewed the U.S. Environmental Protection Agency’s ratings for environmental impact of the proposed actions and Draft EIS adequacy.</p> <p>Because the proposed actions analyzed in this EIS are in various stages of development and have varying timelines for implementation, this EIS has two levels of decisions: programmatic and definitive.</p> <p>Definitive (i.e., specific, project level) decisions will be included in the Record of Decision (ROD) for proposed actions that have sufficient definition to allow detailed EIS analysis of potential discrete impacts. Decisions may incorporate specific measures identified in the analysis to avoid, reduce, or mitigate impacts. This EIS will serve to support the decisions for this class of actions.</p> <p>Programmatic decisions will be included in the ROD for proposed actions that have adequate detail for analysis of a general capability but have flexibility relative to project definition, location, timing, programming, funding, or level of use. Also, actions that are currently not identified for funding of what would take many years to implement may also be decided programmaticaly. This class of decisions would form the basis for "tiering" future environmental analyses once actions are more fully defined or are closer to the time of implementation.</p> <p>For this definitive proposed action, the rating will be taken into consideration in providing additional information, choosing a preferred alternative, and preparing mitigations.</p>
G0027-12	<p>Action: Missile Live Fire for AIM-9 and AIM-120 in the Gulf of Alaska; Rating: LO [Lack of Objections]; Justification: No or minimal adverse impacts to resources.</p>	<p>This comment is duly noted. The Army and Air Force have reviewed the U.S. Environmental Protection Agency’s ratings for environmental impact of the proposed actions and Draft EIS adequacy.</p> <p>Because the proposed actions analyzed in this EIS are in various stages of development and have varying timelines for implementation, this EIS has two</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>levels of decisions: programmatic and definitive.</p> <p>Definitive (i.e., specific, project level) decisions will be included in the Record of Decision (ROD) for proposed actions that have sufficient definition to allow detailed EIS analysis of potential discrete impacts. Decisions may incorporate specific measures identified in the analysis to avoid, reduce, or mitigate impacts. This EIS will serve to support the decisions for this class of actions.</p> <p>Programmatic decisions will be included in the ROD for proposed actions that have adequate detail for analysis of a general capability but have flexibility relative to project definition, location, timing, programming, funding, or level of use. Also, actions that are currently not identified for funding of what would take many years to implement may also be decided programmatically. This class of decisions would form the basis for "tiering" future environmental analyses once actions are more fully defined or are closer to the time of implementation.</p> <p>For this definitive proposed action, the rating will be taken into consideration in providing additional information, choosing a preferred alternative, and preparing mitigations.</p>
G0027-13	Action: Joint Precision Airdrop System Drop Zones; Rating: EC [Environmental Concerns]; Justification: Potentially serious impacts to socioeconomic resources.	<p>This comment is duly noted. The Army and Air Force have reviewed the U.S. Environmental Protection Agency's ratings for environmental impact of the proposed actions and Draft EIS adequacy.</p> <p>Because the proposed actions analyzed in this EIS are in various stages of development and have varying timelines for implementation, this EIS has two levels of decisions: programmatic and definitive.</p> <p>Definitive (i.e., specific, project level) decisions will be included in the Record of Decision for proposed actions that have sufficient definition to allow detailed EIS analysis of potential discrete impacts. Decisions may incorporate specific measures identified in the analysis to avoid, reduce, or mitigate impacts. This EIS will serve to support the decisions for this class of actions.</p> <p>Programmatic decisions will be included in the ROD for proposed actions that have adequate detail for analysis of a general capability but have flexibility relative to project definition, location, timing, programming,</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>funding, or level of use. Also, actions that are currently not identified for funding of what would take many years to implement may also be decided programmatically. This class of decisions would form the basis for "tiering" future environmental analyses once actions are more fully defined or are closer to the time of implementation.</p> <p>For this definitive proposed action, the rating will be taken into consideration in providing additional information, choosing a preferred alternative, and preparing mitigations. closer to the time of implementation.</p> <p>For this programmatic proposed action, the rating will be taken into consideration in providing additional information for tiered future environmental analyses.</p>
G0027-14	<p>We have given the EIS an overall adequacy rating of "2" (Insufficient Information). Generally our impacts (alpha) rating is based on our concerns regarding potential impacts to water quality and aquatic habitats, noise receptors, air quality, subsistence, and other socioeconomic factors, such as safety and other adverse impacts to the private aviation community. Our adequacy rating is based on the concerns we have with the criteria used for the "subsistence community" analysis, additional information needed for direct and cumulative impacts analysis, and lack of use of monitoring data from previous projects (e.g. 1997 Alaska MOA EIS) to help inform this EIS. We recognize the need for the transition to different training activities to fully meet the training and testing requirements for forces and activities in and near Alaska. We also recognize, however, that an increase and expansion of military training activities and areas will result in additional impacts to surrounding communities, users, and resources.</p>	<p>This comment is duly noted. The Army and Air Force have reviewed the U.S. Environmental Protection Agency's ratings for environmental impact of the proposed actions and Draft EIS adequacy. For each proposed action, those ratings will be taken into consideration in providing additional information, choosing a preferred alternative and preparing mitigations.</p> <p>An emphasis on Alaska Native culture was made in the impact analysis methodology, because of the central role subsistence plays in that culture. Alaska Native communities are likely to have higher sensitivity to any impact, due to reduced employment opportunities and increased economic importance of harvest and considerations of the social/cultural effects due to potential disruption in subsistence. It is not meant to downplay the importance of subsistence to rural non-Native residents. Community ranking is used to determine the significance of any potential impacts. The subsistence analysis in the Final EIS has been updated to note that communities with more than 80 percent of the population participating in subsistence activities are ranked as having a high dependence on subsistence resources, as suggested in the comment.</p>
G0027-15	<p>We recommend that ALCOM continue to work closely with potentially impacted stakeholders (general and commercial aviation owners and groups, tribal governments, land owners, subsistence and sport hunting groups and resource managers) to identify ways to further avoid, minimize, and mitigate adverse impacts, particularly in the resource areas of aviation safety and subsistence.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0027-16	<p>We also specifically recommend that ALCOM work closely with our agency, as well as the Alaska Department of Conservation, to further minimize potential impacts to physical and biological resources from air emissions and noise, the generation of hazardous wastes, and discharges into waters of the U.S. Discharges and Hazardous Wastes.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
G0027-17	<p>We are particularly concerned about possible discharge of live munitions into aquatic environments. Depending on the constituents of the munitions, adverse and potentially lethal impacts, such as those seen at Joint Base Elmendorf-Richardson Eagle River Flats, could occur.</p> <p>We recommend that for required live firing training, every effort be made to discharge munitions that do not contain white phosphorus or other constituents that could cause increased mortality in waterfowl similar to what was occurring at Eagle River Flats. Wastewater discharges associated with construction stormwater are included in the discussions of several proposed actions. There does not appear to be discussion of the discharge of</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	munitions, which are also regulated under the National Pollutant Discharge Elimination System. This permit program is scheduled to be transferred from the EPA to the State of Alaska on October 31, 2012, as part of the Phase IV transfer of the Alaska Pollutant Discharge Elimination System. For more information about program transfer, please see the Alaska Pollutant Discharge Elimination System website at http://dec.alaska.gov/water/APDES/phaseIVextension.html .	impacts and locations of the proposals in this EIS. Prior to implementing any of the programmatic proposals considered in this EIS that could expand training (e.g., higher intensity levels of training, or broader types of training and expanded use of the training areas), proponents would undertake further evaluation and an appropriate level of NEPA analysis, permitting, and agency coordination. The discharge of munitions containing white phosphorus as a constituent is not proposed.
G0027-18	We also recommend that the final EIS include, as applicable, a discussion of Spill Prevention, Control and Countermeasure Plans and Facility Response Plans, as required by the Clean Water Act and the Oil Pollution Act of 1990.	None of the six definitive proposals include construction of facilities that require a Spill Prevention, Control, and Countermeasure Plan and Facility Response Plan.
G0027-19	Finally, we recommend that the final EIS provide detailed information regarding the anticipated types of hazardous wastes that will be generated as part of the proposed action, how the wastes will be managed, and the plans for disposal in accordance with federal, state and local requirements. The EPA regulates hazardous wastes under Subtitle C of the Resource Conservation and Recovery Act.	Each proposal in Chapter 3 contains a detailed analysis regarding hazardous materials and waste (Sections 3.1.7, 3.2.7, 3.3.7, 3.4.7, 3.5.7, 3.6.7, 3.7.7, 3.8.7, 3.9.7, 3.10.7, 3.11.7, 3.12.7). Also, Appendix J, Hazardous Materials, lists the ordnance items and quantities projected to be used as part of range operations for each of the proposed actions. Appendix B, Definition of the Resources and Regulatory Settings, details the Department of Defense’s regulatory programs for dealing with hazardous materials and waste, along with general descriptions of the affected environments and munitions-related residue.
G0027-20	To address impacts to subsistence, we recommend further coordination with the Alaska Department of Fish and Game Subsistence Division and Board of Fisheries as well as Federal Subsistence Board to determine if additional measures (such as timing windows, higher minimum altitude) would substantially reduce the potential impacts identified in the EIS, particularly from FOX 3 MOA Expansion, New Paxson MOA and Realistic Live Ordnance Delivery proposed actions.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0027-21	To address the potentially serious impacts to aviation and aviation safety, we encourage you to continue working with commercial and general aviation groups as well as individual owners and operators, and the Airports Divisions within ADOT and FAA to determine if additional avoidance,	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>minimization, or mitigation measures can further reduce impacts, particularly to aviation safety. As identified in the EIS, general and small commercial aviation are critical modes of transportation for communities in rural Alaska, including those identified in the project area. For residents in these communities and in more remote locations, effective communication regarding training activities is often difficult. If information regarding the occurrence and scheduling of such activities is not received by the private operators, or is not timely, safety can be seriously compromised. Therefore, we recommend that work be done to ensure the current effectiveness of the existing Special Use Airspace Information Service that is currently used to inform civilian pilots when MOA and restricted areas are activated. If this information is currently available it should be included in the final EIS. If it is not, we recommend that a study be undertaken to determine its effectiveness. If deficiencies are identified, we recommend that improvements be implemented, preferably before the signing of the Record of Decision.</p>	<p>comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will seek funds, as available, to expand and improve the SUAIS as a recommended and proven method for managing military and civilian air operations. The Final EIS specifies other mitigations for providing safe access and use of airspace for civilian air operations.</p> <p>The Air Force will implement mitigations specified by the FAA as part of their approval of the proposed airspace actions.</p>
G0027-22	<p>We recommend that coordination with the Federal Energy Regulatory Commission occur to ensure that the most current proposed activities associated with the Susitna-Watana Hydroelectric Project are considered in the cumulative impacts analysis in the final EIS.</p>	<p>Revisions in the Final EIS include changes addressing concerns or additional information provided in this comment. The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
G0027-23	<p>To improve readability, we recommend a detailed table outlining alternatives for each proposed action and a detailed discussion regarding each alternative by resource. We recognize that such a table with "averaged" impacts is currently included in the Executive Summary, but it is important that the EIS present the "sharp contrast" between alternatives. While the narrative in the effects section does this to a certain extent, a detailed table would be helpful to readers to visually present the information.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Draft EIS was written to be technically accurate and as understandable to the extent practicable, given the number of proposals and complexity of the subject matter. The Army and Air Force strived to translate technical data into terms that render it an effective disclosure of the environmental impacts of the proposals to all intended readership, including the general public, government agencies, and other organizations. The Executive Summary was designed to provide those statistics and summary information that members of the public would be most interested in. The</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>structure of the Draft EIS is presented in the first few pages of the EIS in order to give the reader an indication of specific issues addressed and overall organization. A description (including location) of all the proposed actions and alternatives and their locations is provided in Chapter 2 of the EIS. Finally, an index is provided at the end of the EIS so a reader may locate specific phrases or subjects of interest.</p> <p>The Final EIS will include a table outlining alternatives for each proposed action, including an accompanying discussion for each alternative by resource or impact area to present the "sharp contrast" between alternatives.</p>
G0027-24	<p>We also expect that the final EIS will contain much greater detail regarding aspects such as the locations of facilities, access roads, numbers of aircraft, and estimated acres of impact, as well as discussion of the potential impacts associated with proposed structures and project activities.</p>	<p>Because the proposed actions analyzed in this EIS are in various stages of development and have varying timelines for implementation, this EIS has two levels of decisions: programmatic and definitive.</p> <p>Definitive (i.e., specific, project level) decisions will be included in the Record of Decision (ROD) for proposed actions that have sufficient definition to allow detailed EIS analysis of potential discrete impacts. Decisions may incorporate specific measures identified in the analysis to avoid, reduce, or mitigate impacts. This EIS will serve to support the decisions for this class of actions.</p> <p>Programmatic decisions will be included in the ROD for proposed actions that have adequate detail for analysis of a general capability but have flexibility relative to project definition, location, timing, programming, funding, or level of use. Also, actions that are currently not identified for funding of what would take many years to implement may also be decided programmatically. This class of decisions would form the basis for "tiering" future environmental analyses once actions are more fully defined or are closer to the time of implementation.</p>
G0027-25	<p>We are particularly interested in the quality, acreage and functions of waters of the U.S. that will be impacted by the discharge of dredged or fill material, and wastewater discharges. We request that for specific proposals where it is appropriate or feasible, a draft Clean Water Act 404(b)(1) analysis be drafted and included as an appendix to the final EIS. By including this analysis for project-specific EISs, permitting decisions under Section 404 can be coordinated with other agency decisions, including the consideration of whether the proposed discharge would represent the least environmentally damaging practicable alternative.</p>	<p>None of the six definitive proposals include waters impacted by the discharge of dredged or fill material and wastewater discharges and, thus, do not require Clean Water Act 404(b)(1) analysis.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
G0027-26	Currently the criteria being used for the subsistence community analysis appears to be based on an arbitrary racial composition, and it seems to discount the common practice of rural Alaskan residents to rely on subsistence resources. Other factors that contribute to this reliance are proximity to food stores and U.S. Post Offices. We recommend that these additional components be considered for the subsistence analysis in the final EIS. If the final EIS relies on the current criteria, we recommend that the document include a discussion of the basis for these criteria.	An emphasis on Alaska Native culture was made in the impact analysis methodology because of the central role subsistence plays in that culture. Alaska Native communities are likely to have higher sensitivity to any impact, due to reduced employment opportunities and increased economic importance of harvest and considerations of the social/cultural effects due to potential disruption in subsistence. It is not meant to downplay the importance of subsistence to rural non-Native residents. Community ranking is used to determine the significance of any potential impacts. The subsistence analysis in the Final EIS has been updated to note that communities with more than 80 percent of the population participating in subsistence activities are ranked as having a high dependence on subsistence resources, as suggested in the comment.
G0027-27	Mitigation and Monitoring We appreciate the inclusion of Appendix K, Mitigations, Best Management Practices, and Standard Operating Procedures. We request that the final EIS include avoidance and mitigation measures (e.g. restrictions to avoid lambing, buffers along Wild and Scenic corridors) identified by the Bureau of Land Management, Alaska Department of Fish and Game, and other agencies responsible for the protection and conservation of public resources in previous and more recent correspondence in response to scoping and review of the draft EIS. We also recommend that additional information be included in the final EIS to clearly distinguish between those mitigation measures that ALCOM has the authority to implement, and those which it cannot and thus, would require the involvement of other agencies to execute them. We believe this information would be consistent with CEQ's Guidance, Appropriate Use of Mitigation and Monitoring and Appropriate Use of Findings of No Significant Impact, issued in January 2011 (http://ceq.hss.doe.gov/current-developments/docs/Mitigation and Monitoring Guidance 14Jan2011.pdf).	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The proponent is coordinating with other land and resource management agencies to acquire best available data for planning mitigations and avoidance procedures. These will reduce effects of aircraft overflight and noise on sensitive wildlife locations and human activities. The decisionmakers will consider all available information prior to making a decision.</p> <p>The Air Force and USAG-FWA will consult with the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas not covered under past mitigations. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>
G0027-28	Finally, and also in line with the mitigation guidance, we recommend that a	The JPARC proponents have carefully considered a variety of alternatives

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	draft adaptive management plan be identified and included in the final EIS to monitor and ensure the success of future mitigation efforts.	and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
G0027-29	Again, we appreciate the opportunity to offer comments on the draft EIS and look forward to working with ALCOM on addressing the issues we have identified for the Final EIS. Please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or curtis.jennifer@epa.gov, with any questions you have regarding our comments.	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments have been duly noted and responses provided, as applicable.
G0028-1	Please "Take No Action" and leave the MOA "as is".	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
G0028-2	Flying in Alaska is hard enough with the unpredictable weather, mountains and an abundance of MOA and restricted areas.	The Army and Air Force concur as flight safety is of utmost importance to the military for all military and nonparticipating aircraft operating within the same airspace environment. For that reason, the mitigations being considered for the Final EIS are to help achieve the safe, compatible use of the airspace under consideration.
T0001-1	I am writing this letter to you in order to continue the open communication that we established when we previously met in your office in February 2011. Our Tribal citizens have recently expressed concerns about the US Air Force's airplanes in our area and we have several questions:	As described in EIS Section 1.6.5, Government-to-Government Consultation, opportunities exist both as part of the NEPA process and as required by Executive Orders and guidance for tribes to participate in government-to-government consultation and other outreach efforts. In your letter of 21 May 2012 you posed three questions regarding military aircraft. We have thoroughly researched these questions and provide the following answers. Since the first two questions were not geographically focused we must apologize for the length and complexity of the answers. Question: What are the Air Force's lateral boundaries along the river valleys? If your limit is 5,000 feet from ground level, how close are you allowed to be

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>next to a mountain when you are flying in a valley?</p> <p>Military aviation is required to comply with both Federal Aviation Regulations (FAR) established by the Federal Aviation Administration (FAA) and specific service limitations. In cases where the regulatory guidance contradicts, military pilots are required to use the more restrictive guidance. In all cases, these rules apply not only to military operations (both inside and outside of Military Operations Areas, or MOAs), but to all aviation operations in the National Airspace Structure. These are federally mandated guidelines that apply to both civilian and military aircraft. Regarding minimum altitudes and operations near adjoining terrain, the FAR require pilots to comply with the following guidelines:</p> <p>(a) Anywhere. An altitude allowing, if a power unit fails, an emergency landing without undue hazard to persons or property on the surface.</p> <p>(b) Over congested areas. Over any congested area of a city, town, or settlement, or over any open-air assembly of persons, an altitude of 1,000 feet above the highest obstacle a horizontal radius of 2,000 feet of the aircraft.</p> <p>(c) Over other than congested areas. An altitude of 500 feet above the surface, except over open water or sparsely populated areas. In those cases, the aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure.</p> <p>(d) Helicopters. Helicopters may be operated at less than the minimum altitudes prescribed in paragraph (b) or (c) of this section if the operation is conducted without hazard to persons or property on the surface. In addition, each person operating a helicopter shall comply with any routes or altitudes specifically prescribed for helicopters by the FAA Administrator.</p> <p>As described in the preceding guidance, the requirement in “other than congested areas” is to remain 500 feet away from any person, vessel, vehicle, or structure. Applied to the original question, if operating at 5,000 feet above ground level (AGL) in a MOA, Air Force pilots are within guidance to operate at 500 feet away from any adjoining ridgeline/mountain with persons, vessels, vehicles, or structure on it, provided they maintain a minimum of 5,000 feet above the underlying terrain. If none of those features are present, there is no prescribed minimum required distance, other than that which provides for safe operation of the aircraft.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>Question: Is the Air Force allowed to fly lower than 5,000 feet if you are flying at a slower speed?</p> <p>The 5,000-foot minimum altitude applies only to operations conducted within SOME of the existing MOAs within Alaska. There are several MOAs in which operations may be conducted at less than 5,000 feet AGL. Aircraft which operate at 250 knots or less below 10,000 feet may conduct training outside of a MOA, but must continue to follow the same “see-and-avoid” visual flight rules (VFR) that apply to all aircraft, civilian or military. Additionally, aircraft that are required to operate at airspeeds above 250 knots in order to maintain safe minimum airspeed (for example, most fighter aircraft have a minimum navigation airspeed of 300 knots) may operate under VFR at these higher airspeeds below 10,000 feet. These operations remain legal in the National Airspace Structure under the FARs governing VFR operations.</p> <p>In general, aircraft which routinely operate below 250 knots, below 10,000 feet, and are not performing acrobatic maneuvers will not require a MOA. Examples for Alaska-based aircraft include C-130s, C-17s, and helicopters. Aircraft that operate above 250 knots, below 10,000 feet, and are performing acrobatic-type maneuvers require a MOA. If these aircraft are NOT performing acrobatic maneuvers and are navigating from point to point, they must fly at their minimum safe airspeed (as indicated in the specific aircraft’s flight manual) and comply with all other FARs regarding VFR operations.</p> <p>Question: Is the Air Force currently flying or are you planning to fly unmanned aircraft in the Matanuska watershed area?</p> <p>The U.S. Air Force does not currently operate unmanned aerial vehicles (UAVs) in the Matanuska watershed area, but the U.S. Army does so just outside the Matanuska watershed overlying portions of Joint Base Elmendorf-Richardson. The current proposals in the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement EIS involve expansions to UAV use north of, but not in, the Matanuska watershed. Transit corridors would link Eielson AFB, Fort Wainwright, and Allen Army Airfield with Restricted Areas R-2202, R-2205, and R-2211 overlying the Donnelly Training Area, Yukon Training Area, and Blair Lakes Impact area, respectively. It would also allow for UAV transit between the Restricted Areas, as well as to the proposed new restricted airspace over the Battle Area</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>Complex near Fort Greeley. The corridors are proposed to support both U.S. Army and U.S. Air Force UAVs participating in training and exercises within the JPARC.</p> <p>These transit corridors are required as a means of moving the systems in controlled airspace until such time as the FAA fully defines the requirements for operating UAVs in the National Airspace Structure. Once the FAA defines those requirements, operations throughout the JPARC, potentially including areas in the Matanuska watershed, could occur as long as the systems are compliant with the regulations and requirements defined by the FAA. Operations that involve "unseen hazards," such as laser designation of surface targets or aerial employment of munitions, would still be required to take place in a restricted airspace such as those listed above.</p>
T0001-2	<p>What are the Air Force's lateral boundaries along the river valleys? If your limit is 5,000 feet from ground level, how close are you allowed to be next to a mountain when you are flying in a valley?</p>	<p>The Air Force has no general altitude restriction with "lateral boundaries along the river valleys." Designated wild and scenic rivers and some wildlife-sensitive river areas are currently avoided by 1,000 to 2,000 feet vertically and 0.5 to 2 miles laterally, depending on the resource being protected. Appendix D of this EIS lists the existing noise-sensitive areas.</p> <p>As an aircraft moves away from the center of a valley, a climb is required to always be the minimum altitude from the terrain directly below it. Where the floor is 5,000 feet above ground level (AGL), the Air Force uses sector altitudes that keep aircraft 5,000 feet above the highest terrain in that sector. A nearly vertical cliff greater than 5,000 feet would be required to fly close to the ridge or canyon rim and still be above the military operations area (MOA) floor.</p>
T0001-3	<p>Is the Air Force allowed to fly lower than 5,000 feet if you are flying at a slower speed?</p>	<p>Assuming the question is referring to a military operations area (MOA) floor of 5,000 feet above ground level (AGL), the answer is yes. Outside of a MOA or other special use airspace, aircraft must comply with FAA regulations for speed. Fighters routinely return to their bases at altitudes below the floors of the MOAs and may be at speeds around 300 knots (FAA waiver). Cargo aircraft fly in Alaska as low as 300 feet in sparsely populated areas and do not require MOAs; their speed will be 250 knots or less.</p> <p>Alternatively, there are 10 military training routes (MTR) in Alaska that allow high-speed flight as low as 100 feet AGL. These are all marked on sectionals and the nearest Flight Service Station (FSS) can tell pilots if an MTR is in use or scheduled to be.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
T0001-4	Is the Air Force currently flying or are you planning to fly unmanned aircraft in the Matanuska Watershed area?	The Air Force occasionally flies unmanned aerial vehicles (UAVs) in Alaska. The FAA only allows their use in Restricted Areas or Class A airspace and above FL600. The Army flies UAVs extensively and is bound by the same airspace restrictions. To go between runways and usable airspace, the FAA issues Certificates of Authorization (COAs) for UAVs. The JPARC EIS includes a proposal for UAV corridors to replace the need for the COAs. These corridors are all proposed around the Restricted Areas R-2202, R-2205, and R-2211. There is no proposal or current need for UAV flying in the Matanuska watershed area.
T0001-5	I look forward to your response. If you have any questions or need clarification, you can all me at xxx-xxx-xxx. I look forward to working with you. May Creator Guide Our Footsteps, /Doug Wade/ Doug Wade Chairman	See detailed reply in T0001-1. Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of the Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
T0002-1	Department of Defense Instruction No. 4710.02, and Executive Order 13175 provides for a protocol and process for meeting and consultation on the development of policies that have implications upon tribes. The Knik Tribal Council formally requests government to government consultations in addressing the tribe's concerns and interests regarding the proposed military operational area expansion to the Joint Pacific Alaska Range Complex.	A reply was sent back to the tribe scheduling the requested meeting.
T0002-2	The Knik Tribal Council has specific concern with the effect of the proposed undertaking upon the tribe's cultural and subsistence resources within the Fox 3 MOA, the Fox 3 MOA Expansion, and the Paxson MOA. The tribe cannot support the proposed expansion without first having the opportunity to participate directly in determining the extent of the project's impact upon the tribe, its lands and the resources that it depends upon. The wildlife in the proposed areas is of significant importance to the tribe and it is our contention that increased military training exercises would impact the migration, production and continued sustainability of the tribe's wildlife resources in these areas.	Potential impacts to subsistence resources and activities from the proposed Fox 3 MOA and new Paxon MOA are evaluated in Section 3.1.13. Where potentially adverse impacts are identified, proposed mitigations are provided in Section 3.1.13.4. The mitigations will continue to be assessed during the Final EIS preparation process. They will be finalized after the preferred alternatives for each definitive proposal are selected by the Army and Navy. Additional concerns can be discussed and coordinated in further consultation efforts we have scheduled with the Knik Tribal Council.
T0002-3	The Knik Tribal Council has specific concern with the effect of the proposed undertaking upon the tribe's cultural and subsistence resources within the Fox 3 MOA, the Fox 3 MOA Expansion, and the Paxson MOA. The tribe	A reply was sent back to the tribe scheduling the requested meeting.

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	cannot support the proposed expansion without first having the opportunity to participate directly in determining the extent of the project's impact upon the tribe, its lands and the resources that it depends upon.	
T0002-4	<p>We are asking to be directly involved in mitigation efforts involving the monitoring of impact to wildlife and how the tribe can participate, both in gathering and collecting the data and information; and in developing the conclusions and findings on the implications to the tribe.</p> <p>Please work with Richard Porter, Knik Tribal Council Executive Director in implementing our request. His contact information is below.</p>	A reply was sent back to the tribe scheduling the requested meeting.
N0001-1	<p>The Alaskan Aviation Safety Foundation (AASF) respectfully requests an extension of the comment period for submitting comments on the Draft Environmental Impact Statement (DEIS) on the Joint Pacific Alaska Range Complex public noticed on March 30, 2012. We request a total comment period of 120 days from the date of the public notice. The National Environmental Policy Act (NEPA) sets forth specific guidelines and requirements for preparing environmental documents and setting time lines for the public to respond. 40 CFR (§) 1502.7 suggests a final EIS should consist of 150 pages, and proposals of unusual scope or complexity shall normally be less than 300 pages. We expect that this draft document is approximately the same length as we should anticipate for the final. The page count is defined in §1502.10. My computer tells me the JPARC DEIS is 655 pages for the pages meeting the definition in §1502.10 d through g. We also note that the total document including appendices is 1,394 pages. §1506.10 (c) says that the comment period should be not less than 45 days on draft statements, and can be extended to accommodate public comments. The AASF feels that a short extension to 120 days total is reasonable and will not adversely affect the USAF decision making process or schedule. The AASF has tried to assemble comments before the published June 7, 2012 deadline, but find that our volunteers will not be able to meet that deadline. We therefore find it necessary to request a further extension in order to provide meaningful comments. USAF staffs have already publicly acknowledged that this is a complex document, and our volunteers can concur. The Congress of Environmental Quality (CEQ) has offered informal guidance that agencies should offer the public every opportunity to provide comments in order to help agencies such as the USAF to make better decisions. The AASF sincerely hopes that the USAF decision makers concur. Thank you for your consideration, and we look forward to your</p>	<p>Given the feedback provided during the public hearings and Draft EIS review process, the U.S. Army and U.S. Air Force, on behalf of ALCOM, extended the Draft EIS comment period from 70 days to 102 days. This extension took place on May 31, 2012. The comment period, originally scheduled to close on June 7, 2012, was extended to July 9, 2012. The proponents of the proposals considered the extension carefully in an effort to balance military training requirements with the importance of ensuring adequate time for citizens and organizations to thoroughly review the Draft EIS.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	favorable response.	
N0002-1	I work as a Vice President at Cook Inlet Region, Incorporated. Our company calls itself CIRI. We are the regional Alaska Native corporation for Southcentral Alaska headquartered here in Anchorage. We also are delegated the tribal authority for the Anchorage region. In general our company has had an opportunity to review the Joint Pacific Alaska Range Complex proposal and Draft EIS.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of the Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0002-2	We believe that the Joint Pacific Alaska Range Complex allows for unprecedented training opportunities for our war fighters that are not found in any other region of the United States and we encourage the development of the JPARC process.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0002-3	We think that in terms of the work done to date with regard to the six definitive proposals they have adequately addressed the specificity, dependence, definition and ripeness requirements of the EIS and in particular with regard to the programmatic proposals we strongly support programmatic proposal eight, nine and 10 which deal with the proposed Tanana Flats training area roadway access, the proposed joint air ground integration complex and the proposed intermediate staging bases.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0002-4	In reviewing the anticipated environmental impacts from the JPARC proposal we are happy to see that there is determined to be little impact on the subsistence uses of the affected areas. Subsistence is very important to the Alaska Native people and the ability to access those resources which have been the resources of our people for thousands of years should be maintained and not impacted by the JPARC proposal.	Thank you for your review of the Draft EIS. Section B.13.1 of the Draft EIS acknowledges that subsistence plays a vital role in the lifestyles of Alaska residents, particularly rural residents and the Alaska Native culture, and is a unique characteristic of life in Alaska.
N0002-5	Additionally, I think that with regard to the socio and economic impacts of the JPARC proposal that the Department of Defense should also consider not just the adverse impacts, but the substantial positive impacts that development of particularly the programmatic proposals that I mentioned previously will have for job opportunity and training and workforce development, particularly for our Alaska Native people. Those regions that are going to be affected by the JPARC development are areas of high unemployment where there is little opportunity for work and the work that would be associated with this proposal would be good work for our people.	For proposed actions that involve construction expenditures, such as the Tanana Flats Training Area and the Intermediate Staging Bases proposed actions, there is the potential for positive economic impacts to local employment from the use of local labor and supplies. These particular proposed actions are programmatic future actions, and construction expenditures are not available at this time to estimate the actual impacts to employment from these actions. For those proposed actions that do not involve personnel changes or additional construction expenditures, no additional employment, training, or workforce development is anticipated.
N0002-6	For all of those reasons Cook Inlet Region, Incorporated, supports this Draft EIS.	Thank you for your comment.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
N0003-1	<p>Facts:</p> <p>I am a combat veteran that understands and appreciates the need for enhanced military training -</p> <p>A half century ago, the military displaced us civilians from the Mt. Hayes Blair Lakes Game Refuge to create a bombing range.</p>	<p>Thank you for your comment. These comments indicate issues that are outside the purview of this EIS, either because they describe current operations or because they describe broader Department of Defense policy decisions. For further assistance with the issue please contact your local base Public Affairs Office or Alaskan Command Public Affairs at (907) 552-2341.</p>
N0003-2	<p>Fox 3 500 AGL</p> <p>I have experienced near-miss situations with A-10s in Iowa Ridge Area -</p> <p>Paxon MOA 500 AGL</p> <p>To create a 500 AGL flight zone, especially in the Paxon MOA, with aircraft much faster than A-10s will be extremely hazardous for local pilot citizens, especially in September.</p> <p>Large waterfowl flocks are also an extreme hazard near Delta Q Delta/Tanana Rivers -</p>	<p>As noted in the FEIS Sections 2.1.1 and 3.1.1, the lower altitudes (below 14,000 feet MSL) within the Paxon MOA would only be used by MFEs during those months of the year when these exercises are conducted, which do not include January, 27 June to 11 July, September, or December. At all other times, routine flight training activities would be conducted at 14,000 feet MSL and above.</p>
N0004-1	<p>Re: AOPA requests for extension of Comment Period for the Draft Environmental Impact Statement for the Joint Pacific Alaska Range Complex</p> <p>To Whom It May Concern,</p> <p>The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 general aviation members nationwide, requests a 60 day extension to the comment period slated to close on June 7, 2012 for the Draft Environmental Impact Statement (DEIS) for the Joint Pacific Alaska Range Complex (JPARC) comment period.</p> <p>Based on AOPA's participation during recent DEIS public meetings and the complexity of concerns raised by both the aviation industry as well as local communities impacted by the JPARC proposed changes, the current 70 day comment period is inadequate to allow for a comprehensive review and public input. The sheer volume and complexity of the JPARC initiative would typically necessitate a minimum of 90 days for the public comment and while recognizing the military's desire to move ahead and remain on schedule, attempting to aggressively move forward without ample public review opportunity seems to negate the true spirit of the National</p>	<p>Given the feedback provided during the public hearings and Draft EIS review process, the U.S. Army and U.S. Air Force, on behalf of ALCOM, extended the Draft EIS comment period from 70 days to 102 days. This extension took place on May 31, 2012. The comment period, originally scheduled to close on June 7, 2012, was extended to July 9, 2012. The proponents of the proposals considered the extension carefully in an effort to balance military training requirements with the importance of ensuring adequate time for citizens and organizations to thoroughly review the Draft EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Environmental Policy Act (NEPA).</p> <p>AOPA strongly suggests the Department of Defense offer an additional 60 days for public review of this complex and lengthy DEIS to ensure the public is offered time to provide substantive comments on the potential consequences of the proposed action. While understanding the desire to adhere to a schedule and budget, there is no substitute for allowing an adequate and thorough public comment period - especially when the DEIS public comment meetings overlapped with a number of already scheduled community events precluding the public from participation at these public meetings.</p> <p>AOPA looks forward to an extension of the comment period to allow for a thorough public review opportunity and to allow the aviation community and public to provide substantive feedback on this complex DEIS.</p>	
<p>N0005-1</p>	<p>I oppose the use of the Fox 3 MOA area for a number of reasons which include the following:</p> <p>1) The area being requested for the Fox 3 is used by a very large amount of people for fishing and hunting recreation, birdwatching, and residents like myself who live in this area on a full-time basis.</p>	<p>Section 3.1.10.1 of the EIS acknowledges that the Fox 3 MOA overlies areas used for recreational activities and would impact recreational use in these areas. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation such as seasonal avoidance areas; expanding the existing Delta National Wild and Scenic River and Gulkana National Wild River to include all portions within the new MOA boundaries; and avoiding overflight of popular hunting areas, campgrounds, and trails between June 27 and July 11. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
<p>N0005-2</p>	<p>This area is easily accesible by people that reside all over the state but many live in close proximity to Anchorage and the Matanuska Valley. It is a popular area for private pilots and small commercial pilots/guides and question the necessity of the additional air space that is being requested.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. As explained in Chapter 1, Purpose and Need for the Proposed Actions, Sections 1.2 and 1.3 of the Draft EIS, the decision on which alternatives the Army and Air Force will pursue will be made in light of the Purpose and Need by Army and Air Force representatives following the review of all relevant facts, impact analyses, mitigations, and comments received via the JPARC EIS public participation process. Additionally, in preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent reasonable and practicable. JPARC is a key attribute of Alaska's value to the military in the twenty-first.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
N0005-3	The necessity of the additional area is questioned and if it is in fact really needed for training area. The Lake Louise tri-lake area is the largest lake system in Alaska which you can drive to and should be preserved for a recreational location for all residents of the state to enjoy. It would make sense to use a more remote area for this training.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force units based within the State of Alaska face an exceptional challenge to meet compelling and increasingly urgent needs borne out of fighting wars. In an era of persistent combat operations, the Army and Air Force need to continue to generate new technologies, learn from battlefield experiences, update tactics, and train intensively to face a committed and agile enemy. Each of these challenges drives the purpose and the need for modernization and enhancements to the range and airspace infrastructure that replicate the modern battlefield for training and testing in Alaska. In preparing the Final EIS the Army and Air Force will make every effort to harmonize mission requirements and community needs so that user conflicts may be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century. The comment to move new fifth-generation fighter training and exercises to other Military Operations Areas (MOAs) in JPARC or more remote areas does not, however, meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Sections 1.2 and 1.3.
N0005-4	Thank you for your consideration in not expanding the air space area. In summary, for the preservation of our tranquil environment, wildlife, and enjoyment of our homes, please do not expand this area for your training.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources.
N0006-1	I operate Copper Valley Air Service here in the basin. Again, the other air taxis around here aren't here so I'm kind of speaking for them. But the MOA low level, we have limited time in the Basin. We got tremendous winter months. We don't see why there should be low level essentially say from the month of June -- or month of May through October when all the revenue is being developed in that four months.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
N0006-2	The expand or have a boundary say from the Denali Highway north, Talkeetna, Richardson Highway, use that -- don't use that in the month -- for four or five months out of the year and maintain at least 5,000 feet above with your original MOA. We just don't need the conflict with our revenue, tourism, three major holidays and hunting season. And I do a tremendous amount of flying in the Basin in that time and that's just one more thing I got	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	to watch out for. That's one of our main concerns.	Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
N0006-3	But we got a tremendous amount of land here and, again, I don't think we should be whipping around here over the top of everybody's houses, homes, cabins. Call it what you like, but essentially it's going to disrupt a tremendous amount of revenue.	The Air Force recognizes that there will potentially be some economic impacts in the affected region of influence under the proposed action. The potential environmental consequences to socioeconomic resources resulting from the Fox 3 MOA expansion and New Paxon MOA are discussed in Section 3.1.12.3. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
N0007-1	<p>I'm going to limit my comments to Fox 3 and to Paxson MOA.</p> <p>I want to make an example of the cumulative impact area. With regard to cumulative impacts, I haven't found any mention of the Susitna Dam which would greatly affect this area and our biological resources or recreation. No mention of the mineral exploration and possible development around Tangle Lakes. No mention of biomass harvest, climate change. I did find cumulative impacts regarding the oil pipeline and the gas pipeline, but not with respect to the biological resources, only with respect to some of the other resources.</p>	<p>The Final EIS is revised to include the Susitna Dam project in Table 4-3 with additional consideration of this action in the cumulative impact analyses in Section 4.8. Climate change is addressed in Section 4.7 of the Draft EIS with regard to greenhouse gases. The analysis in the EIS is based on Council on Environmental Quality (CEQ) guidance for dealing with climate change impacts for NEPA actions. The development of biomass harvesting for energy is a compatible use for land underlying MOAs, whether ongoing or if these projects are approved by land management agencies in the future. Specific new projects, such as the one for Tok in eastern Alaska, would undergo their own evaluations and decisions. Similarly, mineral exploration and development around Tangle Lakes is subject to review and stipulations by the State of Alaska. Productive uses are generally compatible with military flight operations, but may provide combined pressures on passive uses and other land management values. For future mineral development projects such as this, the Alaska Department of Natural Resources (ADNR) has jurisdiction over decisions and terms and conditions in leases or permits. There are current systems in place for civilian pilots to coordinate access through Special Use Airspace with air traffic managers, in order to maintain access for supplies and workers at remote sites. The JPARC Record of Decision will address measures to limit effects of noise on sensitive areas using input provided by State and Federal management agencies.</p>
N0007-2	With respect to biological resources, there is a very short paragraph on cumulative impacts with other non-military actions. In other words, how does this proposal relate to things that are going on that are non-military in terms of effects on us. No substantive non-military actions have been	Public and agency comments have identified other projects occurring or proposed for the underlying region of the expanded Fox 3 and new Paxon MOAs. The Final EIS is revised to include these along with additional assessment in Chapter 4, Table 4-3 and Section 4.8. Most of these would not

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>identified for the areas under the proposed expanded Fox 3 or Paxson MOAs. Therefore, contributions of non-military actions to cumulative impact effects in the Fox 3 Paxson MOA proposal area would be insignificant. Now that's in the biological resources section for cumulative impacts. I just am quite amazed at that statement. Caution.</p> <p>Biological resources, recreation and subsistence all intermesh. Biological resources are essential to subsistence and to almost all recreation and I think that recognition is lacking in this EIS and it makes for a very confusing document. Thank you for your time and for making this opportunity available.</p>	<p>intensify pathways of impacts, but could create localized combinations of impacts that affect specific resources (such as recreation in the locale of the proposed Susitna Dam site). The findings for biological impacts for this proposal do not suggest significant changes in wildlife populations; however, this is predicated upon appropriate refinements to existing flight avoidances, particularly for the expanded airspace. Implementation of the JPARC proposals will include selected flight avoidances in the Record of Decision. Based on this, significant impacts on sport and subsistence hunting are not expected. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
N0007-3	<p>Biological resources, recreation and subsistence all intermesh. Biological resources are essential to subsistence and to almost all recreation and I think that recognition is lacking in this EIS and it makes for a very confusing document. Thank you for your time and for making this opportunity available.</p>	<p>We agree regarding the interconnections among resources, and propose to add the following: "Biological resources are essential to subsistence and, additionally, are a focus of outdoor recreation activities such as hunting, fishing, and birdwatching as well as enhancing other outdoor recreational activities such as cross-country skiing and hiking" under Section 3.1.8, Biological Resources (this is where biological resources are first discussed). Additionally, Volume II, Appendix B contains language to that effect under Biological Resources Section B.8.1, Definition of Resource. The EIS format breaks all these topics down separately for focused analyses. Please refer to separate sections in the EIS on Recreation (under Land Use sections) and Subsistence for human effects analysis and Biological Resources for wildlife effects analysis.</p>
N0008-1	<p>I'm the hatchery manager at Gulkana hatchery, a State facility started in 1973. This is the largest sockeye facility in the world. It's three miles north of Paxson Lodge on a series of springs. The salmon that we provide are basically used for commercial fishing, subsistence, personal use and sport fishery. The upper Copper River is the source of one of the most valuable sockeye and king salmon resources in the state. Besides the hatchery springs, there are over 10 different wild sockeye stocks and at least six different stocks of wild king salmon and the most northern stock of wild rainbows in the United States. Like Luke Catledge mentioned, our single biggest concern is during this window of incubation which is roughly -- can be 120 days. These eggs are extremely susceptible to any type of noise or shock and can be killed with just a simple sound of a gunfire in an incubator. And we definitely would like you to relook at this situation. I mean this is a very, very valuable resource to not just people in the state of Alaska, but people world wide. So thank you.</p>	<p>Detailed information has been added to the EIS on the results of tests run on the effect of noise on fish and fish eggs. The results of sonic boom tests run while eggs are at the most critical stage of development indicate that sonic booms do not result in any increased egg mortality. The majority of noise energy is reflected from the surface of the water. Although supersonic and subsonic sounds could result in short-term behavioral reactions amongst fry, no increased mortality would be expected to occur. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
N0008-2	<p>MR. MARTINEK: Yeah, my name is Gary Martinek, M-A-R-T-I-N-E-K. I'm the hatchery manager at Gulkana hatchery, a State facility started in 1973. This is the largest sockeye facility in the world. It's three miles north of Paxson Lodge on a series of springs. The salmon that we provide are basically used for commercial fishing, subsistence, personal use and sport fishery. The upper Copper River is the source of one of the most valuable sockeye and king salmon resources in the state. Besides the hatchery springs, there are over 10 different wild sockeye stocks and at least six different stocks of wild king salmon and the most northern stock of wild rainbows in the United States. Like Luke Catledge mentioned, our single biggest concern is during this window of incubation which is roughly -- can be 120 days. These eggs are extremely susceptible to any type of noise or shock and can be killed with just a simple sound of a gunfire in an incubator. And we definitely would like you to relook at this situation. I mean this is a very, very valuable resource to not just people in the state of Alaska, but people world wide. So thank you.</p>	<p>The U.S. military has a long record of environmental stewardship in Alaska. There are modifications to proposals and mitigations being considered that alleviate impacts on certain areas of the proposed airspace.</p>
N0009-1	<p>I work with the Gulkana hatchery here locally and my main concern is probably the sonic booms. And working at the salmon hatchery here in the fall especially when we have eggs loaded in the incubators I see that as a potential threat to the safety of the eggs. They're very susceptible to shock and even at the 5,000 foot a sonic boom will rattle and shake things here on the ground. And fortunately we haven't seen any substantial loss in the past, but I see here on the scheduling for their red flag training exercises that this year's proposed to be August -- or scheduled to be in August and again in October. And that first date, August 6th through the 17th, is when we're first loading eggs into the incubators and they're very fragile until they eye up. That's about two months in time. And so that would extend -- and our main egg take extends into the first part of October often and so the eggs are a very fragile state at the -- at that point. And so like I said, even at 5,000 feet a sonic boom directly over the canyon would be detrimental. So my concerns are mainly for this -- the Paxson MOA here. And that's all of my comments. Thanks.</p>	<p>Variables affecting what noise levels will be experienced below the MOAs include the type of aircraft, altitude, speed, and power level in addition to the amount of cover and background noise present. While we don't want to minimize the losses the hatchery may have experienced, experiments with noise and fish eggs and fry do not tend to corroborate noise causing mortality to fish. Additional research findings for fish were added to Appendix E, Noise, and will be added where applicable to the Final EIS text in Section 3.8.1.</p> <p>A 1987 survey to inquire about the effects of low-altitude aircraft operations on fish and wildlife included hatchery managers. This type of survey focused on the most extreme examples of responses and was more informational than scientific. The fish responses reported included sonic booms having no effect on fish eggs at Nevada, Arizona, and Missouri hatcheries to intense, "focused" sonic booms resulting in the death of striped bass due to the fish jumping out of their tanks or dying of seizures in the water at an Alabama lab (Gladwin and Mancini 1988).</p> <p>The potential loudest noise from aircraft is the sonic boom. One study looked specifically at trout and salmon eggs after exposure during a critical phase of development to a variety of simulated sonic boom overpressures similar to those produced by military airplanes. Comparisons with control groups of</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>eggs spawned at the same time indicated that the sonic boom exposure caused no increase in egg or fish fry mortality (Rucker 1973).</p> <p>Stadler and Woodbury (2009) reported the criteria NOAA Fisheries uses to assess the risk to fishes. They found that onset of physical injury would be expected if the peak impulsive sound pressure level (SPL) in water exceeds 183 decibels (dB) for fish smaller than 2 grams. By convention, sound levels in water are expressed in a slightly different way from sound levels in air. Taking into account this unit conversion as well as reflection of much of the inbound noise energy from the water’s surface and conversion from A-weighted to unweighted sound metric, in-water SPL is typically in the neighborhood of 35 dB greater than the A-weighted sound level just above the water’s surface. According to the JPARC Noise section Table 3-6, none of the sound exposure levels (SELs) from 10 various aircraft flying as low as 300 feet AGL currently used are higher than 120 dB, which would equate to about 155 dB in-water SPL. (The lowest proposed flight level proposed for JPARC operations is 500 feet AGL in the Fox/Paxon MOAs and other airspace units).</p> <p>Another study investigated the effects of seismic air guns on eggs, larvae and fry and found significant mortality in three species at a variety of ages but only when the specimens were within about 5 meters of the source, and the most substantial effects were fish that were within 1 to 4 meters of the source.</p> <p>Most studies on noise effects to fish looked at long-term sound exposure, which is not applicable in the case of intermittent overflights.</p> <p>Because we received so many expressions of concern, a request has been submitted to add the hatchery to the sensitive areas that have seasonal flight restrictions published in the pilot’s handbook.</p>
N0010-1	<p>I represent Paxson Lodge. I’m also the President of the Community of Paxson. My concerns mostly are the effect on tourism along with this lodge being as old as it is the sonic booms, the possibility of blowing out windows and guests being in the rooms. If a window was to shatter the impact on that guest as well. These are single pane windows. This lodge is old. It’s been here forever. It’s been in this area since 1904, this lodge has been here since 1946.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The noise mitigation measures in the Final EIS Appendix K and other options would be considered to limit any effects of sonic booms on populated areas such as the Paxson community. Such measures would include establishing avoidance areas over noise-sensitive areas for both subsonic and supersonic flight operations. Mitigation measures to offset adverse impacts of potential sonic booms will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process. The likelihood of windows being broken by sonic booms</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>is low. However, if such an unfortunate event were to occur, the Public Affairs Office should be contacted to initiate a damage claim:</p> <p>Eielson Public Affairs (907) 377-2116 354fw.pa.publicaffairs@us.af.mil</p> <p>JBER Public Affairs (907) 552-8151 pateam@elmendorf.af.mil</p>
N0010-3	<p>The hatchery is also a concern. The hatchery provides the salmon not only for this area, but like Gary said, for the entire northeast mar -- or northwest market and around the world actually.</p>	<p>The Air Force recognizes that there will be potential for impacts to recreation, socioeconomic, and subsistence resources that involve fishing activities. However, impacts to hatcheries are not anticipated as a result of the proposed actions since these facilities are able to control the necessary conditions for young salmon to live, including reliable food, water, space, and shelter. Mitigation measures to offset the potential for adverse impacts to the hatchery will, however, be considered by the Air Force during the preferred alternative selection process in the Final EIS.</p>
N0010-4	<p>The drop in altitude to 500 feet above ground level will also impact the hunting for this area as far as I am concerned and it will also impact the industry that we have where we have people coming to stay here and stay at this lodge and in this area and provide business to not only myself but to Myers (ph) Lake and to Mr. Bakewell's Denali Cabins.</p>	<p>Section 3.1.10.3 of the DEIS acknowledges that the expansion of the Fox 3 MOA and the establishment of the Paxon MOA would affect spatial and temporal availability to specific areas and associated recreational uses and activities (including hunting) due to changes in civilian air access. In addition, the EIS states that low-level overflights and overflights during MFEs in areas underlying the MOA would impact recreational uses. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts. These include suspending Air Force MFE operations during popular recreation seasons, including January, September, and December and between June 27 and July 11, and avoiding overflight of popular hunting areas, campgrounds, and trails during peak use periods between June 27 and July 11 and from mid-August through September; coordinating military schedules with local communities in advance; and providing updated information and maps on the USARTRAK website to identify public access restrictions for military activities. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
N0010-5	<p>The drop in altitude to 500 feet above ground level will also impact the hunting for this area as far as I am concerned and it will also impact the industry that we have where we have people coming to stay here and stay at</p>	<p>Section 3.1.12.1 acknowledges that recreation and tourism is a key industry to Alaska and to the area affected by the Fox 3 MOA and New Paxon MOA alternative actions. Section 3.1.12.3 also acknowledges that one of the major</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	this lodge and in this area and provide business to not only myself but to Myers (ph) Lake and to Mr. Bakewell's Denali Cabins.	concerns for socioeconomic resources associated with the proposed actions is the potential economic impacts to regional businesses and communities from changes to commercial and general aviation. Additional details on the potential environmental consequences to recreation from the proposed action are provided in Section 3.1.10.3 of the Draft EIS. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
N0010-6	This area -- I am -- I'm for the military training and having the ability to train and to provide these maneuver -- or to do these maneuvers, but I do not believe that the Paxson area is an area that is susceptible to these maneuvers. There's plenty of area to the north. Expand the Yukon River. Yukon River there is little to no inhabitants. I understand that you need the geographical with the mountains and that for your training, but Pax -- the area of Paxson and the Gulkana River I do not believe are your best points of interest, they need to be moved. Even if you go north beyond the Paxson area between Fielding (ph) Lake and the Donnelly (ph) area. That would be even -- that'd be very well acceptable for me.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources. The comment to move existing Army and Air Force training areas to other Federal lands or remote areas in Alaska, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Purpose and Need for the Proposed Actions, Sections 1.2 and 1.3 in the Draft EIS.
N0011-1	I'm a Paxson resident, also a resident McClaron (ph) River, Chair of the Paxson Fish and Game Advisory Committee. And my comments are kind of based on this same thing everybody else is here. It's -- low level training is a negative impact for this area, the whole Nelchina Basin actually. It's the highest use recreational area in the interior of Alaska or one of the highest in southcentral I guess it would be if you want to call it southcentral instead of interior. Seems like could have picked a better area, a lot less impact, lot less controversy. The solution I have if you're stuck on this area is no fly zones, 10 mile radius around Paxson, Tangle Lakes, McClaron (ph) River, wherever else is a concern, wherever there's people. If you have the no fly areas around those it seems like that solves a lot of problems as long as you can keep people out of those areas. And that seems to be a concern because right now Paxson's supposed to have aircraft at 18,000 feet and no lower. We certainly do. We have their right on the deck at times. So like to see that -- some -- the way to monitor that, again, is a no fly zone at all, you don't have to worry about it, their altitude. So that's the solution that I see and other than moving the whole MOA out of here and putting it somewhere else where there's less people that's it.	As described in the FEIS, altitudes below 14,000 feet MSL in the proposed Paxson MOA would only be used during the six annual, two-week major flying exercises while routine training flights would only occur above that altitude throughout the year. The FEIS Appendix K contains proposed mitigation measures that include designating flight avoidance/no-fly areas over noise-sensitive and other sensitive land uses within the proposed Fox 3 and Paxon MOAs which would be considered for such locations noted in the comment. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
N0011-2	I'm a Paxson resident, also a resident McClaron (ph) River, Chair of the Paxson Fish and Game Advisory Committee. And my comments are kind of based on this same thing everybody else is here. It's -- low level training is a	The U.S. military has a long record of environmental stewardship in Alaska. There are mitigations being considered that alleviate impacts on certain areas of the proposed airspace. The need for low altitude flight to accomplish

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>negative impact for this area, the whole Nelchina Basin actually. It's the highest use recreational area in the interior of Alaska or one of the highest in southcentral I guess it would be if you want to call it southcentral instead of interior. Seems like could have picked a better area, a lot less impact, lot less controversy. The solution I have if you're stuck on this area is no fly zones, 10 mile radius around Paxson, Tangle Lakes, McClaron (ph) River, wherever else is a concern, wherever there's people. If you have the no fly areas around those it seems like that solves a lot of problems as long as you can keep people out of those areas. And that seems to be a concern because right now Paxson's supposed to have aircraft at 18,000 feet and no lower. We certainly do. We have their right on the deck at times. So like to see that -- some -- the way to monitor that, again, is a no fly zone at all, you don't have to worry about it, their altitude. So that's the solution that I see and other than moving the whole MOA out of here and putting it somewhere else where there's less people that's it.</p>	<p>training includes areas large enough for maneuvering and tactical deception utilizing terrain. It is not feasible to declare every cabin, animal, lake, and recreation area as "noise-sensitive" for the purpose of avoiding overflight. Any remaining areas would be too small and unusable for the stated purpose. The Air Force will attempt to avoid or minimize low-level flight where the most significant adverse impacts exist if the training can still be accomplished.</p> <p>While there is currently no Military Operations Area (MOA) over Paxson, the airspace is available for use by military aircraft. Outside of a Special Use Airspace (SUA), FAA regulations apply. Often, the military has more stringent rules that restrict operations. Current regulations in Alaska permit fighter aircraft to fly at 300 knots as low as 500 feet above ground level (AGL) in uncongested areas; Cargo aircraft will fly as low as 300 feet AGL, but must remain 500 feet from any person, vessel, vehicle, or structure.</p>
<p>N0011-3</p>	<p>I'm a Paxson resident, also a resident McClaron (ph) River, Chair of the Paxson Fish and Game Advisory Committee. And my comments are kind of based on this same thing everybody else is here. It's -- low level training is a negative impact for this area, the whole Nelchina Basin actually. It's the highest use recreational area in the interior of Alaska or one of the highest in southcentral I guess it would be if you want to call it southcentral instead of interior. Seems like could have picked a better area, a lot less impact, lot less controversy. The solution I have if you're stuck on this area is no fly zones, 10 mile radius around Paxson, Tangle Lakes, McClaron (ph) River, wherever else is a concern, wherever there's people. If you have the no fly areas around those it seems like that solves a lot of problems as long as you can keep people out of those areas. And that seems to be a concern because right now Paxson's supposed to have aircraft at 18,000 feet and no lower. We certainly do. We have their right on the deck at times. So like to see that -- some -- the way to monitor that, again, is a no fly zone at all, you don't have to worry about it, their altitude. So that's the solution that I see and other than moving the whole MOA out of here and putting it somewhere else where there's less people that's it.</p>	<p>Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation from the Fox 3 Expansion and New Paxson MOA proposal such as seasonal avoidance areas; expanding the existing Delta National Wild and Scenic River and Gulkana National Wild River to include all portions within the new MOA boundaries; and avoiding overflight of popular hunting areas, campgrounds, and trails between June 27 and July 11. These areas include Brushkana Creek campground, Tangle Lakes campground, Paxson Lake campground, Clearwater Wayside, One Mile Creek/Wolverine Mountain, Tangle Lakes trail, Gulkana River raft trail, Castner Glacier trail Sourdough campground, Lake Louise State Recreation Area, Crosswind Lake, and Matanuska Valley Moose Range. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.</p>
<p>N0012-1</p>	<p>Again, I'd like to enforce that I do support the training of our military, but this area -- John Schandelmeier made a great point with a no fly zone for a 10 mile radius. However, the entire Gulkana (ph) River, Gakona (ph), Gulkana (ph), the entire system that is supported not only by the hatchery but</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>the wild sockeye and, as they said, that they are so fragile for that 120 days out of the year even in the wild stock. That loss would be a magnitude that I could pretty much assume would be unimaginable. It would devastate the commercial fishing, it would devastate the personal fishing and it would devastate the subsistence fishing for the northern part, if not most of the central and southern part of the state of Alaska along with other communities in Washington and British Columbia. That is the biggest concern with this area.</p>	<p>comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
<p>N0013-1</p>	<p>As to the expansion area of MOA 3 Paxson the suggestion would be to put a three mile corridor to the east of the Gakona (ph), Gulkana (ph) River and three miles west of the Gakona, Gulkana. And three miles to the east as well with a ceiling of 10,000 feet -- this area would be open to 10,000 feet and above for exercises. The way to designate this as a no fly zone is to put this as a kill zone during activity. If they drop below 10,000 feet in this area, in this no fly zone, then they would be essentially terminated as far as the exercise goes.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
<p>N0014-1</p>	<p>Paxson Fish and Game Advisory Committee strongly opposes the new proposed Paxson MOA. Sonic booms will adversely affect the largest Sockeye salmon hatchery in the world in time periods when they are the most vulnerable. We urge that a 20 mile wide corridor be implemented where there is no air traffic what-so-ever. 10 miles either side of the Richardson Highway. Frequent violations of current MOA's have convinced us that the Air Force is either unable, or unwilling to monitor it's own activities. We also ask for the same restrictions along the Denali Highway corridor.</p>	<p>The U.S. military has a long record of environmental stewardship in Alaska. There are mitigations being considered that alleviate impacts on certain areas of the proposed airspace. The need for low-altitude flight to accomplish training includes areas large enough for maneuvering and tactical deception utilizing terrain. It is not feasible to declare every cabin, animal, lake, and recreation area as "noise-sensitive" for the purpose of avoiding overflight. Any remaining areas would be too small and unusable for the stated purpose. The Air Force will attempt to avoid or minimize low-level flight where the most significant adverse impacts exist if the training can still be accomplished.</p> <p>While there is currently no MOA over Paxson, the airspace is available for use by military aircraft. Outside of a Special Use Airspace (SUA), FAA regulations apply. Often, the military has more stringent rules that restrict operations. Current regulations in Alaska permit fighter aircraft to fly at 300 knots as low as 500 feet above ground level (AGL) in uncongested areas; cargo aircraft will fly as low as 300 feet AGL, but must remain 500 feet from any person, vessel, vehicle, or structure.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>The Air Force maintains a hotline for complaints about noise or suspected violations of flight rules. Please contact 800-JET NOISE (538-6647) with as much detail as possible so we may research the incident fully.</p>
<p>N0014-2</p>	<p>Paxson Fish and Game Advisory Committee strongly opposes the new proposed Paxson MOA. Sonic booms will adversely affect the largest Sockeye salmon hatchery in the world in time periods when they are the most vulnerable. We urge that a 20 mile wide corridor be implemented where there is no air traffic what-so-ever. 10 miles either side of the Richardson Highway. Frequent violations of current MOA's have convinced us that the Air Force is either unable, or unwilling to monitor it's own activities. We also ask for the same restrictions along the Denali Highway corridor.</p>	<p>There are modifications to proposals and mitigations being considered that alleviate impacts on certain areas of the proposed airspace.</p> <p>Knowing what type and where to expect military aircraft operations can lessen the impact on many people. The Air Force makes great efforts to educate the public on what type of activity to expect in the different airspaces in Alaska. Flight at 300 feet above ground level (AGL) can appear as though the aircraft are right on the tree tops. The FAA and Air Force rules require 500 feet of clearance (vertically or horizontally) from any person, structure, or vessel; visualize this as less than two football fields. Crews are highly skilled and trained to operate at low altitude safely.</p> <p>The Alaskan Military Airspace Info website (www.jber.af.mil/11af/alaskaairspaceinfo) provides information and schedules that will heighten the public awareness of Air Force operations.</p>
<p>N0015-1</p>	<p>My name is Robert Mulford, M-U-L-F-O-R-D. I'm a local organizer for Veterans for Peace. In the counsels of government we must guard against the acquisition of unwarranted influence, whether sought or unsought by the military industrial complex. The potential for the disastrous rise of misplaced power exists and will persist. We must never let the weight of combination endanger our liberties and democratic processes. We should take nothing for granted. Only alert and knowledgeable citizenry can compel the proper messaging of the huge industrial military machinery of defense with our peaceful methods and goals so that security and liberty may prosper together. President Dwight David Eisenhower in his farewell address to the nation, January 17th, 1961.</p> <p>I appreciate the courage of you men in uniform. I wore the uniform myself. I was never in combat, but I appreciate your courage. I understand -- I do understand your courage, but I want to speak real briefly about the courage of another man and another type of courage. Three weeks ago I attended a pre court-martial hearing of a young PFC who exhibited a different kind of courage. I only hope that down the road if you men realize -- come to realize that the misplaced power, the disastrous rise of misplaced power is not only a potential, but it exists in these technologies and these policies that are</p>	<p>Thank you for your comment. These comments indicate issues that are outside the purview of this EIS, either because they describe current operations or because they describe broader Department of Defense policy decisions. For further assistance with the issue please contact your local base Public Affairs Office or Alaskan Command Public Affairs at (907) 552-2341.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	based on these technologies. That you find the courage within yourself to do much the same thing that that brave young PFC, Private Bradley Manning (ph), did and help save this country from this disastrous rise of misplaced power. Thank you.	
N0016-1	As we reported, with Denali Air. Primarily focusing concerns on areas basically out the Nenana River Valley and glaciers surrounding the Mount Devera (ph) area. There are right now two main operators that spend a lot of time, but there's more, Atkins Flying Service in different areas, different companies that fly out there with regular routine flights out that area doing landings, being on the glaciers. The concern was low level traffic in that area affecting that commercial status and the ability to make money and of course safety concerns with fast movers and very slow movers, being us, on wheel skis and different things. So I just wanted to mostly go on record that that was brought up in concern.	The concerns expressed about the proposed Fox 3 MOA expansion and Paxon MOA were considered when planning this proposal. While the Alternative E configuration would avoid some higher use areas flown by civil aircraft, we understood this would not fully alleviate concerns with the lower altitudes proposed under any alternative. The areas and altitudes proposed for this expansion are essential in meeting combat training requirements for advanced aircraft capabilities and adversary tactics that were not yet a factor when the current Alaska training airspace was established 15 years ago. Use of the lower altitudes would be more limited to those mission tactics requiring their use. With both military and civil aviation aircraft potentially sharing use of the same airspace, those existing and proposed mitigation measures addressed in the FEIS Airspace Management and Flight Safety discussions and Appendix K would be used to the greatest extent possible to help ensure the safe, compatible use of this airspace by all concerned.
N0016-2	As we reported, with Denali Air. Primarily focusing concerns on areas basically out the Nenana River Valley and glaciers surrounding the Mount Devera (ph) area. There are right now two main operators that spend a lot of time, but there's more, Atkins Flying Service in different areas, different companies that fly out there with regular routine flights out that area doing landings, being on the glaciers. The concern was low level traffic in that area affecting that commercial status and the ability to make money and of course safety concerns with fast movers and very slow movers, being us, on wheel skis and different things. So I just wanted to mostly go on record that that was brought up in concern.	Section 3.1.12.3 of the Draft EIS acknowledges that one of the major concerns associated with the Proposed Action is potential affects to commercial and general aviation which would have an impact to regional business and communities. Based on public concerns, the expansion of the Fox 3 MOA and New Paxon MOA has been determined to result in significant impacts. The Federal Aviation Administration (FAA) and Air Force would address any impacts and mitigation measures to be taken before implementation of any airspace proposals to reduce potential impacts.
N0016-3	A lot of the areas focus more under the Fox 1 MOA, which is not going to be an issue as long as that surface ceiling goes down to -- or stays above 5,000 AGL. Any change to that in the Fox 3, that 500 feet. I understand the need for training at that low level and that's of value. It's a drastic change and that's one of the things that concerns us I guess is the severe change in that from 5,000 down to 500. Most of the glaciers that we are flying into are going to be out of that realm, but there are some and there's transit areas where we cross that -- through that. It's very difficult without being able to get in contact and alert the MOAs. I think radio repeater -- as I understand it, the radio repeater or the alert systems through the radio traffic is not quite	The FEIS Appendix K proposed mitigations include a measure to pursue funding for any communications enhancements that may be needed to expand coverage within those expanded Special Use Airspace areas where such coverage may be lacking.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>operational yet and the funding is in place, but those aren't at full capacity yet I guess for us to be able to update or get updates on any MOA traffic while we're in the air as far as I understood and I can find out more on that later.</p> <p>But in general I just wanted to have it known that there is commercial traffic out there. We do fly out there regularly and if that is taken into account that would be a good thing to have noted.</p>	
N0017-1	<p>A couple of areas that I wanted to comment on tonight. We, especially here north of the Alaska Range, have really appreciated and enjoyed the safety and the peace of mind of having access to the SUAIS Service, the Special Use Airspace Information Service. That has been a tremendous help in us transiting the area that you guys use for your operations. It has helped de-conflict our passage through that area and from what I hear from your direction back towards us you appreciate having the knowledge where we are and when we're going to transit that area.</p> <p>I would like to encourage you to expand that system, and I know that's been talked about, but especially with the proposal for the Fox MOA expansion and the Paxson MOA. The most coverage we could have down there the better and it would -- from our perspective if the coverage is not there or if a certain repeater may be out of service consider mitigations for not using the lower level, lower strata of that airspace when the communications may not be available for any given time. Because we've had such great success with that service we would like to see it implemented actually nationwide to be honest with you. And we know that there's a couple of other areas in the U.S. where they have similar type systems, but knowing the success that we've had here we especially want it implemented statewide and especially in these lower altitudes where the potential for conflicts exist.</p> <p>One of the things, that as the Airmen's Association we try to make sure that we're up to speed and aware of what's going on not just with this particular procedure and policy change, but with other areas that the military's acting as well as how that interacts with the FAA. And it's not an easy task, but some of the things that we've talked about previously, the moving of the F-16s from Eielson down to JBER and how that might affect some of your proposals and want to make sure that that's at least considered or talked</p>	<p>Thank you for your comments. We appreciate the support and interest the Alaska Airmen's Association and other groups have shown in helping us find solutions to both military and civil aviation airspace needs. Regarding your concerns over the SUAIS coverage, be assured that every effort will be made to fund expansion of this system and enhance other advisory services as needed to better inform the public of the scheduled use of the existing and proposed airspace as noted in the FEIS Appendix K mitigations. The proposed relocation of the F-16s from Eielson AFB to JBER is not associated with or affected by the JPARC proposals in any way and will be assessed separately through the NEPA processes as a standalone proposed action. Pending FAA decisions on how unmanned aircraft operations can be safely and efficiently integrated into the National Airspace System, the military must proceed with identifying and evaluating those corridor options that would best support UAV mission requirements. For that reason a restricted area designation was assessed for these proposals as the most restrictive option each corridor could have on other airspace uses. The different alternatives assessed for each proposal, including the realistic live ordnance proposal to link R-2211 and R-2202, were all considered as reasonable options for achieving the purpose and need of the mission objectives. Those alternatives evaluated by the FAA and identified in the FEIS as the preferred alternative were determined to best meet those objectives while having the least potential adverse effects on IFR and VFR air traffic in those areas. The FEIS noted the more adverse effects this restricted area connection could have on civil air traffic, therefore, if selected, measures would be taken to limit military use of this airspace so as to minimize these effects. Any potential effects a JPARC proposal may have on Fort Greely (Allen Army Airfield), other airfields, and their associated Class D airspace would be further evaluated by the FAA and addressed, as appropriate, through the mitigation measures noted in the FEIS Appendix K. Likewise, the potential effects of the proposed BAX restricted area on VFR and IFR air traffic in that</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>about during some of these areas.</p> <p>Looking at my notes here. As we brought up earlier, with the UAV corridors and the lack of definition from the FAA about your ability to operate these vehicles in the national airspace system, want to make sure that if your proposal for the realistic live ordinance does include connecting R-2211 and R-2202 that you would not be limited to using that airspace for what it was specifically requested for. But since that airspace would potentially be there it would be better to be able to use it for multiple uses, including the UAVs.</p> <p>Question that we also have that -- not sure that it's been dealt with sufficiently is the use of Fort Greely and class delta airspace there with the potential for traffic to possibly decline in that area and the potential for that no longer being a full-time type operations, what would that do for some of the transit areas through that area as far as general aviation and civilian traffic. One of the things that has been brought up numerous times by our members.....</p> <p>One of the things that's been brought up by our members is the narrow slot that would be available to transit up the Richardson Highway and the possibility of possibly shaving some of the eastern boundary of 2202 if the restricted area is approved over the battle area complex to give us a little more breathing room to transit that area and de-conflict with opposite traffic. That is a heavily traveled area, especially in low weather, because we tend to follow low terrain and we need as much room as we can. Also understanding that if it's bad weather chances of you having live weapons release from an aerial platform in the battle area complex is probably pretty limited.</p>	<p>area would also be examined further by the FAA with the appropriate mitigation measures taken to minimize those impacts. Please be advised that the Air Force and the Army will continue to work with all civil aviation concerns through the Alaska Civil-Military Advisory Council and other means necessary to address your concerns and consider solutions for maximizing the shared use of this airspace while also minimizing impacts on civil aviation.</p>
N0017-2	<p>A couple of areas that I wanted to comment on tonight. We, especially here north of the Alaska Range, have really appreciated and enjoyed the safety and the peace of mind of having access to the SUAIS Service, the Special Use Airspace Information Service. That has been a tremendous help in us transiting the area that you guys use for your operations. It has helped de-conflict our passage through that area and from what I hear from your direction back towards us you appreciate having the knowledge where we are and when we're going to transit that area.</p> <p>I would like to encourage you to expand that system, and I know that's been talked about, but especially with the proposal for the Fox MOA expansion</p>	<p>See comment response N0017-1.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>and the Paxson MOA. The most coverage we could have down there the better and it would -- from our perspective if the coverage is not there or if a certain repeater may be out of service consider mitigations for not using the lower level, lower strata of that airspace when the communications may not be available for any given time. Because we've had such great success with that service we would like to see it implemented actually nationwide to be honest with you. And we know that there's a couple of other areas in the U.S. where they have similar type systems, but knowing the success that we've had here we especially want it implemented statewide and especially in these lower altitudes where the potential for conflicts exist.</p> <p>One of the things, that as the Airmen's Association we try to make sure that we're up to speed and aware of what's going on not just with this particular procedure and policy change, but with other areas that the military's acting as well as how that interacts with the FAA. And it's not an easy task, but some of the things that we've talked about previously, the moving of the F-16s from Eielson down to JBER and how that might affect some of your proposals and want to make sure that that's at least considered or talked about during some of these areas.</p> <p>Looking at my notes here. As we brought up earlier, with the UAV corridors and the lack of definition from the FAA about your ability to operate these vehicles in the national airspace system, want to make sure that if your proposal for the realistic live ordinance does include connecting R-2211 and R-2202 that you would not be limited to using that airspace for what it was specifically requested for. But since that airspace would potentially be there it would be better to be able to use it for multiple uses, including the UAVs.</p> <p>Question that we also have that -- not sure that it's been dealt with sufficiently is the use of Fort Greely and class delta airspace there with the potential for traffic to possibly decline in that area and the potential for that no longer being a full-time type operations, what would that do for some of the transit areas through that area as far as general aviation and civilian traffic. One of the things that has been brought up numerous times by our members.....</p> <p>One of the things that's been brought up by our members is the narrow slot that would be available to transit up the Richardson Highway and the possibility of possibly shaving some of the eastern boundary of 2202 if the</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	restricted area is approved over the battle area complex to give us a little more breathing room to transit that area and de-conflict with opposite traffic. That is a heavily traveled area, especially in low weather, because we tend to follow low terrain and we need as much room as we can. Also understanding that if it's bad weather chances of you having live weapons release from an aerial platform in the battle area complex is probably pretty limited.	
N0018-1	Re: AOPA requests for extension of Comment Period for the Draft Environmental Impact Statement for the Joint Pacific Alaska Range Complex To Whom It May Concern, The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 general aviation members nationwide, requests a 60 day extension to the comment period slated to close on June 7, 2012 for the Draft Environmental Impact Statement (DEIS) for the Joint Pacific Alaska Range Complex (JPARC) comment period. Based on AOPA's participation during recent DEIS public meetings and the complexity of concerns raised by both the aviation industry as well as local communities impacted by the JPARC proposed changes, the current 70 day comment period is inadequate to allow for a comprehensive review and public input. The sheer volume and complexity of the JPARC initiative would typically necessitate a minimum of 90 days for the public comment and while recognizing the military's desire to move ahead and remain on schedule, attempting to aggressively move forward without ample public review opportunity seems to negate the true spirit of the National Environmental Policy Act (NEPA). AOPA strongly suggests the Department of Defense offer an additional 60 days for public review of this complex and lengthy DEIS to ensure the public is offered time to provide substantive comments on the potential consequences of the proposed action. While understanding the desire to adhere to a schedule and budget, there is no substitute for allowing an adequate and thorough public comment period - especially when the DEIS public comment meetings overlapped with a number of already scheduled community events precluding the public from participation at these public meetings. AOPA looks forward to an extension of the comment period to allow for a thorough public review opportunity and to allow the aviation community and public to provide substantive feedback on this complex DEIS.	Given the feedback provided during the public hearings and Draft EIS review process, the U.S. Army and U.S. Air Force, on behalf of ALCOM, extended the Draft EIS comment period from 70 days to 102 days. This extension took place on May 31, 2012. The comment period, originally scheduled to close on June 7, 2012, was extended to July 9, 2012. The proponents of the proposals considered the extension carefully in an effort to balance military training requirements with the importance of ensuring adequate time for citizens and organizations to thoroughly review the Draft EIS.
N0019-1	The Greater Fairbanks Chamber of Commerce (GFCC) would like to respectfully request the extension of the comment period for the Joint Alaska Pacific Range Complex (JPARC) draft Environmental Impact Statement	Given the feedback provided during the public hearings and Draft EIS review process, the U.S. Army and U.S. Air Force, on behalf of ALCOM, extended the Draft EIS comment period from 70 days to 102 days. This extension took

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>(EIS). We would like to recommend an additional 60 days which will allow for further comments and analysis based on recent USAF proposals and basing decisions at Alaskan installations. The Air Force, by its force restructuring action, which is not considered in the current EIS draft, of shifting the Eielson F-16s, associated military, and civilian personnel to JBER has created undetermined impacts on Alaskan air space and Alaska’s population. These changes are more than sufficient to warrant an extended period for analysis and comment by the local governments, businesses, organizations and individuals potentially affected by, as yet, unidentified impacts on Alaska’s land, water and air space. The GFCC has a longstanding relationship with the military in Alaska and supports the military’s involvement in the Interior in several ways. In 2012 the Chamber’s Board of Directors and Military Affairs Committee adopted “Continue to Strengthen the Military Presence in Interior Alaska” as one of its most important priorities. We understand the importance and strategic advantage that JPARC offers for a variety of military training opportunities. However, for the reasons stated above we believe this 60 day extension is warranted.</p>	<p>place on May 31, 2012. The comment period, originally scheduled to close on June 7, 2012, was extended to July 9, 2012. The proponents of the proposals considered the extension carefully in an effort to balance military training requirements with the importance of ensuring adequate time for citizens and organizations to thoroughly review the Draft EIS.</p> <p>The F-16 Aggressor Squadron proposed relocation from Eielson AFB to Joint Base Elmendorf-Richardson is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. The airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower altitude airspace to reflect the types of combat in which fifth generation F-22 fighters would be engaged. The F-22s have the capability to initiate combat at greater distances than fourth generation fighters, such as the F-16, so fourth generation fighters must apply diverse tactics which require airspace expansion in distance and altitude. The F-22s must train to combat all such threats regardless of where the aggressor aircraft are based.</p> <p>The location of the F-16 Aggressor Squadron within Alaska is not a connected action to the JPARC proposals. The majority of the JPARC proposals that involve Eielson AFB are Army proposals and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft. The details of the proposed F-16 relocation and training, including Major Flying Exercises such as RED FLAG-Alaska, will be worked out in the coming months. An environmental analysis will be prepared to address the environmental consequences of the proposed F-16 relocation within Alaska.</p>
N0020-1	<p>The Lake Louise Non-Profit Corp. (LLCNPC) represents the 245 homes and cabins in the Tri-Lakes area. With the exception of a few owners, the Community is opposed to the expansion of the FOX 3 and Paxson MOA.</p> <p>Residents have expressed many different reasons for their opposition: low level military aircraft pose a hazard to civil aircraft, disturbance of nesting birds and waterfowl, disturbance of caribou calving, excess noise, fire hazard, use of State lands when the majority of Alaska land is held by the Federal Government.</p>	<p>In consideration of public and agency scoping, Alternative E was added to the Fox 3 MOA and New Paxson MOA alternatives (see Section 2.1.1.1.2 for detailed description). Under Alternative E, the overall airspace structure would be smaller in size with the southern Fox 3 boundary moved approximately 20 NM to the north.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>The Lake Louise area has been chosen by residents because of its beauty, quiet, clean water, and wildlife. Had they wanted air traffic, their property would have been selected next to an airport.</p> <p>Five hundred AGL operations are totally unacceptable and the LLCNPC wants to go on record as strongly opposed.</p>	
N0020-2	<p>Residents have expressed many different reasons for their opposition: low level military aircraft pose a hazard to civil aircraft, disturbance of nesting birds and waterfowl, disturbance of caribou calving, excess noise, fire hazard,....</p>	<p>Animal responses to low-level flights have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. Please see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p> <p>Given the potential for loss or injury to aircrews and aircraft as a result of a bird-aircraft strike, extensive efforts are made by the Military to avoid areas with high concentrations of birds (also described in the Safety section, under Mitigation 3.5.8.4, and Appendix G). The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection.</p>
N0020-3	<p>The Lake Louise Non-Profit Corp. (LLCNPC) represents the 245 homes and cabins in the Tri-Lakes area. With the exception of a few owners, the Community is opposed to the expansion of the FOX 3 and Paxson MOA.</p> <p>Residents have expressed many different reasons for their opposition: low level military aircraft pose a hazard to civil aircraft,...</p>	<p>Much of the Tri-Lakes area is located beneath the proposed Paxon MOA where the lower altitudes below 14,000 feet MSL would only be used during the six annual, two-week major flying exercises, as described in the FEIS Section 2.1.1. Routine training during other times of the year would be above this altitude. While this limitation and the proposed Alternative E configuration does not fully alleviate concerns over low-level flights in this airspace and the adjacent proposed Fox 3 MOA expansion, it may help minimize the potential effects this proposal may have on homeowners and civil aircraft activities in this region. Other mitigations noted in the FEIS Appendix K would also be considered to minimize impacts such as the designation of no-fly zones over noise-sensitive and other sensitive land uses beneath this airspace.</p>
N0020-4	<p>Five hundred AGL operations are totally unacceptable and the LLCNPC wants to go on record as strongly opposed.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
N0020-5	Five hundred AGL operations are totally unacceptable and the LLCNPC wants to go on record as strongly opposed.	Your comment is noted. The potential effects on residential uses around Lake Louise are described in the DEIS in Sections 3.1.10.2 and 3.1.10.3.1. The Air Force has defined Alternative E to reduce overflight of the Lake Louise area. Other mitigations to minimize impacts on this and other communities are being considered and selected mitigations are included in the FEIS and ROD.
N0021-1	As a former military aviator and currently a civil aviation user I feel this is a good example wasted federal dollars and valuable military assets. This whole project is not needed. It appears to be an EMPIRE BUILDING PROJECT which I oppose.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force units based within the State of Alaska face an exceptional challenge to meet compelling and increasingly urgent needs borne out of fighting wars. In an era of persistent combat operations, the Army and Air Force need to continue to generate new technologies, learn from battlefield experiences, update tactics, and train intensively to face a committed and agile enemy. Each of these challenges drives the purpose and the need for modernization and enhancements to the range and airspace infrastructure that replicate the modern battlefield for training and testing in Alaska. In preparing the Final EIS the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century.
N0022-1	On behalf of the AmberLake North Homeowner's Association, who won, material sites, for the prosperity of its creation by the DNR, the position is that we object.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0022-2	We were created for public purpose and mission. We have had past experiences, of being excluded from consistencies reviews in coastal consistencies, due to re-drawn boundaries. We have had plane crashes, not addressed by the DNR, to the satisfaction needed. We can not be subject to political whim, because there is a record establishing the objectionable nature which is be ruled under a recreational standard, such as when opposing the loss of Oil Well Road, for keeping animals protected in the corridor called Alaska Wild Rivers; before the Alaska legislature(by testimony).	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0022-3	The State has a whistle blower statue, but only for state employees. This makes the EIS deficient on its face, because there are unsettled land claims in our area. If the State has not reconciled, the tentatively transferred federal land to the state, and notices have been ignored because of the whistleblower	Thank you for your comment. None of the JPARC proposals involve land acquisition. Also, none of the JPARC proposals involve surface activities in the Amberlake/Amberlake North region. No land interests would be affected in this area.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>statue and employees, who do not have confidence in their job security.....the region known as Amberlake/Amberlake North; humbly respects removal, from your consideration.</p> <p>Creating titles on non recognized parties, before claims are settled, makes this region unsuitable for your or the nation's needs.</p>	
N0022-4	<p>Peer review is deficient under an engineering standard, because this past semester, peer review demonstrated that buildings do not implode by fire intensity, because the quantum physics properties recognize the second property of thermodynamics. That property has fire reversing on its self, and is seen. The necessity does not call for an EIS.</p> <p>The idea that you can use quantum physics, and I can get academically punished, is ground, to file a complaint. Who am I going to complain to?</p> <p>When a student desires to know the truth and the truth is structured to support social sciences only, I object under science.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
N0022-5	<p>Until the President of the United States decides the land Claim issues, decisions concerning who owns what, will cloud your efforts. I applaud your science, but I am bound to a rock geology standard, that is suppose to give the prevailing notice or approval. While those who seek to discredit me, my work is on Elmendorf, and Eielson ABF.</p>	<p>Thank you for your comment. The JPARC proposals do not involve any land acquisition actions. Land status is important to understand who is responsible for affected lands and their management priorities. However, in the DEIS, the impacts on surface uses and resources is the focus. The DEIS provides an assessment of impacts for a full range of physical, biological and human resources and activities.</p>
N0023-1	<p>for the opportunity to make comments to the Alaskan Command. We appreciate your desire to get public input, and we hope and pray that you take us very very seriously. I have over 15000 hours, and 45 years experience as a commercial pilot and flight instructor in this area of Alaska. Training dozens of people in the Glennallen, Chickaloon, Tok, and Bettles area. We make numerous flights to Fairbanks from our base at AK-59 King Ranch, operating 14 aircraft, 3 turbine helicopters, from our base north toward Fairbanks, Talkeetna and Paxson. My son, David King operates in the Alaska Range, especially in the Tangle Lakes area, with three helicopters, in mining operations. We oppose the expansion of the FOX MOA, because it endangers our people, our business, and our lifestyle. We have managed all of these years to be accident free, but an expansion of the MOAs, puts a greater risk on all of us. We're not authorities in military operations, how can we be experts in military operations? But we think it will be more risky for all of us.</p>	<p>The concerns expressed about the proposed Fox 3/Paxon MOA were considered when planning and proposing this airspace expansion. In response to scoping comments, the Alternative E configuration was also proposed to lessen potential impacts on the higher use areas. The expanded airspace and lower altitudes are essential in training in those much advanced tactics newer (fifth) generation aircraft would face in a combat environment that were not yet factors when the current training airspace was established 15 years ago. We realize this expansion would create a greater need to share airspace that has mostly been used exclusively by civil aircraft. For that reason, it would be contingent upon all users to consider those options that would permit and help ensure the safe, compatible use of this airspace. The Air Force would use those existing and proposed mitigation measures addressed in Sections 3.1.1 (Airspace Management) and 3.1.3 (Flight Safety) and Appendix K (Mitigations) to the greatest extent possible to minimize any impacts on other airspace uses.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
N0023-2	<p>We oppose the expansion of the FOX MOA, because it endangers our people, our business, and our lifestyle....And for sure it will change the freedom that we have had all of our lives, hunting, mining, working, and flying in these areas that are proposed to become Military Operations areas....</p> <p>We are the kind of people that are very supportive of our military. We really like the free lifestyle of Alaska. We like our guns, our hunting, flying low, gravel bar-hopping, and flying around the peaks.</p>	See comment response N0025-1.
N0023-3	We fought the expansions of Federal lands for Parks, and have seen the encroachment of Federal rules upon us through the years. When we lived in Bettles, we opposed the massive Parks acquisition of The Gates of the Arctic; sitting in meetings and voicing our opinions. The same thing happened to us when we lived in Glennallen for eight years; just at the time the Wrangle-St Elias Park was established. We voiced our opinions and we never really got any good answers. They said it wouldn't effect public flying, but then we began to hear that they complained that we flew below 2000 feet above Park lands.	<p>None of the JPARC proposals involve acquisition of new land; however, one proposal seeks intermittent use of State land and five proposals involve changes that would expand Special Use Airspace. The FAA will play a key role in fully exploring and defining how these actions are implemented so that all users (civilian and military) maintain reasonable and safe access to airspace for the multiple purposes that aviation supports in Alaska.</p> <p>The cumulative effects of these actions, particularly on civilian air access, are addressed in Section 4.8 of the Draft EIS. The EIS will include some changes to this chapter to address topics and input from public and agency comments. The overall findings and conclusions of the EIS remain the same, in consideration of the mitigations that the proponents will implement.</p>
N0023-4	I can't ever remember getting a response from these comment sections that we fill out. Does it really do any good to fill these out. We know our voices are being heard, but does it make any difference? Please respond. We are people who are seriously impacted by the expansion of military operations.	Public and agency input does make a difference. Thank you for your input. The National Environmental Policy Act requires Federal government agencies to consider public input during preparation of the Draft EIS. The purpose of the input obtained during the scoping process is to assist the EIS preparers in identifying and addressing the issues that are important to the public. The Federal agency then has agency discretion as to whether or not how to modify proposed actions and alternatives. The Draft EIS addresses the potential environmental impacts from the alternatives proposed once they have been more clearly defined. In the Final EIS, the government must not only consider public and agency input, but also must respond to substantive input in the Final EIS and before making final decisions. Alaskan Command (ALCOM), the U.S. Army, and the U.S. Air Force have considered Draft EIS comments in this Final EIS preparation.
N0024-1	On behalf of the Alaska Railroad Board of Directors and our employees, I would like to express our support for the continued development and investment in the Joint Pacific Alaska Range Complex (JPARC). The JPARC Draft Environmental Impact Statement (DEIS) is a welcomed next	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>step in a process that we hope will result in enhanced training opportunities for our United States Armed Forces.</p> <p>As a state-owned corporation, part of the Alaska Railroad’s charter is to support economic development and provide critical support services to our military operations. Our current project to build a bridge across the Tanana River near Salcha meets both requirements. This project is phase one of a multi-phased project called the Northern Rail Extension that will eventually build rail to Delta Junction. This will support future resource development, passenger service options for civilians and military personnel, and will connect the Fort Greely Army Installation by rail to all other major military installations and strategic port facilities in Alaska. In the short term, the Tanana Bridge will provide an important year-round transportation land link to the vast military training grounds encompassed in the JPARC area.</p> <p>We are proud to be constructing a project that represents an important first step in modernizing and enhancing JPARC and we encourage the adoption of alternatives that continue building on this investment. JPARC is the largest military training range in the United States and is critical to securing and defending our nation.</p> <p>The Alaska Railroad will continue to work with the State of Alaska, the Federal Government, the U.S. Military and the local community to help ensure we are providing the best support possible to the courageous men and women who defend our nation.</p>	
N0025-1	<p>State surveys have shown that the majority of Alaskans cherish the beauty, peace and quiet of wild places, and consider that peace and quiet necessary and important to their lives. Natural Quiet is a natural resource that is an essential ingredient of wild areas.</p>	<p>The Air Force recognizes that there will potentially be some impacts to the population in the affected region of influence under the proposed actions. Some persons may experience diminished quality of life. However, quality of life is a subjective term and is highly dependent on various factors that are subject to bias and arbitrariness. Therefore, impacts to quality of life are subjective experiences and not all residents and/or visitors may feel their quality of life or experience would be severely impacted. Common factors for how people define their quality of life include wealth, employment, health, recreation, leisure time, access, safety, wildlife, climate, and the surrounding natural environment. These and additional factors are addressed under separate resource areas (i.e., airspace management and use, noise, biological resources, land use and recreation, socioeconomics, safety, air quality, subsistence, etc.) in the EIS so that the significance of each action on each resource area considers both context and intensity as required under</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		NEPA.
N0025-2	AQRC reluctantly supports the no-action alternative, but has a strong preference for an alternative that would reduce the size of the existing MOAs, not leave them as they are or increase them.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The statement expressed in the comment, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Purpose and Need for the Proposed Actions, Section 1.2 and 1.3.
N0025-3	While AQRC is appreciative of the role of the military and the need for training to stay current, the proposal to, once again, expand the already enormous areas of MOAs and increase the training exercises with their accompanying noise, safety and environmental degradation issues, sacrifices the quality of life that Alaskans cherish.	See comment response N0025 - 1.
N0025-4	It is also a major threat to wildlife resources.	<p>Animal responses to low-level flights have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and waterfowl. Upon analysis, there were no indications that wildlife health or abundance would be adversely affected by the project alternatives. Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p> <p>In addition, the U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Dall sheep lambing and bird concentration areas are included in the flight restricted areas for pilot/aircraft safety (e.g., to avoid bird strikes) and wildlife protection.</p>
N0025-5	Low altitudes to 500 feet are not compatible with acceptable civilian quality of life.	See comment response N0025-1.
N0025-6	Both Alternatives A and E include this level which was rejected in the past by both military and civilian reviewers and should be rejected now.	The need for modernization of the Military Operations Area (MOA) structure is spelled out in Chapter 1 of the EIS. A larger area with low airspace is required to conduct realistic training for Air Force pilots. The MOAs will continue to be shared airspace with general aviation and the impacts are anticipated to be manageable with appropriate mitigations to avoid noise-sensitive areas.
N0025-7	Noise created by military aircraft adversely affects rural and backcountry users.	The Air Force recognizes that noise created by military aircraft has the potential to affect rural and backcountry users. These potential effects are discussed in the EIS as they relate to multiple resource areas, including

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		Cultural Resources, Land Use, Socioeconomics, Subsistence, and Environmental Justice. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
N0025-8	There are all kinds of recreationists along the Richardson and Denali Highways, cabin owners in the Lake Louise area, backpackers in the Talkeetna Mountains and near the Denali Highway, and hunters and fisher throughout the expanded areas being proposed. The mitigation suggestion of publishing times of training missions, as proposed, will not be sufficient to meet their many and varied interests and needs.	Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation from the Fox 3 Expansion and New Paxon MOA proposal. In addition to publishing times of training missions, other proposed mitigation include seasonal avoidance areas; expanding the existing Delta National Wild and Scenic River and Gulkana National Wild River to include all portions within the new MOA boundaries; and avoiding overflight of popular hunting areas, campgrounds, and trails between June 27 and July 11. These areas include Brushkana Creek campground, Tangle Lakes campground, Paxon Lake campground, Clearwater Wayside, One Mile Creek/Wolverine Mountain, Tangle Lakes trail, Gulkana River raft trail, Castner Glacier trail Sourdough campground, Lake Louise State Recreation Area, Crosswind Lake, and Matanuska Valley Moose Range.
N0025-9	Further, there are many homes and growing communities along the Glenn and Richardson Highways, and elsewhere in the Copper River Basin that would be negatively affected by either Alternative A or E.	The Glenn Highway does not underlie the airspace for any of the alternatives proposed for the Fox 3 Military Operations Area (MOA) expansion/new Paxon MOA. The Paxon component of both Alternatives A and E does cross the Richardson Highway; therefore, the area is part of the affected environment and the potential environmental consequences described throughout Chapter 3, Section 3.1 would apply. Portions of the Upper Copper River Basin and the Middle Copper River Basin are within the proposed boundaries. Table 4-1 in the Draft EIS acknowledges that the Copper River Basin Area could potentially experience noise effects from flight activity on surface/ground under the Fox 3 MOA and new Paxon MOA alternative. Section 3.1.12.3 provides a discussion on noise impacts to socioeconomic resources and property values under the Fox 3 MOA and new Paxon MOA alternative. Although the potential impacts on property values are not quantified due to the lack of available data and the complexity of potential variables, the concern for noise impacts on residential areas and the potential affects to property values is recognized as a major concern; therefore the action has been determined to result in significant impacts. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
N0025-10	The Draft EIS quotes various standard noise measurements such as the day-night average noise level and the FAA and EPA standards for noise safety.	The Draft EIS provides time-averaged noise levels such as the day-night average sound level (DNL) in accordance with EPA and FAA standards.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>The FAA mission is airplane safety. The EPA standards address noise as it effects physical health. None of this is relevant. As is admitted in Chapter 3, noise is not experienced as an average and noise increase in quiet areas has greater impact than in less quiet areas. The impact of machine or ordnance noise is to remove peace and quiet. The Draft EIS Alternative A indicates that sonic booms would become much more frequent in Fox 3 and “would be expected to be considered significant.” (3.1.2) According to the Draft EIS, in Alternative A subsonic noise under the Fox 3 expansion and new Paxson MOA would result in problems. “Overall, the relative (noise)change is high, and in quiet settings, these increases would be highly noticeable and cause potentially significant impacts on communities.” (3-79)</p>	<p>However, the Draft EIS also provides supplemental noise metrics that describe individual noise events. Individual aircraft overflights are described using the sound exposure level (SEL) while individual munitions detonation events are described using peak noise levels (e.g., see Tables 3-5 and Figure 3-26).</p> <p>As stated in the Draft EIS, noise impacts associated with certain elements of the proposed action could be considered to be significant. Noise impacts would not be as likely to be considered significant in an area with higher background noise levels. The Mitigations could include establishment of new avoidance areas at specific locations that are particularly noise-sensitive.</p>
N0025-11	<p>The Draft EIS describes the expanded Fox 3 and the new Paxson MOA as being over rural and sparsely populated areas, as if that made noise less of a concern. The opposite is true. The very value of those areas are that they are rural and sparsely populated and therefore a resource to be enjoyed and treasured. If the military judges the effect of its action by the number of people adversely affected, then the judgement being made is that cities are to be saved and wild areas are appropriate sacrifice zones. Many Alaskan civilians see it the other way around. Cities and noise are expanding. Wild areas and natural quiet are shrinking and becoming progressively more valuable. Alaskans live here in this cold dark place because we value the wild and the peace and quiet above all.</p>	<p>See comment response N0025-1.</p>
N0025-12	<p>Wildlife effects.</p> <p>As AQRD has stated in the scoping letter, mammal mating, birthing, feeding, resting, and migrating have been shown to be sensitive to stress in different species at different times. Similarly bird mating, nesting, feeding their young, fledging, food storing for migration or winter, migrating or wintering have been shown to be sensitive to stress in different species at different times. Few, if any, windows of opportunity are available when air noise and/or ordnance will not have negative effects on wildlife. The Alaska Department of Fish and Game has written to you with concerns that both the low level flights and the large scale training could disturb all species. (March 1, 2011)</p>	<p>Section 3.1.8.3 in the DEIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 ft AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter and waterfowl during breeding and migratory seasons. Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p> <p>In addition, the U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Dall sheep lambing and bird concentration areas are included in the flight restricted areas for pilot/aircraft safety (e.g., to avoid bird strikes) and</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		wildlife protection.
N0025-13	The Draft EIS Alternative maps show extensive overlay of Dall Sheep, Caribou calving, and Trumpeter Swan nesting areas. The EIS claims that effects would be short term based on a few studies in other areas. No reference adequately supports the claim that Alternative A with mitigation would have “moderate effects on wildlife and would not be measurable at the population level and not significant.”(3.1.8)	See comment response N0025-12.
N0025-14	No MOA expansion or decrease in flight altitude should occur before specific studies on the effect of various kinds of military noise on moose browsing, Dall sheep lambing in both the Alaska Range and Talkeetna Mountains, caribou calving in the northern Talkeetna Mountains, migration, nesting and fledging of water fowl, including Trumpeter Swan, are done.	<p>Section 3.1.8.3 in the DEIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 ft AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter and waterfowl during breeding and migratory seasons. Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights, to wildlife species. Mitigation identified in the document for three of the definitive projects (Fox/Paxon MOA, RLOD, and BAX Restricted Area expansion) states, “Continue to monitor effects of military training including overflights on select wildlife species (especially herd animals, waterfowl, and raptors) and fisheries during critical seasons such as breeding, young-rearing, and migration. Use knowledge to develop and implement strategies to minimize disturbance to priority wildlife in existing and new SUAs and restricted airspace. This would help natural resources and range managers to coordinate training schedules that minimize impacts on wildlife populations.”</p> <p>In addition, the U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Dall sheep lambing and bird concentration areas are included in the flight restricted areas for pilot/aircraft safety (e.g., to avoid bird strikes) and wildlife protection.</p>
N0025-15	For the above reasons, AQRC supports: No action alternative. No reduction in flight altitude levels. No increase in ordnance and training areas.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0025-16	The perceived need to keep expanding air and training space to keep up with technology never ends. However, our land is finite. When will enough be enough? What volume of civilian outrage is sufficient to stem this inexorable	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	take-over by the military asking itself if it should have more space and answering “More More More.”	land for military use. All land-based military training will take place on existing lands currently withdrawn for military use. A number of the proposals request expanded and additional Military Operations Area (MOA) or airspace for restricted areas in order to meet the purpose and need expressed in Chapter 1, Purpose and Need for the Proposed Actions.
N0026-1	I am submitting the Aircraft Owners and Pilots Association’s formal comments regarding the DEIS for the JPARC, a confirmation of the receipt of our comments would be greatly appreciated. Please feel free to contact me with any questions directly, thank you.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0026-2	The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the Draft Environmental Impact Statement (DEIS) for the modernization and enhancement of ranges, airspace and training areas in the Joint Pacific Alaska Range Complex (JPARC). The U.S. Department of Defense (DoD) has proposed a significant expansion to the Joint Pacific Alaska Range Complex (JPARC) in support of military training. This complex, already the largest military airspace complex in the country occupies some 65,000 square miles of airspace over land, and 42,000 nautical square miles of airspace over the Gulf of Alaska. A series of proposals are included in the DEIS that would further expand this complex. It is imperative that aviation safety and access be preserved for civil users of the complex, given the importance of aviation for basic transportation in the state of Alaska.	We appreciate AOPA’s comments and can assure you, as we have your Alaska representatives, every effort would be made to determine how each JPARC airspace proposal could best be safely implemented without significantly impacting the civil aviation community. Advanced aircraft and weapons system capabilities and changing adversary tactics continue to take our combat operations to new levels that must be incorporated into realistic training scenarios that cannot be fully replicated in a simulator environment. For that reason, the Alaska-based F-22 fighters require this expanded airspace with lower altitudes to conduct realistic training in those tactics they will face from adversaries. Since fifth-generation F-22s have the capability to initiate combat at greater distances, fourth-generation fighters, such as the F-16, must also be able to train in those tactics at greater distances and lower altitudes. Military planners are sensitive to the many concerns AOPA and other stakeholders have expressed over the JPARC proposals and will continue to work with all concerned through the Alaska Civil-Military Aviation Council and other means to find reasonable solutions that help satisfy both civil and military operational requirements.
N0026-3	Economic impact of civil aviation in Alaska According to The Economic Contribution of the Alaska Aviation Industry to Alaska’s Economy, by Northern Economics, Inc., the aviation industry in Alaska contributes \$3.5 billion, or approximately 8%, of the gross state product. The fact that this is proportionately almost 40% greater than the industry’s role in the national economy demonstrates the importance of the aviation industry to Alaska’s economy. An estimated 47,000 jobs are directly and indirectly related to aviation in the state of Alaska. Given the importance of aviation to the state’s economy, it is important that the proposed changes to the airspace do not harm this industry, or significantly	The economic impact of civil aviation as estimated by Northern Economics, Inc. is also provided in Volume II, Section B.12 of the EIS. As stated in Section 3.1.1.2, any procedures and practices to mitigate the potential impacts of an airspace proposal on all airspace uses would be examined by the FAA, Air Force, Army, and other affected interests, as appropriate, in the EIS and aeronautical study review process.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	limit access to resources in the state.	
N0026-4	<p>Proposed MOA Expansion</p> <p>The proposed expansion of the Fox 3 Military Operations Area (MOA) is a significant increase both in lateral and vertical dimensions, lowering the floor from 5,000 feet above ground level (agl) to 500 feet agl. The area encompassed in the proposed expansion is frequently used by general aviation pilots and air taxi operators to support hunting camps and mining operations, conduct air tour operations, access recreational areas or make other uses of this region. Due to its proximity to the population centers of Anchorage, the Mat Su Borough and Fairbanks, where the airspace is heavily used by civil aviation, there would be an increased collision potential with high-speed military aircraft executing training maneuvers in the Fox 3 MOA airspace.</p>	<p>As noted previously, the proposed lateral and vertical expansion of the existing airspace complex is essential in training our modern air forces in those tactics that are now essential for survival in current and anticipated future combat conditions. The Air Force will work with all aviation interests in pursuing those measures that will help ensure the planned use of this proposed airspace for military training activities would have the least impact on civil aviation.</p>
N0026-5	<p>Due to the importance of the proposed airspace area for access to the southern Alaska Range, Denali Highway and Talkeetna Mountains, and to minimize the risk of mid-air collision, expansion of the Fox MOA should be limited to no lower than 5,000 feet agl, and to the smallest possible lateral extent to minimize the risk of mid-air collision.</p>	<p>A 500-foot-AGL floor in the Fox 3 and Paxson MOAs does place military aircraft in the same airspace as nonparticipating aircraft. Just as the Air Force currently shares low airspace in MOAs near Delta Junction, the new airspace will be made safe for all aircraft with a robust Special Use Airspace Information Service (SUAIS) and maximum participation from pilots. This communications network allows a range control operator to inform pilots of the status of military airspace as well as the location of other nearby aircraft. The current SUAIS system would require significant infrastructure additions to cover the new airspace adequately.</p>
N0026-6	<p>The DEIS includes the proposed Paxson MOA, which covers Isabel Pass and portions of the eastern Alaska Range. The pass is a major Visual Flight Rules (VFR) route which links northern Alaska with south central and south east regions of the state.</p>	<p>As described in the FEIS, those altitudes below 14,000 feet MSL in the proposed Paxson MOA would only be used during the six annual major flying exercises and the twice-daily, two-hour timeframes these exercises would occur. The Air Force will work with all aviation interests in pursuing those measures that will help minimize adverse effects on civil aviation activities in this region.</p>
N0026-7	<p>Along the southern flanks of the Alaska Range are mining operations, recreational cabins, airstrips and lakes which experience high levels of use and are not compatible with high speed, low level military aircraft.</p>	<p>The Alternative E configuration for the Fox 3/Paxson MOA proposal was added in consideration of public scoping and FAA comments to avoid those higher use areas and airways that are more prevalent in the southern regions of the Alaska Range. While this may not completely alleviate everyone's concerns, the Air Force would use existing initiatives and consider those FEIS proposed mitigations that would help minimize any impacts those lower level military operations may have on other areas potentially affected by this proposal.</p>
N0026-8	<p>While the concept of VFR corridors has been discussed, the variable weather in this area is not conducive to identifying a single corridor which tends to</p>	<p>As noted in the FEIS proposed mitigations, pending the FAA's study of the preferred airspace proposal alternatives to determine specific impacts and</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	concentrate VFR traffic and increases additional potential for a mid-air collision risk.	mitigation measures to be taken to minimize any impacts on VFR and IFR air traffic, consideration would be given to establishing or expanding existing VFR corridors to provide VFR transit within/near those areas potentially affected by high density military flight activities.
N0026-9	The proposed Paxson MOA should be limited to high altitude usage only, recognizing the importance of Isabel Pass, and the air traffic routes extending from the interior south to Gulkana and beyond for civil aviation.	A 500-foot-AGL floor in the Fox 3 and Paxson MOAs does place military aircraft in the same airspace as nonparticipating aircraft. Just as the Air Force currently shares low airspace in MOAs near Delta Junction, the new airspace will be made safe for all aircraft with a robust Special Use Airspace Information Service (SUAIS) and maximum participation from pilots. This communications network allows a range control operator to inform pilots of the status of military airspace as well as the location of other nearby aircraft. The current SUAIS system would require significant infrastructure additions to cover the new airspace adequately.
N0026-10	Special Use Airspace Information Service Coordination The creation of the Special Use Airspace Information Service (SUAIS) in the 1990's for portions of the JPARC has had a positive impact on VFR usage of the current airspace complex that extends across an area over 300 miles wide. In areas where there is adequate communication and surveillance, this has greatly improved the situational awareness for both civil and military airspace users. Pilots have reported that in the eastern portions of the complex, communications are not adequate and they are experiencing difficulties with the mix of civil uses and military training activities.	The SUAIS has been an effective improvement for regional airspace management. The Air Force is aware of some of its limitations such as range of service and has considered this in the selection of mitigations.
N0026-11	Any expansion of MOA airspace must have accompanying radio coverage, staffing and other elements of the SUAIS infrastructure to allow civil pilots to communicate with Range Control during times that MOAs are active. It is also essential that the tape recorded message broadcast during hours when Range Control is unmanned, be more uniformly broadcast across the JPARC complex. While the current language in the DEIS indicates that "funding will be pursued," given that we still do not have adequate communication in the existing airspace this is not ample assurance that infrastructure will be provided. It is essential that funding be allocated for the addition of radio repeaters, staffing or other infrastructure costs to provide sufficient coverage for any expanded airspace. This infrastructure should be installed and operational before any additional airspace is approved.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS. The Air Force will seek funds, as available, to expand and improve the SUAIS as a recommended and proven method for managing military and civilian air operations. The Final EIS specifies other mitigations for providing

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		safe access and use of airspace for civilian air operations.
N0026-12	<p>IFR Access to MOA airspace Instrument Flight Rules (IFR) access is essential to improving access and aviation safety between Alaska's communities, including those that are under the MOA airspace already contained within the JPARC. Expansion of T-Routes and WAAS approaches are providing this access under a wider range of weather conditions, adding to the benefits of the IFR system. Those benefits are seriously degraded by expansions of MOAs that preclude IFR access for all but emergency or Lifeguard flights. AOPA requests that no additional MOA airspace be added to this complex until provisions are made to provide real-time IFR access through active MOAs.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
N0026-13	<p>While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities both inside and adjacent to MOA airspace given the critical role aviation plays in the Alaskan transportation system.</p>	<p>FAA and military coordination procedures must ensure priority is given to any fire, Medevac, emergency, or other critical service flights requiring access through any airspace environment. This standing requirement would also apply to the JPARC proposed airspace. Measures for providing unrestricted access to other nonemergency or critical service flights would be as noted in the FEIS mitigations.</p>
N0026-14	<p>For example, an aircraft needing to fly from Fairbanks to Tok would normally make a relatively direct 158 nautical mile flight along the airways. When the Delta MOAs are active, aircraft are re-routed, increasing the distance around the airspace to 450 nautical miles, a 2.8 times increase in distance. Due to the huge size of this MOA complex, lacking the ability to cross them using the protections of the IFR system is a significant safety as well as economic impact on the aircraft operators, and the customers that pay for the increased operational cost.</p>	<p>The EIS has determined that there would be economic impacts to commercial and civil aviation aircraft being delayed or diverted to any extent around the proposed airspace when active. The total impacts from such delays are difficult to quantify due to the many factors to be considered in estimating such impacts. Based on the importance of aviation on Alaska's economy and concerns expressed during the public scoping comment period, potential economic environmental consequences to socioeconomic resources associated with the Fox 3 MOA expansion and New Paxon MOA alternatives are determined to be significant. As stated in Section 3.1.1.2, any procedures and practices to mitigate the potential impacts of an airspace proposal on all airspace uses would be examined by the FAA, Air Force, Army, and other affected interests, as appropriate, in the EIS and aeronautical study review process.</p>
N0026-15	<p>The relatively low volumes of IFR operations suggest that the impact to military training of supporting IFR access would be minimal. As more military actions across the globe are conducted around civil flight operations, learning how to dynamically allocate airspace will also help the military "train like they fight." The JPARC provides an ideal test bed to develop this capability, which will require cooperation with the FAA and military agencies.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force will continue to work closely with the FAA and other agencies, as necessary, to help seek reasonable solutions to all civil and military airspace needs.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
N0026-16	<p>Proposed Battle Area Complex Restricted Area</p> <p>The proposal to establish restricted airspace over the Battle Area Complex southeast of Delta Junction is of particular concern to the civil aviation community. Existing Restricted Area 2202 to the west already forces civil traffic out of the most desirable terrain route to and from Isabel Pass, a major VFR corridor connecting the northern half of the state to south central and south eastern Alaska. Winds and highly variable weather associated with the Alaska Range and the mountain pass make it impractical to confine civil traffic to a single, narrow corridor in this area.</p>	<p>This concern was identified during scoping and is noted in the FEIS Airspace Management evaluation of this Restricted Area proposal as an adverse impact. This and other potential effects of this proposal on other airspace uses will be examined by the FAA and the Army to determine how the Army’s training needs can best be accommodated while minimizing impacts on both VFR and IFR air traffic.</p>
N0026-17	<p>AOPA opposes the addition of restricted airspace as proposed in this area, given the need to access the mountain pass, unique weather and terrain, and presence of existing restricted airspace. We suggest the military seek other means to allow training to take place, such as the controlled firing area used today, where firing is halted when a civil aircraft enters the area.</p>	<p>The U.S. Army has validated the need for restricted airspace as an FAA requirement to conduct ordnance delivery from aircraft operating over the Battle Area Complex. The FAA will NOT allow aerial ordnance delivery in a controlled firing area. The VFR corridor along the Richardson Highway will remain intact to facilitate general aviation traffic through mountain pass. A controlled firing area does not permit Army activities like unmanned aerial vehicle (UAV) operations, laser operations, or operations during periods of low ceiling and visibility. The Army always retains the ability to adapt its training areas to meet current mission requirements.</p>
N0026-18	<p>Realistic Live Ordnance Delivery</p> <p>The proposals to establish restricted airspace for live ordnance delivery impact access between Fairbanks, Delta, the Richardson Highway corridor and the recreational and mineralized areas in the Alaska Range to the south. Existing Restricted Areas R-2211 and R-2202 already inhibit air traffic attempting to transit the airspace. Connecting these two restricted areas would create an overall barrier to access in this area; AOPA would like to see effective mitigation to address these concerns.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
N0026-19	<p>Remotely Piloted Aircraft/Unmanned Aerial Vehicle corridors</p> <p>The DEIS proposes establishing restricted airspace corridors for the purpose of navigating Remotely Piloted Aircraft (RPA)/Unmanned Aerial Vehicles (UAV) from military airfields into various restricted airspace areas. There is no doubt that unmanned aerial vehicles play an important role in today’s military, and that training is required. Integrating these vehicles into the National Airspace System is currently a topic of discussion at the national level. Restricting civil airspace to accommodate UAV transits next to the</p>	<p>Pending any FAA and DoD decisions on how UAV operations can be integrated into the National Airspace System, it is imperative that the military proceed with identifying and evaluating those corridors that will be required to support UAV training activities where this training must occur. The FAA Alaskan Region regional office and Western Service Area will be examining the corridor proposals further to determine if and how they may be implemented while minimizing impacts on the civil aviation community and those airport operations potentially affected by these proposals.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	second largest air transportation hub in the state is a concern for the civil aviation community.	
N0026-20	The FAA has consistently denied the addition of new restricted airspace areas for the sole purpose of RPA/UAV operations or for anything other than hazardous activity since Restricted airspace is for containment of hazardous operations. En-route RPA/UAV flights transitioning between the Eielson Air Force base and existing restricted airspace is not a hazardous operation. The proposed establishment of restricted airspace corridors for this purpose is an attempt to circumnavigate the RPAs/UAVs inability to see-and-avoid participating traffic. While awaiting development of a true sense-and-avoid capability that will allow full integration of unmanned aerial vehicles into the National Airspace System, we must rely on other means to separate unmanned from manned aircraft without segregated airspace. The corridors that are proposed would clearly interfere with the safe and efficient access between Fairbanks, the Richardson Highway Corridor and the Alaska Range.	As UAVs continue to play a critical role in combat operations, operators and strategists must learn and train in the various ways these aircraft can be employed against enemy forces. This requires substantial training for ground crews, intelligence, command and control, and other functions having a role in UAV mission planning and operations. Pending FAA decisions for safely integrating both UAV aircraft operations and ground support systems into the National Airspace System, the FEIS assessment of a restricted area designation for each corridor considers how this most restrictive option could affect other airspace uses. The FAA and DoD continue to explore means for accomplishing this integration and until any decisions can be reached on this matter, it is imperative that the military proceed with identifying and evaluating those corridors that will be required to support UAV training activities.
N0026-21	<p>F-16 Relocation Proposal</p> <p>While not identified in the JPARC Draft EIS, announcements in the press have communicated an Air Force plan to relocate the F-16 squadron, currently based at Eielson Air Force Base in support of military training activities, to Joint Base Elmendorf Richardson (JBER). The stated purpose of the proposed move is to reduce operating costs. Statements in the Draft EIS indicate that part of the justification for expanding the FOX MOA airspace to the south, is to reduce operational costs of training exercises, by lowering the amount of fuel required to reach the training airspace from JBER. These two statements seem to be in conflict with one another.</p>	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The location of the F-16 Aggressor Squadron within Alaska is not connected to the JPARC proposals. The Air Force restructuring action to move the F-16 Aggressor Squadron from Eielson AFB to JBER is not included in the JPARC Modernization and Enhancement EIS. This move is a completely separate NEPA action and a separate NEPA document will be prepared to address the impacts of the restructuring program. The F-16 proposed relocation is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. The details of the proposed F-16 relocation and military training, including Major Flying Exercises such as RED FLAG-Alaska, will be worked out in the coming months. The majority of the JPARC proposals that involve Eielson AFB are Army proposals and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft. Additionally, lower fuel consumption and lower energy costs are important factors for the JPARC proposals in this EIS, but are two of many. Chapter 1, Purpose and Need for the Proposed Actions provides all of the requirements and elements that went into the development of the purpose and the need for each of the proposals planned to modernize and enhance future training at JPARC.
N0026-22	It is also not clear what the impact of relocation of the F-16 squadron might have on airspace and the corresponding civil facilities in Anchorage, including Anchorage International Airport.	The possible relocation of the F-16 mission to Anchorage is a separate, unrelated action to the JPARC proposals. If proposed, the Air Force would address this action in a separate NEPA document and the analysis would assess impacts on Anchorage International Airport. Military planning is

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		dynamic and over time each installation has and will experience increases and decreases as missions move in and out. The Services are always trying to maintain balanced use of their assets and high utilization. This balancing of missions is the likely outcome for Eielson AFB and Joint Base Elmendorf-Richardson.
N0026-23	Given the conflicting nature of these two military proposals, it appears that the F-16 relocation cannot help but influence the cumulative impact of the overall JPARC proposal. More analysis of this plan by the military with presentation to the public is required to understand the true impact on this development to allow informed public comment.	The location of the F-16 Aggressor Squadron within Alaska is not connected to the JPARC proposals. The Air Force restructuring action to move the F-16 Aggressor Squadron from Eielson AFB to JBER is not included in the JPARC Modernization and Enhancement EIS. The possible relocation of the F-16 mission to Joint Base Elmendorf-Richardson would undergo a separate NEPA analysis which to evaluate the effects of such a move on the affected installations and surrounding areas. The relocation of missions is a dynamic process for the military. Most installations have undergone patterns of mission beddowns and relocations over the years, with associated increase and decrease in mission activities and construction. The Services are always trying to maintain balanced use of their assets and high utilization at all times. The EIS will address this concern in Chapter 4, within this context of the historic shrinking and swelling of activity. The EIS can only provide a very broad estimate of which actions could bring about the greatest potential cumulative activities with JPARC actions. It should also be noted that none of these relocations are connected to the proposals in the JPARC EIS, the purpose of which establishes capabilities for various training units and exercises in Alaska.
N0026-24	<p>Fifth Generation Fighter Jet Statement Inconsistent AOPA has concerns with a portion of the JPARC document "description of proposed action and alternatives", Section 2.0, 2.1.1 Fox 3 MOA Expansion and New Paxson MOA which states, "...as the fifth generation of U.S. fighters (F-22 and F-35 aircraft) are developed, fielded and deployed in combat, pilots will need to train in the skills and tactics appropriate for these aircraft within an airspace best configured for such training." This statement is in direct contrast with the United States Air Force (USAF) F35A Training Basing EIS, Airspace and Range Use, F-35A, which states, "...flight activities would take place in existing airspace; no airspace modifications would be required for any of the scenarios."</p> <p>It remains unclear whether the USAF is stating that the addition of fifth generation type fighters require additional airspace accommodations or they will be contained in existing airspace. AOPA would welcome clarification</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The United States Air Force (USAF) F35A Training Basing EIS is a NEPA action completely separate from the JPARC Modernization and Enhancement EIS. Each EIS must assess the issues and impacts specifically within the context of each action in a separate manner.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	on this issue as these two USAF documents appear to be in conflict with one another. With the national implications inherent in this debate, AOPA opposes the creation of additional Special Use Airspace to accommodate new aircraft without further consideration of a "giveback" of airspace no longer needed.	
N0026-25	<p>Evaluation of other Alaska MOAs</p> <p>While the DEIS proposals focus on expansion of the airspace in the core area centered on Eielson AFB, there are historical MOAs in other parts of the state that are defined as elements of the JPARC. Given the emphasis on reduction of operating costs, this is an appropriate time to evaluate the present uses of the Stony, Naknek, Susitna and Galena MOAs to determine if they are still required to meet modern training needs. No data was found in the DEIS on uses of these MOAs other than limited use data on the Stony MOA.</p> <p>AOPA would ask the DoD to perform an analysis of existing and future uses of Stony, Naknek, Susitna, and Galena MOAs as part of JPARC to establish their continued need given the changes in training requirements, and need for operational efficiency described in these proposals. Results should be included in the final JPARC Environmental Impact Statement and shared with the public with an opportunity for comment.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources. The statement and request expressed in the comment, however, do not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Purpose and Need for the Proposed Actions, Sections 1.2 and 1.3 of the Draft EIS. Additionally, the MOAs noted in the comment are part of the proposal to conduct Night Joint Training.</p>
N0026-26	<p>Summary</p> <p>AOPA appreciates the opportunity to submit comments on the DEIS for the JPARC and looks forward to working with the DoD on solutions that equitably accommodate both the military's need for realistic training, and the needs of the civil aviation community.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
N0026-27	<p>We urge the military to work collaboratively with the aviation community on plans that incorporate more effective IFR coordination for transit through active MOAs and more reliable SUAIS implementation.</p>	<p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
N0026-28	<p>Finally, we implore you to keep in mind that airspace, especially in the Alaskan Frontier, is the lynchpin that enables many small communities to exist. Any alteration to this vital resource must be approached with the utmost caution.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. As noted in a previous comment, efforts by the Army and Air Force will be made to determine how each JPARC airspace proposal could best be safely implemented without significantly impacting the civil aviation community. As the military moves forward with the formal NEPA and FAA processes for evaluating these airspace proposals, the Air Force and Army will continue to be sensitive to AOPA and other stakeholder concerns and</p>

Table N-5. Government Response to Comments (*continued*)

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		work with all concerned through the Alaska Civil-Military Aviation Council and other means to find reasonable solutions that help satisfy both civil and military operational requirements.
N0027-1	Alaska Survival is a Talkeetna-based nonprofit Alaskan corporation that seeks to protect the health of both people and the natural ecosystem by endeavoring to maintain the integrity of Alaska's land, air, and waters.	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments are duly noted and responses provided.
N0027-2	THE NO ACTION ALTERNATIVE: THE ONLY REASONABLE ALTERNATIVE	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0027-3	<p>The JPARC military representatives have said that they cannot consider the No Action Alternative. Page 6 of the DEIS says that the status quo is not good enough for the modern and emerging weapons. There is no proof for this assumption beyond what JPARC says.</p> <p>At the Talkeetna public meeting, we were told that if this expansion is accepted that there would be 2 supersonic sorties a day, 5 days a week with the potential for increased supersonic flights during training periods with other military from other countries. This will irrevocably change the public lands, the environment and the quality of life for those areas. People outside the areas will hear the sonic booms.</p>	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of the Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS. Additionally, military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. In preparing the Final EIS the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts may be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century.
N0027-4	The April, 1997, Record of Decision for the final EIS for the Alaska Military Operations Areas diminished the Fox MOA by 910 square miles to its present location and raised the proposed minimum flight altitude from 3000 feet AGL to 5000 feet AGL due to undesirable noise impacts and to preclude the potential for direct over flight of sensitive resources. These were sensible decisions and should be retained as the status quo.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0027-5	Much of the existing Fox 3 and proposed expansion is within the Mat Su Borough (MSB). The MSB is the fastest growing area in Alaska with the population expecting to double in the next 20-25 years. The expansion of Fox 3 and the creation of Paxson MOA would expand military operations southerly including the Talkeetna Mountains which are adjacent to the growing communities of Lake Louise, Wasilla, Palmer, Sutton, Chickaloon, and Glacier View. The Lake Louise area has approximately 80 year round residents with about 500 private property parcels. To do good planning, it must be assumed that these parcels will be occupied year round in the future.	The proposed Fox 3 Expansion and New Paxson MOA covers portions of two boroughs and two census areas, including the Matanuska-Susitna Borough, the Denali Borough, the Southeast Fairbanks Census Area, and the Valdez-Cordova Census Area. Therefore, the Region of Influence (ROI) for the proposed action is defined as these two boroughs and two census areas. Section 3.1.12.1 addresses the affected environment of the ROI and potential environmental consequences to the ROI in Section 3.1.12.3. Due to concerns expressed during the public comment scoping period, Alternative E for the Fox 3 Expansion and New Paxson MOA was proposed which would be

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		smaller in size with the southern Fox 3 boundary moved approximately 20 NM to the north (see Section 2.1.1.1.2 for detailed description). Under Alternative E, the boundary of the Fox 3 MOA would not extend over Lake Louise. Wasilla, Palmer, Sutton, Chickaloon, and Glacier View are not within the Fox 3 MOA Expansion boundaries under Alternative A or Alternative E.
N0027-6	We support the Lake Louise Community Non Profit Corporation and the Talkeetna Community Council in their concerns of the noise impacts on the local economy, lifestyle, wildlife, recreational use, and civilian aviation.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0027-7	In the 15 years since the last EIS, the civilian use of the air and ground space in the Fox 3 and Paxson MOAs has significantly increased. There is more public use of the air space and the military must take this into consideration.	The increasing civilian use of the Alaska airspace is noted in the FEIS Airspace Management discussions while also stating that no significant increases are projected for the future use of the proposed training airspace as budget cuts, advanced aircraft and weapons system capabilities, and other factors have actually reduced those flight operations over the years. The FEIS discussions also note the significant impacts the Fox 3 and Paxson MOA proposals may have on other airspace uses and those mitigations that will be pursued along with other viable options to address those impacts. All reasonable means will be examined to help ensure the safe, compatible use of civilian and military aircraft within this shared airspace.
N0027-8	These 2 areas are the breadbasket of Alaska, the heart of valuable natural resources that make Alaska what it is. Pristine public land, fish and wildlife resources, remote wilderness lifestyles, hunting, fishing, recreating, subsistence uses. This is what makes Alaska what it is. This is threatened by anything than the No Action Alternative.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0027-9	SUPPORT MSB RESOLUTION 12-076 This Resolution was passed unanimously by the Borough Assembly 6/28/12, and it states our concerns succinctly.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
N0027-10	Many MSB residents and visitors depend upon the airspace within the proposed expanded airspace for accessing the natural resource rich lands and waters below, for accessing private and public lands via aircraft, for commercial enterprise such as air taxi operations, outfitting, hunter/hiker guiding, operating lodges, operating mines, and for various non-commercial, recreation, and subsistence activities, such as hunting, hiking, food gathering, sightseeing.	Section 3.10.1.3 (Land Use/Recreation), Section 3.11.1.3 (Subsistence) and Section 3.1.12.3 (Socioeconomics) of the EIS acknowledge that civilians utilize airspace within the project area, including for commercial enterprise, recreation, and subsistence activities.
N0027-11	The proposed airspace expansion would cover the Nelchina caribou herd calving grounds located within the MSB and the important Dall sheep	Potential effects to these wildlife areas are reviewed in Section 3.1.8.3. Animal responses to low-level flights have been characterized in recent

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>lambing area/important ewe/lamb habitat in the Black Rapids Glacier and Mountain areas.</p>	<p>studies as minor and wildlife seem to habituate to non-harmful stimuli over time. Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights and sonic booms, on wildlife species.</p> <p>To reduce potential for disturbance under new airspace areas, the following new measure was included in text under the Fox/Paxon Section 3.1.8.4 Mitigations: “Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information.”</p>
<p>N0027-12</p>	<p>The proposed lateral and vertical expansions would increase the probability of conflict between civilian and military aircraft. The potential for near misses or midair collisions is significant and will impact general aviation pilots, air taxi pilots, and air charter pilots who use these areas for hunting, fishing and other recreational and subsistence activities traveling at low altitudes under Visual Flight Rules.</p> <p>General aviation, air taxi, and air charter pilots flying under Instrument Flight Rules conditions would be prohibited from travel through an active MOA. The Richardson Highway is a major aviation transportation corridor for civil aviation traveling north-south.</p> <p>We agree with the MSB Assembly that the minimum flight training altitude should NOT be lowered to 500 feet for the Fox 3/Paxson MOA’s due to potential impacts on wildlife, civilian aircraft traffic and recreational uses. In these MOA’s, the Air Force must conduct all supersonic operations at or above 5,000 feet AGL or 12,000 feet MSL whichever is higher in order to reduce sonic boom intensity and its effects on the surface.</p>	<p>The expanded area and lower altitudes proposed for those MOAs are based on current and future training needs that cannot be fully achieved without use of those vertical and lateral parameters. Therefore, the path forward must be to pursue those mitigations and other viable options that would accommodate the safe, mutual use of this airspace by military and nonparticipating aircraft. The FAA will be reviewing these proposals to determine if/how they can be implemented and managed to minimize impacts on other air traffic flows and their Air Traffic Control operations. Pending those study results, the military will continue to work with the different government agencies and civil aviation stakeholders to discuss those solutions that can best serve all airspace needs.</p>
<p>N0027-13</p>	<p>The Department of Defense must delineate and establish seasonal flight avoidance areas and overflight/operational restrictions over wildlife areas underlying any new or expanded MOAs consistent with the current restriction identified in the 1997 Alaska MOA EIS. These restrictions would include, but not be limited to, minimum overflight altitudes over wildlife areas, including waterfowl, raptor and other migratory bird nesting/breeding/concentration areas, Dall sheep lambing areas, caribou and moose critical season habitat areas. These should be reviewed, identified and expanded if necessary with the assistance of the Alaska Department of Fish and Game and the US Fish and Wildlife Service.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>impacts and locations of the proposals in this EIS.</p> <p>The Air Force will be consulting with the U.S. Fish and Wildlife Service and the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of waterfowl concentration and Dall sheep lambing areas.</p>
N0027-14	<p>Time and area restrictions must be evaluated and established to ensure the public's use of the area and the sustainability of the natural resources. There should be NO Major Flying Exercises and overflight of popular subsistence areas, hunting, areas, campgrounds and trails (5000 feet AGL and half-mile lateral distance) during peak use periods between June 27-July 11, mid-August through September, and during other important hunting seasons determined by the Alaska Department of Fish and Game.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
N0027-15	<p>There must be detailed maps, aeronautical charts and information to the public especially in the communities near Fox 3 and Paxson MOA's that identifies flight corridors, restricted or closure areas and dates of training use.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
N0027-16	<p>CUMULATIVE IMPACTS</p> <p>We disagree with the statement on page 13 of DEIS that the cumulative noise impacts that would occur where the twelve JPARC proposed action overlap would not be significant and would not create disproportionately high and adverse environmental or health effects. There is no data supporting this statement.</p>	<p>Aggregate noise impacts of implementing the JPARC proposals are discussed in Section 4.8.2 along with cumulative impacts with DoD and non-DoD actions. Where JPARC proposals overlap geographically, it is unlikely that mission activities would increase additively, since the primary users served by the JPARC proposals are either existing units conducting their ongoing training, or activities for the same set of major flying exercises each year. The DEIS analysis does not indicate that noise levels for any of the proposed actions individually would introduce incompatible impulsive noise levels outside the boundaries of military land. Mitigations will update current noise avoidance procedures to reduce noise effects on underlying noise-sensitive locations and uses.</p>
N0027-17	<p>We disagree with the statement on page 14 that no significant restriction to subsistence resources are expected from the cumulative effects of the JPARC proposed action, other DoD actions, and non-DoD actions.</p>	<p>During the public comment period, several commenters provided input about additional projects and activities (past, ongoing and future) for the region affected by JPARC proposals. The FEIS Chapter 4 will include these additional projects and will update the assessment of cumulative effects where applicable. In general, many of these projects involve surface activities and/or disturbance, whose affects would be different from (rather than additive to) the JPARC actions. Therefore, pathways of impact would likely not intensify but may be more diverse in their effect on a resource (such as wildlife or recreation). Some specific locations may experience multiple types of impacts. Some of these other actions are being evaluated and may cause significant impacts which may require independent mitigation in their decisions.</p>
N0027-18	<p>There are 3 current and proposed actions and 1 legislatively designated area that did not make it to your list of cumulative impacts in the DEIS and must be considered.</p> <p>Proposed Susitna-Watana Hydroelectric Project</p> <p>This is a megaproject that would develop a large footprint in the Fox 3 MOA. It is proposed to build a 700 to 880 foot dam at River Mile 184 of the Susitna River. There would be a permanent airport and a permanent road built. During the construction of the proposed project, there would be many airplane flights bringing workers and equipment into the area. In the next three years, there will be over 50 studies done in the area as part of the Federal Energy Regulatory Commission Licensing process and the NEPA process. The reservoir will be approximately 40 miles long by 2 miles wide</p>	<p>The Alaska Airspace Manager for the Air Force has reviewed the documents on your website and has identified an area where your project and the Air Force's operations may impact one another.</p> <p>If you pursue instrument approaches to your runways for inclement weather operations (instrument flight rules, or IFR), you will require changes to the Federal Aviation Administration (FAA)-designated airspace to use them. When the Air Force is operating in the Fox 3 MOA above the airfields, you will not have the necessary IFR access to the instrument approaches. Prior planning is the easiest way to avoid delays and diversions due to active military airspace.</p> <p>Outside of days with low visibility or clouds, we suspect that the majority of your operations would be visual flight rules (VFR), and therefore not require the instrument procedures. During VFR flights, your aircraft would not be</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>and will be a focal point for increased human presence in the project area.</p> <p>Mineral Exploration/Production in Fox 3 and Paxson MOA</p> <p>There is active mineral exploration on claims by the company Pure Nickel's Man Alaska Project (2009-2014). These are 240 miles of claims on state land called the Denali Block as well as some on the federal Bureau of Land Management land. The production could be open pit or underground mining. Both methods involve waste rock dumps, tailing stacks and ponds, toxic dust from ore trucks, mine drainage, transmission lines, and access roads. This mineral exploration affects the same migratory wildlife, and the same recreational and subsistence resources of the JPARC expansion DEIS and has its own air and noise pollution negative impacts.</p> <p>Denali Air Special Recreational Use Permit</p> <p>Denali Air is requesting to be able to conduct scenic glacier landings by fixed-wing aircraft near Mt. Deborah on portions of the Yanert and Gillian Glaciers, with up to three departures daily from May 10 to October 10. Currently, BLM is conducting an Environmental Assessment.</p> <p>Nelchina Public Use Area (NPUA)</p> <p>The NPUA encompasses 2.5 million acres of state land in the Talkeetna Mountains and was established by the state legislature in 1985. AS 41.23.010 states that the mandate is to protect, perpetuate, and enhance the fish and wildlife habitat and the public enjoyment of such habitat by the activities of fishing, hunting, trapping, recreation, and additional public uses. In particular, the Nelchina Caribou calving grounds, trumpeter swan nesting areas, and habitats for Dall sheep and brown bear are to be protected. Under AS 41.23.020, the Alaska Department of Natural Resources is directed to adopt a management plan, but this has never been done. It has been managed for multiple-use under the guidelines of the 1985 Susitna Area Plan and now under the 2010 Susitna Matanuska Area Plan, currently under appeal.</p> <p>Not enough attention is being given to the proposed JPARC expansion on this this legislatively designated area, which is vulnerable to project impacts because there is no specific management plan. This needs to be considered.</p>	<p>restricted from flying in the MOA with the Air Force aircraft. When we share airspace, the best way to avoid conflicts is through communication which will be enhanced with our Special Use Airspace Information Service (SUAIS). We will provide a radio frequency to talk to our Range Controller on; he is then able to assist with aircraft locations to keep our operations separate. Ensuring your aircraft are transponder-equipped (transmitting a signal) will assist the SUAIS as the aircraft are easier to see on radar by the Range Controller and the fighter aircraft in the area.</p> <p>Finally, your transmission lines are most likely low enough to be of no concern to the Air Force operations as 500 feet AGL is the proposed floor of the new Fox 3 MOA.</p> <p>The 11th Air Force chairs an Alaska Civil-Military Aviation Council (ACMAC) which meets twice annually to discuss shared airspace issues and ways to avoid conflicts. Military, FAA, Alaska Department of Fish and Game (ADFG), Aircraft Owners and Pilots Association (AOPA), Alaska Airmen and other community groups attend this meeting to enhance the safety of all users of the National Airspace System. Alaska Energy Authority contact information has been added to the list of invitees for the next meeting scheduled tentatively for November 2012.</p> <p>A summary of the information on the Susitna-Watana hydroelectric project and an analysis of potential cumulative effects have been added to the EIS (see Section 4.8).</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
N0027-19	<p>CONCLUSION</p> <p>For all of the above reasons, we support the No Action Alternative, the status quo with the caveats discussed in these comments. We do NOT want Alaskan lives and lands to become a live-virtual-constructive range. This expansion creates a war zone type atmosphere in a state that treasures the pristine and spectacular public lands that underlie the expanded Fox 3 MOA and the creation of a new Paxson MOA.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
N0029-1	<p>The General Aviation Association of Fairbanks International Airport works with approximately sixty pilots and businesses in promotion of general aviation in and around the Fairbanks International Airport area. In this context, we are pleased to submit comments on the proposed JPARC expansion. Key points of concern to our membership include:</p> <p>...</p> <p>b) The EIS should strongly re-examine the possibility of expanded SUAIS. This is needed because of the increased low level traffic the JPARC envisions, combined with frequent slow-moving VFR traffic in the area. c) The floors for the Fox MOAs should be re-examined and lifted from the 500 feet proposed to at least 2,000 feet. It should be noted that flight, even VFR flight, at less than 500 feet, as would be needed to remain away from active military operations, is hazardous and in some cases could be deemed illegal. d) UAV Corridors, while understandable for increasingly common UAVs, should not be constructed in such a manner as to significantly restrict access of general aviation aircraft, both VFR and IFR, to Fairbanks airport. It should be noted that there is significant General Aviation traffic on the east-west axis and that the UAV corridors, as proposed, would restrict that, placing higher requirements on fuel to be carried (due to more circuitous routings) or potentially reducing safety margins. e) Finally, the proposed Battle Area Restricted Area is of significant concern. As anyone familiar with the area knows, this Restricted Area would occur in a region of potentially high winds and varying visibilities. To confine the general aviation community to a single north south corridor could easily compromise safety. We ask that this new Restricted Area be dropped from consideration.</p>	<p>Thank you for your comments. We appreciate the support and interest the General Aviation Association and other groups have shown in offering solutions that would help meet both military and civil aviation airspace needs. We realize there are many challenges and must examine all reasonable options for safely and effectively integrating these essential training needs with other airspace uses. The Air Force will continue to use the Alaska Civil-Military Aviation Council and other avenues to address all concerns with military flight activities in Alaska. In response to your comments, as stated in the FEIS mitigations, funding would be pursued to enhance SUAIS coverage within those more distant areas and lower altitudes where this coverage is lacking. We realize there are great concerns over the purpose and need for the proposed Fox 3 and Paxson MOA floors. The required use of those lower altitudes would be limited to the greatest extent possible for achieving those lower-altitude missions while minimizing those periods VFR pilot may have concerns operating within this airspace. There are many concerns over the proposed UAV restricted area corridors and all options would be considered for scheduling use of each corridor so that UAV training needs can be achieved while having the least impact on VFR and IFR access through these areas. The potential impacts of the proposed Battle Area Complex Restricted Area on VFR flights through varying weather conditions were noted in the FEIS Airspace Management discussions and would require further examination by the FAA in their study of this proposal with the Army.</p>
N0029-2	<p>The General Aviation Association of Fairbanks International Airport works with approximately sixty pilots and businesses in promotion of general aviation in and around the Fairbanks International Airport area. In this context, we are pleased to submit comments on the proposed JPARC</p>	<p>Thank you for your comments. We appreciate the support and interest the General Aviation Association and other groups have shown in offering solutions that would help meet both military and civil aviation airspace needs. We realize there are many challenges and must examine all reasonable options for safely and effectively integrating these essential training needs</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>expansion. Key points of concern to our membership include:</p> <p>...</p> <p>b) The EIS should strongly re-examine the possibility of expanded SUAIS. This is needed because of the increased low level traffic the JPARC envisions, combined with frequent slow-moving VFR traffic in the area. c) The floors for the Fox MOAs should be re-examined and lifted from the 500 feet proposed to at least 2,000 feet. It should be noted that flight, even VFR flight, at less than 500 feet, as would be needed to remain away from active military operations, is hazardous and in some cases could be deemed illegal. d) UAV Corridors, while understandable for increasingly common UAVs, should not be constructed in such a manner as to significantly restrict access of general aviation aircraft, both VFR and IFR, to Fairbanks airport. It should be noted that there is significant General Aviation traffic on the east-west axis and that the UAV corridors, as proposed, would restrict that, placing higher requirements on fuel to be carried (due to more circuitous routings) or potentially reducing safety margins. e) Finally, the proposed Battle Area Restricted Area is of significant concern. As anyone familiar with the area knows, this Restricted Area would occur in a region of potentially high winds and varying visibilities. To confine the general aviation community to a single north south corridor could easily compromise safety. We ask that this new Restricted Area be dropped from consideration.</p>	<p>with other airspace uses. The Air Force will continue to use the Alaska Civil-Military Aviation Council and other avenues to address all concerns with military flight activities in Alaska. In response to your comments, as stated in the FEIS mitigations, funding would be pursued to enhance SUAIS coverage within those more distant areas and lower altitudes where this coverage is lacking. We realize there are great concerns over the purpose and need for the proposed Fox 3 and Paxon MOA floors. The required use of those lower altitudes would be limited to the greatest extent possible for achieving those lower-altitude missions while minimizing those periods VFR pilots may have concerns operating within this airspace. There are many concerns over the proposed UAV restricted area corridors and all options would be considered for scheduling use of each corridor so that UAV training needs can be achieved while having the least impact on VFR and IFR access through these areas. The potential impacts of the proposed Battle Area Complex Restricted Area on VFR flights through varying weather conditions were noted in the FEIS Airspace Management discussions and would require further examination by the FAA in their study of this proposal with the Army.</p>
N0029-3	<p>a) in light of the proposed relocation of fighters from Eielson to JBER, the expansion should be re-evaluated. It is likely that training requirements for Eielson based aircraft and airmen would substantially change if the relocation were to occur.</p>	<p>The F-16 Aggressor Squadron proposed relocation from Eielson AFB to Joint Base Elmendorf-Richardson is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. The airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower altitude airspace to reflect the types of combat in which fifth generation F-22 fighters would be engaged. The F-22s have the capability to initiate combat at greater distances than fourth generation fighters, such as the F-16, so fourth generation fighters must apply diverse tactics which require airspace expansion in distance and altitude. The F-22s must train to combat all such threats regardless of where the aggressor aircraft are based.</p> <p>The location of the F-16 Aggressor Squadron within Alaska is not a connected action to the JPARC proposals. The majority of the JPARC proposals that involve Eielson AFB are Army proposals and ALCOM does not anticipate those being impacted by the proposed move of the F-16</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>aircraft. The details of the proposed F-16 relocation and training, including Major Flying Exercises such as RED FLAG-Alaska, will be worked out in the coming months. An environmental analysis will be prepared to address the environmental consequences of the proposed F-16 relocation within Alaska.</p>
N0030-1	<p>Thank you for the opportunity to comment on this important proposal to expand the Joint Pacific Alaska Range Complex (JPARC). The members of the Alaska Miners Association will be severely impacted by this proposal.</p> <p>The Alaska Miners Association is a non-profit membership organization established in 1939 to represent the mining industry in Alaska. The AMA is composed of more than 1400 individual prospectors, geologists and engineers, vendors, suction dredge miners, small family mines, junior mining companies, and major mining companies. Our members look for and produce gold, silver, platinum, molybdenum, diamonds, lead, zinc, copper, coal, limestone, sand and gravel, crushed stone, armor rock, and other materials. Our members live and work throughout the state including much of the area covered by the proposed expansion of JPARC.</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.</p>
N0030-2	<p>Thank you for the opportunity to comment on this important proposal to expand the Joint Pacific Alaska Range Complex (JPARC). The members of the Alaska Miners Association will be severely impacted by this proposal.</p> <p>The Alaska Miners Association is a non-profit membership organization established in 1939 to represent the mining industry in Alaska. The AMA is composed of more than 1400 individual prospectors, geologists and engineers, vendors, suction dredge miners, small family mines, junior mining companies, and major mining companies. Our members look for and produce gold, silver, platinum, molybdenum, diamonds, lead, zinc, copper, coal, limestone, sand and gravel, crushed stone, armor rock, and other materials. Our members live and work throughout the state including much of the area covered by the proposed expansion of JPARC.</p> <p>We are pleased with some of the changes that have been made over previous alternatives but the current proposals DO NOT address the concerns expressed in AMA's letter of March 4, 2011 submitted during the scoping period for the DEIS. AMA noted that "Expansion of restricted airspace will greatly complicate the ability to develop mineral resources on state, borough,</p>	<p>We appreciate your comments and recommendations and the support you have shown our Alaska military forces. It is our hope that we can work with all stakeholders to arrive at reasonable solutions that will address mutual airspace needs to the greatest extent possible. The Final EIS Chapters 1 and 2 address the purpose and need for the greater expanse of airspace and lower altitudes required to meet mission training needs that cannot possibly be accomplished in the existing airspace to be successful in a combat environment. The siting criteria for the proposed airspace actions did not ignore the potential adverse effects each may have on other airspace and land uses such as mining exploration. Rather, it was determined that the formal NEPA and FAA processes should move forward so that the potential consequences of each proposal and mitigation measure could be fully examined. Every effort will be made to fund those communications improvements required to better inform the public of the scheduled and real-time use of the airspace. Pending FAA decisions on how to integrate UAV operations safely and efficiently into the National Airspace System, the military must proceed with identifying and evaluating those corridor options that would best support UAV mission requirements. Restricted Area designations were assessed for these corridors as the most restrictive option</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>federal, and private lands, including Native owned lands. Much of the region covered by JPARC alternatives is remote and is accessible only by air." With the current DEIS proposal this statement should be changed to read "...will effectively close some State of Alaska lands to any use, including exploration and mining." Also, the DEIS does not adequately recognize the conflicts between low-level high speed military aircraft and helicopters and fixed wing aircraft used to access remote exploration and mining properties. The proposed changes in the DEIS will result in significant conflicts regarding access to and use of mineral lands. The DEIS significantly underestimates the potential conflicts and the impact on mining.</p> <p>Specific comments and recommendations:</p> <ol style="list-style-type: none"> 1. Maximize the use of airspace above the 60% of Alaska that is federal land. This recommendation was made in the AMA March 4, 2011 letter but we can discern no attempt to consider this approach. Most of the land under the proposed new and expanded MOAs is state owned and currently available for mineral exploration and development and much of this land has mineral potential and/or active mineral exploration and development. <p>The Alaska Statehood Act promised the State it could select and receive title to approximately 104 million acres out of the 365 million total acres in the State. However, before the State could complete its selections, Congress passed the Alaska National Interest Lands Conservation Act (ANILCA) which placed more than 100 million acres in federal Conservation System Units (CSUs) which included parks, preserves, refuges, monuments, "Wildernesses", wild and scenic rivers, etc. This Act removed these lands from the opportunity for selection by the state and removed them from all commercial development, including resource development. Much of these lands were highly prospective for mineral development. The current JAPARC DEIS would eliminate mineral development on portions of the now State-owned land that was not taken by ANILCA.</p> <p>MOAs could readily be defined to overlay non-multiple use federal lands that are now in federal CSUs and this should be the very first step prior to expansion of any MOA or Restricted airspace.</p> <ol style="list-style-type: none"> 2. Use a minimum 3,000 feet AGL base for military aircraft operating in Military Operations Areas (MOAs). The proposed 500 feet AGL would be 	<p>each could have on other airspace uses. These proposed Restricted Areas and the others proposed for the expanded R-2205, expanded R-2202, and the Battle Area Complex will be further evaluated by the FAA to determine if and how each could be established and managed to minimize impacts on other air traffic. This study also considers both the individual and cumulative impacts these proposals could have on all airspace uses. Pending FAA decisions on each proposal, those proposed mitigations in the Final EIS and other options would be pursued to minimize impacts on those aviation interests requiring access for subsistence flights, mining exploration, habitat surveys, and other such important endeavors. Your continued support and assistance are requested in finding those solutions that would best achieve both AMA and military objectives within the Alaska airspace complex. The Air Force and Army will continue to interact with all stakeholders through the Alaska Civil-Military Aviation Council and other such avenues to help address our mutual needs and concerns.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>unsafe and such restrictions would nearly eliminate the ability for exploration or for mining companies to access their claims or conduct mineral exploration using aircraft. Generally, mining companies operate their aircraft above 1000 feet AGL for safety and to minimize impacts on wildlife and other users. A 3000-foot AGL lower limit for military aircraft would provide a separation safety zone and reduce impacts on wildlife and other users.</p> <p>Expansion of Fox 3 MOA to include a larger area and much lower altitudes would be a huge problem for the mineral industry. The current Fox 3 MOA primarily overlays the Alaska Range and Denali Highway from west of Tangle Lakes to near Cantwell and has a base of 5,000 feet AGL. The proposed geographic expansion would extend south to include much of the Talkeetna Mountains and east to encompass an area east of Tangle Lakes. The proposal would lower the entire expanded MOA to include the airspace down to 500 feet AGL. The expansion would encompass areas with previous mining and much of the 260 sqmi of mining claims that makeup the M.A.N. project. This project north and west of Paxson has received several \$10s of millions of exploration investment over the past 15 years and drilling continues today as this letter is being written.</p> <p>The New Paxson MOA would extend east from the expanded Fox MOA to include the Richardson Highway corridor (including Isabel Pass) down to 500 feet AGL. This MOA includes much of the Alaska Range East of the Richardson Highway to approximately Mt. Kimball, including the Slate Creek (Upper Chistochina) mineral district. There is past mining in this area and there are currently several major exploration projects working here. To impose an MOA with a 500 foot AGL base would be a significant hardship for exploration and development.</p> <p>The only feasible and environmentally acceptable access to most of the Fox 3 MOA and the Paxson MOA for exploration work is by helicopter and fixed wing aircraft.</p> <p>3. The Special Use Airspace Information System (SUAIS) should be expanded to include the Fox 3 and proposed Paxson MOA and all other MOAs in the state.</p> <p>...</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>5. Restricted airspace corridors for Unmanned Aerial Vehicles (UAV) must not extend lower than 3,000 feet AGL. The DEIS proposes to establish corridors where non-military aircraft would be prohibited (Restricted Airspace) when they are being used for UAVs. Several of these corridors bisect, and therefore would block, corridors commonly used by small aircraft, such as a corridor between Eielson AFB and the Tanana Flats Training Area (R-2211), Fort Wainwright to R-2211, and from R-2205 (Yukon Training Area) to R-2002 (Donnelly Training Area), all of which cross both the Richardson Highway and the Tanana River southeast of Fairbanks. The Corridors from Fort Wainwright to the Yukon Training Area (R-2205) and from R-2211 to R-2202 would also impact small aircraft traveling east and southeast of Fairbanks. According to Table 2-15, the corridors would be used approximately 238 days annually (2/3 of the year) and generally between 7 AM and 7 PM, Monday through Friday. The corridors are proposed to be 5 or 8 miles wide and from 1,200 feet AGL to 17,999 feet MSL.</p> <p>These corridors would directly impact mining operations such as flights from Fairbanks to the Pogo Mine and flights from Fairbanks to the Fortymile Mining District. These Restricted Areas, when active, could result in very lengthy detours, at a minimum adding significant time and costs, and in marginal weather, creating a safety hazard by forcing pilots to deviate significantly from the most direct routes and often to fly over more remote areas and higher terrain to reach their destinations.</p> <p>6. The Governor of Alaska, the Alaska Congressional Delegation and the Millennium Safety Foundation should be petitioned to get the Federal Aviation Administration (FAA) to formally define "see and avoid". A definition for what is meant by this term would eliminate the need for Restrictive airspace corridors for UAV operations. This is clearly the simplest solution for this problem.</p> <p>7. Establish a 3,000 feet AGL base for the expansion of R-2205 (Yukon Training Area). This proposed expansion would establish restricted airspace from Eielson AFB to the existing restricted area R-2205 that overlies part of the Yukon Training Area. This alone would be a major problem, even if the UAV corridors were not established. The cumulative impact of the expansion of R-2205 and the proposed UAV corridors would be to restrict</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>aircraft from traveling up and down the Tanana Valley.</p> <p>8. The restricted area proposed between the training area and Fort Greeley must have a base of on not lower than 3,000 feet AGL. General aviation must have the ability to fly the road system from the Glennallen north through the Delta Junction area and on to Fairbanks without encountering a restricted area. Inclement weather is often present in this area, especially between Glennallen and Delta Junction and not allow pilots to fly this route is guaranteed to result in the deaths of many Alaskans when they must fly other more dangerous routes.</p> <p>Thank you for the opportunity to comment on this important issue. The Alaska Miners Association supports our military (a large percentage of our members are military veterans) and recognizes the need for realistic training but this training can be accomplished as we have recommended without compromising the limited areas of this state that are still open to mineral development.</p>	
N0030-3	<p>We are pleased with some of the changes that have been made over previous alternatives but the current proposals DO NOT address the concerns expressed in AMA’s letter of March 4, 2011 submitted during the scoping period for the DEIS. AMA noted that "Expansion of restricted airspace will greatly complicate the ability to develop mineral resources on state, borough, federal, and private lands, including Native owned lands. Much of the region covered by JPARC alternatives is remote and is accessible only by air." With the current DEIS proposal this statement should be changed to read "...will effectively close some State of Alaska lands to any use, including exploration and mining."</p>	<p>The Draft EIS addressed potential impacts on mining from limited air access (under the Fox 3 and new Paxon MOA proposal) and limited surface access (under the Realistic Live Ordnance Delivery proposal). The EIS includes some additional information based on public and agency comments for these two actions. The Air Force is considering a range of methods for maintaining suitable access for existing mineral interests and mining operations, in coordination with managing agencies. Mitigations and new procedures for access are included in the EIS, Appendix K.</p>
N0030-4	<p>The proposed changes in the DEIS will result in significant conflicts regarding access to and use of mineral lands. The DEIS significantly underestimates the potential conflicts and the impact on mining.</p> <p>Specific comments and recommendations: ... 2. Use a minimum 3,000 feet AGL base for military aircraft operating in Military Operations Areas (MOAs). The proposed 500 feet AGL would be unsafe and such restrictions would nearly eliminate the ability for exploration or for mining companies to access their claims or conduct</p>	<p>As noted in the comment, the land underlying the Fox 3 and Paxon MOA proposal includes several mining areas. Mining is generally considered a compatible use with military use of airspace because noise effects do not impact extractive uses. However, air access is important for remote mining in Alaska. The DEIS addresses this need for access in Section 3.1.10.3. Air access may be constrained up to 60 days per year when MFEs occur, and other days for routine training. The Air Force will publish Major Flying Exercise (MFE) schedules in advance so that civilian pilots can plan operations to avoid these times if preferred. Pilots can also coordinate in real time with airspace managers to gain access when the MOAs are inactive, or get clearance to use certain altitudes when the MOAs are active. As a further</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>mineral exploration using aircraft. Generally, mining companies operate their aircraft above 1000 feet AGL for safety and to minimize impacts on wildlife and other users. A 3000-foot AGL lower limit for military aircraft would provide a separation safety zone and reduce impacts on wildlife and other users.</p> <p>Expansion of Fox 3 MOA to include a larger area and much lower altitudes would be a huge problem for the mineral industry. The current Fox 3 MOA primarily overlays the Alaska Range and Denali Highway from west of Tangle Lakes to near Cantwell and has a base of 5,000 feet AGL. The proposed geographic expansion would extend south to include much of the Talkeetna Mountains and east to encompass an area east of Tangle Lakes. The proposal would lower the entire expanded MOA to include the airspace down to 500 feet AGL. The expansion would encompass areas with previous mining and much of the 260 sqmi of mining claims that makeup the M.A.N. project. This project north and west of Paxson has received several \$10s of millions of exploration investment over the past 15 years and drilling continues today as this letter is being written</p>	<p>option, advanced coordination may resolve any particular needs for access that is time-sensitive. This may cause intermittent impacts, but not to the degree that mining operations would be significantly affected. Road access would be unaffected by this proposal.</p>
N0030-5	<p>The New Paxson MOA would extend east from the expanded Fox MOA to include the Richardson Highway corridor (including Isabel Pass) down to 500 feet AGL. This MOA includes much of the Alaska Range East of the Richardson Highway to approximately Mt. Kimball, including the Slate Creek (Upper Chistochina) mineral district. There is past mining in this area and there are currently several major exploration projects working here. To impose an MOA with a 500 foot AGL base would be a significant hardship for exploration and development. The only feasible and environmentally acceptable access to most of the Fox 3 MOA and the Paxson MOA for exploration work is by helicopter and fixed wing aircraft.</p>	<p>See comment response N0030-4.</p>
N0030-6	<p>4. Expansion of Realistic Live Ordnance Delivery (RLOD) must not be over State-owned lands. Currently these activities occur on and over federal land controlled by Department of Defense (DoD). The proposals include expanding RLOD areas onto a considerable acreage of state lands and some BLM lands not currently under DoD control. These lands are open to mining and under Alternative A include a small, active mining in the Portage Creek area in Little Delta River drainage. RLOD requires that lands included "safety controls necessary to exclude nonparticipating persons and aircraft from the WDZ when ordnance delivery training is taking place in the range training area and the associated air and ground surface areas are active". The</p>	<p>The Air Force, in cooperation with the Alaska Department of Natural Resources, will seek all feasible methods to maintain access for multiple uses and to specific locations for valid existing interests. The Final EIS provides proposed mitigations to reduce any significant impacts on mining interests. Valid claims and interest will receive due process for either compensation or reasonable access for their effective durations. Section 3.2.10.3.1 of the Draft EIS noted that mining claims in the affected area may be infeasible with more than 50 percent reduction in access.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>areas would be used and the restrictions would be in place for "90 to 150" days (see page 2-10).</p> <p>Under DEIS Alternative A, the area of state lands subject to these restrictions is 163,000 acres (page 3-144) located Northwest of the Oklahoma Impact Area in the Donnelly Training Area (described in the DEIS as the expansion of Restricted Area 2202 to include underlying lands). As noted above, this area includes a number of state mining claims. Under Alternative B, 234,600 acres of state land are subject to restrictions, including an almost continuous strip of state land between the Tanana Flats Training Area (R-2211) and the Donnelly Training Area Fort Greeley (R-2202). If these restrictions were in place for 90 - 150 days, they would effectively eliminate other uses of these state lands, and specifically mineral exploration and mining. If the area was closed 150 days of the year, it would be impossible to conduct exploration or mining on the claims. If a mining operation did operate in this area, it would repeatedly be forced to suspend operations and evacuate workers which would be totally impractical. The Environmental Consequences section of the DEIS (Section 3.2) does not address this impact on mining. The proposal would preclude current mining and no new mining operations would be possible on this state land. This should have been assessed in Section 3.2.10.3.1.</p>	
N0030-7	<p>5. Restricted airspace corridors for Unmanned Aerial Vehicles (UAV) must not extend lower than 3,000 feet AGL. The DEIS proposes to establish corridors where non-military aircraft would be prohibited (Restricted Airspace) when they are being used for UAVs. Several of these corridors bisect, and therefore would block, corridors commonly used by small aircraft, such as a corridor between Eielson AFB and the Tanana Flats Training Area (R-2211), Fort Wainwright to R-2211, and from R-2205 (Yukon Training Area) to R-2002 (Donnelly Training Area), all of which cross both the Richardson Highway and the Tanana River southeast of Fairbanks. The Corridors from Fort Wainwright to the Yukon Training Area (R-2205) and from R-2211 to R-2202 would also impact small aircraft traveling east and southeast of Fairbanks. According to Table 2-15, the corridors would be used approximately 238 days annually (2/3 of the year) and generally between 7 AM and 7 PM, Monday through Friday. The corridors are proposed to be 5 or 8 miles wide and from 1,200 feet AGL to 17,999 feet MSL.</p>	<p>The EIS Section 2.1.6 provides the siting criteria for the proposed UAV airspace actions. As described in the response to comment G0015-10, stratification of the UAV corridors will allow civilian aircraft to fly either over or below the altitudes used UAV traffic at any given time. Regarding your noted concerns, the Army will make every effort to fund expansion of the Special Use Airspace Information Service (SUAIS) and enhance other advisory services, as needed, to better inform the public of the scheduled use of the existing and proposed airspace as noted in the EIS mitigations. Pending FAA decisions on how to integrate UAV operations safely and efficiently into the National Airspace System, the military must proceed with identifying and evaluating those corridor options that would best support UAV mission requirements. Restricted area designations were assessed for these corridors as the most restrictive option each could have on other airspace uses. These proposed restricted areas and the others proposed for the expanded R-2205, expanded R-2202, and the Battle Area Complex will be further evaluated by the FAA to determine if and how each could be established and managed to minimize impacts on other air traffic. This study</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>These corridors would directly impact mining operations such as flights from Fairbanks to the Pogo Mine and flights from Fairbanks to the Fortymile Mining District. These Restricted Areas, when active, could result in very lengthy detours, at a minimum adding significant time and costs, and in marginal weather, creating a safety hazard by forcing pilots to deviate significantly from the most direct routes and often to fly over more remote areas and higher terrain to reach their destinations.</p>	<p>also considers both the individual and cumulative impacts these proposals could have on all airspace uses. Pending FAA decisions on each proposal, those proposed mitigations in the Final EIS and other options would be pursued to minimize impacts on those aviation interests requiring access for subsistence flights, mining exploration, habitat surveys, and other such important endeavors.</p>
<p>N0030-8</p>	<p>7. Establish a 3,000 feet AGL base for the expansion of R-2205 (Yukon Training Area). This proposed expansion would establish restricted airspace from Eielson AFB to the existing restricted area R-2205 that overlies part of the Yukon Training Area. This alone would be a major problem, even if the UAV corridors were not established. The cumulative impact of the expansion of R-2205 and the proposed UAV corridors would be to restrict aircraft from traveling up and down the Tanana Valley.</p> <p>...</p> <p>Thank you for the opportunity to comment on this important issue. The Alaska Miners Association supports our military (a large percentage of our members are military veterans) and recognizes the need for realistic training but this training can be accomplished as we have recommended without compromising the limited areas of this state that are still open to mineral development.</p>	<p>See the response to Comments N0030-2 and N0030-7. Section 4.8.1 of the Draft EIS describes how combined implementation and use of JPARC airspace proposals could restrict civilian air access through the Fairbanks-Delta Junction area. On a daily basis, the combination of Special Use Airspaces (SUAs) in use and the altitudes activated will alter how civilian instrument flight rules (IFR) and visual flight rules (VFR) traffic operate. The FAA will consider this in its review of the aeronautical proposals, with the intention of maintaining safety and reasonable civilian access to the national airspace. It is likely that civilian operations will find that future passage through this area requires greater coordination with air traffic controllers. Pilots may choose or need to delay their flights or select alternate routes that are less convenient some percentage of the time. This may have minor to moderate effects on land use (such as access to communities or production sites), commercial activity and businesses; however, most can be managed through communication and real-time coordination with air traffic controllers for through access.</p>
<p>N0031-1</p>	<p>As Executive Director of the Alaska Outdoor Council (AOC) I have reviewed the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement DRAFT Environmental Impact Statement (DEIS) and attended a number of public and an individual meeting hosted by very knowledgeable JPARC staff. The Alaska Outdoor Council (AOC) is a statewide organization made up of individual members and clubs that hunt, trap, fish, and recreate outdoors primarily on public lands and waters. AOC represents over 10,000 Alaskans in the regulatory process regarding access to public lands, waters, and renewable resources that they depend on. AOC, and its parent organizations, has advocated for equal access by the public to public resources in Alaska since before Alaskan Statehood was approved by the US Congress and signed into law.</p> <p>In the past AOC has worked cooperatively with the military regarding access within and over Military Operation Areas and weapons transfer across</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	military lands. During the JPARC DEIS public process, AOC found the military staff involved with this project to be knowledgeable and genuinely interested in informing the public. The willingness to extend the original comment period deadline is an example of how JPARC was making sure all Alaskans who may feel they could be impacted by the expansion of military training operations could have their concerns addressed. AOC thanks you for the extra time to comments and the additional information we received on the DEIS.	
N0031-2	AOC offers the following comments regarding Subsistence Resources as they relate to proposed action #1. Fox 3 MOA Expansion and New Paxson MOA: <ul style="list-style-type: none"> • The DEIS violates Title VIII of ANILCA by using race as a factor to determine dependence of federally qualified communities who hunt, trap, fish, and gather vegetation within the Fox 3 MOA and newly proposed Paxson MOA. The history of ANILCA clearly states a position of race neutrality regarding a priority to public resources. An evaluation of possible restrictions on subsistence uses by all federally qualified communities is required by ANILCA 810(a), not just the villages selected in Table 3-24. 	Please see responses to comments G0013-3 and G0013-1.
N0031-3	<ul style="list-style-type: none"> • The DEIS fails to consider adverse impacts on subsistence uses of thousands of Alaskans (average 3,500 licensed hunters annually) who qualify under AS 16.05.258 as subsistence users on State and private lands in the Fox 3 MOA (GMU 13B - 1,428,519 acres of State land, 28,917 acres of private lands. GMU 13A – 2,519,061 acres of State land, 152,282 acres of private land) and newly proposed Paxson MOA (788,082 acres of State land, 330,927 acres of private lands). State and private lands are by far the major land owners under the Fox 3 MOA and proposed Paxson MOA. 	Please see response to comment G0013-1.
N0031-4	The DEIS fails to report Alaskan resident hunter participation in GMU 13. 5,015 hunters reported hunting moose in GMU 13 in 2010. 4,887 hunters reported hunting Nelchina caribou in 2010, ADF&G harvest data. The population of individual Alaskans living in subsistence communities in the vicinity of the proposed expansion of MOA (Table 3-24, JPARC DEIS) total 1,506 Alaskan residents.	Data has been added as requested in the Final EIS.
N0031-5	The final ROD on the JPARC Modernization and Enhancement should account for impacts to all subsistence users under both federal, ANILCA Title VIII and State subsistence laws, AS 16.05.258, not just the 1,506 subsistence users listed in JPARC DEIS Table 3-24.	Please see response to comment G0013-1.
N0031-6	AOC offers the following comments regarding Biological Resources as they	The Air Force recognizes that there are many individuals and communities

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>relate to proposed action #1. Fox 3 MOA Expansion and New Paxson MOA:</p> <ul style="list-style-type: none"> • Biological resources are currently being managed for an abundant harvestable surplus of moose and caribou by ADF&G. The availability of moose and caribou directly impacts thousands of Alaskan families who choose to make gathering a wildfood harvest part of their sustenance. Fox 3 MOA and the proposed expansion plus the newly created Paxson MOA is airspace over one of the few areas in Alaska where predator/prey management under State law, AS 16.05.255(e) – (g), can be successfully conducted. The final ROD on the JPARC Modernization and Enhancement proposed action #1. Fox 3 MOA Expansion and New Paxson MOA should take into consideration the fact that biological resource enhancement programs are not allowed by federal land managers in the vicinity of the proposed action. Federal land managers continue to reduce the areas where the State may conduct predator/prey management, which makes any adverse impact on biological resources where the state can still manage for abundant harvest that much more of value to Alaskans. 	<p>who rely on the subsistence resources under the proposed Fox 3 and Paxson MOAs. The region of influence (ROI) for this proposed action focused on those communities directly beneath or within 20 nautical miles (NM) of the proposed airspace in order to provide the characteristics of those communities who depend on the affected subsistence resources and may have fewer opportunities to find alternative subsistence resources. The 20-NM ROI was used as a best estimate of a maximum distance traveled without the use of aircraft. Text in the EIS has been revised to clarify the purpose and origin of the . Text has also been added to note that while the communities listed in Table 3-24 depend on the affected subsistence resources, there are individuals from other communities who also harvest subsistence resources in the area who could be also be adversely affected by potential impacts.</p>
N0031-7	<p>The expansion of Fox 3 MOA and the addition of the proposed Paxson MOA in combination with the lowering of the AGL down to 500 feet has the potential to negatively impact a large number of Alaskans who hunt, trap, fish, and recreate via snowmachine, ATV, boat, or aircraft throughout the year in the proposed area. AOC does not want to see folk’s use of public resources on public lands underlying this proposed action diminished by proposed military activities.</p>	<p>Section 3.1.10.3.1 of the DEIS acknowledges that the proposed action, including noise associated with low-level and supersonic overflight, could lessen recreational experiences for some persons. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
N0031-8	<p>AOC strongly supports the militaries presents in Alaska and hopes to work toward continuing our public access to lands under MOAs.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.</p>
N0032-1	<p>The Fairbanks International Airport Operators Council (AOC) is comprised of managers, directors, and owners of businesses and organizations conducting business at Fairbanks International Airport and in the Fairbanks aviation community. The AOC consortium includes representatives from airline and regional air carriers, ground handling services, commuter and air taxi services, local tour companies and advocates for interests in the private aviation community. We have participated in the JPARC public meetings held in Fairbanks, and based on our analysis of the Draft EIS document, would like to comments concerning the proposals.</p> <p>Economic impact of the airport on Fairbanks and Fairbanks North Star Borough is significant. As second busiest passenger airport in the state, the</p>	<p>We appreciate your comments and the support your organization has shown our Alaska military forces. The potential adverse effects the different JPARC airspace proposals may have on other airspace uses, to include uses upon which economic development and subsistence are dependent in Alaska, are also of great concern to the military. Many of the concerns your Council and other stakeholders raised during scoping and the Draft EIS review were considered in the Final EIS preferred airspace alternatives and mitigations to the extent possible to meet both your expectations and the military’s essential training requirements. Pending FAA formal review of these proposals to determine if and how each proposal may affect IFR and VFR air traffic routes and air traffic control system capabilities, both the Air Force and Army would work with all stakeholders to arrive at reasonable solutions that can best</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>airport serves as a hub for more than 50 communities in northern Alaska, with an estimated expenditure of \$261 million annually in wages, capital and operating expenses. It is an economic engine for the community and the state, resulting in over 2,000 jobs, primarily in the Fairbanks North Star Borough, according to a State of Alaska study conducted by Northern Economics. The ability to maintain, or grow this engine, is directly impacted by the ability of air traffic to reach the airport thorough surrounding airspace. Given this back ground, several proposed changes to airspace described in the JPARC Draft EIS are of concern.</p> <p>IFR Access to MOAs</p> <p>The FAA is working to expand and enhance the IFR infrastructure in Alaska. GPS based IFR routes are being developed, and access to rural communities is being enhanced with the addition of WAAS approaches. We have already seen impacts with the recent implementation of the Delta MOAs, which block V-444 between Fairbanks, Delta Junction and communities to the south and east. Additions to MOA airspace, specifically by the proposed Paxon MOA, would further limit IFR access, when active. This is directly in conflict with the efforts to improve safety and access thorough expanding IFR infrastructure. It is essential to develop procedures between the FAA and the military, to provide real-time IFR access to MOAs, at least for limited flight altitudes, to assure routine IFR access between Fairbanks and the surrounding communities. This not only impacts the air taxi or small commuter operators that provide service, but it also impacts the larger air carriers that those commuter flights need to connect with to efficiently move passengers and cargo to more distant locations inside and outside the state. No additional MOA airspace should be established without provisions for real-time IFR access.</p> <p>UAV Corridors</p> <p>The JPARC proposes establishment of corridors for UAV access to restricted areas south and east of Fairbanks, including the use of Restricted Airspace to establish these corridors. Restricting airspace across important civil traffic corridors (including IFR airways), has a direct negative impact on access to Fairbanks International Airport. Other means that do not include segregated airspace must be found that do not restrict access, or compromise safety, with civil aviation arriving or departing from Fairbanks International</p>	<p>satisfy all Alaska aviation interests. Because the Fox 3 MOA and Paxon MOA proposal was a significant scoping concern, the Alternative E configuration was added and it was determined that the lower Paxon MOA altitudes (below 14,000 feet above mean sea level [MSL]) would only be used during the six annual, two-week major flying exercises in order to reduce impacts on higher use air traffic areas. The Air Force would also be working closely with the FAA in planning the scheduled and real-time use of those MOAs so as to minimize any effects on IFR aircraft requiring transit through this airspace. Both the Air Force and Army would also be working closely with the FAA on the restricted area proposals and public concerns over these actions to help determine how each can best be implemented, mitigated, and managed to minimize restrictions on those VFR corridors and IFR routes potentially affected by this active airspace. Be assured that the F-16 relocation will be evaluated separately as it has no association with the JPARC proposals. We realize many challenges lie ahead for determining how each airspace action could be implemented to ensure the safe, compatible use of this airspace by all concerned. Your continued support and assistance are requested in pursuing that objective. The Air Force and Army will continue to interact with all stakeholders through the Alaska Civil-Military Aviation Council and other such avenues to help address our mutual needs and concerns.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Airport.</p> <p>Restricted Areas</p> <p>Several proposals seek to add restricted airspace south and east of Fairbanks. The Realistic Live Ordinance Delivery has an alternative that would link the existing Restricted Areas 2211 and 2202, forming a barrier to civil traffic headed into the Alaska Range from Fairbanks, Delta Junction and the Richardson Highway corridor. We opposed restricting that access to mining, hunting and recreational areas in the Alaska Range. Similarly, the proposal to establish restricted airspace over the Battle Area Complex near Delta Junction also impacts access to Isabel Pass, a major civil aviation corridor between the interior and south central Alaska. Restricting access to these areas again has an impact as many of these flights either depart from or arrive at Fairbanks International Airport.</p> <p>F-16 Relocation</p> <p>Not addressed in the JPARC Draft EIS is the recently proposed relocation of the F-16 aircraft based at Eielson to Joint Base Elmendorf Richardson (JBER). This change would undoubtedly impact the already very busy airspace in the Anchorage area, including Anchorage International Airport. Fairbanks and Anchorage airports are part of a system. We would like to see an analysis of this proposal, to understand the potential impacts of the planned F-16 move on the JPARC proposals.</p> <p>We recognize the value of military training, and understand these activities can have a positive impact on the Fairbanks area. Our interest is in working with the military and FAA to identify mitigations that allow this training to continue, without negatively impacting the activities at Fairbanks International Airport.</p>	
N0032-2	<p>The Fairbanks International Airport Operators Council (AOC) is comprised of managers, directors, and owners of businesses and organizations conducting business at Fairbanks International Airport and in the Fairbanks aviation community. The AOC consortium includes representatives from airline and regional air carriers, ground handling services, commuter and air taxi services, local tour companies and advocates for interests in the private aviation community. We have participated in the JPARC public meetings held in Fairbanks, and based on our analysis of the Draft EIS document,</p>	<p>The EIS acknowledges civil and commercial aviation as a key industry to Alaska and one of the major concerns regarding the JPARC actions is the potential economic impact from changes in airspace management and use. While the total economic impact from these actions is difficult to quantify due to the many complex variables required for such estimates and the lack of available data, due to the concerns expressed during the public scoping comment period, actions that involve changes to airspace use and management have been determined to result in significant economic impacts.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>would like to comments concerning the proposals.</p> <p>Economic impact of the airport on Fairbanks and Fairbanks North Star Borough is significant. As second busiest passenger airport in the state, the airport serves as a hub for more than 50 communities in northern Alaska, with an estimated expenditure of \$261 million annually in wages, capital and operating expenses. It is an economic engine for the community and the state, resulting in over 2,000 jobs, primarily in the Fairbanks North Star Borough, according to a State of Alaska study conducted by Northern Economics. The ability to maintain, or grow this engine, is directly impacted by the ability of air traffic to reach the airport thorough surrounding airspace. Given this back ground, several proposed changes to airspace described in the JPARC Draft EIS are of concern.</p>	<p>The study conducted by Northern Economics, Inc., regarding the important contribution that aviation is to Alaska’s economy has been referenced in Section B.12. The Air Force and the FAA would be addressing such stakeholder concerns further through consultation/interaction with appropriate agencies/organizations.</p>
<p>N0032-3</p>	<p>Restricted Areas</p> <p>Several proposals seek to add restricted airspace south and east of Fairbanks. The Realistic Live Ordinance Delivery has an alternative that would link the existing Restricted Areas 2211 and 2202, forming a barrier to civil traffic headed into the Alaska Range from Fairbanks, Delta Junction and the Richardson Highway corridor. We opposed restricting that access to mining, hunting and recreational areas in the Alaska Range. Similarly, the proposal to establish restricted airspace over the Battle Area Complex near Delta Junction also impacts access to Isabel Pass, a major civil aviation corridor between the interior and south central Alaska. Restricting access to these areas again has an impact as many of these flights either depart from or arrive at Fairbanks International Airport.</p>	<p>Sections 3.2.10.3 and 3.3.10.3 of the EIS acknowledge that the Realistic Live Ordnance and Battle Area Complex actions would result in changes in civilian access that would affect the spatial and temporal availability to specific areas, and associated recreational uses. Sections 3.2.10.4 and 3.3.10.4 list mitigation measures that could be implemented to reduce the impacts. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.</p>
<p>N0032-4</p>	<p>F-16 Relocation Not addressed in the JPARC Draft EIS is the recently proposed relocation of the F-16 aircraft based at Eielson to Joint Base Elmendorf Richardson (JBER). This change would undoubtedly impact the already very busy airspace in the Anchorage area, including Anchorage International Airport. Fairbanks and Anchorage airports are part of a system. We would like to see an analysis of this proposal, to understand the potential impacts of the planned F-16 move on the JPARC proposals. We recognize the value of military training, and understand these activities can have a positive impact on the Fairbanks area.</p>	<p>The F-16 Aggressor Squadron proposed relocation from Eielson AFB to Joint Base Elmendorf-Richardson is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. The airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower altitude airspace to reflect the types of combat in which fifth generation F-22 fighters would be engaged. The F-22s have the capability to initiate combat at greater distances than fourth generation fighters, such as the F-16, so fourth generation fighters must apply diverse tactics which require airspace expansion in distance and altitude. The F-22s must train to combat all such threats regardless of where</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>the aggressor aircraft are based.</p> <p>The location of the F-16 Aggressor Squadron within Alaska is not a connected action to the JPARC proposals. The majority of the JPARC proposals that involve Eielson AFB are Army proposals and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft. The details of the proposed F-16 relocation and training, including Major Flying Exercises such as RED FLAG-Alaska, will be worked out in the coming months. An environmental analysis will be prepared to address the environmental consequences of the proposed F-16 relocation within Alaska.</p>
N0032-5	<p>Our [FAI Airport Operators Council] interest is in working with the military and FAA to identify mitigations that allow this training to continue, without negatively impacting the activities at Fairbanks International Airport.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The military intends to continue to coordinate with land and resource management agencies, airspace users, and airspace managers in order to plan military operations that minimize interference with tribal, public, and agency activities and peak user periods to the maximum extent possible without compromising the quality of training and safety.</p>
N0033-1	<p>Ahtna Incorporated is supportive of the military's effort to enhance and upgrade the military's technological capabilities and weaponry for combat preparation. We appreciate and honor all of the servicemen and women who serve our country. Our Ahtna People have and continue to proudly serve in the military. We are proud of our armed forces, and indebted to them. Unfortunately, Ahtna Incorporated has some concerns with the preliminary JPARC Environmental Impact Statement.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
N0033-2	<p>Section 3.1.9 Cultural Resources page 3-53: In Appendix B Definition of the Resources and Regulatory Setting, section B.9 the definition is given as follows: Cultural resources are prehistoric and historic sites, buildings,</p>	<p>The wording on page 3-50 will be corrected as suggested.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>districts, or objects that are important to a culture or community for scientific, traditional, religious or other purposes. Cultural resources are generally divided into six categories: archeological resources, architectural resources, traditional cultural properties, cultural landscapes, National Historic Landmarks, and National Monuments.</p> <p>Traditional cultural properties are properties, sites, or other resources associated with the cultural practices and beliefs of a living community that link the community to the past and help maintain its cultural identity and are listed or eligible for listing on the National Register. Traditional cultural resources are areas associated with the cultural practices and beliefs of a living community that link the community to its past and help maintain its cultural identity that have not been evaluated for National Register eligibility. Sacred sites are well-known areas associated with cultural practices or beliefs of a living community. Most traditional cultural properties, resources, or sacred sites in Alaska are associated with Alaska Natives. Traditional cultural properties or resources can include archeological resources, locations of prehistoric or historic events, sacred areas, sources of raw materials used in manufacture of tools and sacred objects, certain plants, or traditional hunting and gathering areas. Both historic properties and significant traditional resources identified by Alaska Natives are evaluated for potential adverse impacts of action.</p> <p>On page 3-50, under the title Traditional Cultural Properties and Alaska Native Concern, there is the following statement: There are no Alaska Native tribes within this area, but there are scattered remote residences. There are no properties of traditional religious and cultural importance known to be located within the area. This needs to be corrected.</p> <p>Ahtna Incorporated is one of the 13 Alaskan regional Native corporations. The Ahtna traditional territory stretches from Cantwell across the Alaska Range through Paxson to the Mentasta Mountains. The territory continues south through the Susitna River headwaters to the Chugiak Mountains, east to the Wrangell Mountains, and west to the Talkeetna Mountains. The territory encompasses the entire length to the Copper River from the headwaters to Woods Canyon south of Chitina (Attachment A). The Ahtna people have used and occupied this land for 5000 to 7000 years (USDA-NRCS 1999). Department of Defense Instruction number 4710.02 Enclosure</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>2 section E2.1 states “As tribal boundaries have shifted and tribes have migrated, tribes that seem far removed geographically may have a traditional interest in assets and action at specific, present day installations.” The entire proposed Fox 3 MOA expansion lies entirely within the Ahtna people’s traditional territory. The majority of the proposed Paxson MOA lies within this territory as well (Kari 2010).</p> <p>Ahtna Incorporated is comprised of eight villages: Cantwell, Chistochina, Chitina, Copper Center, Gakona, Gulkana, Mentasta and Tazlina. Each of these villages has a village council which is recognized as its own tribe by the United States government. Each of these villages was contacted by letter, by the United States Air force through the Alaska Command (ALCOM) concerning the JPARC proposal. The ALCOM has also had two meetings with Ahtna Incorporated in regards to the JPARC proposal.</p>	
N0033-3	<p>Paragraph 4 section 3.1.9.31 Environmental Consequences Alternative A states: In compliance with Section 106 of the National Historic Preservation Act (NHPA), ALCOM, on behalf of the Air Force, has completed consultation with the Alaska State Historic Preservation Office (SHPO) and determined that no historic properties will be affected by implementation of the proposed action. Consultation with potentially affected Alaska Native tribes, Alaska Native Claims Settlement Act (ANSCA) corporations, and Tribal government entities regarding ALCOM’s finding of no historic properties affected is ongoing. In accordance with AFI 32-7065, all NHPA Section 106 consultation will be completed, unless circumstances prevent it, prior to finalizing the EIS and signing the ROD. By your own words and actions in this section you acknowledge the Ahtna tribes in the region. Under ANSCA section 14 (h) (1) Regional Native Corporations have the right to receive title from the federal government to existing cemetery sites and historical places. Currently, Ahtna has on file with BLM ten applications for 14 (h) (1) sites within the Fox 3 MOA expansion area. All ten sites have been examined by a Bureau of Indian Affairs (BIA) archeologist and each site received a Certificate of Eligibility. Ahtna Incorporated hopes the protection of the Tangle Lakes Archeological District (VanderHock 2011) is also taken into account. It appears to be a logical conclusion that air traffic and sonic booms should not have a significant impact on these sites. The fact remains that these sites need to be acknowledged in your report.</p>	<p>Section 3.1.9.1 will be revised to include, “Alaska Native tribes in the proposed Paxon MOA and Fox 3 MOA expansion area include the Cheesh-Na Tribe (formerly the Native Village of Chistochina), the Native Village of Gakona, the Knik Tribe, and the Native Village of Tyonek, as well as scattered residences. Properties of traditional religious and cultural importance known to be located within the area include 10 burial sites affiliated with peoples of the Alaska Native Corporation of Ahtna, Inc.”</p>
N0033-4	<p>Section 3.1.8 Biological Resources page 3-38: Under section 3.1.8.1 Affected Environment, the vegetation cover is described as: shrub</p>	<p>The Nowacki 2003 reference will be checked to see if it is listed under another primary author and added if it is found to be missing. On-the-ground</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>communities of willow (<i>salix</i> spp.), birch (<i>Betula</i> spp.), and alder (<i>Alnus</i> spp.) occupy lower slopes and valley bottoms. Forests are rare and confined to low-elevation drainages (Nowacki 1995). The Copper River Basin ecoregion, which underlies the southwestern portion of the expanded Fox 3 MOA and proposed Paxson MOA, is a large wetland complex underlain by thin to moderate thick permafrost and pockmarked with thaw lakes and ponds. A mix of low shrubs and black spruce (<i>Picea mariana</i>) forests and woodlands grows in the wet organic soils. Cottonwood (<i>Populus</i> spp.), willow, and alder line rivers and streams as they braid or meander across the basin. The paper cited in this paragraph by Nowacki is not listed in your references. A Google search of the authors name provided contact information at the USDA Forest Service. Personal correspondence with Mr. Nowacki revealed that the paper cited was an earlier version of an effort to map the ecosystems of Alaska. The newest version was published in 2003. It is a combined effort of the National Park Service, USDA Forest Service, U.S. Geological Survey, and Alaska Biological Research, Inc.</p>	<p>vegetation surveys over all of the project areas were not possible and the project had to rely on the geographic information system (GIS) information that was available. Also, for more discussion on wetlands please see Water Resources Sections 3.X.6 (where X is the section number for a specific proposed action).</p>
N0033-5	<p>According to this paper, the Fox 3 MOA, the Fox 3 MOA expansion, and the proposed Paxson MOA lie within the Alaska Range Transitional Division (Spencer et al, 2003). The description given of this area is “boreal forests distributed in the valleys and lowlands of the division, but wildfire and permafrost have much influence on vegetation. Soils in the mountainous units of the Alaska Range and Lime Hills are generally thin, rocky, and cold, with scattered pockets of permafrost. The Copper Basin floor is formed of interleaved lacustrine deposits, glacial material, and volcanic debris that form fine-grained saturated soils with ice-rich permafrost. The basin support Boreal vegetation patterns, with white spruce and birch on higher ground and black spruce, low shrubs, sedges and mosses growing in wetlands. White spruce and balsam poplar form successional stands along the rivers. The lower slopes of the Talkeetna Mountains are cover with dense thickets of alder that transition to low shrubs in the sub-alpine and blueberry rich alpine tundra. Vegetation of all types succumbs to the harsh conditions at about 4000 feet, leaving the higher area to bare rock, talus (broken loose bedrock), and ice.”</p>	<p>Additional soils and stratigraphy information was added to the Physical Resources section in response to the comment.</p>
N0033-6	<p>The soil surveys for the Copper River area, the Gulkana River describe the cover type as boreal forest. Species composition in boreal forest is determined by wildfire frequency. Wildfire frequency, intensity, and distribution create a mosaic of species across the landscape (USDA 1991).</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. This information will be incorporated into the appropriate parts of the Final EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	The Soils of the Gulkana Area list 47 different forest cover types (Clark and Kautz 1999). The Soils of the Copper River Area list five forest cover types: black spruce, white spruce-quaking aspen, white spruce-paper birch, white spruce-quaking aspen-balsam poplar, and white spruce/black spruce (USDA 1999). White spruce, aspen, and balsam poplar grow on soils with no permafrost (National Park Service 2012).	
N0033-7	The area of the Fox 3 MOA expansion and the new Paxson MOA is an incredibly rich and varied ecosystem and not just black spruce and wetlands. This ecosystem supports Ahtna's year round subsistence resources.	Subsistence resources and activities are important to Alaskans. Potential impacts to subsistence resources and activities from the proposed Fox 3 MOA and new Paxson MOA are evaluated in Section 3.1.13. Where potentially adverse impacts are identified, proposed mitigations are provided in Section 3.1.13.4. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
N0033-8	Boreal forests are a wildfire ecosystem. The largest wildfires in acreage are cause by lightning strikes, while most small acreage fires are human caused. Wildfires create a mosaic of vegetation types across the landscape of different stages of succession (Johnson et al. 2001). Fuel moisture and fuel load are the two largest factors determining fire intensity (Ross et al. 2001). The boreal forest contained in the proposed Fox 3 MOA expansion and Paxson MOA are particularly prone to intense wildfires. In the 1990's there was an intense spruce beetle, <i>Dendroctonus rufipennus</i> , infestation. Several million acres of spruce trees were killed in this decade long outbreak. The Copper River Basin was one of the areas heavily impacted by this infestation. There are still many tens of thousands of beetle killed, standing dead trees within the Copper River Basin (USDA 1997). These standing dead trees are susceptible to torching, where the fire quickly travels up the stem of the tree to the crown. If the wind is blowing the fire can quickly spread to neighboring live trees (USDA 2001).	Wildland fire issues are covered under the Safety Sections 3.X.3 (where X is the section number for a specific proposed action). The wildland fire issue explored under Biological Resources is in Section 3.1.8.3.1, a discussion of the potential for flares to ignite fires. The preparers will incorporate the information provided into the appropriate parts of the Final EIS.
N0033-9	Much of the proposed areas have forest cover types of 1) white spruce, <i>Picea glauca</i> , 2) mixed white spruce/ black spruce, <i>Picea mariana</i> , and 3) black spruce cover type (USDA 1999). These forest types are especially vulnerable to wildfire. This is because of the low moisture content of the leaves compared to deciduous tree, and the presence of dead retained lower branches that is conducive to torching. Black spruce is particularly highly flammable (Chapin et al. 2008).	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. This information will be incorporated into the appropriate parts of the Final EIS.
N0033-10	Finally, heavy wildfire suppression since the 1950 has resulted to excessive fuel loads in the boreal forest. Fire suppression has increased landscape flammability. This is of particular concern because of climate shift in the last	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Mitigation measures to offset the adverse impacts associated with fire suppression for the applicable definitive proposals will continue to be

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	decade due to global warming. This volatility is of great concern around local communities (Chapin et al 2008).	reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
N0033-11	The use of the Chaff & Flare defensive flares over the boreal forest is a great concern to Ahtna Incorporated.	If your concerns are regarding wildland fire, this issue is covered under the Safety sections. Please see Section 3.1.8.3.1 for a discussion of chaff and flare use effects to biological resources. Use of chaff does not influence the frequency or behavior of wildland fires or ignitions.
N0033-12	In Chapter 3.0 Affected Environment and Environmental Consequence it is stated that 1) there will be altitude restrictions of 5000 feet AGL from June through September, and 2000 feet AGL for the rest of the year. 2) It also states that the defensive flare is composed of small pellets of highly flammable material that burn rapidly at extremely high temperatures. It burns completely within approximately 3.5 seconds, or approximately 400 to 500 feet from the release point. There are no independent studies to measure the chance of igniting a wildfire in this highly flammable landscape. What measures will the Air force take to ensure that a wild fire will not be ignited? What measures will the Air Force take if they do ignite a wildfire? Who will be responsible for putting the wildfire out? State and Federal agencies will not suppress fires in areas with possible live ordinance present. One of the papers in your references section (Air Force 1997) Use of flares will be suspended when warranted by the fire condition code. Who determines the fire conditions?	<p>Three primary management actions are used to prevent wildfires. First, a fire danger rating system based on the weather (weather index) is used to reduce the likelihood of a fire by limiting military activities. Certain military activities are restricted when thresholds of wildfire risk are reached. Second, wildfire danger is reduced through the removal of accumulated fuels (e.g., prescribed burning and/or construction and maintenance of fire or fuel breaks). Third, an Initial Attack Response Team remains available during military training activities during high and extreme fire danger to provide a rapid initial response to wildfires in the area. These actions are designed to minimize the potential for wildfires from training activities.</p> <p>In addition to monitoring the fire weather index and modifying planned training activities accordingly, military personnel use other prevention measures, such as establishing nontraining buffers within 0.5 miles of training areas adjacent to non-military land to protect the surrounding areas. Prescribed burns and mechanical thinning would also be conducted for the training areas.</p> <p>Wildfire suppression is conducted by the BLM, Alaska Fire Service, and/or the military fire department. Suppression operations are dependent on the fire management category status of the respective area. Fire planning within the training areas is guided by practices of the Integrated Wildland Fire Management Plan and management practices for each training area by Alaska Wildland Fire Management Plan priorities.</p>
N0033-13	In the environmental consequences section 3.1.8.3.1 there is a discussion on chaff and flare use. It says "extensive studies of chaff particles and defensive flare constituents have found no negative impacts on biological resources. There is nothing cited here. You can't make a statement like that and not back it up. A study was located in the references (Air Force 1997). The Air Force study says that fire danger assessment will be addressed by using BEHAVE, a predictive fire model. Then the paper goes on to say "Although the study examined fire history data from various locations for correlations	<p>The next sentence in the paragraph referenced in the comment gives the most recent review of the topic: "A recent evaluation of the effects of chaff and flares on wildlife applicable to nearby areas is contained in the Delta Military Operations Area Environmental Assessment (Air Force 2010)."</p> <p>It should be noted that use of chaff is not linked to fire ignitions or other environmental effects. Text will be added to provide references and to clarify this.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	between level of flare use, method of flare employment, environmental conditions, and fire occurrence, no correlation could be derived at a statistically valid level.” In short, the Air Force has no idea how chaff and flare will affect the probability of starting a wild fire. There are no independent studies of chaff and flare devices cited.	
N0033-14	The Environmental Effects of Self-Protection Chaff and Flare Final Report states “information from range personnel and investigative reports for specific fires indicates that fire from flares have occurred, even in areas where minimum release altitude is 5000 feet AGL. Specifically, one fire in Meadow Valley, which burned 21,600 acres in 1993, was attributed to flare use according to a BLM fire investigator.”	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
N0033-15	The Alaska Interagency Fire Management plan (1987) provides for a natural fire regime in unit 13 for the purpose of wildlife habitat enhancement. This plan provides for small scale fires in the area. Caribou will not return to a burn area for 50 years. It important to create a mosaic of landscape types for optimum wildlife habitat (Schwanke 2010). Ahtna Incorporated feels that the possibility of chaff & flare cause wild fires will disrupt this management plan. The Air Force’s own report supports the fact that chaff and flare can trigger large acreage fires.	Wildland fire issues are covered under Safety sections. Please see Section 3.1.8.3.1 for a discussion of the potential for flares to ignite fires. It should be noted that use of chaff is not linked to fire ignitions or other environmental effects. Text will be added to provide references and to clarify this.
N0033-16	Section 3.1.8.1 Continued. The EIS acknowledges the fact that “caribou habitat underlies most of the airspace, with summer range and calving habitat underlying the central and western parts of the airspace and winter habitat under both the eastern and western portions.” This is not just “caribou habitat.” This is the Nelchina Caribou Herd range.	“Nelchina Caribou Herd” will be added into text to clarify.
N0033-17	The Nelchina Caribou herd (NCH) population fluctuates between 35,000 to 40,000 animals. It has a migratory range that stretches from north of Tok on the Eagle highway to their calving grounds north of Eureka and west of Lake Louise. After the calving season they disperse though out Unit 13, and conversely throughout most of the proposed Fox 3 MOA expansion, and the proposed Paxson MOA. This is the most road and off road vehicle accessible caribou herd in Alaska. People from Kenai, Soldotna, Anchorage, Wasilla, Palmer, Chickaloon, Sutton, Eureka, Mendeltna, Tolsona, Glenallen, Valdez, Chitina, McCarthy, Copper Center, Tazlina, Glennallen, Gulkana, Gakona, Sourdough, Paxson, Delta, Chistochina, Mentasta, Tok, Tetlin, Dot Lake, Healy Lake and Tanacross depend on this herd for sustenance (Alaska Division of Fish & Game (ADFG), 2008).	Please see response to comment G0013-1.
N0033-18	Harvest records from 1998 to 2010 show an average of 3,023 animals are harvested from this herd annually. There are four years that the harvest was	Section 3.1.13.3 evaluates potential impacts to caribou as a subsistence resource. Specific information as provided for the Nelchina Caribou Herd

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>between 4,500 and 5,800 caribou harvested (Schwanke, 2010). ADFG manages the herd to supply from 2000 to 4000 animals a year (ADFG 2008). In 1997 there were 13,612 hunters registered for the Tier 1 hunt of the NCH. In 1996 there were 19,397 registered hunters (Fall & Simeone 2010). Though these numbers reflect the peak number of hunters since 1990, they do demonstrate the intense hunting pressures the NCH is under.</p>	<p>has been added to this section in the Final EIS.</p>
<p>N0033-19</p>	<p>The NCH has been intensely managed by ADFG since the 1950's. The management objective is to maintain the herd population from 35,000 to 40,000 animals. The ratio between bull to cow management objective is 40 bulls to 100 cows. The tools that ADFG use to manage for these objectives are 1) annual population counts by fixed wing aircraft and helicopter, 2) an active wolf control program, and 3) harvest quotas from several state and federal hunts, and the Ahtna Community Hunt (ADFG 2008). Limiting the flights into game unit 13 will reduce the ability to accurately assess population numbers of the NCH. This will lower the available caribou for annual harvest, as ADFG will have to be more conservative in order to ensure management objectives (Schwanke 2012).</p>	<p>The proposed Fox 3 expansion and new Paxon MOA do place military aircraft in the same airspace as nonparticipating aircraft. This would include Alaska Department of Fish and Game (ADFG) survey aircraft as alluded to in the comment. The Air Force has worked closely with ADFG over the years for safe accomplishment of wildlife and other surveys in other MOAs that include low altitudes. Communication is the key to safely sharing airspace, and the proposed MOAs will be made safe for all aircraft with a robust Special Use Airspace Information System (SUAIS) and maximum participation from pilots. This communications network allows a range control operator to inform pilots of the status of military airspace as well as the location of other nearby aircraft. The current SUAIS system would require significant infrastructure additions to cover the new airspace adequately. In addition, avoidance areas have long been established for the calving season of the Nelchina Caribou Herd.</p>
<p>N0033-20</p>	<p>Section 3.1.8.3.1 Environmental Consequences Alternative A: In this section it is stated that: Wildlife species would be exposed to over flight by military aircraft flying as low as 500 feet above ground level (AGL), potentially causing altered behavior or metabolic effects. Additionally, high speed maneuvers within the proposed air space would create sonic booms, and training would incorporate use of chaff & flares, as defensive measures. Behavioral responses to over flights of 500 feet AGL and above are generally characterized for wildlife species, including various ungulate species, as minor and include individuals assuming an alert posture, rising, walking, or running short distances. Few studies have evaluated the effect of military over flights on moose; several have studied the effect on caribou.”</p> <p>The paper cited as to behavioral responses to over flights (Lawler et al. 2005) only studies the short term effect on caribou by over flights and sonic booms of A-10, F-15, and F-16 aircraft. There is no study cited about over flights and sonic booms of the F-22 and F-35 aircrafts. Additionally, another paper cited about the short term effects on caribou (Manci et al. 1988) states that “escape and strong panic reactions were observed in 65 to 75% of all</p>	<p>These are some of the issues we came up against in finding definitive research for our analysis. Many studies are older, use different aircraft, and often don't give overflight elevations or sound levels, or times of year, or don't quantify animal reactions. Physiological experiments, by their intrusive nature (attaching equipment to wildlife,) usually occurred on captive animals so are difficult to interpret for free-ranging wildlife. It is important to note that the studies cited in Manci et al. (1988) describing responses to overflight at altitudes up to (meaning below) 500 feet AGL. One study is less than 200 feet and includes helicopters and the other is less than 500 feet and also involves helicopters, which are generally believed to create stronger reactions than fixed-wing aircraft at a given distance. These altitudes are an important aspect because, as described in 3.1.8.3, aircraft noise diminishes most rapidly with distance in the first few hundred meters above ground. F-22 and F-35 aircraft, specifically, are most effective at moderate-to-high altitudes and spend the majority of their time at altitudes above 10,000 feet AGL (mostly considerably higher). They would not add appreciably to the numbers of sorties or flight time spent at low altitudes (i.e., between 500 feet AGL and</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	groups to over flights of fixed wing aircraft up to 500 feet AGL. Groups consisting primarily of cows, calves and yearlings tended to show a stronger response to the aircraft than groups of bulls.” The paper goes on to state that “Little is known of the long term effect of noise on the physiology of wild ungulates.”	<p>3,000 feet AGL). The conventional jet aircraft mentioned in the comment are the ones expected to spend more of their time at low altitudes and would be the most likely to overfly wildlife at altitudes less than 3,000 feet AGL, so the studies by Lawler et al (2005) described in the DEIS are appropriate.</p> <p>The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection. To reduce potential for disturbance under new airspace areas, the following new measure was included in text under the Fox/Paxon Section 3.1.8.4 Mitigations: “Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information.” Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p>
N0033-21	Other studies have been undertaken to understand caribou responses to human disturbances. Wolfe et al. in 2000 reports that “Individuals and groups of caribou move away from point sources of disturbance, increase activity and energy expenditure near disturbance, and shift away from areas of extensive and intensive development.” Cameron et al. in 1992 report that caribou herds on the North Slope of Alaska shifted their calving grounds in response to oil field development. Initially the caribou chose to calf near the coast where predators were few. As development increased they shifted the calving ground away from the development. The area the caribou now calf in has increased predation pressure on the calves.	<p>While these are interesting studies, the disturbance of development is very different than that of the intermittent overflight. Development includes sustained noises and nearby human, vehicle, and permanent structure presence. These are perceived differently than responses to overflight. Animal responses to low-level flights have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor, and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. All known caribou calving areas within the JPARC project area were taken into consideration during effects analysis.</p> <p>Please see Appendix E for a review of research on overflight effects to various wildlife species.</p>
N0033-22	Whitten 2001 reported to the House Committee on Resources that caribou calving areas are considered to be critical habitats. Oil development of the Arctic National Wildlife Refuge was halted because the primary area sought for development lay within the calving grounds of the Porcupine Caribou herd. “This large, migratory herd moves between the u.s. and Canada and is vital to the traditional subsistence cultures of numerous Native villages in both countries.”	Your example of oil development differs from effects expected from the JPARC occasional overflights in that it includes continuous noise and presence of humans, vehicles and structures remaining in one place. Section 3.1.8.3 in the DEIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 ft AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor, and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. All known caribou calving areas

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>within the JPARC project area were taken into consideration during effects analysis. The preparers agree with the commenter on the importance of calving areas to caribou.</p> <p>The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection. To reduce potential for disturbance under new airspace areas, the following new measure was included in text under the Fox/Paxon Section 3.1.8.4 Mitigations: “Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information.” Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p>
N0033-23	<p>ADFG 2008 reported that the Delta Caribou herd moved their calving grounds from north of the Alaska Range (pre-Fox 3 MOA) to south of the Alaska Range (post-Fox 3 MOA). “No information was found in the literature describing startle effects of chaff on wildlife” (Air Force 1997).</p>	<p>The preparers have reviewed the 2007 and 2009 Caribou Management Reports prepared by the Alaska Department of Fish and Game. The 2009 report covers the years 2006-2008. Caribou management reports are produced by ADFG every two years. There is no 2008 report and 2011 has not been published yet. The preparers could find no mention of the Fox MOA or any other MOA, no mention of military overflight in either ADFG document, and were unable to substantiate the claim made in this comment. Changes in seasonal movements of caribou are discussed in both reports, but there is no suggestion of causation with regard to changes in calving areas between the 1980s and early 2000s (ADFG 2009, pp 125-126). In the DEIS (page 3-49 and Appendix E, Noise), the preparers addressed the findings of ADFG studies on military jet aircraft overflight on caribou calving prepared by Mangoun et al. (2003) and Lawler et al. (2005). Additional information has been added to Appendix E.</p> <p>The commenter is correct in stating that no literature was found concerning startle effects of chaff on wildlife. After release from the aircraft, chaff floats down as widely dispersed hair-like strands which are virtually undetectable and would not startle wildlife.</p> <p>Citation: Alaska Department of Fish and Game (ADFG). 2009. Caribou management report of survey-inventory activities 1 July 2006-30 June 2008. P. Harper, editor. Juneau, Alaska.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
N0033-24	<p>Discussion of the noise levels created by the sonic booms is addressed in Section 3.1.2.3.1 Noise Environment Consequences Alternative A: All subdivisions of the proposed Fox 3 MOA as well as the new Paxson MOA would have an established minimum flight altitude at 500 feet AGL. Subsonic aircraft noise levels beneath the Paxson MOA/ATCCAA would increase from 37 to 54 dB Ldnmr. Noise levels beneath all subunits of the expanded Fox 3 MOA would increase from 39 dB Ldnmr to 54 dB Ldnmr. Air craft would fly at lower altitudes as a result of "floor: altitude decrease. Decreasing altitudes would result in increased individual over flight noise events."</p> <p>The definition of what dB Ldnmr is lacking in this draft EIS. Consulting the Eglin Air Force Base EIS (Appendix E Noise) gives this definition: Onset-rate Adjusted Monthly Day-Night Average Sound Level.</p>	<p>The Air Force concurs with the first part of the comment, which lists noise level changes under baseline and proposed conditions.</p> <p>Ldnmr stands for onset rate-adjusted day-night average sound level. "Ldnmr" is spelled out in the List of Acronyms, Abbreviations and Symbols. The noise metric Ldnmr is explained in Appendix B, section B.2.1 (Definition of Resource) and is also discussed in Appendix E, Section E.1.2.5. A spelled-out version of the abbreviation has been added to Section 3.1.2.1, which is the section in which Ldnmr is first used.</p>
N0033-25	<p>This average decibel calculation is worthless when taking into account 500 foot AGL over flights with accompanying sonic booms. Caribou do not care about averages. The in the moment experience is what will cause the startle reaction in caribou.</p>	<p>Noise data are usually recorded and reported in decibels averaged over a day-night period. The preparers of the EIS considered single-event noise levels when addressing effects of overflight on wildlife, including caribou (see Section 3.1.8.3). Supersonic flight and sonic booms are also addressed in the document. As stated in Section 3.1.2, supersonic aircraft operations are permitted in the existing Fox 3 MOA/Air Traffic Control Assigned Airspace (ATCAA) down to 5,000 feet AGL or 12,000 feet MSL, whichever is higher. There would be no supersonic flight authorized at 500 feet AGL. Overpressures from sonic booms for a variety of military jet aircraft in Mach 1.2 level flight at 10,000 feet AGL range from 4.4 to 5.7 pounds per square foot for F-16 and F-22, respectively (see Table 3-6, "Sonic Boom Peak Overpressures for Aircraft at Mach 1.2 Level Flight"). Near the centers of Fox 3 MOA/ATCAA and the Paxson MOA/ATCAA, sonic booms would increase from about 4.6 to 5.2 per day on average.</p>
N0033-26	<p>An F-15 aircraft creates a sonic boom of 3.92 pounds per square foot and 139.6 decibels at 100 feet AGL (Hamby 2004). An internet search of various blog sites from around Air Force bases deploying F-35s say that its sonic boom is much, much louder than an F-15. They all ask the same question: What is the decibel level of the sonic boom for an F-22 and F-35? The Air Force has not published what the sonic boom decibel level for F-22 and F-35 aircraft is. Ahtna Incorporated would like to know what the decibel levels of the sonic booms created by these aircraft at 500 feet AGL, at 1000 feet AGL, at 2000 feet AGL, and at 5000 feet AGL.</p>	<p>Time-averaged supersonic noise levels are published in the EIS in all instances where supersonic noise levels would be affected by the Proposed Action. Also, Table 3-6 (entitled "Sonic Boom Peak Overpressures for Aircraft at Mach 1.2 Level Flight") lists sonic boom peak overpressures for several aircraft, including the F-22 at Mach 1.2 during level flight. Overpressure, as measured in pounds per square foot, is the metric most often used to describe individual sonic booms. F-35 sonic booms are not described in Table 3-5 (entitled "Sound Exposure Level in Decibels Under the Flight Track Associated with Representative Aircraft Types"), but are expected to be similar to sonic booms generated by F-16 aircraft based on aircraft</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>geometry and flight characteristics. For more information on F-35 supersonic characteristics, please see the F-35 Training Basing EIS published in June 2012. Supersonic operations would not be conducted in the expanded Fox 3 or proposed Paxson MOAs at altitudes below 5,000 feet AGL or 12,000 feet MSL, whichever is higher. Sonic boom overpressure generated at 5,000 feet AGL has been added as the most extreme example of overpressure generated by direct overflight during straight and level flight at Mach 1.2.</p>
<p>N0033-27</p>	<p>Section 3.1.13.2 Subsistence Impact Assessment Methodology: Your assessment methodology is inadequate in at least 3 ways. First, limiting the subsistence analysis to the eight communities within 20 nautical miles of the MOAs does not accurately represent patterns of resource use and distribution in the Nelchina Basin/Copper Basin area. Many communities beyond those addressed in the analysis rely on resources in the impacted areas and consequently will be negatively impacted by the proposed actions. Resources are spread across the landscape, and local residents go to where the resources are. Sometimes that means driving substantial distances in order to put food on the table and fill the freezer. The analysis should be expanded to incorporate the Alaska Board of Game Findings (Attachment B) along with those communities with a positive Customary and Traditional (C & T) use determination under the Federal Subsistence Program for moose, caribou or both on lands within the proposed Fox 3 expansion and Paxson MOA as discussed in the EIS. Both the Board of Game Findings and the C & T determinations are based on analysis of all available data regarding patterns of resource use, and provide a more realistic basis for identifying impacted communities than the 20 nautical mile rule.</p>	<p>Please see response to comment G0013-1.</p>
<p>N0033b-1</p>	<p>Second, 20-plus year old community harvest data is woefully inadequate for making decisions that affect people’s livelihoods. For example, in the 1980s, when many of those studies were done, Copper Basin residents could harvest caribou in Unit 11. That area is now closed to the harvest of caribou, due to conservation concerns.</p>	<p>Please see response to comment N0033b-1.</p>
<p>N0033b-2</p>	<p>There is increased reliance on caribou hunting opportunities in Unit 13, which underlies the proposed Fox 3 MOA expansion and Paxson MOA. To people familiar with this data, the “most representative year” referred to in the analysis is identifiable as the most recent year for which a comprehensive subsistence survey data are available. JPARC should follow the lead of the Alaska Gas Line Pipeline Project and base its analysis on updated comprehensive community subsistence data, providing funding to support</p>	<p>Please see response to comment G0013-2.</p>

Table N-5. Government Response to Comments (*continued*)

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	updated surveys as needed.	
N0033b-3	As a first step, the list of potentially affected communities (as discussed above) should be examined in terms of when the most recent comprehensive harvest survey took place and whether an update is scheduled in the next year or two. For those potentially affected communities that are five or more years out from the most recent update and are not on the list for an update, funding should go to the Alaska Department of Fish & Game Subsistence Division, or a similarly qualified independent organization to collect this information. A decision on the project should be delayed until up to date subsistence information for the potentially affected communities can be incorporated into the subsistence impact assessment.	Please see response to comment G0013-2.
N0033b-4	Third, limiting the communities with high dependence on subsistence to only those with a majority (>50%) Alaska Native population fails to recognize patterns of residence by the Ahtna people in the Copper Basin communities, or the importance of subsistence to other local residents. While it is appropriate for predominantly Alaska Native communities to fall in the “high dependence” category, there are other rural communities in the area that should also be classified as such. Indeed, some of the Ahtna villages with federally recognized tribal governments were excluded from the “high dependence” category because the percentage of Alaska Native residents, while significant, does not reach the 50% level. Once up to date information is obtained regarding harvest and use of subsistence resources (as described in the previous paragraph), this question should be revisited for all potentially affected communities.	Please see response to G0013-3.
N0033b-5	Communities in which 80% or more of households reporting using subsistence resources should be classified as “high dependence” regardless of community composition.	Please see response to comment G0013-3.
N0033b-6	ADFG Board of Game Findings #2006-170-BOG has established Ahtna’s Customary and Traditional Use rights in Game Management 13 for Moose and Caribou regardless of village affiliation or proximity to a money economy. Customary and Tradition uses of moose and caribou in Game Management Units 11, 12, and 13 are administered the ADFG Community Hunt (Attachments C & D). This entire section needs to be re-examined using the correct sources for your assessment.	Please see response to comment G0013-3.
N0033b-7	Although the ANILCA section 810 analysis is mentioned, it is not completed. Issues that need to be addressed are 1) The effect of use, occupancy, or disposition on subsistence uses and needs, 2) The availability of other lands for the purpose sought to be achieved, 3) Cumulative effects	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The discussions and analyses in Chapter 3 regarding ANILCA for subsistence will be reviewed in accordance with the comment during the preparation of the Final EIS, as applicable.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>resulting in reductions in the availability of resources used in subsistence purposes, caused by alteration of their normal locations, migration, and distribution patterns. Please refer to comments on sections 3.1.8.3.1 and 3.1.2.3.1 when completing the 810 analysis. A new section that systematically analyses the impact of the proposed actions regarding the expanded Fox 3 MOA & Paxson MOA on subsistence resources needs to be added to the EIS.</p>	
<p>N0033b-8</p>	<p>Ahtna Incorporated feels strongly that the proposed Fox 3 MOA expansion and proposed new Paxson MOA would have adverse effects on our Customary and Traditional Subsistence uses in these areas.</p>	<p>Potential impacts to subsistence resources and activities from the proposed Fox 3 MOA and new Paxson MOA in the EIS are evaluated in Section 3.1.13. Where potentially adverse impacts are identified, proposed mitigations are provided in Section 3.1.13.4. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
<p>N0033b-9</p>	<p>Ahtna feels the proposed mitigation measures in the EIS are inadequate.</p>	<p>Section 4.7 of the Executive Summary provides an overview of mitigation and protective measures relevant to the JPARC EIS. The alternatives, including the Proposed Actions, are already subject to mitigation and protective measures, up to and including best management practices (BMPs) and standard operating procedures (SOPs). NEPA regulations require an EIS to include appropriate mitigation measures not already included in the Proposed Action or alternatives (40 CFR 1502.12(f)). As such, additional proposed measures are listed in Chapter 3, following the description and analysis of individual resource areas under each proposed action. A detailed account of existing and proposed mitigation and protective measures is provided in Appendix K of Volume II of the EIS.</p> <p>Unavoidable, adverse impacts are impacts identified during the public and agency review of the Draft EIS that cannot be mitigated to an acceptable level. Such impacts will be identified for decisionmakers in the Final EIS and Record of Decision (ROD). The ROD will state whether all practicable mitigation measures have been adopted, and if not, why not (40 CFR Section 1505.2(c)). The ROD will identify the mitigation measures and monitoring and enforcement programs that have been selected and will indicate mitigations adopted as part of the agency’s decision. The ROD will outline the mitigation and monitoring measures in sufficient detail to constitute an enforceable commitment, or incorporate by reference the portions of the EIS that do.</p>
<p>N0033b-10</p>	<p>Government to Government Consultation: Executive Order (EO) 13175</p>	<p>The Department of Defense (DoD) is very serious about its special</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>November 9, 2000: There several mandates in this EO that have not been adequately addressed.</p> <p>1) Section 1 Definitions (a): ‘Policies that have tribal implications’ refers to regulations, legislative comments or proposed legislation, and other policy statements or actions that have substantial direct effects on one or more Indian Tribes.</p> <p>2) Section 1 Definitions (b): ‘Indian Tribe’ means an Indian of Alaska Native Tribe, band, nation, pueblo, village, or community that the Secretary of the Interior acknowledges to exist as an Indian tribe pursuant to the Federally Recognized Tribe List Act of 1994. 25 U.S.C. 479a.</p> <p>3) Section 2 Fundamental Principles (a): The United States has a unique legal relationship with Indian tribe governments as set forth in the Constitution or the United States, treaties, statutes, Executive Orders, and court decisions. Since the formation of the Union, the United States has recognized Indian Tribes as domestic dependent nations under its protection. The Federal Government has enacted numerous statutes and promulgated regulations that establish a trust relationship with Indian tribes.</p> <p>4) Section 2 Fundamental Principles (b): Indian tribes exercise inherent sovereign powers over their member and territories.</p> <p>5) Section 3 Policy Making Criteria (a): Agencies shall respect Indian tribal self-government and sovereignty, honor tribal treaty and other rights; and strive to meet responsibilities that arise from the unique legal relationship between the Federal Government and Indian tribal governments.</p> <p>6) Section 5 Consultation (a): Each agency shall have an accountable process to ensure meaningful and timely input by tribal officials in the development of regulatory policies that have tribal implications.</p> <p>7) Section 5 Consultation (b)(2)(8): To the extent practicable and permitted by law, no agency shall promulgate any regulation that has tribal implications and that preempts tribal law unless the agency, prior to formal promulgation of the regulation,</p> <p>a. consulted with tribal officials early in the process of developing the proposed regulation.</p> <p>b. In a separately identified portion of the preamble to the regulation as it is to be issued in the Federal Register, provides the Director of the OMB a tribal summary impact statement, which consists of a description of the</p>	<p>relationship with the sovereign Federally Recognized Tribes. Hence the Department was thorough in developing its American Indian and Alaska Native (AI/AN) Policy. During its development, the Policy was sent out for review by all of the Federally Recognized Tribes in the nation, including in Alaska three times. Further, a 15-member tribal review committee oversaw the Policy’s development in addition to it being presented for review at appropriate venues such as the National Congress of American Indians. The Alaska Implementation Guidance of the AI/AN Policy was sent to all of the Federally Recognized Tribes in Alaska for two reviews before it was finalized. DoD Instruction 4710.02 implements the Policy. Because of this robust and tribally involved review process, when, in 2009, President Obama instructed each agency to submit a detailed plan of actions the agency will take to implement the policies and directives of Executive Order (E.O.) 13175, DoD was one of the few agencies that did not have to revamp their AI/AN policies. The Alaskan Command sent the DoD’s AI/AN Policy and related documents to all 229 Federally Recognized Tribes in the state six times and made policy training available to all 229 tribes at five separate venues.</p> <p>Question a. All 229 Alaska Tribes were invited to a meeting in December 2008 when JPARC modernization was first introduced. Early in the plan development stage (in September 2010), 35 tribes received invitations for government-to-government consultation. Tribes were consulted before any other agency, entity, group, or the public.</p> <p>Question b. The July 2010 Guidance for Implementing E.O. 13175 directs that a “tribal impact summary statement” be included in the preamble to draft-final regulations submitted to the Office of Management and Budget (OMB) for review under E.O. 12866 “Regulatory Planning and Review.” The proposed modernization of JPARC is not a draft regulation submitted to OMB for review under E.O. 12866, hence a tribal impact summary statement is not required.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>extent of the agencies prior consultation with tribal officials, a summary of the nature of their concerns and the agency’s position supporting the need to issue the regulation, and a statement of the extent to which the concerns of the tribal officials have been met.</p>	
<p>N0033b-11</p>	<p>To date, the only contact from the Department of Defense to the tribes of Cantwell, Chistochina, Chitina, Copper Center, Gakona, Gulkana, Mentasta and Tazlina has been a form letter to only some of these tribes. There were also two meetings with Ahtna Incorporated. The first meeting was approximately forty five minutes long. The second meeting was approximately one and a half hours in length. Ahtna Incorporated feels that there is a long way to go in meeting the obligations set forth in Executive Order 13175 in regards to Government to Government Consultation. Where is the tribal summary impact statement?</p>	<p>The threshold for offering consultation with tribes is when a proposed action “may have the potential to significantly affect protected tribal resources, tribal rights or tribal lands.” The Department of Defense (DoD) uses this very encompassing threshold because it does not know of a tribe’s interest and possible effect without asking. As such, the DoD routinely sends offers of consultation to a large number of tribes, in this case, 35 Federally Recognized Tribes (including all 8 of the tribes specified in the comment), with some as many as 150 miles away. For JPARC, these offers of consultation were not “form letters” but were official invitations personally signed by the highest ranking military officer in Alaska (a three-star General) in recognition of the sovereignty of the tribes. Included with the invitation were: maps and descriptions of the proposed actions, military consultation policies outlining rights and responsibilities of the tribes, and a list of all 35 tribes offered JPARC consultation. The consultation offer and associated background information was crafted in recognition of busy tribal leaders with small staff (websites were identified if more detailed information was needed) and instructed them to accept consultation if they could identify protected tribal resources, tribal rights, or tribal lands that may be affected. Further, they were asked to reply even if they did not want to consult and to notify the DoD of additional tribes to which consultation should be offered. The invitations were sent with a “return receipt” requested, to highlight their importance. Some of the tribes (those closest to JPARC) responded by requesting formal consultation, and two (both Ahtna area tribes) outlined concerns but chose not to consult. Because DoD policy compels expansive consultation offers, it is routine for only a small subset to actually request consultation, as was the case with JPARC. Alaska tribes are for the most part busy and avoid consultation on topics that are very unlikely to affect them. Nonetheless, all of tribes who did not answer the DoD’s invitation were telephoned, emailed, or personally visited to ensure the tribes truly did not want to consult or had no comment. The DoD policies direct that consultation be “early and meaningful,” thus, JPARC formal consultation was held between elected tribal leaders face-to-face with the two highest ranking military officers in Alaska (three-star Air Force and two-star Army Generals) so their concerns could receive direct and immediate response by officials</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>that controlled JPARC’s development. The minutes of those meetings were included in the Draft EIS. Subsequent to the high-level consultation, two other tribes requested meetings, which were granted.</p> <p>The July 2010 Guidance for Implementing E.O. 13175 directs that a “tribal impact summary statement” be included in the preamble to draft-final regulations submitted to the Office of Management and Budget (OMB) for review under E.O. 12866 “Regulatory Planning and Review.” The proposed modernization of JPARC is not a draft regulation submitted to OMB for review under E.O. 12866, hence, a tribal impact summary statement is not required.</p>
N0033b-12	<p>Department of Defense Instruction Number 4710.02 DoD Interactions with Federally Recognized Tribes: There are several instructions set forth in this document that Ahtna Incorporated believes have not been adequately addressed.</p> <p>1) Section 6.1 Procedures: The DoD Components shall consult with tribes whenever proposing an action that may have the potential to significantly affect protected tribal resources, tribal rights or tribal lands.</p> <p>2) Section 6.3 Procedures: Consultation required by paragraphs 6.1 and 6.2 shall apply to proposed actions that may have the potential to significantly affect tribes, including, but not limited to: land disturbing activities, construction, training, over-flights, management of properties of traditional religious and cultural importance, protection of sacred sites from vandalism and other damage, access to sacred sites, access to treaty reserved resources, disposition of cultural items in accordance with reference (k), and land use decisions.</p> <p>3) Section 6.4 Procedures: The DoD Components shall afford tribes that have a cultural or historical affiliation with the lands encompassed by the installation an opportunity to consult on the development of the Integrated Cultural Resources Management Plan (ICRMP), and where tribal treaty rights or other rights to natural resources potentially may be affected, Integrated Natural Resources Management Plans (INRMPs).</p> <p>4) The DoD Components shall involve tribal governments early in the planning process for proposed actions that may have the potential to affect protected tribal rights, land, or resources, and shall endeavor to complete consultations prior to implementation of the proposed action. Early involvement means that the tribal government is given an opportunity to</p>	<p>The Department of Defense (DoD) is very serious about its special relationship with the sovereign Federally Recognized Tribes. Hence the Department was thorough in developing its American Indian and Alaska Native (AI/AN) Policy. During its development, the Policy was sent out for review by all of the Federally Recognized Tribes in the nation, including in Alaska three times. Further, a 15-member tribal review committee oversaw the Policy’s development in addition to it being presented for review at appropriate venues such as the National Congress of American Indians. The Alaska Implementation Guidance of the AI/AN Policy was sent to all of the Federally Recognized Tribes in Alaska for two reviews before it was finalized. DoD Instruction 4710.02 implements the Policy. Because of this robust and tribally involved review process, when, in 2009, President Obama instructed each agency to submit a detailed plan of actions the agency will take to implement the policies and directives of Executive Order (E.O.) 13175, DoD was one of the few agencies that did not have to revamp their AI/AN policies. The Alaskan Command sent the DoD’s AI/AN Policy and related documents to all 229 Federally Recognized Tribes in the state six times and made policy training available to all 229 tribes at five separate venues.</p> <p>The threshold for offering consultation with tribes is when a proposed action “may have the potential to significantly affect protected tribal resources, tribal rights or tribal lands.” The Department of Defense (DoD) uses this very encompassing threshold because it does not know of a tribe’s interest and possible effect without asking. As such, the DoD routinely sends offers of consultation to a large number of tribes, in this case, 35 Federally Recognized Tribes (including all 8 of the tribes specified in the comment), with some as many as 150 miles away. For JPARC, these offers of</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>comment on a proposed action in time for the tribal government to provide meaningful comments that may affect the decision. Installations should take advantage of the processes put forth in 40 CFR parts 1500 1508 to involve tribes in early planning.</p>	<p>consultation were not “form letters” but were official invitations personally signed by the highest ranking military officer in Alaska (a three-star General) in recognition of the sovereignty of the tribes. Included with the invitation were: maps and descriptions of the proposed actions, military consultation policies outlining rights and responsibilities of the tribes, and a list of all 35 tribes offered JPARC consultation. The consultation offer and associated background information was crafted in recognition of busy tribal leaders with small staff (websites were identified if more detailed information was needed) and instructed them to accept consultation if they could identify protected tribal resources, tribal rights, or tribal lands that may be affected. Further, they were asked to reply even if they did not want to consult and to notify the DoD of additional tribes to which consultation should be offered. The invitations were sent with a “return receipt“ requested, to highlight their importance. Some of the tribes (those closest to JPARC) responded by requesting formal consultation, and two (both Ahtna area tribes) outlined concerns but chose not to consult. Because DoD policy compels expansive consultation offers, it is routine for only a small subset to actually request consultation, as was the case with JPARC. Alaska tribes are for the most part busy and avoid consultation on topics that are very unlikely to affect them. Nonetheless, all of tribes who did not answer the DoD’s invitation were telephoned, emailed, or personally visited to ensure the tribes truly did not want to consult or had no comment. The DoD policies direct that consultation be “early and meaningful,” thus, JPARC formal consultation was held between elected tribal leaders face-to-face with the two highest ranking military officers in Alaska (three-star Air Force and two-star Army Generals) so their concerns could receive direct and immediate response by officials that controlled JPARC’s development. The minutes of those meetings were included in the Draft EIS. Subsequent to the high-level consultation, two other tribes requested meetings, which were granted.</p> <p>The July 2010 Guidance for Implementing E.O. 13175 directs that a “tribal impact summary statement” be included in the preamble to draft-final regulations submitted to the Office of Management and Budget (OMB) for review under E.O. 12866 “Regulatory Planning and Review.” The proposed modernization of JPARC is not a draft regulation submitted to OMB for review under E.O. 12866, hence a tribal impact summary statement is not required.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>INRMPs and ICRMPs are documents prepared by installations, which is separate from the JPARC proposal.</p> <p>It is not DoD's policy to have government-to-government (G2G) consultation with tribes whether they want to or not, harass them until they want to consult, or subject them to undesired information meetings. The quality of G2G consultation is not measured by the number of meetings and the number of tribes but whether it was early (with tribes expressing a potential effect) , meaningful (tribes could influence the outcome), and held at a high level as would be appropriate when meeting with a sovereign.</p> <p>Meetings with Ahtna had nothing to do with G2G consultation with tribes but were held because: Ahtna requested it, Ahtna was a major landholder in the vicinity and in compliance with Public Law 108-199 section 161.</p>
N0033b-13	Where is the INRMP? A form letter to some of the affected tribes, and two short meetings with the Regional Native Corporation does not constitute Government to Government consultation.	<p>The Department of Defense (DoD) is very serious about its special relationship with the sovereign Federally Recognized Tribes. Hence the Department was thorough in developing its American Indian and Alaska Native (AI/AN) Policy. During its development, the Policy was sent out for review by all of the Federally Recognized Tribes in the nation, including in Alaska three times. Further, a 15-member tribal review committee oversaw the Policy's development in addition to it being presented for review at appropriate venues such as the National Congress of American Indians. The Alaska Implementation Guidance of the AI/AN Policy was sent to all of the Federally Recognized Tribes in Alaska for two reviews before it was finalized. DoD Instruction 4710.02 implements the Policy. Because of this robust and tribally involved review process, when, in 2009, President Obama instructed each agency to submit a detailed plan of actions the agency will take to implement the policies and directives of Executive Order (E.O.) 13175, DoD was one of the few agencies that did not have to revamp their AI/AN policies. The Alaskan Command sent the DoD's AI/AN Policy and related documents to all 229 Federally Recognized Tribes in the state six times and made policy training available to all 229 tribes at five separate venues.</p> <p>All 229 Alaska Tribes were invited to a meeting in December 2008 when JPARC modernization was first introduced. Early in the plan development stage (in September 2010), 35 tribes received invitations for government-to-government consultation. Tribes were consulted before any other agency, entity, group, or the public.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
N0033b-14	In summary, Ahtna cannot support the proposed Fox 3 MOA expansion and proposed Paxson MOA for both alternative A and B. Ahtna Incorporated can only support the No Action Alternative.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0033b-15	Ahtna Incorporated feels that there was a minimal amount of effort put towards the completion of this EIS.	The composition of the JPARC Modernization and Enhancement Draft EIS spanned the course of approximately one year. During that time, the document underwent multiple internal reviews and revisions in order to ensure proper content, accurate analysis, and a thorough assessment of all proposed actions in accordance with NEPA guidelines and all other applicable regulations. Such further review and revision will occur before the Final EIS is released. In addition to the 31 preparers/subject matter experts (Chapter 7), the JPARC Draft EIS was produced utilizing the time, guidance, and expertise of numerous personnel from the following organizations: U.S. Departments of the Army and the Air Force, U.S. Pacific Command (PACOM), U.S. Army Pacific (USARPAC), U.S. Pacific Air Forces (PACAF), U.S. Army Alaska, (USARAK), 11th Air Force Alaskan Command, Alaska National Guard, U.S. Army Environmental Center (AEC), U.S. Air Force Center for Engineering and the Environment, and the U.S. Army Installation Command, Pacific Region (IMCOM). Figure 1-6 of the JPARC EIS details the key steps required in the EIS process in order to maintain compliance with NEPA as per the Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (Code of Federal Regulations 1500-1508). To date, the process for the JPARC EIS has encompassed approximately one year and seven months. A Notice of Intent to prepare an EIS for the JPARC Modernization and Enhancement was published in the Federal Register on December 8, 2010. The scoping period followed the publication of the NOI and lasted 90 days, from December 8, 2010 to March 4, 2011. The scoping period, an open public comment process involving members of the public, communities, organizations, and Federal and State agencies, represents the first major step toward identifying the relevant issues to be analyzed in depth in the EIS and eliminating issues that are not relevant. Based on the expertise of the lead agencies and issues raised by the public, the Army and the Air Force prepared the Draft EIS. The Draft EIS describes the JPARC purpose and need, explains the proposed action and alternatives, presents the existing conditions in the region potentially affected, and provides analysis of the environmental consequences of the proposed actions and each alternative, including the No Action Alternative. The Draft

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		EIS is a comprehensive document for public and agency review. A Notice of Availability of the Draft EIS was published in the Federal Register on March 30, 2012.
N0033b-16	1) The areas encompassed by the proposed action contain the traditional territories of the Ahtna Peoples.	The EIS will be revised to say, "Alaska Native tribes in the proposed Paxon MOA and Fox 3 MOA expansion area include the Cheesh-Na Tribe (formerly the Native Village of Chistochina), Native Village of Gakona, the Knik Tribe, and the Native Village of Tyonek, as well as scattered residences." "Properties of traditional religious and cultural importance affiliated with peoples of the Alaska Native Corporation of Ahtna known to be located within the area include 10 burial sites affiliated with peoples of the Alaska Native Corporation of Ahtna, Inc."
N0033b-17	2) This area is an incredibly rich ecosystem that supports the year round Customary and Traditional use of subsistence resources.	Subsistence resources and activities are important to Alaskans. Potential impacts to subsistence resources and activities from the proposed Fox 3 MOA and new Paxon MOA are evaluated in Section 3.1.13. Where potentially adverse impacts are identified, proposed mitigations are provided in Section 3.1.13.4. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
N0033b-18	3) There are no studies completed concerning the possibility of wild fire ignition by the use of chaff and flare.	<p>Comment noted. The following measures would be implemented to minimize the potential for fire. First, a fire danger rating system based on the weather (weather index) is used to reduce the likelihood of a fire by limiting military activities. Certain military activities are restricted when thresholds of wildfire risk are reached (including the use of flares). Second, wildfire danger is reduced through the removal of accumulated fuels (e.g., prescribed burning and/or construction and maintenance of fire or fuel breaks). Third, an Initial Attack Response Team remains available during military training activities during high and extreme fire danger to provide a rapid initial response to wildfires in the area. These actions are designed to minimize the potential for wildfires from training activities.</p> <p>In addition to monitoring the fire weather index and modifying planned training activities accordingly, military personnel use other prevention measures, such as establishing nontraining buffers within 0.5 miles of training areas adjacent to non-military land to protect the surrounding areas. Prescribed burns and mechanical thinning would also be conducted for the training areas.</p> <p>Wildfire suppression is conducted by the BLM, Alaska Fire Service, and/or the military fire department. Suppression operations are dependent on the fire</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		management category status of the respective area. Fire planning within the training areas is guided by practices of the Integrated Wildland Fire Management Plan and management practices for each training area by Alaska Wildland Fire Management Plan priorities.
N0033b-19	4) There is no plan in place to deal with a wildfire ignited by chaff & flare.	<p>The following practices would be employed for all training activities, including the use of chaff/flare. First, a fire danger rating system based on the weather (weather index) is used to reduce the likelihood of a fire by limiting military activities. Certain military activities are restricted when thresholds of wildfire risk are reached. Second, wildfire danger is reduced through the removal of accumulated fuels (e.g., prescribed burning and/or construction and maintenance of fire or fuel breaks). Third, an Initial Attack Response Team remains available during military training activities during high and extreme fire danger to provide a rapid initial response to wildfires in the area. These actions are designed to minimize the potential for wildfires from training activities.</p> <p>In addition to monitoring the fire weather index and modifying planned training activities accordingly, military personnel use other prevention measures, such as establishing nontraining buffers within 0.5 miles of training areas adjacent to non-military land to protect the surrounding areas. Prescribed burns and mechanical thinning would also be conducted for the training areas.</p> <p>Wildfire suppression is conducted by the BLM, Alaska Fire Service, and/or the military fire department. Suppression operations are dependent on the fire management category status of the respective area. Fire planning within the training areas is guided by practices of the Integrated Wildland Fire Management Plan and management practices for each training area by Alaska Wildland Fire Management Plan priorities.</p>
N0033b-20	5) Caribou will not return to a burned area for 50 years.	Comment noted. This will be included in the EIS. Wildland fire issues are covered under the Safety sections. Please see Section 3.1.8.3.1 for a discussion of the potential for flares to ignite fires.
N0033b-21	6) The areas contained in the proposed Fox 3 MOA expansion and the proposed Paxson MOA contain the summer and fall ranges of the Nelchina Caribou Herd (NCH). This includes the calving ground of the NCH. Calving grounds are considered critical habitat. Ahtna feels that the Air Force has not dealt with this issue adequately.	Section 3.1.8.3 in the EIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 feet AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor, and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. All known caribou calving areas

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>within the JPARC project area were taken into consideration during effects analysis.</p> <p>The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection. Implementation of the JPARC proposals will include selected refinements to existing flight avoidances of sensitive areas in the Record of Decision (ROD). Mitigation measures to offset adverse impacts will continue to be reviewed and refined, with agency input when necessary, when the preferred alternative is selected during the Final EIS preparation process. To reduce potential for disturbance under new airspace areas, the following measure was included in the EIS's Fox 3/new Paxon MOAs Section 3.1.8.4 (Mitigations): "Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information." Additional overflight restrictions within the proposed Fox 3/new Paxon MOAs areas, such as those identified in the comment, are being considered but have not been finalized at this time.</p> <p>Also, see Appendix E, Noise, for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p>
N0033b-22	<p>7) The literature cited in this EIS concerning the effect of caribou to over flights, sonic booms, and chaff and flare deployment is lacking and incomplete. Ahtna feels that only literature supporting the proposed action is cited. The Air Force has reported that there is no literature on the effects of chaff & flare on wildlife. A complete literature review needs to be included in this EIS. Several studies of other caribou herds in Alaska show that caribou will choose avoidance when faced with development or human interaction.</p>	<p>Text on effects of chaff and flares on wildlife will be added to the FEIS. Cases in which caribou have chosen avoidance when faced with development or human interaction differ in several ways from the proposed action. In these cases the avoidance is of physical on-the-ground development coupled with human settlement and human activity (e.g., oil and gas development and shipping facilities). These differ from effects expected from the JPARC overflights in that it includes continuous noise and presence of humans, vehicles and structures remaining in one place. Animal responses to low-level flights have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. All known caribou calving areas within the JPARC project area were taken into consideration during effects analysis. Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
N0033b-23	Ahtna feels the NCH will also choose avoidance in response to the proposed action. This will severely impact the Customary and Traditional Subsistence uses in these areas.	Section 3.1.13.3 acknowledges the potential for impacts to caribou herds as a result of the noise and visual stimuli of low-level overflights. Section 3.1.13.4 of the EIS discusses proposed mitigations in order to minimize potentially adverse impacts. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
N0033b-24	8) The NCH already faces incredible hunting pressure. ADFG has intensely managed this herd for over 50 years to provide an annual harvest of up to 3000 animals. Air space restrictions will inhibit ADFG's ability to accurately assess herd populations. This will result in smaller harvest quotas, as ADFG will have to be more conservative to meet management objectives.	The military understands the importance of such survey flights and would work with responsible agencies to determine when and how they can best be accommodated without being adversely affected by military flight operations.
N0033b-25	9) Startle response of caribou has been discussed. The decibel of the sonic boom of the F-22 and F-35 has not been discussed. The averaging of day and night sound levels is not adequate to describe what the caribou will experience when the F-22s and F-35s fly over them at 500 feet AGL. Ahtna specifically wants to know what the sonic boom decibel level will be at 500 feet AGL, 1000 feet AGL, 2000 feet AGL and 5000 feet AGL for all aircraft type proposed to use this airspace.	Supersonic flight is not currently permitted at altitudes below 5,000 feet AGL or 12,000 feet MSL (whichever is lower) in existing airspace units. This same supersonic "floor" altitude would apply to proposed new/expanded airspace units. In the EIS, Table 3-6 (entitled "Sonic Boom Peak Overpressures for Aircraft at Mach 1.2 Level Flight") lists sonic boom overpressure, which is traditionally expressed in pounds per square foot, associated with straight and level overflight at various altitudes of several common supersonic-capable aircraft types. Overpressure values at 5,000 feet AGL, the lowest altitude at which supersonic flight is permitted, will be added as part of the Final EIS.
N0033b-26	10) The extensive studies of chaff particles and defensive flare constituents need to be disclosed. The studies were mentioned in the EIS but nothing was cited. Only one paper was in the reference section.	The potential for fire from the use of flares is considered low. Additionally, the following measures would be implemented to minimize the potential for fire. First, a fire danger rating system based on the weather (weather index) is used to reduce the likelihood of a fire by limiting military activities. Certain military activities (including the use of flares) are restricted when thresholds of wildfire risk are reached. Second, wildfire danger is reduced through the removal of accumulated fuels (e.g., prescribed burning and/or construction and maintenance of fire or fuel breaks). Third, an Initial Attack Response Team remains available during military training activities during high and extreme fire danger to provide a rapid initial response to wildfires in the area. These actions are designed to minimize the potential for wildfires from training activities.
N0033b-27	11) The Subsistence Assessment Section needs to be totally rewritten using relevant source documents, specifically the ADFG Board of Game Findings #2006-170 BOG. The Federal Subsistence Program customary and traditional use determinations, and ADFG BOG Findings #2006-170-BOG	The Air Force is not creating criteria for subsistence uses. Section 3.1.13.2 is providing the impact analysis methodology used to determine potential impacts from the proposed action. Please see response to comment G0013-1.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	have already set the criteria for subsistence uses in the Copper River Basin. The Air Force has no right to create their own criteria, and then state that there will be no substantial impact to subsistence uses.	
N0033b-28	12) An 810 analysis has not been completed.. Issues that need to be addressed are 1) The effect of use, occupancy, or disposition on subsistence uses and needs, 2) The availability of other lands for the purpose sought to be achieved, 3) Cumulative effects resulting in reductions in the availability of resources used in subsistence purposes, caused by alteration of their normal locations, migration, and distribution patterns.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The discussions and analyses in Chapter 3 regarding ANILCA for subsistence will be reviewed in accordance with the comment during the preparation of the Final EIS, as applicable.
N0033b-29	13) Ahtna Incorporated feels the Air Force has not completed their obligation of Government to Government consultation in this matter as mandated by Executive Order 13175 and the Department of Defense Instruction number 4710.02. Ahtna also feels that the two meetings with Ahtna will be used to show that they accomplished this obligation. Ahtna Incorporated is the Regional Native Corporation, not a tribal entity. The Air Force needs to implement face to face meetings with all eight Ahtna villages to satisfy this obligation. Sending a form letter, and stating there was no reply, does not satisfy the obligations.	The threshold for offering consultation with tribes is when a proposed action “may have the potential to significantly affect protected tribal resources, tribal rights or tribal lands.” The Department of Defense (DoD) uses this very encompassing threshold because it does not know of a tribe’s interest and possible effect without asking. As such, the DoD routinely sends offers of consultation to a large number of tribes, in this case, 35 Federally Recognized Tribes (including all 8 of the tribes specified in the comment), with some as many as 150 miles away. For JPARC, these offers of consultation were not “form letters” but were official invitations personally signed by the highest ranking military officer in Alaska (a three-star General) in recognition of the sovereignty of the tribes. Included with the invitation were: maps and descriptions of the proposed actions, military consultation policies outlining rights and responsibilities of the tribes, and a list of all 35 tribes offered JPARC consultation. The consultation offer and associated background information was crafted in recognition of busy tribal leaders with small staff (websites were identified if more detailed information was needed) and instructed them to accept consultation if they could identify protected tribal resources, tribal rights, or tribal lands that may be affected. Further, they were asked to reply even if they did not want to consult and to notify the DoD of additional tribes to which consultation should be offered. The invitations were sent with a “return receipt” requested, to highlight their importance. Some of the tribes (those closest to JPARC) responded by requesting formal consultation, and two (both Ahtna area tribes) outlined concerns but chose not to consult. Because DoD policy compels expansive consultation offers, it is routine for only a small subset to actually request consultation, as was the case with JPARC. Alaska tribes are for the most part busy and avoid consultation on topics that are very unlikely to affect them. Nonetheless, all of tribes who did not answer the DoD’s invitation were telephoned, emailed, or personally visited to ensure the tribes truly did not

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>want to consult or had no comment. The DoD policies direct that consultation be “early and meaningful,” thus, JPARC formal consultation was held between elected tribal leaders face-to-face with the two highest ranking military officers in Alaska (three-star Air Force and two-star Army Generals) so their concerns could receive direct and immediate response by officials that controlled JPARC’s development. The minutes of those meetings were included in the Draft EIS. Subsequent to the high-level consultation, two other tribes requested meetings, which were granted.</p> <p>The July 2010 Guidance for Implementing E.O. 13175 directs that a “tribal impact summary statement” be included in the preamble to draft-final regulations submitted to the Office of Management and Budget (OMB) for review under E.O. 12866 “Regulatory Planning and Review.” The proposed modernization of JPARC is not a draft regulation submitted to OMB for review under E.O. 12866, hence, a tribal impact summary statement is not required.</p>
N0033b-30	14) There is no Integrated Natural Resource Management Plan as required by Department of Defense Instruction number 4710.02.	INRMPS are required for natural resource management of specific installations and those within the JPARC project area were used as references (e.g., for Fort Wainwright) for this DEIS.
N0033b-31	Ahtna Incorporated feels that there are not enough studies done on long term effects of over flights, sonic booms, and chaff & flare deployment to ensure that unfavorable impact to subsistence uses in the Ahtna Region does not occur.	The EIS contains several peer-reviewed studies on the long-term effects of overflights, sonic booms, chaff, and flares on wildlife, which are listed in the References section of the EIS. Section 3.X.8 of the EIS (where X represents the section number for a specific proposed action) discusses the potential for adverse impacts to wildlife from these training activities for every proposed action. These studies are incorporated into the analysis for Section 3.X.13, which evaluates subsequent potential impacts to subsistence resources. In addition, Appendix E, Section E.2.8, also addresses impacts to wildlife from aircraft noise.
N0033b-32	The Air Force has not included other areas in Alaska where the proposed maneuvers can take place in the EIS. Ahtna Incorporated feels that these maneuvers should be done somewhere else where the impacts can be studied long term. Only after long term studies can be accessed could Ahtna Incorporated approve of these new and expanded MOAs.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The comment to move existing Army and Air Force training areas to other Federal lands or remote areas in Alaska, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Sections 1.2 and 1.3.
N0033b-33	Big game species are taken for food and not for their trophy value by families engaged in subsistence uses. The Board may undertake efforts to reduce or eliminate the trophy values of the resources taken to focus entirely	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	on the inherent subsistence values.	includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0033b-34	<p>Attachment A</p> <p>[MAP]</p> <p>-----</p> <p>Attachment B</p> <p>Findings for the Alaska Board of Game #2006 – 170 - BOG</p> <p>Game Management Unit 13 Caribou and Moose Subsistence Uses</p> <p>Background</p> <p>Virtually since its inception, the Tier II subsistence permit system has been plagued with public complaints about inequities, unfairness, and false applications. Over the years, the Alaska Board of Game (Board) has amended its regulations numerous times to try to address management and legal problems, but the controversy continues and the system remains rife with problems. Public complaints have been primarily directed at the Tier II permitting system-particularly those near urban areas like the Minto moose hunt and the Nelchina Tier II caribou hunt.</p> <p>The Board has primarily focused on the Nelchina basin caribou and moose hunts because these have generated the vast majority of the interest and complaints from the general public. In addition, Board members are concerned the hunting patterns no longer meet the Board’s intent when these subsistence hunts were originally established in regulation. A review of these hunts question whether the current hunts are consistent with the Board’s customary and traditional use findings based on the eight criteria the Joint Boards of Fish and Game established (5 AAC 99.010) for implementing the state subsistence law (AS 16.05.258(a)).</p> <p>Statistics associated with the Nelchina caribou hunt illustrate some troubling trends. Permits have been slowly shifting away from local Alaskan residents the Board identified as the most dependent on the wildlife resources in the region and towards less subsistence dependent urban residents. Testimony</p>	<p>Thank you for providing the attached material. Information from these materials will be reviewed and incorporated as appropriate into the Final EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>from some local residents of Unit 13 indicated they no longer participated in the state subsistence program. The present Tier II scoring and permit allocation system has made it more difficult for long-time, resource-dependent residents of the area to compete for permits, forcing them to rely more heavily on the federal system to provide for subsistence opportunities. The system also makes it almost impossible for area newcomers and younger Alaskans to ever qualify for the limited permits despite their subsistence dependence on wildlife resources for food. In addition, many of the traditions associated with a subsistence way of life are being sidestepped and avoided, such as the traditional teaching of the art of hunting, fishing and trapping to younger generations; and the processing, utilization, and other long-term social and cultural relationships to the resources being harvested and to the land that produces those resources.</p> <p>The Board’s long-term goal is to design a system to accommodate subsistence-dependent users in such a manner that permits can be virtually guaranteed from year to year. The reliability of available hunting opportunities is critical to the maintenance of the subsistence way of life. This could be similar and complementary to the federal subsistence permit system. The federal program allows any Alaska resident living in the Copper Basin and several communities outside of GMU 13 to harvest two caribou and one moose per year, there is no limit per household except in Unit 13(E) for moose, harvest of caribou by gender is also generally unrestricted in units 13(A) and 13(B), and moose hunters may only take any antlered bull under the federal system.</p> <p>Bag limits may not be accumulated across both state and federal systems, so hunters can take a total of only one moose and two caribou for the year. State regulations allow all Alaskan residents to harvest a bull moose with spike-fork or 50-inch antlers or antlers with 4 brow tines on at least one side from September 1 – 20. In addition, up to 150 Tier II permits are issued for any bull moose, August 15 – 31, with only one permit being allowed per household. The moose seasons for federally qualified users on federally-managed lands are much longer from August I - September 20.</p> <p>Under the state system, all caribou permits are issued under Tier II regulations and were limited to 3 per household. The Board recently changed the limit to 2 per household. The bag limit is one caribou, although</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>in recent years, harvest under state regulation has been limited to bulls only. The caribou season for federally qualified users on federal land is 10 days longer in the fall, ending September 30 rather than September 20.</p> <p>State regulations do not jeopardize a qualified federal subsistence hunter from hunting under a federal permit. However, if there are too many state applicants, controlling statutes mandate that permits be issued under the Tier II criteria, with all of its attendant problems.</p> <p>The Board intends to explore subsistence hunt provisions that reflect and accommodate the customary and traditional use patterns of Nelchina caribou and moose in Game Management Unit (GMU) 13, while distinguishing those uses from other uses.</p> <p>In accordance with the Joint Boards of Fisheries and Game eight criteria for implementing the state subsistence law, the following findings are made:</p> <p>Findings</p> <p>When the Board originally determined there were customary and traditional uses of the Nelchina Caribou Herd and moose in GMU 13, it recognized these subsistence uses were established by Ahtna Athabaskan communities within the Copper River basin, and were later adopted by other Alaska residents. Due to the importance of, and high level of competition for subsistence permits in this area, the Board has undertaken, as precisely as possible, the task to identify the particular characteristics of these customary and traditional use patterns. Although they have changed over time due to limited access associated with demographic, economic, and technological factors, the patterns are characterized by traditional fall and winter hunting seasons, efficient methods and means, thorough use of most of the harvested animal, harvest areas traditionally associated with local communities, traditions about harvesting and uses that are passed between generations orally and through practice, and reliance on other subsistence resources from within these same traditional harvest areas.</p> <p>Criterion 1. A long-term consistent pattern of noncommercial taking, use, and reliance on the fish stock or game population that has been established over a reasonable period of time of not less than one generation, excluding interruption by circumstances beyond the user's control, such as</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>unavailability of the fish or game caused by migratory patterns.</p> <p>This criterion presupposes that an identifiable, consistent “pattern” of noncommercial taking, use, and reliance is characteristic of subsistence use. The Board finds, even though there are many similarities among all users of the moose and caribou resources in the area, there continue to be identifiable distinctions, constituting a unique pattern of subsistence use, that is traceable in direct line back to the original Ahtna Athabascan and later non-native customary and traditional use.</p> <p>The Board has concluded that the pattern of moose and caribou subsistence use for this region was originally defined by the Ahtna Athabascan residents and then adopted and modified by other local settlers in the early 20th century. This pattern of use was established over many generations and focused on the total aggregate of fish, wildlife, and plant resources locally available to the area residents.</p> <p>The greatest dependency on subsistence resources occurred prior to the completion of the existing road system in the 1940s. After about 1950, historical use patterns changed rapidly, especially with the introduction of more mechanized access methods. The mobility of the subsistence and non-subsistence users, the availability of seasonal and part-time employment, increased human populations, increasing competition for wildlife resources, and fluctuating game populations (particularly moose and caribou) caused major shifts in subsistence dependency of people within and adjacent to the region. Nevertheless, aspects of the traditional Ahtna Athabascan use pattern are present today, but subsistence-dependent families engaged in that pattern now account for a smaller percentage of all users than a half-century ago. Most of the long-term subsistence patterns in this area are community-based. The area’s communities tend to be long-established, by Alaskan standards, and the residents of these communities tend to be long-term residents, descending from multi-generational families with long ties to the area. These communities tend to exhibit a use of local resources that stretches back to well before Euroamerican contact. In contrast, the use pattern based out of nearby urban areas tends to involve much more recently established communities, a high degree of turnover among residents, short-term residency and, generally, a relatively brief history of use.</p> <p>Criterion 2. A pattern of taking or use recurring in specific seasons of each</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>year.</p> <p>Local communities established a tradition of hunting caribou, moose, and other big game species in the late summer and early fall following subsistence fishing, and again hunting in the winter as fresh meat was needed and game was available. Winter hunts have always been critical to subsistence users, as very few other subsistence resources are available during this time. This need for, and use of, winter hunting opportunities is different from use patterns developed by residents of Alaska's more developed and urban areas, where almost all big game hunting takes place exclusively in the fall and is controlled largely by regulations. Thus, as late as 1984, over 60% of the caribou harvest taken by local residents was taken during the winter. Recent changes in that pattern can be largely attributed to regulatory changes, competition from non-local hunters and shifting migratory patterns of the caribou herd. The seasonal use pattern was based on the traditional Ahtna seasonal movements and the general availability of game. For example, the fall hunt traditionally followed the salmon harvest, whereas the winter hunt took place whenever meat was needed and game was available.</p> <p>Criterion 3. A pattern of taking or use consisting of methods and means of harvest that are characterized by efficiency and economy of effort and cost.</p> <p>Before the mid-20th century, Ahtna Athabascan hunters tended to rely on boat access along the area's major waterways in fall, on foot along established trails, and by dog team along winter trails after freeze-up. With the opening up of the Nelchina basin to highway access, and the introduction of off-road vehicles, snowmachines, four-wheelers, and other transportation innovations, a shift in the use pattern occurred. Now, local residents tend to utilize roads as hunting corridors in place of rivers in the fall, and use snowmachines to access the backcountry in winter. Recently, expensive off-road vehicles have been purchased and used by many nonlocal users and a few more affluent local residents in an attempt to compete with non-local hunters and to increase their opportunity for success. The use of all terrain vehicles may create their own hunting efficiencies as hunting effort and transportation take advantage of labor-saving devices. Hunting methods have changed over the last 75 years. Automobiles, snowmachines, and less expensive all terrain vehicles may make hunting more effective because local and nonlocal residents can now cover larger areas when hunting</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>caribou or moose. Local hunters can, when animals are available, make relatively short trips that fit into a contemporary work schedule. On the other hand, the use of highway, off-road, and similar vehicles has promoted more frequent short trips with considerable transportation costs for depreciation, fuel, and maintenance. What are being lost are the multi-resource harvest efficiencies associated with long subsistence-oriented summer and fall camping trips traditionally engaged in by Ahtna communities. Thus, recent transportation improvements and fuel prices may have changed traditional subsistence activities to the point where it is unlikely that there is a positive cost/benefit (from an economic standpoint) associated with some of the hunting techniques, especially in cases involving the use of expensive recreational motor vehicles. Overall, the use of some motorized vehicles such as ATVs has blurred the distinction between true customary and traditional patterns and recreational activities.</p> <p>Residents of local communities-those with the longest histories of use of moose and caribou in the region-have traditionally traveled shorter distances to hunt than do non-local participants; and generally utilize less technology in doing so. Most Ahtna elders testified they still prefer to walk in to hunting areas and maintain permanent camps, whenever possible, in accordance with longstanding means and methods. On the other hand, most non-local users must travel at least 125 miles just to get to the area and have tended to be reliant on all-terrain vehicles (ATVs), aircraft and other expensive off-road and recreational vehicles.</p> <p>As late as 1984, Copper Basin residents utilized only highway vehicles for hunting access over 65% of the time. It is the Board's conclusion that many of these newer technologies have been adopted based on a perceived need to compete with technologically-oriented recreational hunters from Alaska's urban areas. This may be a direct effect of the 1984 regulations. Historically, much of the taking of caribou, moose, and small game was done as part of a seasonal round of subsistence activities throughout defined areas used by the community. Family dependence on these resources required a commitment of considerable time and effort to accumulate adequate subsistence resources to meet annual protein requirements and other customary and traditional uses. Another example of subsistence efficiency in the customary and traditional use pattern has been that specialized hunters tend to provide for the community at large, sometimes or often taking more</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>than necessary for their own family’s use in their capacities as community providers, and to fulfill social and cultural obligations. Community subsistence activities are then divided among members and further introduced into traditional patterns of barter and exchange. Thus, some harvest and others process, distribute, receive and utilize the results of the harvest. Each member of the community has a defined role and specialty. A third example of subsistence efficiency, historically, has been the effort to keep hunting as close to home as reasonably possible, minimizing cost and effort necessary to obtain the wild food resources needed by families and communities. The Board believes that, if competition among users can be reduced, this efficiency is likely to be easier for subsistence users to realize. In these community efforts, special emphasis has been placed on allowing the maximum opportunity to harvest as many animals and the widest variety of useable species as efficiently as possible. Emphasis was also placed on food gathering activities and other traditions associated with Ahtna Athabascan communities.</p> <p>Criterion 4. The area in which the noncommercial long-term, and consistent pattern of taking, use, and reliance upon the fish stock or game population has been established.</p> <p>The Board is examining the area where the subsistence hunting of big and small game occurred prior to the significant change in uses and activities that occurred after approximately 1950 in Game Management Unit 13.</p> <p>Subsistence uses involve an intimate and exclusive relationship between the user and a very particular set of places generally in close proximity to the hunter’s residence. The user is tied to the land. Other types of uses do not exhibit these close, long-term, multi-generational ties to a particularly locality. Even as late as 1981, hunters from Copper Basin communities did not report traveling out of the basin to hunt, while urban-based hunters named alternative areas if they could not hunt Nelchina caribou and moose. Testimony from Ahtna elders emphasized their reliance on local fish and game, and their reluctance, for practical and cultural reasons, to travel outside of their traditional areas for subsistence purposes. Likewise, they described the longstanding family and community use histories and patterns for such areas. Consistently, lifelong residents of the local areas did not share the attitude of utilizing other areas. When Nelchina caribou were not available to them they either added emphasis on moose, and/or use of the</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Mentasta caribou herd. Resident lake fish species and small game were other alternatives commonly mentioned as alternative and supplemental wild food resources. Families in the range of the Nelchina caribou who harvested little or no wild game mentioned receiving donated meat as an alternative. This differs markedly from the use patterns found in Alaska’s urban areas, where traveling to, and exploring, new game country is deemed a virtue and an essential part of many outdoor experiences.</p> <p>The Ahtna pattern exhibits a familiarity with terrain and landscape including the associated history of the region transmitted through oral traditions and Ahtna geographic placenames.</p> <p>Criterion 5. A means of handling, preparing, preserving, and storing fish or game that has been traditionally used by past generations, but not excluding recent technological advances where appropriate.</p> <p>The traditional pattern has been to salvage and use all parts of the harvested animal, in conformance with traditions prohibiting waste. Lifelong residents of the Copper Basin testified they still practice their traditional methods of harvest by retrieving the entire carcass and all bones, hide, head, heart, liver, kidneys, stomach, and fat. Only the antlers were often left behind. This also differs from patterns based out of urban areas, where hunters tend to focus on the meat and antlers, usually leaving most organs, bones, and the hide in the field.</p> <p>Ahtna elders also emphasized that preparation and storage are viewed as essential components of their overall use. Women traditionally look forward to practicing their roles as preparers and preservers of harvested game every bit as much as men looking forward to harvesting and providing the game. These traditions and roles are passed on by older relatives to younger family members through in-the-field training and a system of engii (rules of appropriate behavior or taboos) that teach traditional means of harvest, handling, and preparation. These “engiis” emphasize traditional Ahtna views of the human place within the natural world and a respectful treatment of animals.</p> <p>Criterion 6. A pattern of taking or use that includes the handing down of knowledge of fishing or hunting skills, values, and lore from generation to</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>generation.</p> <p>The Board has concluded that the subsistence traditions of handing down the hunting and fishing knowledge, values and skills through family oriented experiences are an important aspect of the subsistence way of life in this region. Providing the opportunities for the young and old to participate in subsistence activities is critical to the perpetuation of traditional knowledge about hunting locations, hunting methods, methods of handling harvests, and respectful treatment of wildlife. To increase hunting opportunities for youth, a recent provision adopted by the Board allows a resident hunter between the ages of 10 and 17 to hunt on behalf of a resident permit holder. The youth hunter must have completed a certified Basic Hunter Education course and be in direct supervision of the permit holder, who is responsible for ensuring all legal requirements are met.</p> <p>Ahtna elders have passed this knowledge on to the next generation in the context of community based traditions that included relatively long summer and fall camping trips described above. As mentioned previously, teaching roles and lessons tend to be more formalized through the system of “engiis” than is the case for uses based out of the urban areas. Skills emphasized included not only those needed to harvest each species, but also the art of field preparation and care for a wide variety of species and the utilization, preparation, and distribution of game. Most local users learned how to hunt in the local area from other family members in the local area. Most older, local users have also taught other family members. On the other hand, most non-local users learn about hunting in the area by personal experience or from fellow non-local, unrelated hunters. Also, non-local users tend to be controlled primarily by applicable statutes and regulations rather than long-term oral traditions and community-based values.</p> <p>The Board considers it extremely important to stress the need to pass on skills and knowledge associated with utilization of all parts of the animal taken, as well as preservation of the traditional, cultural rules and family values associated with these subsistence users in this area. Field skills need to be perpetuated for handling not only the meat but the hides, internal organs, stomach, and intestines. This is consistent with the customary practice of maximizing the use of animals taken characteristic of subsistence uses.</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Criterion 7. A pattern of taking, use, and reliance where the harvest effort or products of that harvest are distributed or shared, including customary trade, barter, and gift-giving.</p> <p>Widespread community-wide sharing is customary in local communities, involving all family members, elders, others in need, and taking place in formal settings such as during ceremonial potlatches. As such, sharing has associated social, cultural, and economic roles in the community. Sharing is expected and follows well-understood community standards that are structured on kinship relations and obligations. As an example, young hunters are required by Athabaskan tradition to give all or most of their first harvested animal to elders and others in need. Also, traditional barter and exchange follow these standards. Successful Ahtna harvesters traditionally share some of their moose and caribou meat with other families and communities to meet their social obligations and for ceremonial purposes. This, again, is in contrast to the uses arising out of the urban areas where hunters are completely free to share, or not share, as they see fit and there is not a system of sharing, barter, and exchange. In addition to the key social and cultural roles of sharing in the local rural community, sharing of subsistence resources plays a key economic role in distributing essential food supplies throughout the community. The Board has concluded it is imperative to accommodate the customary and traditional family and community harvest sharing practices as part of the subsistence way of life to the maximum extent possible.</p> <p>Use of the state authorized proxy system has provided a limited opportunity for individuals to harvest for permittees who are personally incapable of participating in the field but who have a personal history of subsistence use. Proxy hunters are not required to fully accommodate the customary and traditional practices. Non-local users, on the on the other hand, tend to have few established rules or traditions requiring sharing, and seldom share outside of their own households. External sharing, when it occurs, is usually with friends and co-workers, and extensive kinship networks are absent. There are no non-local traditions of community-wide meat distribution.</p> <p>Criterion 8. A pattern that includes taking, use, and reliance for subsistence purposes upon a wide diversity of the fish and game resources and that provides substantial economic, cultural, social, and nutritional elements of</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>the subsistence way of life.</p> <p>The Board has concluded it is critical to emphasize the values associated with the reliance and dependence on a wide variety of fish and wildlife resources as an important element of the subsistence way of life for this region. Subsistence use patterns historically required a significant dedication of time and effort towards the harvesting of adequate fish and game resources to meet the protein and nutritional requirements of the subsistence harvesters, their families, and their communities.</p> <p>This differs markedly from the more recreational type of uses arising out of the Alaska’s more urban areas, where a single, focused effort to harvest only one resource in any given location, and then salvage only what is legally required from that resource, tends to be a predominant characteristic. To the extent that other foodstuffs are harvested, they are often harvested in completely separate areas, far removed from the fall hunting area. Also, different hunting areas are explored in different years. This separation of the interconnected diversity of resource uses also seriously undermines the principles reflected in Criterion 3. As more and more emphasis is placed on single species harvesting patterns, cost is increased, and efficiency is reduced. Such practices do not reflect the customary and traditional use pattern.</p> <p>Reliance on most, or all, locally available sources of wild food is characteristic of a traditional subsistence way of life where maximum economic and nutritional benefits typically must be derived from the hunt and harvests. The local harvest of salmon has historically been the most important wildlife resource in terms of useable pounds per subsistence-dependent family in Unit 13. Alaska residents are allowed to use a fish wheel in the Copper River between Slana and the Copper River bridge at Chitina to harvest salmon-permits are issued free of charge. The limit is 500 total salmon for a household with two or more members and 200 for a household with one member, with no limit on the number of Chinook salmon in the total harvest by fish wheel. The salmon run in the Copper River is primarily comprised of sockeye and Chinook salmon.</p> <p>Use of moose and caribou by local communities is embedded in a wide range of other fish and wildlife uses. It is also embedded in a mixed, subsistence-cash economy characterized by seasonal employment and relatively low cash</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>incomes. A wide variety of subsistence foods are still critically important in these local economies. Almost all hunting, fishing, and gathering takes place locally and the majority of meat and fish consumed tends to come from local sources.</p> <p>Big game species are taken for food and not for their trophy value by families engaged in subsistence uses. The Board may undertake efforts to reduce or eliminate the trophy values of the resources taken to focus entirely on the inherent subsistence values.</p>	
N0033c-1	<p>Attachment C</p> <p>ALASKA DEPARTMENT OF FISH AND GAME</p> <p>Copper Basin MOOSE</p> <p>Community Subsistence Harvest Permit PROGRAM 2012-2013</p> <p>HUNT ADMINISTRATION</p> <p>Community Subsistence Harvest (CSH) Hunt administration will be in accordance with the Alaska Department of Fish and Game’s statutory and regulatory authority, including managing this common use resource for sustained yield while adhering to laws regarding the subsistence preference passed by the Alaska State Legislature.</p> <p>COPPER BASIN MOOSE CSH PERMIT</p> <p>According to regulations found at 5 AAC 92.072 Community Subsistence Harvest Hunt Area and at 5 AAC 92.052 Discretionary Permit Hunt Conditions and Procedures, ADF&G may issue community based subsistence harvest permits for big game species where the Alaska Board of Game has established a community harvest hunt area. The board established the Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti-Kaah (Copper Center) Community Harvest Area for moose and caribou in 2009 (5 AAC 92.074(d) Community Subsistence Harvest Areas), hereafter referred to as the Copper Basin CSH area.</p> <p>The CSH permit program allows communities or groups of 25 or more to</p>	<p>Thank you for providing the attached materials. These materials will be reviewed and incorporated as appropriate into the Final EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>apply annually for a CSH permit for an established CSH area. A group can choose to apply for a Copper Basin moose CSH permit, a Copper Basin caribou CSH permit, or both. These groups may select, from their group members, individual harvesters who may possess particular expertise in hunting to harvest wildlife resources on behalf of the community or group.</p> <p>The hunt conditions in this Copper Basin Moose CSH permit program are made for the purposes of notifying the community/group of users of how to use the moose in a manner consistent with the customary and traditional use pattern described in the board's 2006 and 2011 findings Game Management Unit 13 Caribou and Moose Subsistence Uses (2006-170-BOG and 2011-184-BOG), as well as to ensure an orderly administration of the CSH permit program and hunt (CM300).</p> <p>A community or group may possess only one (1) Copper Basin Moose CSH permit at any given time and group members may subscribe to only one (1) Copper Basin Moose CSH group per regulatory year. The Copper Basin Moose CSH permit expires at the end of the regulatory year for which it was issued. Renewal of a Copper Basin Moose CSH permit is the responsibility of the community or group coordinator.</p> <p>APPLICATION PROCESS</p> <p>THE COMMUNITY OR GROUP COORDINATOR</p> <p>In addition to permit hunt conditions and procedures found in 5 AAC 92.050 and 5 AAC 92.072, the community or group applying for a Copper Basin Moose CSH permit must designate a coordinator as part of the application process. The coordinator certifies that the information presented in a Copper Basin Moose CSH permit application is true and correct to the best of the coordinator's ability; monitors and reports on compliance with the conditions of a Copper Basin Moose CSH permit; and serves as the primary point of contact, among other duties. ADF&G will issue one (1) Copper Basin Community Moose Harvest Permit to each coordinator.</p> <p>For 2012-2013, the group application period will be November 1 - December 31, 2011. Group Applications must be postmarked by December 31 and received by January 15. Groups will not be formally approved until:</p> <p>1) at least 25 eligible group members have applied (including the group</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>coordinator), and</p> <p>2) all moose CSH permit reporting requirements from the previous regulatory year have been met (not applicable to first-time CSH groups).</p> <p>Once Group Applications have been submitted, individual/household Participant Applications will be accepted through July 1, 2012 by 5 p.m. (AST). Participant Applications must be submitted to a group coordinator for approval. Group coordinators must then submit approved Participant Applications to ADF&G; applications must be postmarked by June 15 and received by July 1. Incomplete applications will be void per 5 AAC 92.050 Required Permit Hunt Conditions and Procedures. Send completed applications to your local ADF&G office, or to the Anchorage ADF&G office (see “For More Information,” below).</p> <p>There is no limit to the number of communities or groups that may apply for a Copper Basin Moose CSH permit and there is no limit to the number of participants who may subscribe to a community or group, except that there must be 25 or more verified members in each group.</p> <p>INDIVIDUALS/HOUSEHOLDS</p> <p>Each household must submit one (1) completed Participant Application to a group coordinator for approval. All members of the household age 10 and up must be listed on the application and are subject to all CSH hunt eligibility requirements and conditions. The coordinator must ensure that group members understand the terms and conditions of the CSH permit hunt. Group coordinators may submit approved Participant Applications to ADF&G through July 1.</p> <p>A “household” means that group of people domiciled in the same residence per 5 AAC 92.990 (23) Definitions .</p> <p>By submitting a completed Participant Application, all household members are certifying they have read, understand, and will comply with the hunt conditions as well as the applicable Board of Game findings (Game Management Unit 13 Caribou and Moose Subsistence Uses).</p> <p>ADF&G will issue one (1) Copper Basin CSH moose harvest ticket/report to</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>each household member listed on the application (the bag limit is 1 bull I person; see "Open Seasons, Bag Limits, and Antler Restrictions," below).</p> <p>Hunters must abide by all applicable state hunting regulations and statute requirements including licensing, hunter education, and reporting requirements. Similar to other state hunts, CSH harvest ticket numbers must appear on the back of the hunter's license, CSH harvest tickets must be carried in the field while hunting, they must be validated immediately upon killing an animal and before leaving the kill site, and must remain in the hunter's possession until the animal has been delivered to the location of processing for human consumption.</p> <p>Copper Basin CSH harvest reports must be mailed or delivered to ADF&G within 5 days of taking the bag limit, or within 15 days of the close of the final season, even if the hunter did not hunt or did not take an animal. Hunters may also report online.</p> <p>PARTICIPANT ELIGIBILITY</p> <p>All household members subscribing to the Copper Basin Moose CSH hunt must meet the following eligibility requirements. The requirements apply to the same regulatory year as the CSH Participant Application (2012-2013).</p> <ul style="list-style-type: none"> • No member of the household can apply for any drawing/Tier I/Tier II/registration moose hunts, or hold general season moose harvest tickets. • No member of the household can apply for drawing/Tier I/Tier II/registration caribou hunts outside the Copper Basin CSH hunt area. • All household members agree to hunt moose and caribou only within the Copper Basin CSH hunt area. • No member of the household can be on the Failure to Report (FTR) list. <p>COPPER BASIN CSH PERMIT HUNT AREA, AND AREA OPEN TO MOOSE HUNTING</p> <p>The Copper Basin CSH permit hunt area includes all of Unit 11, Unit 13, and a portion of Unit 12 (southwest of the Tok River where it crosses the Glenn Highway Tok Cut-Of) per 5 AAC 92.074 (d).</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>[MAP]</p> <p>OPEN SEASONS, BAG LIMITS, ANTLER RESTRICTIONS</p> <p>The Copper Basin moose CSH hunting season dates and bag limits are specific to game management units within the CSH area. Up to 70 bull moose that do not meet general season antler restrictions (“any bulls”) can be taken under the Copper Basin Moose CSH hunt. Limits may be set on how many “any bulls” may be harvested from specific geographic areas within the CSH hunt area for conservation reasons. There is no collective limit to the number of moose meeting general season antler restrictions (see below) that can be taken under the Copper Basin Moose CSH permit.</p> <p>The bag limit is one (1) bull moose per person in Unit 11 and 13 and one (1) bull moose with spike/fork, or 50” antlers, or 4 or more brow tines in the open portion of Unit 12, unless modified by ADF&G emergency order.</p> <p>If the number of “any-bulls” reported taken for anyone geographic area reaches or exceeds established conservation limits (announced prior to hunting season), the area will remain open to CSH hunters, although the bag limit will change by emergency order to reflect the general season antler restriction for the area.</p> <p>The Copper Basin Moose CSH hunt season dates and general season antler restrictions are listed below:</p> <p>Area CSH Season Dates General Season Antler Restrictions</p> <p>Unit 11 August 10-September 20 Spike/fork, or 50” antlers, or 3 or more brow tines. Unit 13 August 10-September 20 Spike/fork, or 50” antlers, or 4 or more brow tines. Portion of Unit 12 August 24-August 28 and September 8-September 17 Spike/fork, or 50” antlers, or 4 or more brow tines.</p> <p>DESIGNATED HUNTERS</p> <p>The CSH program allows a community or group to designate members (from within the group) who may possess particular expertise in hunting to harvest</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>wildlife resources on behalf of the members of the community or group. To take a moose on behalf of another CSH harvest ticket holder (beneficiary), a hunter must carry both the beneficiary's and their own CSH moose harvest ticket in the field while hunting. The harvested moose must be delivered to the beneficiary. The beneficiary is responsible for all reporting requirements.</p> <p>HUNT TERMS AND CONDITIONS</p> <p>Customary and traditional uses of Unit 13 moose are thoroughly described in 2006-170-BOG and 2011• 184-BOG. The Board of Game found that the subsistence pattern in the Copper Basin is characterized by thorough use of most of the harvested animal. Therefore, all participants in the Copper Basin Moose CSH hunt must salvage for human consumption:</p> <ol style="list-style-type: none"> 1. All edible meat from the frontquarters, hindquarters, ribs, neck, and backbone, as well as the head, heart, liver, kidneys, stomach, and hide; and 2. Meat of the head, frontquarters, hindquarters, and ribs must remain naturally attached to the bones until delivered to the place where it is processed for human consumption. <p>The board also found that the subsistence pattern is characterized by meaningful communal sharing. At least one communal sharing event featuring moose harvested under the terms of a Copper Basin CSH hunt must be held. A complete description of the event (date, location, number of participants, amount of meat shared, and so forth) must be included in the final hunt report, to be submitted by the group/community coordinator.</p> <p>CUSTOMARY AND TRADITIONAL USE PATTERN</p> <p>The edible products of moose taken under the terms of a Copper Basin Moose CSH hunt must be used for human consumption and may not be sold or offered for sale. In order to comply with 5 AAC 92.072 (c) (1) (F), the department must ensure that the applicable customary and traditional use patterns described in board findings are observed by subscribers, including meat sharing. Subscribers need not have already established the pattern of community use summarized below; however, by applying, subscribers will be certifying that they have read, understood, and will voluntarily attempt to participate in and establish the pattern of subsistence use described in the</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Unit 13 board findings summarized below:</p> <ol style="list-style-type: none"> 1. Participation in the consistent pattern of noncommercial taking, use, and reliance on Nelchina caribou, Copper Basin moose and other local wild foods. The existing pattern of use has been established over many generations and is focused on the total aggregate of fish, wildlife, and plant resources in the Copper Basin CSH area. 2. Participation in the pattern of taking or use of wild resources from the Copper Basin CSH area that follows a seasonal use pattern of year-round harvest effort in the area, with harvests of moose and caribou by community members in both the fall and winter hunts, when legally permissible. 3. Participation in the pattern of taking or use of wild resources in the Copper Basin CSH area that includes methods and means of harvest characterized by efficiency and economy of effort and cost, especially taking advantage of the maximum opportunity to harvest, as efficiently as possible, a variety of usable species in the Copper Basin CSH area. 4. Participation in the pattern of taking or use of wild resources that occurs in the Copper Basin CSH area due to close ties to the area and a familiarity with the terrain and associated history of the Copper Basin CSH area. 5. Use of means of processing and preserving wild resources from the Copper Basin CSH area that have traditionally been used by past generations, including use of all of the parts required to be removed from the field under the terms of a Copper Basin Moose CSH permit. 6. Participation in the pattern of taking or use of wild resources from the Copper Basin CSH area that includes the handing down of knowledge of hunting skills, values, and lore about the Copper Basin CSH area from generation to generation. The board considered it critical to the perpetuation of the customary and traditional use pattern to provide opportunities for the young and old to participate in subsistence activities; the board also found it extremely important to stress the need to pass on skills and knowledge associated with use of all parts of the harvested animal. 7. Participation in the pattern of taking wild resources from the Copper Basin CSH area in which the harvest is shared throughout the community, 	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>including customary trade, barter, and gift-giving.</p> <p>In order to observe this pattern, a portion of the edible products of moose taken under the terms of a Copper Basin Moose CSH hunt should be primarily shared, in a meaningful way, with other members of the community or group. Hunters should also demonstrate a pattern of meaningful communal sharing that provides first for the needs of the community or group elders and disabled, as identified by the community or group. In addition, hunters who have harvested their first moose should give a portion to other members of the community or group.</p> <p>8. Participation in the pattern that includes taking, use, and reliance for subsistence purposes not only on Ne/china caribou and moose, but also on a wide variety of wild resources in the Copper Basin area.</p> <p>REPORTING</p> <p>Harvest ticket holders must mail or deliver Copper Basin CSH harvest reports to ADF&G within 5 days of taking the bag limit, or within 15 days of the close of the season, even if the hunter did not hunt or did not take an animal. Hunters may also report online.</p> <p>Failure to report may jeopardize sustained yield management of Copper Basin moose and the future of the CSH hunt; therefore, failure to report according to this schedule may result in citation and/or placement of harvest ticket holders on the state Failure to Report (FTR) list.</p> <p>To better address the subsistence needs of Copper Basin Moose CSH participants, the board requested that all moose harvested by CSH participants within the CSH area be accounted for, regardless of whether taken under federal or state regulations. All moose taken (that do not meet general antler restrictions) by Copper Basin Moose CSH participants within the CSH area will count against the up to 70 any-bull moose allowed for the CSH hunt.</p> <p>In order for the department to ensure that permittees have complied with all regulations addressing the terms and conditions of their Copper Basin Moose CSH permit, as well as the customary and traditional use pattern described in 2006-170-BOG and 2011-184-BOG, and in order to gather additional data on subsistence uses, the community or group coordinator must submit an</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>annual written report, which summarizes the group’s member households’ required reporting information as well as a description of the communal pattern observed by participants. The report must be postmarked by October 20. Additional supplemental reports can be submitted after October 20, prior to the deadline for Participant Applications (July 1). However, subsequent Copper Basin Moose CSH group applications will not be approved until all reporting requirements are met. If no report or an incomplete report is received, the group will be ineligible to participate in subsequent Copper Basin Moose CSH hunts. Group coordinators are encouraged to submit a complete written report as soon as possible to ensure adequate notice for subsequent group approval.</p> <p>The written report must include, at a minimum:</p> <ol style="list-style-type: none"> 1. A list of the names and harvest ticket numbers for those individuals whose bag limits were filled under the terms of a Copper Basin Moose CSH permit; and 2. A list of the names and harvest ticket numbers of the beneficiaries whose bag limits were filled by a designated hunter under the terms of a Copper Basin Moose CSH permit; and 3. The number of moose taken in federal subsistence hunts by those hunters also participating in the Copper Basin Moose CSH hunt; and 4. A specific description of how the community or group observed the customary and traditional use pattern described in 2006-170-BOG and 2011-184-BOG. The department will provide a reporting form to assist with this section of the report; however, a summary narrative is also required that includes a description of at least one meaningful communal sharing event. <p>Some information in these reports may be subject to state confidentiality laws.</p> <p>Deliver or mail reports to: ADF&G Copper Basin CSH P.O. Box 47 Glennallen, AK 99588</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>FOR MORE INFORMATION</p> <p>Visit www.adfg.alaska.gov for more information, or contact Glennallen ADF&G 822-3461.</p> <p>Send completed applications to your local ADF&G office, or: ADF&G Copper Basin Community Subsistence Hunt 333 Raspberry Road Anchorage, AK 99518</p> <p>The Alaska Department of Fish and Game (ADF&G) administers all programs and activities free from discrimination based on race, color, national origin, age, sex, religion, marital status, pregnancy, parenthood, or disability. The department administers all programs and activities in compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title 11 of the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, and Title IX of the Education Amendments of 1972.</p> <p>If you believe you have been discriminated against in any program, activity, or facility please write: ADF&G ADA Coordinator, P.O. Box 115526, Juneau, AK 99811-5526; U.S. Fish and Wildlife Service, 4401 N. Fairfax Drive, MS 2042, Arlington, VA 22203; Office of Equal Opportunity, U.S. Department of the Interior, 1849 C Street NW MS 5230, Washington DC 20240.</p> <p>The department's ADA Coordinator can be reached via phone at the following numbers: (VOICE) 907-465-6077; (Statewide Telecommunication Device for the Deaf) 1-800-478-3648; (Juneau TDD) 907-465-3646; (FAX) 907-465-6078; For information on alternative formats and questions on this publication, please contact the ADF&G Division of Wildlife Conservation at P.O. Box 115526, Juneau, AK, 99811-5526 or (907) 465-4176.</p> <p>2012 - 2013 Copper Basin Community Harvest Group Application [FORM]</p> <p>2012 - 2013 Copper Basin Community Harvest Participant Application [FORM]</p>	
N0033c-2	Attachment D	Thank you for providing the attached materials. These materials will be

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>ALASKA DEPARTMENT OF FISH AND GAME</p> <p>Copper Basin CARIBOU</p> <p>Community Subsistence Harvest Permit PROGRAM 2012-2013</p> <p>HUNT ADMINISTRATION</p> <p>Community Subsistence Harvest (CSH) Hunt administration will be in accordance with the Alaska Department of Fish and Game’s statutory and regulatory authority, including managing this common use resource for sustained yield while adhering to laws regarding the subsistence preference passed by the Alaska State Legislature.</p> <p>COPPER BASIN CARIBOU CSH PERMIT</p> <p>According to regulations found at 5 AAC 92.072 Community Subsistence Harvest Hunt Area and at 5 AAC 92.052 Discretionary Permit Hunt Conditions and Procedures, ADF&G may issue community based subsistence harvest permits for big game species where the Alaska Board of Game has established a community harvest hunt area The board established the Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti-Kaah (Copper Center) Community Harvest Area for moose and caribou in 2009 (5 AAC 92.074(d) Community Subsistence Harvest Areas), hereafter referred to as the Copper Basin CSH area.</p> <p>The CSH permit program allows communities or groups of 25 or more to apply annually for a CSH permit for an established CSH area. A group can choose to apply for a Copper Basin caribou CSH permit, a Copper Basin moose CSH permit, or both. These groups may select, from their group members, individual harvesters who may possess particular expertise in hunting to harvest wildlife resources on behalf of the community or group.</p> <p>The hunt conditions in this Copper Basin Caribou CSH permit program are made for the purposes of notifying the community/group of users of how to use caribou in a manner consistent with the customary and traditional use pattern described in the board’s 2006 and 2011 findings Game Management Unit 13 Caribou and Moose Subsistence Uses (2006-170-BOG and 2011-</p>	<p>reviewed and incorporated as appropriate into the Final EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>184-BOG), as well as to ensure an orderly administration of the CSH permit program and hunt (CC001).</p> <p>A community or group may possess only one (1) Copper Basin Caribou CSH permit at any given time and group members may subscribe to only one (1) Copper Basin Caribou CSH group per regulatory year. The Copper Basin Caribou CSH permit expires at the end of the regulatory year for which it was issued. Renewal of a Copper Basin Caribou CSH permit is the responsibility of the community or group coordinator.</p> <p>APPLICATION PROCESS</p> <p>THE COMMUNITY OR GROUP COORDINATOR</p> <p>In addition to permit hunt conditions and procedures found in 5 AAC 92.050 and 5 AAC 92.072, the community or group applying for a Copper Basin Caribou CSH permit must designate a coordinator as part of the application process. The coordinator certifies that the information presented in a Copper Basin Caribou CSH permit application is true and correct to the best of the coordinator's ability; monitors and reports on compliance with the conditions of a Copper Basin Caribou CSH permit; and serves as the primary point of contact, among other duties. ADF&G will issue one (1) Copper Basin Community Caribou Harvest Permit to each coordinator.</p> <p>For 2012-2013, the group application period will be November 1 - December 31, 2011. Group Applications must be postmarked by December 31 and received by January 15. Groups will not be formally approved until:</p> <ol style="list-style-type: none"> 1) at least 25 eligible group members have applied (including the group coordinator), and 2) all caribou CSH permit reporting requirements from the previous regulatory year have been met (not applicable to first time CSH groups). <p>Once Group Applications have been submitted, individual/household Participant Applications will be accepted through July 1, 2012 by 5 p.m. (AST). Participant Applications must be submitted to a group coordinator for approval. Group coordinators must then submit approved Participant Applications to ADF&G; applications must be postmarked by June 15 and received by July 1. Incomplete applications will be void per 5 AAC 92.050</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Required Permit Hunt Conditions and Procedures. Send completed applications to your local ADF&G office, or to the Anchorage ADF&G office (see “For More Information,” below).</p> <p>There is no limit to the number of communities or groups that may apply for a Copper Basin Caribou CSH permit and there is no limit to the number of participants who may subscribe to a community or group, except that there must be 25 or more verified members in each group.</p> <p>INDIVIDUALSIHOUSEHOLDS</p> <p>Each household must submit one (1) completed Participant Application to a group coordinator for approval. All members of the household age 10 and up must be listed on the application and are subject to all CSH hunt eligibility requirements and conditions. The coordinator must ensure that group members understand the terms and conditions of the CSH permit hunt. Group coordinators may submit approved Participant Applications to ADF&G through July 1.</p> <p>A “household” means that group of people domiciled in the same residence per 5 AAC 92.990 (23) Definitions.</p> <p>By submitting a completed Participant Application, all household members are certifying they have read, understand, and will comply with the hunt conditions as well as the applicable Board of Game findings (Game Management Unit J 3 Caribou and Moose Subsistence Uses).</p> <p>ADF&G will issue one (1) Copper Basin CSH caribou harvest ticket/report to each household (the bag limit is 1 caribou / household).</p> <p>Hunters must abide by all applicable state hunting regulations and statute requirements including licensing, hunter education, and reporting requirements. Similar to other state hunts, CSH harvest ticket numbers must appear on the back of the hunter’s license, CSH harvest tickets must be carried in the field while hunting, they must be validated immediately upon killing an animal and before leaving the kill site, and must remain in the hunter’s possession until the animal has been delivered to the location of processing for human consumption.</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Copper Basin CSH harvest reports must be mailed or delivered to ADF&G within 5 days of taking the bag limit, or within IS days of the close of the final season, even if the hunter did not hunt or did not take an animal. This hunt may close early; it is the hunter’s responsibility to check for Emergency Closures. Hunters may also report online.</p> <p>PARTICIPANT ELIGIBILITY</p> <p>All household members subscribing to the Copper Basin Caribou CSH hunt must meet the following eligibility requirements. The requirements apply to the same regulatory year as the CSH Participant Application (2012-2013).</p> <ul style="list-style-type: none"> • No member of the household can apply for any drawing/Tier I/Tier II registration caribou hunts, or hold general season caribou harvest tickets (unless the hunt occurs after the close of the CSH hunt and the bag limit is higher). • No member of the household can apply for drawing/Tier I/Tier II/registration moose hunts outside the Copper Basin CSH hunt area. • All household members agree to hunt moose and caribou only within the Copper Basin CSH hunt area. • No member of the household can be on the Failure to Report (FTR) list. <p>COPPER BASIN CSH PERMIT HUNT AREA, AND AREA OPEN TO CARIBOU HUNTING</p> <p>The Copper Basin CSH permit hunt area includes all of Unit 11, Unit 13, and a portion of Unit 12 (southwest of the Tok River where it crosses the Glenn Highway Tok Cut-Of) per 5 AAC 92.074 (d). Due to conservation concerns for adjacent caribou herds, only Unit 13 is open to caribou hunting under the terms of a Copper Basin Caribou CSH permit.</p> <p>[MAP]</p> <p>OPEN SEASONS AND BAG LIMITS</p> <p>The Copper Basin Caribou CSH season is: August 10 - September 20, and October 21 - March 31. The bag limit is one (1) caribou per household. For</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>conservation reasons, the season and bag limit may be modified by ADF&G emergency order. Up to 300 caribou can be taken under the Copper Basin Caribou CSH permit program (applies to all groups collectively).</p> <p>DESIGNATED HUNTERS</p> <p>The CSH program allows a community or group to designate members (from within the group) who may possess particular expertise in hunting to harvest wildlife resources on behalf of the members of the community or group. To take a caribou on behalf of another household (beneficiary), a hunter must carry both the beneficiary's and their own CSH caribou harvest ticket in the field while hunting. The harvested caribou must be delivered to the beneficiary. The beneficiary is responsible for all reporting requirements.</p> <p>HUNT TERMS AND CONDITIONS</p> <p>Customary and traditional uses of Nelchina caribou are thoroughly described in 2006-170-BOG and 2011 84-BOG. The Board of Game found that the subsistence pattern in the Copper Basin is characterized by thorough use of most of the harvested animal. Therefore, all participants in the Copper Basin Caribou CSH hunt must salvage for human consumption:</p> <ol style="list-style-type: none"> 1. All edible meat from the frontquarters, hindquarters, ribs, neck, and backbone, as well as the heart, liver, kidneys, and fat; and 2. Prior to October 1, meat of the frontquarters, hindquarters, and ribs must remain naturally attached to the bones until delivered to the place where it is processed for human consumption. <p>The board also found that the subsistence pattern is characterized by meaningful communal sharing. At least one communal sharing event featuring caribou harvested under the terms of a Copper Basin CSH hunt must be held. A complete description of the event (date, location, number of participants, amount of meat shared, and so forth) must be included in the final hunt report, to be submitted by the group/community coordinator.</p> <p>CUSTOMARY AND TRADITIONAL USE PATTERN</p> <p>The edible products of caribou taken under the terms of a Copper Basin Caribou CSH hunt must be used for human consumption and may not be</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>sold or offered for sale. In order to comply with 5 AAC 92.072 (c) (1) (F), the department must ensure that the applicable customary and traditional use patterns described in board findings are observed by subscribers, including meat sharing. Subscribers need not have already established the pattern of community use summarized below; however, by applying, subscribers will be certifying that they have read, understood, and will voluntarily attempt to participate in and establish the pattern of subsistence use described in the Unit 13 board findings summarized below:</p> <ol style="list-style-type: none"> 1. Participation in the consistent pattern of noncommercial taking, use, and reliance on Nelchina caribou, Copper Basin moose and other local wild foods. The existing pattern of use has been established over many generations and is focused on the total aggregate of fish, wildlife, and plant resources in the Copper Basin CSH area. 2. Participation in the pattern of taking or use of wild resources from the Copper Basin CSH area that follows a seasonal use pattern of year-round harvest effort in the area, with harvests of moose and caribou by community members in both the fall and winter hunts, when legally permissible. 3. Participation in the pattern of taking or use of wild resources in the Copper Basin CSH area that includes methods and means of harvest characterized by efficiency and economy of effort and cost, especially taking advantage of the maximum opportunity to harvest, as efficiently as possible, a variety of usable species in the Copper Basin CSH area. 4. Participation in the pattern of taking or use of wild resources that occurs in the Copper Basin CSH area due to close ties to the area and a familiarity with the terrain and associated history of the Copper Basin CSH area. 5. Use of means of processing and preserving wild resources from the Copper Basin CSH area that have traditionally been used by past generations, including use of all of the parts required to be removed from the field under the terms of a Copper Basin Caribou CSH permit. 6. Participation in the pattern of taking or use of wild resources from the Copper Basin CSH area that includes the handing down of knowledge of hunting skills, values, and lore about the Copper Basin CSH area from generation to generation. The board considered it critical to the perpetuation of the customary and traditional use pattern to provide opportunities for the young and old to participate in subsistence activities; the board also found it extremely important to stress the need to pass on skills and knowledge 	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>associated with use of all parts of the harvested animal.</p> <p>7. Participation in the pattern of taking wild resources from the Copper Basin CSH area in which the harvest is shared throughout the community, including customary trade, barter, and gift-giving. In order to observe this pattern, a portion of the edible products of caribou taken under the terms of a Copper Basin Caribou CSH hunt should be primarily shared, in a meaningful way, with other members of the community or group. Hunters should also demonstrate a pattern of meaningful communal sharing that provides first for the needs of the community or group elders and disabled. as identified by the community or group. In addition, hunters who have harvested their first caribou should give a portion to other members of the community or group.</p> <p>8. Participation in the pattern that includes taking, use, and reliance for subsistence purposes not only on Nelchina caribou and moose, but also on a wide variety of wild resources in the Copper Basin area.</p> <p>REPORTING</p> <p>Harvest ticket holders must mail or deliver Copper Basin CSH harvest reports to ADF&G within 5 days of taking the bag limit, or within 15 days of the close of the season, even if the hunter did not hunt or did not take an animal. If the season is closed early by emergency order, unsuccessful (and did not hunt) reports must be returned within 15 days of the closure. Hunters may also report online.</p> <p>Failure to report may jeopardize sustained yield management of the Nelchina caribou herd and the future of the CSH hunt; therefore, failure to report according to this schedule may result in citation and/or placement of harvest ticket holders on the state Failure to Report (FTR) list.</p> <p>To better address the subsistence needs of Copper Basin Caribou CSH participants, the board requested that all caribou harvested by CSH participants within the CSH area be accounted for, regardless of whether taken under federal or state regulations. All caribou taken by Copper Basin Caribou CSH participants within the CSH area will count against the up to 300 caribou allowed for the CSH hunt.</p> <p>In order for the department to ensure that permittees have complied with all regulations addressing the terms and conditions of their Copper Basin</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Caribou CSH permit, as well as the customary and traditional use pattern described in 2006-170-BOG and 2011-184-BOG, and in order to gather additional data on subsistence uses, the community or group coordinator must submit an annual written report, which summarizes the group’s member households’ required reporting information as well as a description of the communal pattern observed by participants. The report must be postmarked by April 30. Additional supplemental reports can be submitted after April 30, prior to the deadline for Participant Applications (July 1). However, subsequent Copper Basin Caribou CSH group applications will not be approved until all reporting requirements are met. If no report or an incomplete report is received, the group will be ineligible to participate in subsequent Copper Basin Caribou CSH hunts. Group coordinators are encouraged to submit a complete written report as soon as possible to ensure adequate notice for subsequent group approval.</p> <p>The written report must include, at a minimum:</p> <ol style="list-style-type: none"> 1. A list of the names and harvest ticket numbers for those individuals whose bag limits were filled under the terms of a Copper Basin Caribou CSH permit; and 2. A list of the names and harvest ticket numbers of the beneficiaries whose bag limits were filled by a designated hunter under the terms of a Copper Basin Caribou CSH permit; and 3. The number of caribou taken in federal subsistence hunts by those hunters also participating in the Copper Basin Caribou CSH hunt; and 4. A specific description of how the community or group observed the customary and traditional use pattern described in 2006-170-BOG and 2011-184-BOG. The department will provide a reporting form to assist with this section of the report; however, a summary narrative is also required that includes a description of at least one meaningful communal sharing event. <p>Some information in these reports may be subject to state confidentiality laws.</p> <p>Deliver or mail reports to: ADF&G Copper Basin CSH P.O. Box 47 Glennallen, AK 99588</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>FOR MORE INFORMATION</p> <p>Visit www.adfg.alaska.gov for more information, or contact Glennallen ADF&G 822-3461. Send completed applications to your local ADF&G office, or: ADF&G Copper Basin Community Subsistence Hunt 333 Raspberry Road Anchorage, AK 99518</p> <p>The Alaska Department of Fish and Game (ADF&G) administers all programs and activities free from discrimination based on race, color, national origin, age, sex, religion, marital status, pregnancy, parenthood, or disability. The department administers all programs and activities in compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, and Title IX of the Education Amendments of 1972.</p> <p>If you believe you have been discriminated against in any program, activity, or facility please write: ADF&G ADA Coordinator, P.O. Box 115526, Juneau, AK 99811-5526 ; U.S. Fish and Wildlife Service, 4401 N. Fairfax Drive, MS 2042, Arlington, VA 22203; Office of Equal Opportunity, U.S. Department of the Interior, 1849 C Street NW MS 5230, Washington DC 20240.</p> <p>The department’s ADA Coordinator can be reached via phone at the following numbers: (VOICE) 907-465-6071; (Statewide Telecommunication Device for the Deaf) 1-800-478-3648; (Juneau TDD) 907-465-3646; (FAX) 907-465-6078; For information on alternative formats and questions on this publication, please contact the ADF&G Division of Wildlife Conservation at P.O. Box 115526, Juneau, AK, 99811-5526 or (907) 465- 4176</p> <p>2012 - 2013 Copper Basin Community Harvest Group Application [FORM]</p> <p>2012 - 2013 Copper Basin Community Harvest Participant Application [FORM]</p>	
N0034-1	This comment is submitted by Talkeetna Air Taxi(TAT) a FAR part 135 air taxi headquartered in Talkeetna, Alaska. TAT owns and operates 8 aircraft	Section 3.1.10.1 of the EIS indicates the areas beneath the proposed Fox 3 MOA expansion and new Paxson MOA are used for recreational uses

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>and is one of the largest air services in the area. The comments will concentrate on the proposed expansion of the Fox 3 MOA. Most of the clients we fly into the mountains and rivers in the Talkeetna area including the Talkeetna Mountains expect a natural pristine environment that is relatively free of pollution and noise. The user groups that frequent the Talkeetna Mountains are as follows: rafters on the Talkeetna River, climbers and skiers on the glaciers and high peaks in the Mount Sovereign area, hikers in the lower tundra mountains, hunters, and photographers. These user groups are very concerned with the expansion of the Fox MOA and feel this will potentially ruin their experience in the mountains. The central theme stems from both the low level flight potential (500ft) and the expansion of it. One of the great draws of the Talkeetna Mountains is that is is far from any large groups, a quiet environment, and relatively close to Talkeetna. It offers a Brooks Range type experience that is a fraction of the cost. We as an air service feel a need to protect this type of environment for there are few left. Once word gets out that it is in a hot MOA that is approved for low level ops with military aircraft its reputation could be ruined in short order.</p> <p>...</p> <p>Hunters in town of Talkeetna have voiced concern about the low level operations by military aircraft. They feel this could disrupt caribou migration, breeding and even the hunt. Climbers and skiers are concerned about potentially being avalanched by the effects of low flying aircraft and sonic booms.</p>	<p>including hunting, fishing, mountain climbing, backpacking, and camping. Section 3.1.10.3 of the EIS acknowledges that the proposed action could result in impacts to recreational use in popular locations from intermittent, intensive, and repetitive aircraft overflights during MFEs, particularly during the most critical recreation period between approximately June 15 and September 15. In addition, the EIS acknowledges that indirect effects on civilian air access would affect spatial and temporal availability of recreational areas underlying the expanded Fox 3 MOA and new Paxon MOA. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts, such as providing advance schedules of training missions in the MOA and avoiding MFEs in the peak seasonal times and/or flying at higher altitudes during these periods.</p> <p>Section 3.1.10.3 of the DEIS (p. 3-77, line 42 through 3-78, line 2) indicates that avalanches are a risk to skiers and other outdoor recreation in high mountain areas. Studies and reports have generally concluded that it is very unlikely that a sonic boom would trigger an avalanche unless the area is already critically unstable. A study performed in the Swiss Alps concluded that sonic boom is a poor means to produce avalanche (Perroud and Lecomte 1986).</p>
N0034-2	<p>This comment is submitted by Talkeetna Air Taxi(TAT) a FAR part 135 air taxi headquartered in Talkeetna, Alaska. TAT owns and operates 8 aircraft and is one of the largest air services in the area. The comments will concentrate on the proposed expansion of the Fox 3 MOA. Most of the clients we fly into the mountains and rivers in the Talkeetna area including the Talkeetna Mountains expect a natural pristine environment that is relatively free of pollution and noise. The user groups that frequent the Talkeetna Mountains are as follows: rafters on the Talkeetna River, climbers and skiers on the glaciers and high peaks in the Mount Sovereign area, hikers in the lower tundra mountains, hunters, and photographers. These user groups are very concerned with the expansion of the Fox MOA and feel this will potentially ruin their experience in the mountains. The central theme stems from both the low level flight potential (500ft) and the expansion of it. One of the great draws of the Talkeetna Mountains is that is is far from any</p>	<p>The Air Force acknowledges that there will be potential for noise impacts from the expansion of the MOA and low-level flight proposed. Section 3.1.10.3 addresses the potential environmental consequences to land use, special use areas, and recreation from noise associated with military aircraft. As stated in Section 3.1.10.3.1, the BLM and ADNR will continue to manage lands to meet multiple objectives including approval of new activities, leases and permits that require air access or construction of major infrastructure. The Air Force would continue coordination with these agencies and develop mitigations to address any specific concerns and minimize any potential impacts to users. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>large groups, a quiet environment, and relatively close to Talkeetna. It offers a Brooks Range type experience that is a fraction of the cost. We as an air service feel a need to protect this type of environment for there are few left. Once word gets out that it is in a hot MOA that is approved for low level ops with military aircraft its reputation could be ruined in short order.</p>	
<p>N0034-3</p>	<p>As a pilot looking at an aviation map I am amazed there needs to be expansion to the MOAs. Galena, Stony, Susitna, Fox, Delta....all consume hundreds of square miles! . . . In closing we feel very strongly that the no action alternative should be chosen.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska’s airspace. The comment to move new fifth generation fighter training and exercises to other MOAs in JPARC does not, however, meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Sections 1.2 and 1.3. Additionally, the airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 and fifth generation fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower altitude airspace to reflect the types of combat in which fifth generation fighters would be engaged. These fighters have the capability to reach out at greater distances than fourth generation fighters, so fourth generation fighters must apply diverse tactics that require airspace expansion in distance and altitude that the existing MOAs do not provide.</p>
<p>N0034-4</p>	<p>The proposed Susitna Dam has increased air traffic and should be addressed in your study.</p>	<p>The Alaska Airspace Manager for the Air Force has reviewed the documents on your website and has identified an area where your project and the Air Force’s operations may impact one another.</p> <p>If you pursue instrument approaches to your runways for inclement weather operations (instrument flight rules, or IFR), you will require changes to the Federal Aviation Administration (FAA)-designated airspace to use them. When the Air Force is operating in the Fox 3 MOA above the airfields, you will not have the necessary IFR access to the instrument approaches. Prior planning is the easiest way to avoid delays and diversions due to active military airspace.</p> <p>Outside of days with low visibility or clouds, we suspect that the majority of your operations would be visual flight rules (VFR), and therefore not require the instrument procedures. During VFR flights, your aircraft would not be restricted from flying in the Military Operations Area (MOA) with the Air Force aircraft. When we share airspace, the best way to avoid conflicts is through communication which will be enhanced with our Special Use</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>Airspace Information Service (SUAIS). We will provide a radio frequency to talk to our Range Controller on; he is then able to assist with aircraft locations to keep our operations separate. Ensuring your aircraft are transponder-equipped (transmitting a signal) will assist the SUAIS as the aircraft are easier to see on radar by the Range Controller and the fighter aircraft in the area.</p> <p>Finally, your transmission lines are most likely low enough to be of no concern to the Air Force operations as 500 feet AGL is the proposed floor of the new Fox 3 MOA.</p> <p>The 11th Air Force chairs an Alaska Civil-Military Aviation Council (ACMAC) that meets twice annually to discuss shared airspace issues and ways to avoid conflicts. Military, FAA, Alaska Department of Fish and Game (ADFG), Aircraft Owners and Pilots Association (AOPA), Alaska Airmen and other community groups attend this meeting to enhance the safety of all users of the National Airspace System.</p> <p>Alaska Energy Authority contact information has been added to the list of invitees for the next meeting scheduled tentatively for November 2012.</p> <p>A summary of the information on the Susitna-Watana hydroelectric project and an analysis of potential cumulative effects have been added to the EIS (see Section 4.8).</p>
N0034-5	<p>This comment is submitted by Talkeetna Air Taxi(TAT) a FAR part 135 air taxi headquartered in Talkeetna, Alaska. TAT owns and operates 8 aircraft and is one of the largest air services in the area. The comments will concentrate on the proposed expansion of the Fox 3 MOA. Most of the clients we fly into the mountains and rivers in the Talkeetna area including the Talkeetna Mountains expect a natural pristine environment that is relatively free of pollution and noise. The user groups that frequent the Talkeetna Mountains are as follows: rafters on the Talkeetna River, climbers and skiers on the glaciers and high peaks in the Mount Sovereign area, hikers in the lower tundra mountains, hunters, and photographers. These user groups are very concerned with the expansion of the Fox MOA and feel this will potentially ruin their experience in the mountains.</p> <p>...</p> <p>The next concern is potential conflict with our aircraft and the low level</p>	<p>The Air Force recognizes the concerns TAT and others have expressed over the Fox 3 and Paxon MOA proposals and would seek those viable options for minimizing any adverse effects this action could have on other airspace and land uses within the Talkeetna Mountain area. While the Alternative E configuration reduces the area potentially affected by military operations, it is understood that this would not fully alleviate concerns over noise, low-level operations, midair collisions, and other risks or annoyances in this area. The Air Force would seek those viable means that would help minimize such adverse effects and provide for the safe, mutual use of this airspace. This includes enhancing communications within the affected areas, as indicated in the proposed FEIS mitigations.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>operations. We operate with military aircraft in the Susitna MOA and the Denali area. We have had conflict with fighters straying from the MOA and entering Denali Park. The concerning aspect is the aircraft are not tuned to the common frequency. We have complained over the years but there has not been any acknowledgement. We feel operations in the expanded FOX MOA will increase the risk of a potential mid-air and our pilots are very concerned.</p> <p>Hunters in town of Talkeetna have voiced concern about the low level operations by military aircraft. They feel this could disrupt caribou migration, breeding and even the hunt. Climbers and skiers are concerned about potentially being avalanched by the effects of low flying aircraft and sonic booms. As a pilot looking at an aviation map I am amazed there needs to be expansion to the MOAs. Galena, Stony, Susitna, Fox, Delta....all consume hundreds of square miles!</p>	
N0035-1	<p>Copper Country Alliance is a non-profit conservation organization serving the Copper River Basin and Wrangell Mountains area of Alaska. Most of our members live in the Copper Basin; the others are very familiar with the region. All share an appreciation for the region as it is: scenic and wild, with the chance to see interesting wildlife. Most of our members also engage in subsistence activities in the region.</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.</p>
N0035-2	<p>Following are our comments on the JPARC Modernization and Enhancement Draft Environmental Impact Statement (DEIS). Our comments are confined to the FOX and Paxson Military Operations Areas (MOAs).</p> <p>We are completely opposed to Alternatives A and E in the JPARC Draft Environmental Impact Statement.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
N0035-3	<p>We prefer the No Action Alternative, but only because no alternate was presented that would have addressed the current flagrant violations of horizontal and vertical airspace and of supersonic speeds below FAA limits.</p>	<p>Supersonic flight is not permitted below FL300 in the Copper Valley area. While there is currently no Military Operations Area (MOA) over Paxson, the airspace is available for use by military aircraft. Outside of Special Use Airspace (SUA), FAA regulations apply. Often, the military has more conservative rules that restrict operations. Current regulations in Alaska permit fighter aircraft to fly at 300 knots as low as 500 feet above ground level (AGL) in non-congested areas; cargo aircraft will fly as low as 300 feet AGL, but must remain 500 feet from any person, vessel, vehicle, or structure.</p> <p>The Air Force maintains a hotline for complaints about noise or suspected violations of flight rules. Please contact 800-JET NOISE (538-6647) with as much detail as possible so we may research the incident fully.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
N0035-4	<p>DEIS FAILS TO ADDRESS SIGNIFICANT ISSUES THAT WERE RAISED IN SCOPING:</p> <p>Failure to Discuss Violations by Air Force Jets</p> <p>Airspace violations are not rare: Our members and others have observed Air Force jets flying below the required 5000 feet AGL in the Fox 3 MOA, training below 18,000 feet in the Paxon ATCAA, and flying at supersonic speeds when they are below required minimums. Our organization raised this issue in our scoping comments. The Bureau of Land Management documented specific incidents. (See v. II, A-45 and A-46.) I believe that other commenters also raised this issue. We have been unable to find any reference to this issue in the DEIS, other than including the BLM documents and mentioning the toll-free number that citizens can use to report jet noise. Noise is clearly not the only issue here, and the DEIS does not—as far as we can determine—disclose that there are violations.</p>	<p>The FEIS Section 3.1.1 (Airspace Management and Use) and Appendix D (Airspace) describe the military training routes (MTRs) and low-altitude tactical navigation (LATN) training area that currently exist in the region where the expanded Fox 3 and Paxon MOAs are proposed. The MTRs are shown on aeronautical charts and used by fighter aircraft while the LATN is a vast, uncharted expanse of airspace used primarily by cargo-type aircraft. Therefore, aircraft observed operating outside the published boundaries and altitudes of the existing MOAs may be operating within the MTR and LATN airspace. Please contact either the Eielson AFB or JBER Public Affairs office to be directed to the appropriate organization that can address any questions or complaints you may have regarding military aircraft operations. As noted in the FEIS, such reporting is strongly encouraged so that appropriate actions can be taken to reinforce pilot compliance with standard operating policies and procedures.</p>
N0035-5	<p>Our organization’s scoping comments specifically requested that this issue be addressed, and we suggested mitigations: “All alternatives should include monitoring and enforcement of flight levels and flight speeds. Random but frequent checks should be made of flight tapes. Look into the feasibility of beepers than warn pilots when they are below prescribed flight levels and when they are approaching Mach 1.”</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
N0035-6	<p>Failure to Address Important Cumulative Impacts</p> <p>Susitna Dam:</p> <p>The proposed Susitna-Watana dam is a huge project for which the Federal Energy Regulatory Commission (FERC) is preparing an Environmental Impact Statement. It has strong backing from the state legislature, which in the summer of 2011 provided the Alaska Energy Authority with \$66 million to study it; therefore, it is “reasonably foreseeable.” The dam’s impacts to wildlife could be substantial, as evidenced by ADFG embarking on multi-year studies on the Nelchina caribou herd, moose, and ptarmigan, while other entities are conducting studies of potential impacts to migratory birds.</p>	<p>The Alaska Airspace Manager for the Air Force has reviewed the documents on your website and has identified an area where your project and the Air Force’s operations may impact one another.</p> <p>If you pursue instrument approaches to your runways for inclement weather operations (instrument flight rules, or IFR), you will require changes to the Federal Aviation Administration (FAA)-designated airspace to use them. When the Air Force is operating in the Fox 3 MOA above the airfields, you will not have the necessary IFR access to the instrument approaches. Prior planning is the easiest way to avoid delays and diversions due to active military airspace.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>The dam site would lie beneath the Fox 3 MOA, where this DEIS proposes to lower the minimum flight level from 5,000 feet above ground level (AGL) to 500 feet AGL. According to scoping comments provided by ADFG and USFW on the JPARC proposal, these low-level flights are of particular concern with regard to many wildlife species, including the moose, the Nelchina caribou herd, and migratory birds being studied for the Susitna-Watana project. Also, one of the proposed access roads, departing from the Denali Highway, underlies the Fox 3 MOA. Certainly this is a cumulative impact that should have been mentioned.</p>	<p>Outside of days with low visibility or clouds, we suspect that the majority of your operations would be visual flight rules (VFR), and therefore not require the instrument procedures. During VFR flights, your aircraft would not be restricted from flying in the MOA with the Air Force aircraft. When we share airspace, the best way to avoid conflicts is through communication which will be enhanced with our Special Use Airspace Information Service (SUAIS). We will provide a radio frequency to talk to our Range Controller on; he is then able to assist with aircraft locations to keep our operations separate. Ensuring your aircraft are transponder-equipped (transmitting a signal) will assist the SUAIS as the aircraft are easier to see on radar by the Range Controller and the fighter aircraft in the area.</p> <p>Finally, your transmission lines are most likely low enough to be of no concern to the Air Force operations, as 500 feet AGL is the proposed floor of the new Fox 3 MOA.</p> <p>The 11th Air Force chairs an Alaska Civil-Military Aviation Council (ACMAC) which meets twice annually to discuss shared airspace issues and ways to avoid conflicts. Military, FAA, Alaska Department of Fish and Game (ADFG), Aircraft Owners and Pilots Association (AOPA), Alaska Airmen and other community groups attend this meeting to enhance the safety of all users of the National Airspace System.</p> <p>Alaska Energy Authority contact information has been added to the list of invitees for the next meeting scheduled tentatively for November 2012.</p> <p>A summary of the information on the Susitna-Watana hydroelectric project and an analysis of potential cumulative effects have been added to the EIS (see Section 4.8).</p>
<p>N0035-7</p>	<p>Mineral Exploration and Mining:</p> <p>The DEIS (vol. I, page 3-59) addresses mining claims and active mines in the region. It depicts them in Figure 3-12. Curiously, it does not list any of them as having cumulative impacts in conjunction with the JPARC proposals. To take one example with which our organization is very familiar, Pure Nickel, Inc., has been conducting exploratory drilling on its "MAN" nickel/copper/platinum claims, which include important wintering and rutting grounds for the Nelchina caribou herd. This is of concern to resource managers. As the Alaska Board of Game wrote in its March 26, 2008 letter</p>	<p>The information provided in your comment on other uses and activities in the affected region are noted, and incorporated into the FEIS where applicable. In general, mining operations are compatible with military training operations. This proposal may have minor impact on air access for mining in the underlying areas (mostly during the six major flying events each year), but real-time coordination between pilots and airspace managers can minimize these conflicts. The potential for cumulative impacts on wildlife from military airspace use and surface mining operations is minimal since their activities and pathways of impact are different. The primary effects on wildlife from</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	to the Governor, "We recognize the potential for mineral extraction in this area and in associated mineral leases, but remain convinced the long-term value of maintaining wildlife habitat far outweighs the potential benefits of possible development projects known at this time." The claims area is also an important subsistence area and is a favorite destination for hikers, paddlers, photographers, mushers, and tour companies. To date, multinational ITOCHU has invested \$17 million on these claims, making it sufficiently foreseeable to deserve mention. As another example, the DEIS mentions active mining north of the Denali Highway at Valdez Creek, but does not discuss whether there might be cumulative impacts with regard to subsistence, recreation, or wildlife.	the Fox 3 and New Paxon MOA proposals result from aircraft noise rather than changes to habitat, as for a mining operation. The potential for cumulative impact on recreation from multiple uses in specific locations has been noted in the FEIS in Section 4.8.10.
N0035-8	In spite of the all the above, the DEIS says, with regard to cumulative impacts to biological resources: "Cumulative Impacts of JPARC Proposals with Other Non-Military Actions. No substantive non-military actions have been identified for the areas under the proposed expanded Fox 3 or Paxon MOAs; therefore, contributions of non-military actions to cumulative effects in the Fox 3/Paxon MOA proposal area would be insignificant." (DEIS v. I, page 4-27)	In light of information provided about projects within the Fox 3 and New Paxon proposal area, including the proposed Susitna-Watana Hydroelectric project, evaluation of cumulative impacts has been revised in Section 4.8 of the FEIS where applicable. Some of these projects may have significant impact assessed for different resources. The assessment looks at the combination of mostly surface-based actions with those of this proposal (which do not involve direct surface disturbance). These interactions may not intensify a particular impact pathway on a given resource. Instead, the variety of stressors is given additional consideration.
N0035-9	Climate Change: Our scoping comments stated, "Research is especially important for those species with small populations and/or special vulnerability to other stressors like climate change. Examples include wolverine and pika." The only reference that the DEIS makes to climate change is on page 4-17, where air quality is discussed. There is no mention of how implementation of Alternative A or E might interact with climate change to affect biological resources. For instance, how might low level flights and/or sonic booms affect denning wolverine?	While climate change is a concern for potentially affecting vegetation/habitats for some high-elevation species, our conclusions for other well-studied wildlife species are that the JPARC proposals would have no significant adverse effects. Animal responses to low-level flights have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Please see Appendix E for a review of research on noise effects, primarily from aircraft overflights and sonic booms, on wildlife species. In the case of wolverine, given the logistical difficulties of conducting studies on wildlife response to overflight with rare and secretive animals such as the wolverine, it would probably be infeasible to find a large enough sample size and to be able to observe them during occasional overflights to obtain adequate data to support rigorous analysis. The FEIS includes some additional clarification on how climate change may factor into regional impacts on wildlife related to JPARC proposals.
N0035-10	DEIS UNDERSTATES IMPACTS:	Maximum overflight noise levels (in dB Lmax) are shown in Table 3-5 for several representative aircraft types in flight configurations typically used in training airspace. Aircraft noise levels are highly variable depending on

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Noise:</p> <p>The DEIS gives 123 dB as the loudest noise that would be heard in the Fox 3 and Paxson MOAs during low-level (500 feet AGL). Presumably, this would be generated by subsonic flight, because supersonic flight is not supposed to be conducted below 5,000 feet AGL or 12,000 feet AGL. “This degree of noise would likely annoy or startle persons overflown,” (DEIS v. I, page 3-79). However, according to the Canadian Journal of Otolaryngology, just 120 dB exposure can injure the ear. The Final EIS should acknowledge ear damage and return the minimum flight level to 5000 feet AGL to prevent such damage.</p> <p>Within the DEIS, we have not found any information on the decibel level of a supersonic jet flying at 500 feet AGL or 1000 AGL. As documented by the Bureau of Land Management (DEIS v. II, A-25 and A-26), supersonic flight already does occur at 1000 feet AGL or even hundreds of feet AGL. “Annoy” and “startle,” the words used in the DEIS, hardly describe the reactions of those exposed. “Terrify” is more accurate. I have experienced this myself while berry picking with a child a few miles east of the Fox 3 MOA, and I thought that a bomb had dropped nearby. (See Copper Country Alliance Scoping Comments.) The Final EIS should acknowledge that these events occur and will become more common, should quantify the noise level, should describe impacts to wildlife and humans, and should describe the ways that it proposes to address the problem of too-low supersonic flight.</p>	<p>engine power setting and lateral distance to the listener along with several other operational and environmental parameters. The 123 dB noise level listed in section 3.1.10.3.1 is theoretically possible, but it would be a very rare event to experience an overflight with a maximum noise level of 123 dB. Maximum noise level values presented in Section 3.1.10.3.1 have been revised to reflect more overflight noise levels that are more representative of typical overflights.</p> <p>One factor relevant to the frequency of intense overflight noise is the percentage of total training time spent at low altitudes. As shown in Appendix D, Table D-3, supersonic fighter aircraft spend the majority of training time at high altitudes. For example, the F-22 spends approximately 93 percent of total training time at altitudes at or above 3,000 feet AGL.</p> <p>Another important factor is the frequency of direct aircraft overflight. It is much more likely that a person will be overflown by an aircraft offset by some lateral distance than overflown by an aircraft directly overhead.</p> <p>As described in Appendix A, pages A-25 and A-26, there are documented examples of people being severely startled by low-altitude subsonic aircraft overflights in existing airspace. However, these most extreme events are rare enough to warrant being reported as an exceptional event.</p> <p>Supersonic flight would not be permitted at altitudes below 5,000 feet AGL or 12,000 feet MSL, whichever is higher, within the expanded Fox 3 MOA or proposed Paxson MOA. Intense aircraft overflight noise events do occur currently beneath existing training airspace, but these events should be being generated by aircraft operating at subsonic speeds for aircraft below 5,000 AGL/12,000 MSL. If a sonic boom is experienced which appears to have been generated by and aircraft at less than 5,000 feet AGL, feel free to report the event to Eielson AFB Public Affairs so that the incident can be investigated.</p> <p>It is difficult to assess the statement attributed to the Canadian Journal of Otolaryngology without knowing the actual article and the context of the level cited. The duration of the sound is as important as its level. High noise levels from low altitude flight are, of course, a concern and have been specifically studied:</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>Nixon (1993) measured changes in human hearing from noise representative of low-flying aircraft on Military Training Routes (MTRs). The potential effects of aircraft flying along MTRs are of particular concern as the maximum overflight noise levels can exceed 115 dB, with a rapid increase in noise level exceeding 30 dB/sec. In this study, participants were first subjected to four overflight noise exposures at A-weighted levels of 115 dB to 130 dB. One-half of the subjects showed no change in hearing levels, one-fourth had a temporary 5 dB increase in sensitivity, and one-fourth had a temporary 5 dB decrease in sensitivity. In the next phase, participants were subjected to up to eight successive overflights, separated by 90 second intervals, at a maximum level of 130 dB until a temporary shift in hearing was observed. The temporary hearing threshold shift showed a decrease in sensitivity of up to 10 dB.</p> <p>Ising (1999) measured temporary threshold shifts of 115 test subjects between 18 and 50 years old after laboratory exposure to military low-altitude flight (MLAF) noise. The results indicate that repeated exposure to MLAF noise with maximum noise levels greater than 114 dB may have the potential to cause permanent noise induced hearing loss, especially if the noise level increases rapidly.</p> <p>The most pertinent result was that of Nixon, who showed no ill effects from a sequence of four successive exposures up to 130 dB but hearing damage risk at twice that exposure. Ising replicated the result that hearing damage risk is associated with repeated exposure to this type of noise event. In the proposed action, exposure to single events at this level will be rare, and exposure to multiple events comparable to (or even approaching) those in Nixon's study will not occur. The primary adverse effect will be surprise or startle, as stated in the DEIS.</p>
N0035-11	<p>MITIGATIONS:</p> <ol style="list-style-type: none"> 1. Keep the minimum flight level at 5,000 feet AGL. The proposed 500-foot AGL would put civil aviation in harm's way; disrupt wildlife at critical times; disrupt human activities such as subsistence, wildlife viewing, hiking, and paddling; and damage the ears of humans and wildlife. 2. Enforce restrictions on pilots flying Air Force jets. Violations of minimum flight level, MOA boundaries, and supersonic flight minimums have been rampant. Somewhere, the system is breaking down. Restrictions 	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>and the consequences of violations should be emphasized before each flight. Flights should be closely monitored. Discipline should be swift and certain. Foreign pilots who violate restrictions should be sent home.</p> <p>3. Conduct any supersonic operations at or above 5,000 feet AGL or 12,000 feet MSL, whichever is higher.</p> <p>4. Create a civilian oversight group with members selected by affected communities and interest groups. Meet at least quarterly to exchange information. Fund the meetings and participants' meeting-related expenses.</p> <p>5. Delineate and establish seasonal flight avoidance areas and overflight/operational restrictions over wildlife and other areas. Solicit and take the advice of biologists in the Alaska Department of Fish and Game, the U.S. Fish and Wildlife Service, and the Bureau of Land Management.</p> <p>6. Establish a no-flight zone over the Delta and Gulkana Wild and Scenic Rivers and 10 miles on each side of them. This means no flights, at any altitude.</p> <p>7. Establish a no-flight zone over the Denali and Richardson highways, and 10 miles on each side of them. This means no flights, at any altitude.</p>	<p>impacts and locations of the proposals in this EIS.</p>
N0035-12	<p>Thank you for this opportunity to comment and for planned future opportunities.</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. This comment is duly noted.</p>
N0036-1	<p>I am Chair of the local Fish and Game board here in Central and the Locals feel that we do not wish to see the Range expanded since we all feel that the number of sonic booms are some thing we do not wish to increase and the number of Aircraft are a danger to local Pilots plus We have seen the wild animals dart off leaving there young new born open to being taken by Wolves and Bears. Please No more land and air being taken by the DOD.</p>	<p>Your concerns are noted and such issues would be addressed through the mitigations noted in the FEIS and other viable options for addressing any potential adverse effects associated with noise and sonic booms, land and airspace uses, and biological resources. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.</p>
N0036-2	<p>I am Chair of the local Fish and Game board here in Central and the Locals feel that we do not wish to see the Range expanded since we all feel that the number of sonic booms are some thing we do not wish to increase and the number of Aircraft are a danger to local Pilots plus We have seen the wild animals dart off leaving there young new born open to being taken by Wolves and Bears. Please No more land and air being taken by the DOD.</p>	<p>Such concerns that you and others raised during the scoping and DEIS review processes were considered in those proposed mitigation measures that will be pursued to minimize potential adverse effects relating to sonic booms, land and airspace uses, biological resources, and other areas of concern. The Air Force and Army will be working with all stakeholders to the extent necessary to arrive at those viable solutions that will serve both military and civilian interests.</p>
N0036-3	<p>I am Chair of the local Fish and Game board here in Central and the Locals feel that we do not wish to see the Range expanded since we all feel that the</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The proposals included in the Draft EIS to modernize and</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>number of sonic booms are some thing we do not wish to increase and the number of Aircraft are a danger to local Pilots plus We have seen the wild animals dart off leaving there young new born open to being taken by Wolves and Bears. Please No more land and air being taken by the DOD.</p>	<p>enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use. A number of the proposals request expanded and additional Military Operations Area (MOA) or airspace for restricted areas in order to meet the purpose and need expressed in Chapter 1, Purpose and Need for the Proposed Actions.</p>
<p>N0036-4</p>	<p>I am Chair of the local Fish and Game board here in Central and the Locals feel that we do not wish to see the Range expanded since we all feel that the number of sonic booms are some thing we do not wish to increase and the number of Aircraft are a danger to local Pilots plus We have seen the wild animals dart off leaving there young new born open to being taken by Wolves and Bears. Please No more land and air being taken by the DOD.</p>	<p>Section 3.1.8.3 in the DEIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 feet AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. Sonic booms are also addressed in the document. As stated in the DEIS, supersonic flight operations are permitted in the existing Fox 3 MOA/ATCAA down to 5,000 feet AGL or 12,000 feet MSL, whichever is higher. Overpressures from sonic booms for a variety of military jet aircraft in Mach 1.2 level flight at 10,000 feet AGL range from 4.4 to 5.7 pounds per square foot for F-16 and F-22, respectively (Table 3-6). Near the centers of Fox 3 MOA/ATCAA and the Paxon MOA/ATCAA, sonic booms would increase from about 4.6 to 5.2 per day on average. Also, please see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p> <p>The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection. To reduce potential for disturbance under new airspace areas, the following new measure was included in text under the Fox/Paxon Section 3.1.8.4 Mitigations: "Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information."</p>
<p>N0037-1</p>	<p>I am greatly concerned, in fact alarmed, by the proposal to enlarge the jet training areas (MOAs) to include Lake Louise, most of the Denali Highway including the Tangle Lakes region, and some of the Richardson Highway. The tremendous expansion of space is cause enough for objection, but the allowance of flights as low as 500 feet above ground level is unconscionable over this terrain. War planes are necessary and, in their own way, beautiful, but they do not mix with the character of this region and the values placed</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. General aviation is particularly important in Alaska as a means of commerce, subsistence, recreation and emergency transportation. In preparing the Final EIS the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	upon it by those who use it for recreation, hunting, fishing, camping, exploration, and the quest for quiet and solitude. The aerial invasion and blast of sound would harm and alarm both wildlife and humans.	maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century.
N0037-2	I am greatly concerned, in fact alarmed, by the proposal to enlarge the jet training areas (MOAs) to include Lake Louise, most of the Denali Highway including the Tangle Lakes region, and some of the Richardson Highway. The tremendous expansion of space is cause enough for objection, but the allowance of flights as low as 500 feet above ground level is unconscionable over this terrain. War planes are necessary and, in their own way, beautiful, but they do not mix with the character of this region and the values placed upon it by those who use it for recreation, hunting, fishing, camping, exploration, and the quest for quiet and solitude. The aerial invasion and blast of sound would harm and alarm both wildlife and humans.	Your comment is noted. Sections 3.1.10.3. (Land Use) and 3.1.8 (Biological Resources) of the DEIS acknowledge that noise and low-level overflight could affect wildlife and land use including recreation. Sections 3.1.8.4 (Biological Resources) and 3.1.10.4 (Land Use) list mitigation measures that could be implemented to reduce the impacts to wildlife and land use such as seasonal avoidance areas; no Major Flying Exercises during January, September, December and June 27 to July 11; and coordinating the schedule of Major Flying Exercises with local communities in advance. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
N0037-3	I am greatly concerned, in fact alarmed, by the proposal to enlarge the jet training areas (MOAs) to include Lake Louise, most of the Denali Highway including the Tangle Lakes region, and some of the Richardson Highway. The tremendous expansion of space is cause enough for objection, but the allowance of flights as low as 500 feet above ground level is unconscionable over this terrain. War planes are necessary and, in their own way, beautiful, but they do not mix with the character of this region and the values placed upon it by those who use it for recreation, hunting, fishing, camping, exploration, and the quest for quiet and solitude. The aerial invasion and blast of sound would harm and alarm both wildlife and humans.	See comment responses N0037-1 and N0037-2.
N0037-4	I am greatly concerned, in fact alarmed, by the proposal to enlarge the jet training areas (MOAs) to include Lake Louise, most of the Denali Highway including the Tangle Lakes region, and some of the Richardson Highway. The tremendous expansion of space is cause enough for objection, but the allowance of flights as low as 500 feet above ground level is unconscionable over this terrain. War planes are necessary and, in their own way, beautiful, but they do not mix with the character of this region and the values placed upon it by those who use it for recreation, hunting, fishing, camping, exploration, and the quest for quiet and solitude. The aerial invasion and blast of sound would harm and alarm both wildlife and humans.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's airspace and resources. JPARC is an important and vital component of the national defense strategy of the United States and is a key attribute of Alaska's value to the military in the twenty-first century. The Army and Air Force are required by NEPA to make the efforts required to harmonize mission requirements and community needs in order that user conflicts be avoided, minimized, or mitigated to the extent feasible and practicable.
N0038-1	In the best interests of the public, CSDA wants to point out that under Cumulative Impacts, the draft has not mentioned the proposed Susitna Dam.	The Alaska Airspace Manager for the Air Force has reviewed the documents on your website and has identified an area where your project and the Air

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>This should be done. Include the following:</p> <p>Proposed Susitna-Watana Hydroelectric Project</p> <p>This is a megaproject that would develop a large footprint in the Fox 3 MOA. It is proposed to build a 700 to 880 foot dam at River Mile 184 of the Susitna River. There would be a permanent airport and a permanent road built. During the construction of the proposed project, there would be many airplane flights bringing workers and equipment into the area. In the next three years, there will be over 50 studies done in the area as part of the Federal Energy Regulatory Commission Licensing process and the NEPA process. The reservoir will be approximately 40 miles long by 2 miles wide and will be a focal point for increased human presence in the project area.</p>	<p>Force’s operations may impact one another:</p> <p>If you pursue instrument approaches to your runways for inclement weather operations (instrument flight rules, or IFR), you will require changes to the Federal Aviation Administration (FAA)-designated airspace to use them. When the Air Force is operating in the Fox 3 MOA above the airfields, you will not have the necessary IFR access to the instrument approaches. Prior planning is the easiest way to avoid delays and diversions due to active military airspace.</p> <p>Outside of days with low visibility or clouds, we suspect that the majority of your operations would be visual flight rules (VFR), and therefore not require the instrument procedures. During VFR flights your aircraft would not be restricted from flying in the MOA with the Air Force aircraft. When we share airspace, the best way to avoid conflicts is through communication which will be enhanced with our Special Use Airspace Information Service (SUAIS). We will provide a radio frequency to talk to our Range Controller on; he is then able to assist with aircraft locations to keep our operations separate. Ensuring your aircraft are transponder-equipped (transmitting a signal) will assist the SUAIS as the aircraft are easier to see on radar by the Range Controller and the fighter aircraft in the area.</p> <p>Finally, your transmission lines are most likely low enough to be of no concern to the Air Force operations as 500 feet is the proposed floor of the new Fox 3 MOA.</p> <p>The 11th Air Force chairs an Alaska Civil-Military Aviation Council (ACMAC) that meets twice annually to discuss shared airspace issues and ways to avoid conflicts. Military, FAA, Alaska Department of Fish and Game (ADFG), Aircraft Owners and Pilots Association (AOPA), Alaska Airmen and other community groups attend this meeting to enhance the safety of all users of the National Airspace System.</p> <p>Alaska Energy Authority contact information has been added to the list of invitees for the next meeting scheduled tentatively for November 2012.</p> <p>A summary of the information on the Susitna-Watana hydroelectric project and an analysis of potential cumulative effects have been added to the EIS (see Section 4.8).</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
N0039-1	The Northern Alaska Environmental Center (NAEC) thanks you for the opportunity to submit comments on the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Environmental Impact Statement (EIS) on behalf of our organization and its members. Our non-profit conservation organization promotes conservation of the environment and sustainable resource stewardship in Interior and Arctic Alaska through education and advocacy. We have over 1,500 members most of whom live, work, and recreate in the areas that will be affected by the proposed JPARC activities.	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.
N0039-2	Recommended Alternative Based on the alternatives listed in the proposal thus far, we recommend the no action alternative.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0039-3	We will address in more detail some particular issues that affect the quality of life of Fairbanks members and elsewhere in the Interior of Alaska, which primarily involve the FOX 3 and Paxson MOA addition, Tanana Flats Training Area Roadway Access and expansion of the Proposed Realistic Live Ordnance Delivery west of the Donnelly Training Area.	The Air Force recognizes that there will potentially be some impacts to the population in the affected region of influence under the proposed actions. Some persons may experience diminished quality of life. However, quality of life is a subjective term and is highly dependent on various factors that are subject to bias and arbitrariness. Therefore, impacts to quality of life are subjective experiences and not all residents and/or visitors may feel their quality of life or experience would be severely impacted. Common factors for how people define their quality of life include wealth, employment, health, recreation, leisure time, access, safety, wildlife, climate, and the surrounding natural environment. These and additional factors are addressed under separate resource areas (i.e., airspace management and use, noise, biological resources, land use and recreation, socioeconomics, safety, air quality, subsistence, etc.) in the EIS so that the significance of each action on each resource area considers both context and intensity as required under NEPA.
N0039-4	We also recommend consideration of a new alternative that would decrease level of existing impact in the national conservation areas which include preserve, refuge, and wild and scenic rivers, as well as throughout the Yukon River watershed.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources. The recommendation expressed in the comment, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Purpose and Need for the Proposed Actions, Sections 1.2 and 1.3 of the Draft EIS.
N0039-5	FOX 3 MOA and Paxson MOA	Thank you for taking part in the public and agency review process for the

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	The eastern Alaska Range is an important area to many of our members, who spend considerable time deep in the mountains. Many have cabins within FOX 3 and within the additions.	JPARC Draft EIS. This comment is duly noted.
N0039-6	Lowering AGL's from 5,000 to 500 feet is a dramatic change and one that has negative impacts to various user groups and potential impacts to wildlife. Planes flying at an altitude of 500ft would produce cumulative impacts to people and fish and wildlife from noise disturbance including human health and wildlife reproduction and energetic stresses, impacts to sport and subsistence hunting, fishing, and other activities, effects on federal and state conservation areas and other public lands, wild lands and wilderness values including solitude and intact ecological system integrity, recreation and tourism, effects on bush and commercial flight safety, and air and water quality impacts.	The potential effects aircraft operations at those lower altitudes may have on wildlife, population centers, and other airspace uses are addressed in the FEIS Airspace Management, Flight Safety, Biological, and Noise analyses of the Fox 3 and Paxon MOA proposals. Those existing and proposed mitigations that would be considered to minimize any adverse effects on these resources, to include no-fly areas to avoid noise and other sensitive areas, are noted in FEIS Appendix K.
N0039-7	We are also concerned about the effects on Pacific salmon, migratory birds, marine mammals, and other wildlife that migrate from the Gulf of Alaska to sub-arctic and arctic habitats and may be affected by the Gulf of Alaska Temporary Maritime Activities Area.	These issues would be addressed in NEPA and Endangered Species Act compliance documents that would be prepared if the AIM-9 and AIM-120 proposal becomes definitive. As stated in the DEIS Section 3.11.8, the Navy is already training with these weapons in this area so the programmatic proposal would represent an increase in operations but not a completely new effect for this area. No new impacts to biological organisms are expected. The infrequency and limited volume of residual concentrations of hazardous substances would not result in concentrations considered harmful.
N0039-8	Wildlife As the EIS states, the Fox 3 MOAs and the new Paxon MOA include some of the largest hunting grounds for caribou as well as lambing and rutting areas for caribou and Dall sheep. It is vital that mitigation measures and flight restrictions be put into place to protect calving grounds, lambing areas, and rutting areas indicated in Figure 3-5 and 3-6.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS. The Air Force will be consulting with the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		Dall sheep lambing areas.
N0039-9	We support the establishment of a minimum overflight altitude of 3,000 feet AGL over the Delta and other Caribou Herd calving areas from May 15 to June 15.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will be consulting with the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>
N0039-10	Judging by Table 3-11, not much caribou habitat has been spared in the Expanded Fox 3 MOA as 94% of the airspace consists of caribou habitat. We recommend measures to reduce this to 75% or less to protect this vital subsistence resource.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will be consulting with the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>
N0039-11	The EIS only sites one study of the impacts on Dall Sheep. One study is	This was the only study found on Dall sheep in the region. Additional studies

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	inadequate.	on similar species (bighorn sheep) are included in Appendix E, which contains a review of research on noise effects, primarily from aircraft overflights, on a variety of wildlife species.
N0039-12	In terms of wildlife, NAEC believes Alternative E superior to Alternative A because it impacts less acreage of wildlife habitat. The No Action Alternative is our preferred alternative.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0039-13	The EIS should also consider impacts on smaller, less iconic animals and migratory birds.	Additional text will be added to indicate effects on migratory birds and smaller, less iconic animals. Please see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on a variety of wildlife species, most of which occur in the Alaska region.
N0039-14	Figure 3-7 is inadequate in showing the diversity of Migratory Waterfowl Habitat underlying the Fox 3 and Paxson MOAs.	The project mapped all available wildlife information.
N0039-15	Since the EIS states that studies have shown that the visual aspect and peak noise level (Lpk) of overflights diminish rapidly with increasing altitude of overflight, we recommend that you raise the 500 foot AGL to at least 1,000 feet in this critical waterfowl area.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will be consulting with the U.S. Fish and Wildlife Service prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of waterfowl concentration areas.</p>
N0039-16	<p>Hunting and Recreation</p> <p>Hunters are perhaps the most common user group throughout the eastern Alaska Range. AGL's of 500 feet will certainly impact the experience of their hunt -- from the loss of a wilderness experience to the potential and unpredictable herd scattering that could occur when an aircraft traveling at or</p>	Section 3.1.10.3 of the EIS evaluates impacts of the proposed action on recreation. This section acknowledges that the suddenness and unpredictability of low-level overflights and sonic booms during MFEs may result in annoyance and could lessen a recreational experience for some persons. The effect of these noise sources is not expected to change the behavior of game animals such that hunting resources would be impacted.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	near mach speeds nears by. The proposal would affect recreational visitors to the Denali Highway — including its surrounding public lands— which is a favorite area to bring the important tourism visitor sector “visiting friends and relatives” as well as independent travelers and others.	Mitigation measures that could be implemented to reduce impacts to recreation are provided in Section 3.1.10.4. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
N0039-17	NAEC urges the Air Force to consider limiting air traffic during the months that ADF&G data has shown high visitor use and hunter success (namely mid-August, late September, and end of October to early November).	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
N0039-18	The Paxson MOA would certainly make operations more difficult for local pilots and their clients, wildlife, and ground travelers.	The Fox 3 and Paxon MOA Alternative E configuration and use of the lower Paxon MOA altitudes (below 14,000 feet MSL) for major flying exercises only during the six annual, two-week periods these are conducted would minimize adverse impacts on those higher use areas and altitudes where civilian flights normally occur. Likewise, those mitigations noted in the FEIS and other viable options would be considered to help ensure the safe, mutual use of this airspace by all concerned.
N0039-19	Mountaineering Mountaineering is another common use for which lowered AGL’s and increased MOA’s would bring negative impacts.	Section 3.1.10.1 of the EIS identifies mountain climbing as one of the recreational uses within the project area. Section 3.1.10.3.1 of the DEIS acknowledges that noise associated with low-level overflight could lessen recreational experiences for some persons. Sections 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
N0039-20	Sonic booms from jets have been known to trigger avalanches on slopes that otherwise would remain stable for mountaineers. In addition, jets flying so close to mountaineers -- who can often be in serious situations in the first place -- presents unnecessary stresses, compromises safety, and also greatly detracts from the experience of solitude which is best exemplified in our great mountain ranges.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Mitigations exist, and will be carried forward, that avoid low flight activity and supersonic activities in many of these designated "sensitive" areas within the proposed new airspace boundaries. Additional sensitive areas or no-fly zones may be designated as a result of consultation with recreation organizations and natural resource agencies during the drafting of this EIS.

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
N0039-21	Such low AGL's may also pose problems for bush pilots who would normally be flying under the MOA's, adding extra expense to traveler's budgets if they are required to add more miles to their flight plans or simply not be able to go.	The importance of civilian aviation is recognized throughout the EIS. Section 3.1.12.3 acknowledges and discusses the potential economic impacts of commercial or civil aviation aircraft being delayed or diverted. Due to the economic importance of civil aviation to Alaska's economy, the Fox 3 MOA and New Paxon MOA proposed actions have been determined to result in significant impacts to socioeconomic resources. As stated in Section 3.1.1.2, any procedures and practices to mitigate the potential impacts of an airspace proposal on all airspace uses would be examined by the FAA, Air Force, Army, and other affected interests, as appropriate, in the EIS and aeronautical study review processes.
N0039-22	We recommend that the EIS include an analysis of such comments and explain the process for the public to provide documentation of such events.	Section 3.1.10.4 of the EIS identifies mitigations that are under consideration, including providing an easy-access number and website for the public to use for complaints and to access updated information. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
N0039-23	Special Areas We are especially concerned about this expansion southward to the Lake Louise area and farther eastward on the Denali Highway. In addition to the greater Eastern Alaska Range, there would be substantial impacts to the Tangle Lakes – a very popular birdwatching, camping, hunting, fishing, and paddling destination not currently affected by any MOAs.	Section 3.1.10.3 of the DEIS evaluates the impacts to recreational areas within the project area, including the Lake Louise and Tangle Lakes. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation, including avoiding overflight of popular hunting areas, campgrounds, and trails (5,000 feet AGL and half-mile lateral distance) during peak use periods between June 27 and July 11 and from mid-August through September and other important hunting seasons determined with ADFG. These locations include Tangle Lakes and Lake Louise State Recreation Area.
N0039-24	The proposed 500 foot AGL's would certainly alter the experience of users there, as well as potential stresses to the Nelchina Caribou Herd, which relies on that region for wintering habitat.	Section 3.1.8.3 in the DEIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 feet AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor, and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/ lambing seasons and in winter. All known calving, lambing, and important bird areas within the JPARC project area were taken into consideration during effects analysis. Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species. The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		flight restricted areas for pilot/aircraft safety and wildlife protection. To reduce potential for disturbance under new airspace areas, the following new measure was included in text under the Fox/Paxon Section 3.1.8.4 Mitigations: "Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information."
N0039-25	Many of our members have publicly spoken out about designating the area as a State Wildlife Refuge. The proposed 500 foot AGL's are not compatible with that type of use and land management.	The area around Tangle Lakes Archaeological District is identified as a specially managed area within the Fox 3 MOA and New Paxon MOA proposal footprint. This area, with multiple uses, including those uses mentioned in your comment, is being considered for avoidance. Your comment on member support for the Tangle Lakes as a State Wildlife Refuge is noted. The EIS also considers the effect of low-flying aircraft and noise on wildlife in Section 3.1.8.3. The Air Force is coordinating with Alaska Department of Fish and Game on redefining existing wildlife avoidance locations to more accurately reflect current conditions and the overlap with this new area under this proposal.
N0039-26	We recommend that Tangle Lakes be designated an avoidance area as Lake Louise is proposed to be to minimize impact on residents. This area also includes the Tangle Lakes Archeological District as well as the Delta National Wild & Scenic River.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
N0039-27	Noise Pollution In Table 1-10 of the EIS, the FOX 3 MOA and Paxson MOA are noted to have potential for significant adverse impacts on socioeconomics, noise, safety and land use. Under Alternative A, the noise pollution in the Paxson MOA would increase substantially, from 37 to 54 dB L and noise pollution in FOX 3 MOA would increase from 29 to 49 dB L. In Alterntive E, the Paxson levels would increase from 37 to 54 dB L and Fox from 39 to 50 dB L. For these reasons, we do not find that the benefits outweigh the risks in the proposed plan for the addition to FOX 3 and MOA, and therefore request No	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Additionally, mitigation measures to offset the potential for adverse noise impacts will continue to be reviewed and refined when the preferred alternative for this proposal is selected during the Final EIS preparation process.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	Action be taken regarding these areas.	
N0039-28	The military already controls large swaths of airspace and could certainly find a way to use existing resources to fit their mission.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0039-29	We request that No Action be taken regarding the proposed plan for a Paxson MOA.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0039-30	Tanana Flats Training Area Roadway Access The Tanana River is a tremendous resource near and dear to the inhabitants of Alaska's Interior. It is a major tributary of the Yukon River and a vital salmon subsistence river, waterfowl corridor, and transportation corridor for recreationalists and local residents of the interior.	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. This comment is duly noted.
N0039-31	Wetlands and Water Table 1-10 of the EIS notes that the Tanana Flats Training Area Roadway Access comes with the potential for significant adverse impacts on physical resources including soils and permafrost, water resources, biological resources, and wetlands. We are concerned about potential impacts of the proposed roadway project on the delicate biological balance of this river downstream. Specifically, as the EIS admits, hydrologic studies are needed to ensure that culverts installed along the proposed roads would not produce a discernible change in the hydrologic flow regime of the area.	As the comment notes, the Tanana Flats area is a wetland-rich area. A linear road through a wetland-rich area could concentrate flow into some wetlands and reduce flow into others. When this programmatic proposal is ready for a separate NEPA action to occur, hydrologic studies will be required to ensure that the road would be built so that it does not create a discernible change in the hydrologic flow regime and have indirect effects on downstream wetlands.
N0039-32	We ask that you consider the potential for significant adverse impacts on subsistence for this project.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Adverse impacts for subsistence activities have been addressed for each of the six definitive proposals and the six programmatic proposals under consideration in the JPARC Modernization and Enhancement EIS. The Final EIS will include measures to mitigate adverse impacts that would have the potential to affect subsistence activities for each proposal.
N0039-33	The area surrounding the Tanana is wetlands-rich. Sixty-five percent of the Tanana Flats Training Area is wetlands and special care must be taken to preserve the ecosystem integrity of this area to mitigate impacts downstream. Detailed wetlands surveys should be required before this project moves forward. We urge developers to follow the recommended site selection	The TFTA Access Road is a programmatic action. Detailed surveys will be required once initial alignments have been developed in a future NEPA action. The programmatic action will follow the recommended site selection criteria and BMPs in Section 3.8.6.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	criteria and BMPs in section 3.8.6 to reduce impacts on water and wetland quality.	
N0039-34	Sensitive areas for Raptors should be included in the list of criteria developed to reduce adverse effects on page 3-381	Thank you for your comment. Where identified, sensitive areas for raptors, including nesting/roosting areas, will be added to siting criteria lists for all programmatic proposals.
N0039-35	<p>Living/Recreating on the Tanana</p> <p>Many of our members canoe and motor between Fairbanks and Nenana as a recreational and subsistence activity. The population of Fairbanks uses this area heavily for summer salmon fishing and fall moose hunting.</p>	The DEIS acknowledges that recreational activities including hunting and fishing occur within the project area. Sections 3.2.10.1 and 3.8.10.1 provide a discussion of recreational uses within the project area including within the Tanana River basin. The general recreational uses and opportunities provided in the region are described in Appendix B, Definition of the Resources and Regulatory Settings, Section B.10.3.3. Recreational uses and values of these areas are described in Appendix I, Land Use, Public Access, and Recreation.
N0039-36	Members living on this stretch of the river have complained of shocking noise pollution and disturbance from what they have described as “bombs” in the Tanana Flats Training Area on the East Bank of the river. People on the West Bank of the Tanana should be considered in the Affected Environment section of Socioeconomic impacts.	The Tanana Flats Training Area (TFTA) Roadway Access programmatic proposal would involve construction of access roads and changes in ground maneuver activities with the TFTA in a future NEPA action. Section 3.8.12.3 recognizes that although the actions proposed would be within the boundaries of the TFTA, if any portion of a TFTA access road were to extend off military land, detailed coordination would be required with landowners and regulators, particularly the Alaska Department of Natural Resources (ADNR), Alaska Department of Fish and Game (ADFG), Alaska Railroad Corporation, Alaska Department of Transportation, U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS), Fairbanks North Star Borough, and potentially affected nearby communities. The TFTA proposal does not involve "bombs" or munitions expenditures; therefore the EIS does not discuss the potential noise impacts from munitions firing and detonation, ground vehicle maneuvers, and aircraft training activities that currently take place on TFTA. However, the EIS does discuss the environmental consequences of noise impacts from the use of heavy equipment during construction and generated by vehicles using the access roads (Section 3.8.2.3).
N0039-37	<p>Yukon River Watershed Impacts</p> <p>The upper Yukon River watershed already has a high concentration of MOAs (Yukon 2, 3, 4, 5) that can result in adverse impacts to wildlife, recreation, and subsistence resources and users and noise disturbance that is incompatible with the purposes of Yukon-Charley National Preserve, Yukon Flats National Wildlife Refuge, part of Arctic National Wildlife Refuge, and</p>	See comment response N0039-4.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	the Birch Creek, Charley, and 40-mile Wild & Scenic Rivers, and we recommend consideration of a new alternative that would decrease level of existing impact in the conservation areas and throughout the Yukon River watershed.	
N0039-38	Realistic Live Ordnance Delivery We believe the Proposed Realistic Live Ordnance Delivery west of the Donnelly Training Facility is also unnecessary. We are opposed to additional live ordnance designations and feel those activities should be limited to existing facilities.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Additional live ordnance delivery would not take place west of the Donnelly Training Area. As stated in Chapter 2, Section 2.1.2.1.2, Alternative B, Lines 21-24, "Alternative B is basically an expansion of Alternative A. Alternative B adds the use of the Blair Lakes Impact Area in R-2211 of the TFTA to the northwest of R-2202 of the DTA. The Blair Lakes Impact Area would provide for the use of inert ordnance only, given its current use by the Air Force, as well as its current configuration and hazard zone safety requirements."
N0039-39	We have heard from members whose planned expeditions to exit the peaks of the Eastern Alaska Range have already been thwarted upon learning about the restrictions that made it illegal to float down Delta Creek.	Your comment is duly noted.
N0039-40	We are opposed to any additional restrictions that undermine Alaskans' ability to enjoy their surrounding landscapes.	Your comment is duly noted.
N0039-41	The DVD copies of this document were fairly easy to navigate and we appreciate the attention put to that.	Thank you for your comment.
N0039-42	We similarly appreciate Figure 3-10 (Land Status and Special Use Areas in the Fox 3 MOA Expansion and New Paxson MOA Proposal area) in that it delineates land use categories but feel the EIS could go much farther in clearly identifying conservation areas by their individual place names, rather than slight shifts in colors and dash marks. Because the proposed areas encompass such a complicated patchwork of land designations, we recommend that all maps show the boundaries of federal and state conservation areas. This should include parks, refuges, conservation areas, recreation areas, National Wild and Scenic River, proposed wilderness areas, state habitat areas. We believe this will help the public understand incompatible uses and to assess impacts as well as better assess mitigation such as additional seasonal restrictions to avoid effects on wildlife reproduction, migrations, and other sensitive activities.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The maps used for the JPARC EIS used the best mapping and geographic information system (GIS) data available and are consistent with information presentation guidelines in accordance with NEPA and CEQ regulations.
N0039-43	Energy conservation is a core value of our organization. We support and applaud the plan's efforts to reduce fuel consumption and increase efficiency. We applaud the inclusion of figures like 3-13 that shows the Renewable Resources in the Fox 3 MOA and New Paxson MOA Proposal	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. Lower fuel consumption and lower energy costs are important factors for the JPARC proposals in this EIS, but are two of many. Chapter 1,

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Area, although we do not sense meaningful integration of this data into the EIS or purpose of the expansion. We do not, however think that the most impactful savings can come at the cost of AGL reductions to 500 feet, a height that is jarring and disruptive to wilderness qualities of solitude and quiet that we prize Alaska’s remote areas for.</p>	<p>Purpose and Need for the Proposed Actions provides all of the requirements and elements that went into the development of the purpose and the need for each of the proposals planned to modernize and enhance future training at JPARC. Additionally, JPARC is an important and vital component of the national defense strategy of the United States and is a key attribute of Alaska’s value to the military in the twenty-first century. The Army and Air Force are required by NEPA and CEQ regulations to make the efforts necessary to harmonize mission requirements and community needs in order that user conflicts be avoided, minimized, or mitigated to the extent feasible and practicable.</p>
<p>N0039-44</p>	<p>If the military is truly concerned with energy efficiency, it seems that they should do everything in their power to base flights more locally.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Lower fuel consumption and lower energy costs are important factors for the JPARC proposals in this EIS, but are two of many. The proximity of JBER and Eielson AFB were factors considered in the development of the Fox 3 MOA Expansion and Paxon MOA Addition as well to have aircraft based more locally.</p>
<p>N0039-45</p>	<p>There is much energy used getting planes to the Yukon-Charlie area from Fairbanks and Anchorage. If the Eielson Air force Base was moved to Anchorage, there would be a huge increase in fuel costs associated with getting the planes to interior-based flight areas. We request that the cumulative impacts of this potential move be addressed in the EIS.</p>	<p>The government has no intention of moving Eielson AFB to Anchorage. Fighter units based at Joint Base Elmendorf-Richardson (JBER) and Eielson AFB will use Special Use Airspace (SUA) within the effective operating distance of each type of aircraft. Any mission relocations by the Air Force give full consideration to a range of parameters when selecting suitable locations. Flying distance to training areas and fuel consumption are important considerations in their planning, and were criteria in developing JPARC proposals. Section 5.1.2 in the Draft EIS and EIS addresses the topic of fuel consumption and conservation. The proposed expansion of the Fox 3 MOA provides improved training capabilities for aircraft operating from both Eielson AFB or JBER in a relatively equidistant location to both airfields.</p>
<p>N0039-46</p>	<p>We believe additional night hours on existing MOA’s will pose great impacts to residents, recreational and subsistence users and wildlife. We ask that the Air Force exercise some restraint and limit its noise impacts on these places by using existing policy regarding night hours.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		impacts and locations of the proposals in this EIS.
N0039-47	None of the alternatives adequately address the cumulative impacts of the existing MOA night flying disruptions.	Section 4.8.2 in the Draft EIS and Final EIS describes how the effects from existing night flying operations are included in the existing noise environment and affected environment. The baseline noise levels for the MOAs are an accumulation of all military users and the noise modeling accounts for the time of day (or night) of these operations. As such, they are cumulative of all existing military flying operations. The possible impacts from current military operations in MOAs have been evaluated in previous NEPA documents, and may include sporadic intrusive noise over some locations in the current affected environment. Mostly these are activities occurring after dark but before 10:00 p.m., as the Air Force does not currently perform training after 10:00 p.m. Current noise avoidance procedures were established to reduce the impacts of current military operations in special use airspace. The evaluation of night flying operations in this EIS considers changes in noise levels resulting from shifting a portion of sorties to after 10:00 p.m. The projected changes in noise resulting from implementing the night training proposal are described in Section 3.5.2.3. Impacts on wildlife and land uses are described in Sections 3.5.8.3 and 3.5.10.3, respectively. Mitigation measures (and noise avoidance procedures) to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
N0039-48	In the materials submitted to the public, there is no definition of what a “documented noise sensitive area” is or what restrictions, if any, might be associated with these areas.	"Noise-sensitive" is a relative term and there is no legal or scientific definition other than that living things in the area are considered to have a stronger-than-average response to noise. Areas that are known or suspected of being particularly noise-sensitive are described (i.e., documented) in Appendix B, Section B.2.3.5 and a map of noise-sensitive areas is shown in Figure B-3. Specific restrictions on areas exposed to increased noise levels are being considered currently and would be published as part of the JPARC EIS mitigation implementation plan.
N0039-49	While there are alternatives described with different extensions of Proposed Night Joint Training for all training purposes versus major flying exercise, there is no indication of the total number of flights anticipated for each alternative.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Chapter 2, Section 2.1.5.1.1, Alternative A would allow Air Force Night Joint Training flights for Major Flying Exercises (MFE) only. Lines 20-22 state, "Such exercise sessions would typically occur up to 10 nights per year with the number of aircraft sorties participating in each session (50 plus) being somewhat less than each daytime session (up to 70)." The number of flights for MFEs would be the same for Alternative B. The comment is correct, however, that the Draft EIS does not include the number of flights estimated for routine tactical training operations. These sorties will be added

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		to the Final EIS.
N0039-50	Alternatives should also be considered that may reduce flight hours or numbers of flights in existing MOAs in consideration of the cumulative impacts.	The Air Force is not considering reductions in night operations at this time. The proposal is based on projected needs for night training. The noise assessment indicates slight increases in noise levels from the proposed shift of operations to nighttime; however, the degree of change and the resulting levels are not suggesting more than minor impacts on biological resources, persons, underlying uses, or specially managed lands.
N0039-51	Thank you for taking the time to read our thoughts on this important matter. We hope to be involved in the future, as do many of our colleagues.	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. This comment is duly noted.
N0040-1	<p>The Experimental Aircraft Association (EAA), on behalf of over 176,000 general aviation pilots and aviaiton enthusiasts nationwide, including more than 5,000 members in Alaska, submits the following response to the U.S. Department of Defense (DoD) in regards to the Draft Environmental Impact Statement (DEIS) for the expansion of the Joint Pacific Alaska Range Complex (JPARC).</p> <p>EAA concurs with the concern of its members who live, work, and fly in the areas included in the DEIS. The impact of the proposed expansion of the JPARC Military Operating Areas (MOAs) to general aviation must be considered due to the importance of general aviation to the Alaskan civilian population. Some of the busiest airspace for general aviation traffic in Alaska lies within the areas included in the proposed expansion.</p> <p>Furthermore, the JPARC lies in close proximity to three of Alaska’s largest population centers: Anchorage, Fairbanks and the Mat Su Borough. Busy air routes which link these population centers and their surrounding areas will be impacted by the expansion of the MOAs.</p> <p>Included in the DEIS is the lateral and vertical expansion of the Fox 3 MOA and the addition of the new “Paxon” MOA. The lowering of the Fox 3 MOA’s floor from 5,000 feet AGL to 500 feet AGL significantly diminishes safety and increases the risk of collision between the small general aviation aircraft that frequent this airspace and fast moving military jet traffic. This large decrease in the MOA’s floor elevation also severely restricts general aviation pilots to flying at low altitudes which are unrealistic and unsafe in mountainous terrain. This restriction greatly reduces a general aviation pilot’s options in the event of an emergency such as an engine failure. Due to these risks, the floor of the Fox 3 MOA should be kept at 5,000 feet AGL</p>	<p>We appreciate the support the EAA has shown the military and understand the many concerns you and other aviation interests have expressed over the JPARC airspace proposals, particularly the Fox 3 and Paxon MOA expanded airspace. We also recognize that portions of this proposed airspace encompass higher use areas where general aviation traffic regularly operates. As explained in the FEIS, this expanded airspace and lower altitudes will be a critical element in meeting those training requirements considered essential for the success of our air forces in a combat environment. The manner in which this airspace would be used to accomplish that purpose while not adversely affecting other airspace uses would be a key ingredient in implementing this proposed action. Pending the FAA’s study of the JPARC airspace proposals, the Air Force will work closely with all aviation stakeholders to find those viable solutions that will provide for the continued safe, mutual use of this vast airspace complex. The existing and proposed mitigation measures noted in the FEIS would be pursued while also considering other options stakeholders may suggest for minimizing adverse effects on the general aviation community.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>and its boundaries should be extended the least amount possible.</p> <p>The proposed Paxon MOA would also essentially cut off major portions of important air routes that link Southern and Northern Alaska. High amounts of general aviation traffic would be restricted to small corridors, increasing the likelihood of mid-air collisions. The proposed Paxon MOA would also cover a heavily utilized recreational and hunting area. The Paxon MOA should either be stricken from the proposal completely or restricted to high-altitude operations to minimize risks to general aviation.</p> <p>These proposals as well as others included in the DEIS are far-reaching and would have a profound impact on general aviation in Southern Alaska. The impact to the livelihoods of Alaskans living in the areas that will be affected by these proposed changes should be carefully considered before any decisions are made regarding the future of the JPARC.</p>	
<p>N0040-2</p>	<p>The Experimental Aircraft Association (EAA), on behalf of over 176,000 general aviation pilots and aviaiton enthusiasts nationwide, including more than 5,000 members in Alaska, submits the following response to the U.S. Department of Defense (DoD) in regards to the Draft Environmental Impact Statement (DEIS) for the expansion of the Joint Pacific Alaska Range Complex (JPARC).</p> <p>EAA concurs with the concern of its members who live, work, and fly in the areas included in the DEIS. The impact of the proposed expansion of the JPARC Military Operating Areas (MOAs) to general aviation must be considered due to the importance of general aviation to the Alaskan civilian population. Some of the busiest airspace for general aviation traffic in Alaska lies within the areas included in the proposed expansion. Furthermore, the JPARC lies in close proximity to three of Alaska’s largest population centers: Anchorage, Fairbanks and the Mat Su Borough. Busy air routes which link these population centers and their surrounding areas will be impacted by the expansion of the MOAs.</p> <p>Included in the DEIS is the lateral and vertical expansion of the Fox 3 MOA and the addition of the new “Paxon” MOA. The lowering of the Fox 3 MOA’s floor from 5,000 feet AGL to 500 feet AGL significantly diminishes safety and increases the risk of collision between the small general aviation aircraft that frequent this airspace and fast moving military jet traffic. This large decrease in the MOA’s floor elevation also severely restricts general</p>	<p>Section 3.1.10.3 of the DEIS acknowledges that the expansion of the Fox 3 MOA and the establishment of the Paxon MOA would result in indirect effects on civilian air access to areas below or in the vicinity of land underlying the proposed and existing MOAs, including those used for recreation. Section 3.1.12 of the EIS addresses impacts to socioeconomic, including key industries in the region such as civilian aviation and recreation and tourism. Sections 3.1.10.4 and 3.1.13.4 list mitigation measures that could be implemented to reduce the impacts, including coordinating the schedule of MFEs with local communities in advance. In addition, Section 3.1.1.4 (Airspace) lists mitigation measures that could be implemented to reduce the impacts, such as use of the SUAIS and establishing or expanding existing VFR flyway corridors as necessary to provide VFR aircraft transit through areas that may be affected by high density military flight activities within/near the proposed airspace. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>aviation pilots to flying at low altitudes which are unrealistic and unsafe in mountainous terrain. This restriction greatly reduces a general aviation pilot’s options in the event of an emergency such as an engine failure. Due to these risks, the floor of the Fox 3 MOA should be kept at 5,000 feet AGL and its boundaries should be extended the least amount possible.</p> <p>The proposed Paxon MOA would also essentially cut off major portions of important air routes that link Southern and Northern Alaska. High amounts of general aviation traffic would be restricted to small corridors, increasing the likelihood of mid-air collisions. The proposed Paxon MOA would also cover a heavily utilized recreational and hunting area. The Paxon MOA should either be stricken from the proposal completely or restricted to high-altitude operations to minimize risks to general aviation.</p> <p>These proposals as well as others included in the DEIS are far-reaching and would have a profound impact on general aviation in Southern Alaska. The impact to the livelihoods of Alaskans living in the areas that will be affected by these proposed changes should be carefully considered before any decisions are made regarding the future of the JPARC.</p>	
N0040-3	<p>The Experimental Aircraft Association (EAA), on behalf of over 176,000 general aviation pilots and aviaiton enthusiasts nationwide, including more than 5,000 members in Alaska, submits the following response to the U.S. Department of Defense (DoD) in regards to the Draft Environmental Impact Statement (DEIS) for the expansion of the Joint Pacific Alaska Range Complex (JPARC).</p> <p>EAA concurs with the concern of its members who live, work, and fly in the areas included in the DEIS. The impact of the proposed expansion of the JPARC Military Operating Areas (MOAs) to general aviation must be considered due to the importance of general aviation to the Alaskan civilian population. Some of the busiest airspace for general aviation traffic in Alaska lies within the areas included in the proposed expansion. Furthermore, the JPARC lies in close proximity to three of Alaska’s largest population centers: Anchorage, Fairbanks and the Mat Su Borough. Busy air routes which link these population centers and their surrounding areas will be impacted by the expansion of the MOAs.</p> <p>Included in the DEIS is the lateral and vertical expansion of the Fox 3 MOA</p>	<p>The concerns expressed over the proposed airspace actions are also of utmost concern to the Air Force as they explore those means that would provide for the safe shared use of this airspace complex. The FAA will be conducting their own study of the preferred alternative for each airspace proposal to determine if and how each could be safely implemented and managed without adversely impacting visual flight rules (VFR) and instrument flight rules (IFR) air traffic and Air Traffic Control system capabilities. Pending the completion of that study, the Air Force would work closely with all aviation stakeholders in finding those viable solutions that would safely meet all military and civil aviation needs.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>and the addition of the new “Paxon” MOA. The lowering of the Fox 3 MOA’s floor from 5,000 feet AGL to 500 feet AGL significantly diminishes safety and increases the risk of collision between the small general aviation aircraft that frequent this airspace and fast moving military jet traffic. This large decrease in the MOA’s floor elevation also severely restricts general aviation pilots to flying at low altitudes which are unrealistic and unsafe in mountainous terrain. This restriction greatly reduces a general aviation pilot’s options in the event of an emergency such as an engine failure. Due to these risks, the floor of the Fox 3 MOA should be kept at 5,000 feet AGL and its boundaries should be extended the least amount possible.</p> <p>The proposed Paxon MOA would also essentially cut off major portions of important air routes that link Southern and Northern Alaska. High amounts of general aviation traffic would be restricted to small corridors, increasing the likelihood of mid-air collisions. The proposed Paxon MOA would also cover a heavily utilized recreational and hunting area. The Paxon MOA should either be stricken from the proposal completely or restricted to high-altitude operations to minimize risks to general aviation.</p> <p>These proposals as well as others included in the DEIS are far-reaching and would have a profound impact on general aviation in Southern Alaska. The impact to the livelihoods of Alaskans living in the areas that will be affected by these proposed changes should be carefully considered before any decisions are made regarding the future of the JPARC.</p>	
N0041-2	<p>The Alaska Airmen’s Association is a statewide organization with 2500 members dedicated to supporting safe aviation in Alaska. In this letter we hope to define the requirements of the civil aviation community and elucidate industry concerns. Specific areas of the proposal include the expansion of the Fox 3 MOA, the proposed Paxson MOA Low Altitude Structure, IFR Access to MOA Airspace, restricted airspace over the Battle Area Complex south of Delta Junction and the proposed UAV Corridors. Given the importance of the aviation transportation system for all Alaskans we trust the military acknowledges the requirements of the civil aviation community for the safety of all users.</p> <p>The proposed expansion of the Fox 3 MOA intrudes both laterally and vertically in to an area of Alaska highly used by the general public. Expanding a MOA to within 30 miles of Alaska’s fastest growing populace is precarious. The Mat-Su Valley is home to over 230 landing areas and to</p>	<p>Your opposition to any additional airspace that hinders IFR traffic is duly noted.</p> <p>Section 3.1.10.1 of the Draft EIS acknowledges that the Lake Louise Special Use Area is a popular recreational area located within the project area. Section 3.1.10.3 of the EIS acknowledges that noise associated with low-level overflight could lessen recreational experiences for some persons. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation.</p> <p>Section 3.1.10.3 of the Draft EIS acknowledges that the expansion of the Fox 3 MOA and the establishment of the Paxon MOA would result in indirect effects on civilian air access to areas below or in the vicinity of the project area. The EIS acknowledges that the proposed action requires increased vigilance by both military and civilian pilots to maintain continued awareness</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>over 2,000 of Alaska’s general aviation pilots. The Lake Louise recreation area is one of the most frequented destinations for all Alaskan’s who enjoy hunting, fishing, hiking, boating but most importantly for the quiet and pristine outdoor experience. Military aircraft travelling in excess of 500 kts and/or 500’ would not only endanger civil aviation traffic but destroy Alaska’s quintessence.</p> <p>The same argument applies to the Paxson MOA Low Altitude proposal. This area is a major VFR route connecting northern Alaska with the south central and eastern regions of the state. Variable weather in this area eliminates the discussion of corridors that would create congested, unsafe situations for aviation traffic.</p> <p>MOA’s today prohibit IFR access by civilian aircraft during exercises. This not only affects the economic viability of communities with and outside of these areas but history shows it has been difficult even obtaining access during emergency situations. This results in an even bigger concern: the loss of safety for VFR operators who are being encouraged to use low-level civil corridors. If larger, IFR capable aircraft are forced to use the VFR corridor during these exercises, this puts these larger, faster aircraft on the same flight path as our smaller general aviation aircraft at low altitude, which is a loss of safety for all civil operators. We oppose any additional airspace that hinders IFR traffic and the negatively impacts our communities.</p> <p>The proposals to establish more restricted airspace for live ordinance delivery further impacts the Fairbanks, Delta Junction areas and north even more. Again, the areas affected are accessed by Alaskans utilizing these areas for mining, hunting and recreation. Existing restricted areas already have a negative impact to civilian communities.</p>	<p>of each other’s presence while sharing this MOA airspace. Sections 3.1.10.4 (Land Use/Recreation) and 3.1.1.4 (Airspace) list mitigation measures that could be implemented to reduce the impacts.</p>
N0041-3	<p>The Alaska Airmen’s Association is a statewide organization with 2500 members dedicated to supporting safe aviation in Alaska. In this letter we hope to define the requirements of the civil aviation community and elucidate industry concerns. Specific areas of the proposal include the expansion of the Fox 3 MOA, the proposed Paxson MOA Low Altitude Structure, IFR Access to MOA Airspace, restricted airspace over the Battle Area Complex south of Delta Junction and the proposed UAV Corridors. Given the importance of the aviation transportation system for all Alaskans we trust the military acknowledges the requirements of the civil aviation</p>	<p>The Air Force recognizes that aircraft noise could have adverse effects on civilian activities and predicted impacts are described in the EIS. Lake Louise is being considered as a potential designated avoidance area due to increased civilian activity in that area. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>community for the safety of all users.</p> <p>The proposed expansion of the Fox 3 MOA intrudes both laterally and vertically in to an area of Alaska highly used by the general public. Expanding a MOA to within 30 miles of Alaska’s fastest growing populace is precarious. The Mat-Su Valley is home to over 230 landing areas and to over 2,000 of Alaska’s general aviation pilots. The Lake Louise recreation area is one of the most frequented destinations for all Alaskan’s who enjoy hunting, fishing, hiking, boating but most importantly for the quiet and pristine outdoor experience. Military aircraft travelling in excess of 500 kts and/or 500’ would not only endanger civil aviation traffic but destroy Alaska’s quintessence.</p> <p>The same argument applies to the Paxson MOA Low Altitude proposal. This area is a major VFR route connecting northern Alaska with the south central and eastern regions of the state. Variable weather in this area eliminates the discussion of corridors that would create congested, unsafe situations for aviation traffic.</p> <p>The proposals to establish more restricted airspace for live ordinance delivery further impacts the Fairbanks, Delta Junction areas and north even more. Again, the areas affected are accessed by Alaskans utilizing these areas for mining, hunting and recreation. Existing restricted areas already have a negative impact to civilian communities.</p>	
N0041-4	<p>The Alaska Airmen’s Association is a statewide organization with 2500 members dedicated to supporting safe aviation in Alaska. In this letter we hope to define the requirements of the civil aviation community and elucidate industry concerns. Specific areas of the proposal include the expansion of the Fox 3 MOA, the proposed Paxson MOA Low Altitude Structure, IFR Access to MOA Airspace, restricted airspace over the Battle Area Complex south of Delta Junction and the proposed UAV Corridors. Given the importance of the aviation transportation system for all Alaskans we trust the military acknowledges the requirements of the civil aviation community for the safety of all users.</p> <p>The proposed expansion of the Fox 3 MOA intrudes both laterally and vertically in to an area of Alaska highly used by the general public. Expanding a MOA to within 30 miles of Alaska’s fastest growing populace is precarious. The Mat-Su Valley is home to over 230 landing areas and to</p>	<p>Concerns expressed over the potential airspace conflicts and flight safety risks associated with the JPARC proposals will be addressed as the Air Force and Army move forward with the further study of these proposals by the FAA. The individual and cumulative effects these proposals could have on Alaska’s aviation transportation system were considered during the planning of these proposals pending the NEPA processes and FAA study that would more closely examine the potential adverse effects on air traffic and Air Traffic Control system capabilities. Be assured that the concerns and proposed solutions of the Association and others expressed through written comments, public meetings, and other direct interactions will be a priority while exploring those mitigation measures and other viable options that would best serve the safe and compatible use of this airspace by all military and civilian interests. Cooperative efforts will be needed to resolve issues with the lower altitudes, VFR corridors, airspace restrictions, UAV corridor designations, and other such concerns noted by the Association and others in</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>over 2,000 of Alaska’s general aviation pilots. The Lake Louise recreation area is one of the most frequented destinations for all Alaskan’s who enjoy hunting, fishing, hiking, boating but most importantly for the quiet and pristine outdoor experience. Military aircraft travelling in excess of 500 kts and/or 500’ would not only endanger civil aviation traffic but destroy Alaska’s quintessence.</p> <p>The same argument applies to the Paxson MOA Low Altitude proposal. This area is a major VFR route connecting northern Alaska with the south central and eastern regions of the state. Variable weather in this area eliminates the discussion of corridors that would create congested, unsafe situations for aviation traffic.</p> <p>MOA’s today prohibit IFR access by civilian aircraft during exercises. This not only affects the economic viability of communities with and outside of these areas but history shows it has been difficult even obtaining access during emergency situations. This results in an even bigger concern: the loss of safety for VFR operators who are being encouraged to use low-level civil corridors. If larger, IFR capable aircraft are forced to use the VFR corridor during these exercises, this puts these larger, faster aircraft on the same flight path as our smaller general aviation aircraft at low altitude, which is a loss of safety for all civil operators. We oppose any additional airspace that hinders IFR traffic and the negatively impacts our communities.</p> <p>Five years ago the Alaska Airmen participated in an EIS process that resulted in the building of the Battle Area Complex south of Delta Junction. One of the concerns at the time was the possibility of restricted air space over the complex. We were assured that this would never be a requirement. Our position has not changed even though the military’s planned use of airborne weapons release has changed. We oppose restricted airspace over an area where weather, terrain, and mountain passes creates a challenging and potentially unsafe situation.</p> <p>The proposals to establish more restricted airspace for live ordinance delivery further impacts the Fairbanks, Delta Junction areas and north even more. Again, the areas affected are accessed by Alaskans utilizing these areas for mining, hunting and recreation. Existing restricted areas already have a negative impact to civilian communities.</p>	<p>your comments.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>We understand Unmanned Aerial Vehicles are the future and that the military would like to integrate these into their training. Corridors allowing UAV's to access training areas is an enormous safety concern. Currently the National Airspace System does not have a mechanism that allows UAV's to harmoniously fly and communicate in the same airspace as civil aircraft. Until true sense and avoid capability is defined and developed we need to side with safety and oppose these corridors as proposed.</p> <p>Alaska already has one of the largest areas of airspace in the world secured for training. The Alaska Airmen's Association supports our military and understands the need for training; however we are concerned for other users of this airspace. Through the scoping and public meetings it was explained that the military needed such low altitudes and expanded areas in order to train for existing and future threats to the 5th generation fighters and to train with new weapons systems. It was also stated that this redesign was based on saving transient time and fuel to reach the training areas. While not part of this proposal, we ask the military to look at all Alaska airspace they currently hold and release airspace that is not being effectively utilized. We also question the reasoning and claims for the proposed F-16 move to JBER as they seem to contradict the motives of the JPARC redesign.</p> <p>We do know that improved and consistent communication that includes real-time information for pilots sharing this airspace needs to occur. Implementing a statewide Special Use Airspace Information Systems (SUAIS) as well as improving the existing service are essential to operating an airspace complex of this size. Radio coverage and communication remains unreliable in the eastern areas of the current complex. Beside improvements to the current program, we would like alternatives to be explored for communicating the status of the MOA's improving access in the ranges for civil aircraft when not in use. We ask that the floor of current and proposed airspace be determined based on communication coverage for SUAIS.</p>	
N0042-1	<p>The Alaskan Aviation Safety Foundation (AASF) is a non-profit membership driven organization with the central goal to promote aviation safety in Alaska. We had a team review the Joint Pacific Alaska Range Complex (JPARC) Draft Environmental Impact Statement (DEIS) document dated March 2012, which contains proposals for modernizing and changing various features of the airspace and training ranges in the JPARC. We offer</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. This EIS has been prepared in accordance with the standards and information requirements pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] 4321 et seq.) and the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508. The Army and Air Force will conduct a</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>the following comments and observations.</p> <p>Purpose and Need</p> <p>The National Environmental Policy Act (NEPA) regarding Purpose and Need (40 CFR §1502.13) states, “The statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action.” In this DEIS document, the purpose statement (section 1.2) does not document the purpose of the DEIS as we understand it, which is to provide comprehensive training areas for current and future military training. The AASF supports providing comprehensive training areas, but the AASF is not supportive of the purpose stated in the document. We suggest restructuring the purpose to focus on current and future training areas. Section 1.3 containing the Need statement is not focused and does not include the proposed actions as required in §1502.13. We found it extremely difficult, and at times not possible, to connect a need with the proposed actions found later in the document...</p> <p>The USAF has extensive MOAs in Alaska, and in order to justify an expansion NEPA requires an explanation of why the existing MOAs are not adequate. The alternatives section states there is a need for more air space without discussing why the existing MOAs are inadequate, and fails to connect to the stated need in section 1.3. In addition the purpose and need statements in sections 1.2 and 1.3 do not appear to support either alternative A or E. As such, the AASF requires additional justification and at this time opposes both the Fox 3 MOA Expansion and the New Paxon MOA...</p> <p>Section 3.1.1.4 acknowledges adverse impacts, but in NEPA terminology we submit that these impacts are significant and require mitigation. Table ES-2 codes these as significant, which is inconsistent with section 3.1.1.4. The wording in this section does not address mitigation, rather it says (paraphrasing from the section) that the FAA and USAF will study impacts and mitigation measures, and work with civil aviation users to resolve issues. We expect a DEIS to document impacts, rate them significant or not significant, and if significant to propose adequate mitigation. If the SUAIS is proposed as a mitigation measure, we expect the DEIS to show us the translator locations and coverage areas...</p>	<p>thorough review of each of the points discussed in the AASF comment regarding the JPARC proposals during the preparation of the Final EIS. Revisions would be made based on whether the comment adheres to the original purpose and need to modernize and enhance JPARC to undertake future military training exercises for the Army and Air Force of the twenty-first century in accordance with how each proposal must meet that purpose and need. The Army and Air Force recognize also that military operations must be conducted in harmony with the needs of other uses and users of Alaska’s lands and airspace.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Battle Area Complex Restricted Area Addition</p> <p>The AASF rejects this proposal because the impacts to civil aviation safety are significant, and the proposed mitigation is inadequate. Existing Restricted Area 2202 to the west already forces civil traffic out of the most desirable terrain route to and from Isabel Pass. Isabel Pass includes the Richardson Highway VFR corridor connecting the northern half of the state to south central and south eastern Alaska. Winds and highly variable weather associated with the Alaska Range and the mountain pass make it impractical to confine civil traffic to a single, narrow corridor in this area. During previous EIS analysis of USAF expansion proposals, the aviation community raised the issue about the possible need for restricted airspace. While this is easy expansion area for the military, such expansion causes significant impacts to civil aviation. Section 3.3.1.4 acknowledges potential adverse impacts on airspace. As we stated above, we submit this is very significant by any reasonable measure. Mitigation measures offered are to study the issues, which is not acceptable. Disregard of the NEPA process to identify and mitigate significant impacts causes us distress. The USAF has stated they want to work with us, but this proposal disregards such working together for the benefit of all. The military has other options and this DEIS must explore these other options in detail...</p> <p>In general the expansion of R-2205 follows recommendations we have made in comments to previous environmental documents. We remain concerned that sections such as 3.4.1.4 acknowledge potential adverse impacts and the mitigation is to study the issues. This does not adequately comply with the NEPA process...</p> <p>The AASF has a long history of working with the USAF to provide aviation safety for all users, civilian and military. Our volunteers have always tried to provide fair and balanced comments to USAF proposals. Our membership contains many current and former members of the military. We value the USAF as a legitimate user of the Alaskan airspace, and desire to provide airspace adequate to meet the USAF training needs. With that said, our team struggled to analyze and comment on this DEIS document. Some drawings and submittals have been sub-standard and difficult to read and analyze. This document was 655 pages long, rather than the 300 pages codified in NEPA §1502.7. There are discontinuities between the purpose, need, alternatives, affected environment, and environmental consequences, and we were not</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>able to capture and comment on all of them. A DEIS document compiled to meet the NEPA code should be well laid out and the required sections connected to form a comprehensive and understandable program, and we found this document to be lacking in this regard...</p> <p>In summary because of the deficiencies in this DEIS document, the AASF submits this DEIS should be rewritten to follow 14 CFR 1500-1508, also known as the NEPA, and resubmitted. The need still exists for adequate training airspace and ground surface and we look forward to working with the USAF to identify needs and meet those needs.</p>	
N0042-2	<p>Purpose and Need</p> <p>The National Environmental Policy Act (NEPA) regarding Purpose and Need (40 CFR §1502.13) states, “The statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action.” In this DEIS document, the purpose statement (section 1.2) does not document the purpose of the DEIS as we understand it, which is to provide comprehensive training areas for current and future military training. The AASF supports providing comprehensive training areas, but the AASF is not supportive of the purpose stated in the document. We suggest restructuring the purpose to focus on current and future training areas. Section 1.3 containing the Need statement is not focused and does not include the proposed actions as required in §1502.13. We found it extremely difficult, and at times not possible, to connect a need with the proposed actions found later in the document.</p> <p>The following is our analysis and comment on each of the proposed actions.</p> <p>Fox 3 MOA Expansion and New Paxon MOA</p> <p>The USAF has extensive MOAs in Alaska, and in order to justify an expansion NEPA requires an explanation of why the existing MOAs are not adequate. The alternatives section states there is a need for more air space without discussing why the existing MOAs are inadequate, and fails to connect to the stated need in section 1.3. In addition the purpose and need statements in sections 1.2 and 1.3 do not appear to support either alternative A or E. As such, the AASF requires additional justification and at this time opposes both the Fox 3 MOA Expansion and the New Paxon MOA...</p>	<p>Section 1.3 addresses the need for efficient and realistic training. Realistic training with new tactics and weapon systems allows fewer assets to cover larger areas. Concurrent with the requirement to cover larger areas is the need to reduce inefficient training activities such as transiting to and from MOAs. Realistic training must be efficient to achieve readiness within real-world resources constraints. The Air Force currently conducts low-level training in the Yukon MOAs during MFEs and for daily training. The Yukon MOAs currently provide adequate training space, but they do not satisfy the need to be efficient. The distance to that airspace from JBER is three times the distance to enter the proposed Fox 3 MOA. The significant difference corresponds to valuable time and fuel being wasted and a lack of efficiency rendering the current airspace inadequate.</p> <p>Text on Page 1-8, line 7 has been changed: "This EIS describes and analyzes the potential environmental effects associated with the Air Force and Army proposals to modernize and enhance JPARC in Alaska to best support current and future military training in and near Alaska."</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Section 2.1.1 says the need is to provide a 180 x 60 nautical mile airspace. We submit that the Yukon MOAs already provide more than three times this airspace. There is no explanation why this existing airspace will not provide a realistic training environment that meets the USAF training need...</p>	
<p>N0042-3</p>	<p>Fox 3 MOA Expansion and New Paxon MOA</p> <p>The USAF has extensive MOAs in Alaska, and in order to justify an expansion NEPA requires an explanation of why the existing MOAs are not adequate. The alternatives section states there is a need for more air space without discussing why the existing MOAs are inadequate, and fails to connect to the stated need in section 1.3. In addition the purpose and need statements in sections 1.2 and 1.3 do not appear to support either alternative A or E. As such, the AASF requires additional justification and at this time opposes both the Fox 3 MOA Expansion and the New Paxon MOA.</p> <p>Section 2.1.1 says the need is to provide a 180 x 60 nautical mile airspace. We submit that the Yukon MOAs already provide more than three times this airspace. There is no explanation why this existing airspace will not provide a realistic training environment that meets the USAF training need...</p> <p>Section 3.1.3 Safety is of utmost concern to the AASF. Proposed expansion of the MOAs down to 500 ft will increase the collision risk between civil and military aircraft, aircraft mishap potential, and bird/wildlife-aircraft strike hazards. The AASF opposes this expansion of these MOAs down to 500 ft due to this decrease in both civil and military flight safety. In addition, Table ES-2 codes Safety – Flight for the Fox 3 MOA Expansion and New Paxon MOA as “Potential for significant adverse impacts; Requires management actions or mitigations to avoid or reduce impacts.” While in section 3.1.3.4 Mitigations provides some existing programs/procedures, but states “No further mitigations are proposed for this resource.” This is unacceptable to the AASF, and appears contradictory to the executive summary...</p> <p>Realistic Live Ordnance Delivery</p> <p>The alternatives section discusses the need for more space, mostly “As the technology for new weapons systems continues to evolve, the ground footprint for ordnance delivery continues to expand...” So again we have a need statement in the alternatives section rather than in the need section. The need statement is vague, and appears more as an effort to secure some land</p>	<p>We appreciate your comments and understand your Foundation’s concerns over the need for each JPARC airspace proposal and the potential adverse effects they may have on the civil aviation community. The purpose and need for each airspace proposal explained in the EIS Chapters 1 and 2 were based on mission requirements and criteria that were thoroughly and carefully considered in determining the airspace structure required to support future mission needs. We recognize this rationale cannot always be explained or further clarified in a manner the public and civil aviation interests can fully understand or accept when they feel their own airspace needs are being compromised. The existing Special Use Airspace environment may appear to all as being more than adequate in supporting those current military training activities occurring on a daily basis that don’t appear to be significantly infringing on civil aviation flight operations. However, it is very important to understand that the more widespread and distant location of the MOAs, distances from the restricted areas/ranges used in conjunction with MOA activities, and their varying structures and altitude limitations will no longer be sufficient in effectively supporting short- and longer-term training needs. Future airspace requirements must be able to fully and effectively incorporate advances in aircraft technology, weapons systems, defensive and offensive tactical maneuvers, and other such considerations that pilots must master to be successful in a real combat environment. Likewise, as fuel costs continue to rise and DoD budgets are reduced, it is increasingly essential that this training environment be situated where aircraft transit times/distances for both Eielson AFB and JBER are minimized while maximizing training opportunities within this airspace.</p> <p>As explained in Section 3.1.1.2, the FAA must study the airspace proposals to determine if and how each may be implemented and managed so as not to impact air traffic flows and their Air Traffic Control system capabilities. Until the FAA makes final decisions on these proposals and agreements are reached with all concerned on how any adverse impacts will be mitigated, the EIS airspace analyses and Appendix K mitigations could only more generally identify those measures to be considered in mitigating impacts. More definitive measures and other viable options will be examined with the FAA</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>now that may or may not be needed in the future. The existing MOAs constitute a huge amount of land and air. What we fail to find, and expect to find in a DEIS analysis, is exactly how much is needed now, why the existing MOAs are not adequate, and a reasonable projection of how much will be needed in the future. There may be some further justification hidden in the lengthy Affected Environment and Environmental Consequences section, but as written we could not connect the sections of this NEPA document into a coherent and well thought out proposal...</p> <p>Section 3.2.1.4 looks to be a copy of the airspace mitigation section from the Fox 3 MOA Expansion section. As such our comments above apply to this section too.</p> <p>Battle Area Complex Restricted Area Addition</p> <p>The AASF rejects this proposal because the impacts to civil aviation safety are significant, and the proposed mitigation is inadequate. Existing Restricted Area 2202 to the west already forces civil traffic out of the most desirable terrain route to and from Isabel Pass. Isabel Pass includes the Richardson Highway VFR corridor connecting the northern half of the state to south central and south eastern Alaska. Winds and highly variable weather associated with the Alaska Range and the mountain pass make it impractical to confine civil traffic to a single, narrow corridor in this area. During previous EIS analysis of USAF expansion proposals, the aviation community raised the issue about the possible need for restricted airspace. While this is easy expansion area for the military, such expansion causes significant impacts to civil aviation. Section 3.3.1.4 acknowledges potential adverse impacts on airspace. As we stated above, we submit this is very significant by any reasonable measure. Mitigation measures offered are to study the issues, which is not acceptable. Disregard of the NEPA process to identify and mitigate significant impacts causes us distress. The USAF has stated they want to work with us, but this proposal disregards such working together for the benefit of all. The military has other options and this DEIS must explore these other options in detail.</p> <p>Expansion of Restricted Area R-2205</p> <p>In general the expansion of R-2205 follows recommendations we have made in comments to previous environmental documents. We remain concerned</p>	<p>and key stakeholders to seek those solutions that would best serve the safe, compatible use of this airspace. Your understanding and support of this most important endeavor is critical as we continue our dialogue with the AASF and other agencies in discussing those issues, concerns, and suggestions that will help accomplish this objective.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>that sections such as 3.4.1.4 acknowledge potential adverse impacts and the mitigation is to study the issues. This does not adequately comply with the NEPA process.</p> <p>Unmanned Aerial Vehicle Access</p> <p>We understand the Military’s desire to establish UAV training areas. Furthermore we agree with the airspace analysis paragraph 3.6.1.4 that there are adverse and significant impacts, however this section does not offer any clear mitigation for these adverse and significant impacts. We submit aviation safety is likewise impacted. Therefore, based on the airspace management and safety sections we find cause to oppose the proposal...</p> <p>Use of the Naknek, Stony, Galena, and Susitna MOAs are currently part of the military training options for Alaska. From our perspective the Naknek and Stony MOAs provide an alternative to meet the need for expansion of the Fox 3 MOA. Yet their use was not addressed in this document. Again our stated goal is to help the USAF acquire the area needed to meet your training needs, but we are not agreeable to have the USAF keep or bank MOAs all over Alaska that may or may not be needed in the future. Please address the total MOA need in the final EIS.</p>	
N0042-4	<p>Night Joint Training</p> <p>In general we support the need for adequate night training. As aviators we understand this issue. We also find that we need to remind the USAF that noise impacts on the human environment are recognized to be larger at night. The FAA noise analysis process applies a 10 decibel penalty to night noise impacts. Section 3.5.2.4 does not acknowledge this fact. Additional mitigation may be required. We also find it curious that the USAF has not applied administrative relief to your own rules for aviation currency as a way to fix the problem. We would like this DEIS to discuss the potential to administratively modify the USAF rules for pilot night currency.</p>	<p>The Air Force uses the same noise metric to describe noise as is typically used by the FAA with two modifications. First, because Air Force activity is highly variable, the month with highest operations tempo is used to characterize the noise environment. Second, high-speed and low-altitude flying that is sometimes conducted by Air Force aircraft results in noise events on the ground with high noise onset rates. Potentially startle effects of these sudden onset noise events are accounted for by applying a ‘penalty’ of 0 to 11 decibels. These two factors differentiate Ldnmr, which is used by the Air Force to describe airspace training noise, from Ldn, which is the noise metric most commonly used by the FAA. Like the Ldn metric, the Ldnmr metric includes a 10-decibel ‘penalty’ for noise events occurring after 10:00 p.m. or before 7:00 a.m.</p> <p>The Ldnmr noise metric is described in Appendix B, Section 2.1 and is discussed further in Appendix E, Section E.1.2.5. The penalty of 10 decibels is mentioned on page 3-258, line 18 regarding Night Joint Training (NJT) noise impacts.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>The tactical advantages to fighting at night are well-known. While it would be possible to modify training regulations to remove the night training requirement, doing so would not provide for the most combat-realistic training possible. Modifying regulations governing Daylight Savings Time is outside of the purview of the DoD.</p>
<p>N0043-1</p>	<p>FOX 3 MOA Expansion and New PAXON MOA Affecting High Altitude Jet Aircraft</p> <p>Alaska Airlines regularly files over Northway via J502 between Seattle and Fairbanks. We rely on the most direct routing to ensure profitability and schedule reliability. Under the existing MOA/ATCAA activation, we incur regular and costly reroutes when forced to file via the 63°N corridor due to the J502 route being closed to IFR traffic. Any additional impact posed by an expanded MOA/ATCAA might prove unsustainable for our operation. As Alaska files and flies consistent and repeatable flight paths via advanced navigation methods, it is conceivable that an enhanced corridor for High Altitude IFR traffic be created that allows efficient transit through military airspace.</p> <p>Expand Restricted Area R2205, Including the Digital Multipurpose Training Range</p> <p>As proposed, the expanded R2205 is in the vicinity of the primary arrival and departure Airway (J502). This airspace expansion must be analyzed with consideration of the Fairbanks RNAV Sills, STARs and RNAV (RNP) approach procedures slated for implementation later this year. All impacts stated in the Draft EIS are based on existing flight tracks and do not consider these new arrival and departure tracks.</p> <p>Proposed Remotely Piloted Aircraft (RPA)/Unmanned Aerial Vehicle (UAV) corridors</p> <p>The UAV corridors could pose a significant impact to Alaska Airline’s operation by restricting essential arrival and departure paths to Fairbanks International. Alaska Airlines opposes the development of these corridors due to the further restriction of access to Fairbanks International.</p> <p>Consideration of Future Airspace and Procedure Enhancements</p>	<p>Such concerns as you have noted are more appropriately addressed by the FAA in their Aeronautical Study of each airspace proposal. This study examines, in much greater detail, the individual/cumulative effects of each proposal relative current/forecast air traffic operations, air traffic control services/system capabilities, IFR routing alternatives such as you noted, and other such factors that could affect the FAA’s overall ability to safely and efficiently manage Alaska’s airspace. The FEIS Airspace discussions addressed these factors to the extent this information was available through inputs received from the FAA and aviation concerns, scoping comments, aeronautical charts, the Alaska Aviation System Plan, and other resources reflecting Alaska’s airspace uses. The military realizes the importance of all aviation needs and services throughout Alaska, and will work with the FAA and key stakeholders, including airline representatives, to seek those solutions that would best serve both civilian and military interests. The safe and compatible use of Alaska’s airspace is of utmost importance to the Air Force and Army as they continue to explore those options that will help achieve that objective.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Significant FAA and Industry resources have been deployed to complete several RNAV Optimized Profile Descents, RNAV Departure Procedures, and RNAV (RNP) Approach Procedures at FAI--all scheduled for full implementation in September, 2012. These new procedures are necessary to ensure efficient operations for all capable users and align with the FAA's NextGen initiative. Alaska Airlines feels it is essential that these arrival and departure tracks be considered in the EIS study in effort to aid in impact analysis and developing mitigation strategies.</p> <p>Missile Live Fire For AIM-9 And AIM-120 In The Gulf Of Alaska</p> <p>Alaska Airlines transits the Gulf of Alaska between the Hawaiian Islands and Anchorage and the Lower 48 States and Anchorage. As we have recently started to take advantage of more direct over-water routing between the lower 48 and Anchorage, the Draft EIS does not directly address the impact that this proposal has on existing Gulf of Alaska traffic. The EIS must include this information in order to fully analyze the impact of the proposal.</p> <p>Cumulative Impacts</p> <p>The cumulative impacts of adding further restrictions to airspace that is already limited by MOAs and ATCAAs in the State of Alaska needs to be identified and addressed by providing data on both direct and indirect impacts. Other elements of the JPARC, such as Stony, Naknek, Susitna, and Galena need to be evaluated in conjunction with the JPARC expansion EIS and determine if they are still necessary to meet modern training needs. Because Alaska provides "the largest available land, air and sea training in the world", expansion of JPARC should identify ways to offset impacts of other current military airspace. Evaluating the JPARC Expansion proposal independently of existing military airspace does not allow for consideration of the cumulative impacts to civil airspace users throughout the State of Alaska.</p>	
N0044-1	<p>The National Outdoor Leadership School appreciates this opportunity to provide comments during the public comment stage of the Environmental Impact Statement (EIS) for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex (JPARC). As an outfitter running extended backcountry expeditions throughout the state of Alaska, we closely follow proposed projects that have the potential to affect the wilderness experience that our students expect.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
N0044-2	<p>NOLS has been operating in Alaska since the school established its base near Palmer in 1971. Since then, thousands of students have experienced the world-class wilderness opportunities available across this vast state through backpacking, sea kayaking, and mountaineering opportunities provided through our school.</p> <p>The Talkeetnas in particular are a core destination for NOLS backpacking and mountaineering courses. With a strong wilderness feel, a quiet setting, good wildlife viewing opportunities, and a close proximity to NOLS Alaska, these mountains are an excellent fit for our program. Each year, NOLS runs 10-15 courses in the area, totaling approximately 5,000 user days. Our season runs from mid-May through mid-August. Other operators value the Talkeetnas as an operating area as well, including Alaska Pacific University. Furthermore, the area is very popular during hunting season, especially in August and September, and many local guides bring clients to the area to harvest from the big game populations found there.</p>	<p>Section 3.1.10.1 of the EIS acknowledges that the Fox 3 and New Paxon MOAs overlie areas used for recreational activities, including camping, hunting, trapping, and fishing.</p>
N0044-3	<p>The existing Fox 3 Military Operations Area (MOA) overlays a major portion of our operations in the Talkeetnas. At current use levels, and with the existing flight boundary at 5,000 feet above ground level (AGL), military exercises do not significantly impact our courses. It is not uncommon for a course in the Talkeetnas to hear sonic booms multiple times on a course—a jarring experience for any wilderness traveler, and one that would only be amplified were the flight level boundary reduced to 500 feet.</p>	<p>While the proposed action would reduce the Fox 3 MOA 'floor' to 500 feet AGL, supersonic flight would not be permitted below 5,000 feet AGL or 12,000 feet MSL, whichever is higher. As the lowest supersonic training would not change, sonic booms would not be expected to become more intense under the proposed action. Sonic booms would be expected to become slightly more frequent, increasing from an average of 4.6 to 5.2 booms per day near the center of the airspace. Aircraft operating at subsonic speeds would also generate noise that could be disturbing, and these flights would be conducted as low as 500 feet AGL. Flights at low altitude make up a relatively small percentage of total training time, as shown in Appendix D, Table D-3.</p>
N0044-4	<p>Changes associated with the proposed actions, however, would negatively impact NOLS operations in the Talkeetnas. Specifically, aspects of the proposed Fox 3 MOA expansion and the proposed Paxon MOA will impede the quality of our courses, and may in fact impede our ability to support our courses with aircraft. The significant expansion in boundaries, the proposed lower floor boundary of 500 feet AGL, and the expectation of increased frequency of training exercises will combine to have a major impact on NOLS and other operators in the area.</p>	<p>The extent to which aircraft operations within the expanded airspace and lower altitudes may affect those land areas where NOLS operations typically occur is addressed in the EIS Airspace, Land Use, and Noise discussions and the associated proposed mitigation measures in Appendix K. The Air Force is sensitive to the effects their operations could have on hunting, recreation, and other outdoor experiences during times of the year when these opportunities are most advantageous, and would be exploring viable options with stakeholder interests for minimizing impacts on those activities and any their aviation supports.</p>
N0044-5	<p>The first and most obvious concern related to the JPARC EIS is that of a</p>	<p>The Air Force recognizes that there will potentially be noise impacts resulting</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	diminished wilderness experience for NOLS students due to the increased presence of frequent, low-flying aircraft, and the associated visual and aural impacts on both our courses and on the wildlife of the area. Such a dramatic change in the wilderness feel of the area would not only diminish the quality of the experience for students on wilderness courses, but would also discourage future potential students from enrolling, affecting our bottom line. Our clientele--most of whom come from outside Alaska and seek out our courses for a backcountry adventure in The Last Frontier--anticipate natural quiet, an absence of human impact, and abundant wildlife.	from the proposed action which could also have an effect on recreation and economic activity. Areas with the most sensitivity to noise are those that are managed for their special resource values, and generally serve a recreational or preservation function. Military users would continue to coordinate with management agencies, including BLM and ADNR, to address concerns and issues and develop mitigations to protect resource management responsibilities and land uses.
N0044-6	Beyond big game like moose, caribou, Dall's sheep, and brown bear, the Talkeetnas are a thriving habitat for birds, including ducks, geese, trumpeter swans, and golden and bald eagles. Wolverines also call the area home. Though on-the-ground impacts of the project may be minimal, significant adverse impacts on the flora and fauna have been identified (page 3-47). Even with mitigation efforts the biological resources of the area may see lasting damage.	Section 3.1.8.3.1 includes a review of research that shows that animal responses to low-level flights have been characterized in recent studies as minor, and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/ lambing seasons and in winter. The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas flight restrictions are located. Mitigation measures included for this proposal (Section 3.1.8.4) include: "Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information," as well as "Continue to monitor effects of military training, including overflights, on select wildlife species (especially herd animals, waterfowl, and raptors) and fisheries during critical seasons such as breeding, young-rearing, and migration. Use knowledge to develop and implement strategies to minimize disturbance to priority wildlife in existing and new SUAs. This would help natural resources and range managers to coordinate training schedules that minimize impacts on wildlife populations."
N0044-7	We look forward to seeing a more detailed plan for monitoring effects of military training on select wildlife species (especially herd animals, waterfowl and raptors) as described on page 3-51 in the final EIS.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>Included in the Draft EIS mitigation measures for definitive projects under Biological Resources was the following: "Monitor effects of military training including overflights on select wildlife species (especially herd animals, waterfowl, and raptors) and fisheries during critical seasons such as breeding, young-rearing, and migration. Use knowledge to develop and implement strategies to minimize disturbance to priority wildlife in existing and new SUAs and restricted airspace. This would help natural resources and range managers to coordinate training schedules that minimize impacts on wildlife populations."</p>
N0044-8	<p>We would also welcome a detailed plan for monitoring the effects of military training on visitors to the area.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
N0044-9	<p>Secondly, there is a potential for complications with private flights, which are essential to an extended NOLS wilderness expedition in these mountains. Courses in the Talkeetnas are typically re-ratoned by bush plane, and if there is a medical emergency, airplanes or helicopters are often the best options for evacuation. In public meetings, there have been assurances that private flights could continue. However, "...Scoping and other informal indicators suggest that an increasing segment of this aviation community may elect to avoid an active MOA. This may create impacts if these pilots would cancel or delay their flights, or otherwise fly increased travel distances around an active MOA to avoid this active airspace..." (page 3-18).</p>	<p>Emergency flights are always given top priority in any airspace operating environment. While civilian pilots may be encouraged to delay or divert their flights briefly during those relatively short periods a MOA may be active, a MOA is not restricted; therefore military pilots are constantly alert to any nonparticipating aircraft observed within this airspace and will take those actions necessary to maintain a safe operating distance from those aircraft. The JBER and Eielson AFB Midair Collision Avoidance Program pamphlets (available on websites and as hard copies) provide helpful information and guidance for operating safely within active MOAs and they would be updated as needed for any changes/additions to the JPARC airspace.</p>
N0044-10	<p>We look forward to an explicit plan for dealing with planned and emergency flights in the proposed Fox and Paxton MOA expansions.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>Emergency operations will always take precedence over training operations. Air Traffic Controllers and Airspace Managers will ensure unhindered access for emergency flights.</p>
N0044-11	<p>As the final EIS is developed, we encourage planners to consider reducing the size of the Fox 3 and Paxon MOAs and to consider keeping the boundary at 5,000 feet AGL in popular backcountry zones. This is just one opportunity to mitigate and/or minimize the impacts on backcountry travelers.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
N0044-12	<p>During scoping, we supported Alternative C, which included the Fox 3 MOA expansion (the proposed Fox 3,4,5, and 6 MOAs) without the low-altitude MOA. Though it was not clear at the time, we also asked that the proposed Paxton MOA also maintain a boundary of 5,000 feet AGL. If the Alaska Command requires a zone for low-altitude exercises, NOLS would be least impacted in the proposed Fox 6 MOA, and the southern half of the proposed Paxon MOA.</p> <p>Because in the draft EIS only Alternatives A, E, and No Action are explored, we feel compelled to suggest a compromise. With adjustments as specified above, we could support a revised Alternative E. Though we recognize that the Alaskan Command is seeking to respond to public comment by amending the southern border of the Fox 3 MOA in Alternative E, this change will not reduce the impacts of the project on NOLS courses significantly enough for us to support this alternative. We anticipate that this alternative that would allow us to conduct our courses with few noticeable impacts if the adjustments specified above were adopted into Alternative E.</p>	<p>Alternative C was determined to not provide the lateral and vertical airspace structure required to fully achieve the stated objectives for expanding the current MOA and therefore not carried forward.</p> <p>The compromise to modify Alternative E as stated, with a 500-foot-AGL floor in Fox 3 and Paxon MOAs would not satisfy the need for realistic low-level training, as it restricts aircraft to the relatively flat sections where terrain masking is difficult at best. This compromise would also restrict aircraft from approaching the target areas (R-2202 and R-2211) at required low altitudes.</p>
N0044-13	<p>Lastly, we encourage the Alaskan Command to explore the possibility of alerting the public to upcoming exercises as described on page 3-17,</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>preferably several weeks in advance. In the case of NOLS, this advanced notice would give us an opportunity to alert our courses in the field, and would give our instructors a chance to make any necessary preparations.</p>	<p>actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
<p>N0044-14</p>	<p>Thank you for your careful consideration of these comments. In a land as vast and untrammled as Alaska, there should be room for everybody. If the concerns of all stakeholders are given careful consideration, and if the spirit of cooperation and balance is preserved in this JPARC EIS process, there is reasonable hope that we might reach an amicable compromise. Please do not hesitate to contact us with any further questions or concerns.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
<p>N0045-1</p>	<p>RDC is a statewide business association comprised of individuals and companies from Alaska’s oil and gas, mining, forest products, tourism and fisheries industries. RDC’s membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC’s purpose is to encourage a strong, diversified private sector in Alaska and expand the state’s economic base through the responsible development of our natural resources.</p> <p>RDC submitted a letter March 3, 2011 explaining it recognized the importance of military training but is concerned that sufficient economic impact studies were not conducted prior to the release of the JPARC Modernization and Enhancement EIS. RDC urged the military to work with the Alaska Miners Association and other stakeholders (such as tourism) to develop an EIS that achieves maximum benefit for resource industries, public access, and military training needs. Overall, it does not appear these concerns were addressed.</p> <p>Reduce the Unmanned Vehicle Aircraft corridors to the minimum airspace needed, and mitigate use of these areas to reduce or eliminate the impact to resource development activities in the area;</p> <p>Consider making the most use of federal areas not designated for mineral</p>	<p>The following discussion is provided in Section 3.1.12.3.1 but also applies to the other proposed actions throughout the EIS. "Impacts on key industries such as energy development and mining are expected to be low. The Air Force would coordinate with FAA and other regulatory agencies to evaluate energy development proposals under the proposed airspace on a case-by-case basis. If there were concerns about an energy development proposal, the Air Force would raise those concerns to the appropriate authority. In addition, overflight activities are not expected to significantly impact mining operations, especially if activities can be communicated in advance, avoidance areas can be identified, and pilots are briefed as part of the training mission." Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>resources, instead of lands with mining or other activities.</p> <p>The potential economic impacts of the proposals in the EIS will likely be overly burdensome for not only large projects, but also for the “mom and pops” projects in the areas. RDC supports multiple-use of Alaska’s land, air and resources and advocates for increased access for resource and community development.</p>	
N0045-2	<p>The Resource Development Council (RDC) is writing in response to the request for comments and information for the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Draft Environmental Impact Statement (EIS).</p> <p>Additionally, RDC requests mitigation measures be developed with stakeholders, to include:</p> <ul style="list-style-type: none"> - Prevention of mid-air collisions by developing a minimum altitude for military training aircraft; - Improvement of radar and communications systems so that civilian stakeholders and military personnel operating in training areas are better informed; - Reduce the Unmanned Vehicle Aircraft corridors to the minimum airspace needed, and mitigate use of these areas to reduce or eliminate the impact to resource development activities in the area; 	<p>Pending the FAA’s study of each proposed airspace action, the Air Force and Army proponents will pursue those existing and proposed mitigations noted in the FEIS Appendix K and other viable options for minimizing any adverse impacts on land and airspace uses. This will be done in collaboration with key stakeholders to arrive at those mutual decisions that will help ensure all military and civil airspace needs are met in the safest and most efficient manner possible.</p>
N0046-1	<p>The Alaska Airports Association (AkAA) is a non-profit organization dedicated to enhancing the operation and management of airports and back country landing areas within the State of Alaska. In addition, the goals of the AkAA are to support the needs and safety of aviation. Established in 2009, membership includes municipal and state airport operation managers, pilot groups, pilots, and aviation consultants. Our organization has over 100 members through individual and corporate memberships.</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.</p>
N0046-2	<p>The US Department of Defense has proposed a significant expansion to the Joint Pacific Alaska Range Complex (JPARC) in support of military training. This complex, already the largest military airspace complex in the country, occupies some 65,000 square miles of airspace, in addition to significant holds of land, sea and an additional 42,000 nautical square miles of airspace on the Gulf of Alaska. A series of proposals are included in the draft Environmental Impact Statement that would further expand this complex. While we support military training, it is imperative that aviation</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	safety and access be preserved for civil users of the regional complex area and for military personnel given the importance of aviation for basic transportation, goods and services, and medical resources in the state of Alaska.	
N0046-3	The proposed expansion of the Fox 3 MOA is a significant increase in lateral extent, but also in vertical dimension, lowering the floor from 5,000 ft above ground level (agl) to 500 ft agl. This expansion is in direct conflict with areas that are frequently used by general aviation pilots and air taxi/transport operators to support hunting camps, mining operations, air tour operations, access recreational areas, homesteads, support ongoing Susitna-Wantana Hydroelectric Project related activity up to and including a proposed 7,000 ft IFR runway or make other uses of this region important to the economic benefit of Alaska.	Concerns raised over the potential adverse effects of the Fox 3 MOA and new Paxon MOA proposal were noted in the EIS and will be further examined by the FAA in their formal study of these proposals. The Air Force will be working with the FAA and key stakeholders to pursue those existing and proposed mitigation measures noted in EIS Appendix K along with other viable options that would minimize impacts on airport operations and general aviation/air taxi activities throughout the affected region. Flight safety is paramount in seeking those solutions that would help meet all military and civil aviation airspace needs.
N0046-4	Landing areas are dispersed throughout this proposed MOA on river bars, lakes, valleys, and ridges, in communities and in undeveloped areas where new airport facilities will be needed to support future projects such as the Susitna-Wantana hydroelectric project. Due to its proximity to the largest population center in Alaska, this proposed expansion will result in an increased collision potential between high-speed military aircraft executing low level training maneuvers on MOA airspace and civilian aviation.	The EIS addresses those charted public airports and private airfields within the areas affected by the different JPARC airspace proposals, and it is also recognized that many other uncharted airstrips/landing areas are dispersed throughout this region. Both the Air Force and the Army understand the essential role all these facilities play in serving the current and future needs of those many interests that greatly depend upon aviation support in this region. This will be a key consideration in the FAA's study of each airspace proposal and those measures the military proponents would be pursuing with the FAA and key stakeholders to address any impacts on the civil aviation community. Those mitigation measures noted in the EIS and other viable options to be examined would all be aimed at finding those solutions that would best meet both military and civilian airspace needs while providing a safe, compatible operating environment for all concerned.
N0046-5	The Draft Environmental Impact Statement did not clearly identify why this area is necessary for use or why other existing MOA's are not available.	The primary purpose and need to modernize and enhance existing JPARC training areas can be identified in EIS Chapter 1, Sections 1.2 and 1.3. Section 1.3, Need for Action identifies and discusses the four factors driving the need for enhanced and modernized training and testing facilities at JPARC. These include (1) technological advances, (2) advances in combat tactics and techniques and combat lessons learned, (3) the need to achieve diversified, realistic training in an efficient manner, and (4) the potential for synergy in meeting the physical needs of various Services and joint training. Section 1.3.3.2, Configuration of Training Airspace discusses a primary need for the Fox 3 MOA and new Paxon MOA proposal. As to "why other existing MOA's are not available" for new fifth-generation fighter training and

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		exercises: they do not meet the purpose and need for this highly advanced flight training. The Fox 3 MOA and new Paxon MOA proposal was developed specifically to conduct this type of flight training.
N0046-6	In addition, mitigations for the proposals were not clearly identified.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The mitigations for each of the definitive proposals will be clearly identified during the Final EIS preparation process. In this phase, the preferred alternative for each definitive proposal will be selected based on criteria that meet the purpose and need by Air Force and Army representatives following their review of all relevant facts, impact analyses, and comments received on the Draft EIS. In preparing the Final EIS, the proponents will make every effort to harmonize mission requirements and community needs so that user conflicts are mitigated to the maximum extent reasonable and practicable. This response is applicable to all comments categorized as Mitigation (MT). Responses will be added when the Army and Air Force make decisions on the mitigations to be included for each definitive proposal in the JPARC Final EIS and Record of Decision (ROD).
N0046-7	Additional work should be completed prior to expansion or creation of new MOA's.	As explained in Chapter 1, Purpose and Need for the Proposed Actions, Sections 1.2 and 1.3 of the Draft EIS, the decision on which alternative the Air Force will pursue regarding the Fox 3 MOA and New Paxon MOA proposal will be made in light of the Purpose and Need by Air Force representatives following the review of all relevant facts, impact analyses, mitigations, and comments received via the JPARC EIS public participation process.
N0046-8	The Special Use Airspace Information Service (SUAIS) was created as a result of the mid-1990's expansion of the MOAs. The existing SUIAS around FAIRBANKS has been plagued with communication issues. Two of the repeater sites have been out of service for extended periods of time with one recently planned to be replaced. In a heavily used area just outside of Black Rapids, near the West Fork of the Little Delta it has been difficult to make radio contact. This is not an uncommon complaint by pilots landing and departing along the river in the area. If the existing SUAIS is poorly maintained and insufficient in numerous areas, how will expansion of the same provide for public safety?	The SUAIS serves an important purpose in providing current information on MOA activity and range status and the Air Force recognizes that radio coverage for this service may not always be available or reliable in some areas. The Air Force is addressing such concerns noted in your comments and has included the SUAIS status as a standing agenda item at the Alaska Civil/Military Aviation Council meetings to keep civil aviation interests informed of those actions being taken or considered to improve the SUAIS performance. As noted in the EIS Appendix K mitigations, funding will be pursued to expand and enhance communications within the expanded Special Use Airspace (SUA) areas. It is important that the civil aviation community be aware that the active status of the MOAs and restricted areas is also available through direct communications with Eielson Range Control by telephone at (800) 758-8723 or (907) 372-6913, the Automated Flight Service Stations, and Anchorage Center.
N0046-9	This area is extremely important for camping, mining, subsistence,	Section 3.1.12.1 of the EIS acknowledges that key industries in the region,

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	hydroelectric projects, and hunting which are important to the economic benefit of Alaska.	including natural resources and mining, recreation and tourism, and civil aviation contribute greatly to the Alaska economy.
N0046-10	This area is extremely important for camping, mining, subsistence, hydroelectric projects, and hunting which are important to the economic benefit of Alaska.	The EIS has determined that the economic impacts associated with the Fox 3 Expansion/New Paxon MOA would be significant. Additional information on the recreational opportunities in the affected environment and the potential environmental consequences to recreation is provided in Section 3.1.10, Land Use. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
N0046-11	Recommendation 1: Due to the importance of the airspace for access to the southern Alaska Range, Denali Highway and Talkeetna Mountains, and to minimize the risk of mid-air collision, especially while landing and departing airports, back country airfields, lakes, airstrips and ridges the Fox MOA, should be limited to 5,000 feet agl, and to the smallest possible lateral extent to minimize the risk of mid-air collision. In addition, real time IFR access should be provided to IFR traffic when the MOA is active.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
N0046-12	<p>Recommendation 2: Any expansion of MOA airspace must have accompanying radio coverage, staffing and other elements of the SUAIS infrastructure to allow civil pilots to communicate with US Air Force Range Control during times the MOAs is in use. It is also essential that the tape recorded messages, broadcast during hours when Range Control is unmanned, and be more uniformly broadcast across the JPARC complex. While the current language in the Draft EIS indicates that “funding will be pursued,” given that we still do not have adequate communication in the existing airspace, it is essential that:</p> <p>(a) Radio repeaters should be installed and operational before airspace is granted and in use. The repeaters should provide adequate coverage so aircraft can make contact and communicate with range control prior to entry into the special use airspace. The terrain in the proposed Fox MOA offers many different landing scenarios and communication in valleys and hillsides may be challenging.</p> <p>(b) Mitigations include raising the floor to the level where two way</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	communication is available any time a station is down or the system is otherwise not fully operational, to allow general aviation or commercial pilots to operate without unanticipated encounters with high-speed military traffic.	
N0046-13	<p>Paxson MOA Low Altitude Structure</p> <p>The military has proposed a Paxson MOA, which covers Isabel Pass and portions of the eastern Alaska Range. The pass is a major VFR route which links northern Alaska with south central and south east regions of the state. Along the southern flanks of the Alaska Range are mining operations, recreational cabins, airstrips, and backcountry landing areas along with lakes which experience high levels of use, which are not compatible with high speed, low level military aircraft. While the concept of VFR corridors has been discussed, the variable weather in this area is not conducive to identifying a specific single corridor which concentrates VFR traffic and increases the mid-air collision risk.</p>	<p>This FEIS Airspace Management discussions note the concern regarding impacts this proposal and the proposed Battle Area Complex restricted area may have on this passage, particularly during variable weather conditions that may require course diversions. Pending the FAA's analysis of these proposals and potential impacts on this corridor, the Air Force and Army would consider those mitigations/viable options for minimizing impacts on this area.</p>
N0046-14	<p>The Draft Environmental Impact Statement did not clearly identify why this area is necessary for use or why other existing MOA's are not available. In addition, mitigations for the proposals were not clearly identified. This work should be completed prior to creating the new MOA.</p>	<p>The purpose and need for this proposal are described in Sections 1.2 and 1.3 of the Draft EIS and Final EIS. Mitigations are provided in Appendix K.</p>
N0046-15	<p>Recommendation 3: The proposed Paxson MOA, if considered, should be for high altitude usage only, recognizing the importance of Isabel Pass, and the air traffic routes extending from the interior south to Gulkana and beyond for civil aviation. Real time IFR access should be provided when the MOA is active.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
N0046-16	<p>IFR Access to MOA airspace</p> <p>Considerable public investment is being made to expand airways, instrument approaches, weather reporting and remote communication outlets across Alaska; the trend is to continue modernization as funding resources become available. A corresponding private investment will be made by aircraft owners and facility owners to utilize these existing and proposed facilities.</p>	<p>The FAA study of the JPARC airspace proposals will be taking such considerations into account when determining if and how each could be implemented without creating any adverse impacts on IFR air traffic flows and their air traffic control capabilities for managing that traffic. A collaborative effort would be required among the FAA, military, and other key stakeholders to find those solutions that could best serve all military and</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Expansion of MOAs over IFR airways precludes civil access to the airways when the MOAs are active, excepting for emergency and lifeguard flights. Experience gained over recent years with the Delta MOA's, which overlays V-444 between Fairbanks, Delta, Tok and Northway, have continued to demonstrate difficulties for lifeguard repositioning flights and other uses such as wild fire suppression logistical flights. Asking these operators to fly VFR is a potential reduction in safety and economic benefits for Alaskans. The loss of IFR access also impacts proposed projects such as the proposed 7,000 ft IFR runway to support the Susitna-Wantana Hydroelectric Project located within the boundaries of the proposed airspace and projects located outside of the boundaries of the proposed airspace.</p>	<p>civil needs for this airspace.</p>
N0046-17	<p>Recommendation 4: No additional MOA airspace should be granted that interferes with IFR access until provisions are made to provide real-time IFR access through active MOAs or to an IFR instrument approach/departure associated with an airport facility. While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities or facilities both inside and adjacent to MOA airspace given the critical role aviation plays in the Alaskan transportation system especially during IMC requiring IFR operations</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
N0046-18	<p>Proposed Battle Area Complex Restricted Area The proposal to establish restricted airspace over the Battle Area Complex southeast of Delta Junction is of particular concern to the civil aviation community. Existing Restricted Area 2202 to the west already forces civil traffic out of the most desirable terrain route to and from Isabel Pass, a major VFR corridor connecting the northern half of the state to south central and south eastern Alaska. Winds and highly variable weather associated with the Alaska Range and the mountain pass make it impractical to confine civil traffic to a single, narrow corridor in this area. Five years ago, during an EIS process, the aviation community raised the issue about the possible need for restricted airspace, given that there were other locations available to site the military training facilities that already offered this type of airspace.</p>	<p>As noted previously, the FEIS Airspace Management discussions note the concern the proposed Battle Area Complex restricted area may have on this passage, particularly during variable weather conditions that may require course diversions. Pending the FAA's analysis of these proposals and potential impacts on this corridor, the Army would consider those mitigations/viable options for minimizing impacts on VFR transit through this area.</p>
N0046-19	<p>Recommendation 5: The Alaska Airports Association supports the aviation community, to oppose the addition of restricted airspace as proposed in this area, given the need to access the mountain pass, unique weather and terrain,</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	and presence of existing restricted airspace. We suggest the military seek other alternate means to allow their training to take place, such as the controlled firing area used today, where firing is halted when a civil aircraft enters the area.	recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
N0046-20	<p>Proposed Restricted Areas for Realistic Live Ordinance Delivery (RLOD)</p> <p>The proposals to establish restricted airspace for live ordinance delivery impact access between Fairbanks, Delta, the Richardson Highway corridor and the recreational and mineralized areas in the Alaska Range to the south. Further restriction of airspace limits access to these areas.</p>	The restricted airspace proposed for live ordnance deliveries could limit some transit opportunities between Fairbanks, Delta, the Richardson Highway and the higher-use areas to the south when this airspace is activated for RLOD mission activities. The extent of such limitations will be dependent upon the selected Final EIS preferred alternative, the FAA's study of this alternative, and those mitigation measures and other viable options the Air Force would pursue with the FAA and key stakeholders to minimize impacts. As noted in Chapter 2 of the EIS, the anticipated use of this restricted airspace for ordnance delivery training would be the same as currently exists for Restricted Area R-2202 (90 to 150 days annually at a maximum of 5 hours daily to include RED FLAG-Alaska flying periods). This scheduled use would be publicized through the Special Use Airspace Information Service (SUAIS) and other available means.
N0046-21	<p>Recommendation 6: The existing Restricted Areas (2211 and 2202) already limit access between the road corridor communities in the region. The Alaska Airports Association opposes connecting the two restricted areas making an overall barrier to access in this area of the State of Alaska.</p>	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
N0046-22	<p>Proposed Unmanned Aerial Vehicle Corridors</p> <p>There is no doubt that unmanned aerial vehicles play an important role in today's military aviation and that training is required. UAV integration into the National Airspace System is currently a topic of discussion at the national level as these airships are expanded in aviation usage alternatives.</p>	While the FAA, DoD, and other concerns continue to explore means for safely integrating UAV operations into the National Airspace System, the military must proceed with identifying and evaluating those locations/corridors where this training airspace is required. The FEIS examined these corridor proposals as restricted areas to identify the potential impacts this alternative could have on VFR and IFR air traffic within each

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	Restricting civil airspace to accommodate UAV transits next to the second largest airport hub in the state is a concern.	affected area. The FAA Alaskan Region regional office will determine if and how each corridor can be implemented to support UAV mission training needs.
N0046-23	Recommendation 7: Corridors that are proposed would interfere with the safe and efficient access into Fairbanks International Airport and other local airports such as Chena Marina, the Richardson Highway Corridor and the Alaska Range. Other means to separate UAV from civil aircraft, without utilizing restricted airspace, should be pursued.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
N0046-24	Mitigation for Caribou/Sheep/Moose Season in the Alaska Range While the Air Force already avoids scheduling of Major Force Exercises during September, December and January to avoid interference with sport and subsistence hunting, key areas under existing and proposed MOAs are heavily used for wildlife and sport fishing harvest. Military operations during these times should be avoided to ensure safety of civilian aircraft and avoid the potential for mid air collisions with low flying military operations.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
N0046-25	Recommendation 8: Avoid the scheduling of Major Flying Exercises during the fall Moose, Sheep and Caribou hunting seasons and during times for subsistence harvests.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
N0046-26	F-16 Relocation Proposal	The location of the F-16 Aggressor Squadron within Alaska is not connected

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	While not identified in the JPARC Draft EIS, announcements in the press have communicated an Air Force plan to relocate the F-16 squadron, currently based at Eielson AFB in support of military training activities, to Joint Base Elmendorf Richardson (JBER) within the next year or so. It is also not clear what the impact of relocation of the F-16 squadron might have on airspace in and around the Susitna MOA and the corresponding civil public use facilities in Anchorage and the Matanuska Susitna Borough airports.	to the JPARC proposals. The Air Force restructuring action to move the F-16 Aggressor Squadron from Eielson AFB to JBER is not included in the JPARC Modernization and Enhancement EIS. This move is a completely separate NEPA action and a separate NEPA document will be prepared to address the impacts of the restructuring program. The F-16 proposed relocation is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. The details of the proposed F-16 relocation and military training, including Major Flying Exercises such as RED FLAG-Alaska, will be worked out in the coming months. The majority of the JPARC proposals that involve Eielson AFB are Army proposals and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft.
N0046-27	Recommendation 9: More analysis of this plan is required to understand the true impact on this development to allow informed public comment.	See comment response N0046-26.
N0046-28	Evaluation of other Alaska MOAs The draft EIS proposals focus on expansion of the airspaces. These MOAs and those located in other parts of the state are elements of the JPARC. The overall justification for the expansion of the FOX 3 and creation of the Paxson are for operation efficiencies however, there has been no published evaluation of the present uses of the Yukon, Stony, Naknek, Susitna and Galena MOAs to determine if they are still required to meet modern training needs or justify the expansion. No data was found in the Draft EIS on uses of these MOAs other than limited use data on the Stony MOA.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's airspace. The other MOAs in JPARC are still required to meet modern training needs, but they are not, however, part of the purpose and need of this EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Sections 1.2 and 1.3. The MOAs noted, however, will be used to conduct Night Joint Training flight exercises, in accordance with the purpose and need for that proposal.
N0046-29	Recommendation 10: Provide an analysis of existing uses of the existing JPARC Complex including Yukon, Stony, Naknek, Susitna and Galena MOAs to establish their continued need given the changes in training requirements, and need for operational efficiency described in the Draft EIS proposals.	The baseline operations SUAs affected by JPARC proposals account for all existing military operations. The EIS does note that implementation of the Fox 3 and New Paxon MOA proposal may reduce the current level of Stony MOA. Each of these MOAs remains a key part of the airspace needed to meet past, current, and future training for the Air Force in Alaska, particularly as the needs to support fifth-generation fighter aircraft evolve. Concepts for future relocation of F-16 squadrons to JBER and consideration of an F-35 beddown at Eielson are not currently proposed by the Air Force, but could change the number of operations in regional SUAs, with possible increases and decreases for specific MOAs and military training routes. These actions would undergo further evaluation based on current and proposed operations. Because military needs change and continue to evolve, annual use of regional SUA may fluctuate, but the need for regional SUA remains.
N0046-30	The Alaska Airports Association respects the public comment process and appreciates the opportunity to provide recommendation, comments and input	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. This comment is duly noted.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	from airport operators and aviation professionals around the State of Alaska to support the safe and efficient use of the aviation transportation resources available.	
N0047-1	The Talkeetna Community Council, Inc. has studied the proposed JPARC Enhancement and Modernization EIS and has determined that the “NO ACTION ALTERNATIVE” is the only option which provides our community with the aviation safety, recreational opportunities and economic stability we currently enjoy. Neither Alternative A nor Alternative E offer relief from both lateral and vertical expansion which have been determined to cause significant adverse effects in the areas of Socio - Economics, Air Space Management/Flight Safety, Land Use - recreational / subsistence, and Noise from the proposed FOX MOA Expansion and the New Paxson MOA.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS
N0047-2	Of particular concern to our community is the proposed high/low flight sectors and the dropping of the operations floor to 500’ AGL(above ground level) . This dangerous drop in flight operations coupled with the inclusion of UAV (Unmanned Aerial Vehicle) corridors, constitutes a severe risk to Talkeetna’s robust commercial and general aviation.	The concerns you and others have expressed over the potential flight safety risks of the proposed airspace actions are also of utmost concern to the military. Those safety measures currently used in the existing airspace coupled with the FEIS proposed mitigations and other viable options would be pursued to the extent possible to help ensure the safe, compatible use of the proposed airspace. The FAA study of the preferred alternatives will determine if and how each action can be implemented and managed so as not to adversely affect the safety of flight and Air Traffic Control operations in the affected regions.
N0047-3	This lowering of the minimum flight training altitude to 500 feet also compromises recreational use of the area and poses negative impacts to wildlife.	The potential adverse effects each proposal may have on recreation, hunting, wildlife habitats, and other areas of concern are acknowledged in the related FEIS resource analyses and proposed mitigations. As noted previously, pending the FAA’s study of these proposals, both the Air Force and the Army would pursue these mitigations and other options to the extent possible to minimize any adverse effects on civilian aviation activities.
N0047-4	Many of our concerns have been cited in the Scoping Process and are included in Vol. 1, Chapter 3.0 Affected Environment and Environmental Consequences. 3.1 FOX MOA Expansion & New PAXSON MOA.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0047-5	The following are areas within the scope of the proposal that we have determined to be inadequately examined: Air Space Management and Safety - Talkeetna hosts one of the busiest small airports in the state. The area of proposed expansion is a mountainous	The FEIS Airspace Management and Flight Safety Sections acknowledge the concerns you and many others have expressed regarding the potential impacts of the JPARC airspace proposals on VFR and IFR flights in the affected areas. The military is also concerned about the safety of all aircraft that could be sharing the same airspace. Pending FAA evaluation of the preferred

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	region presenting terrain challenges and limited flight corridors through passes. The increased safety risks from the expanded special use air space and lowering of the MOA floor, will potentially result in aircraft conflicts and crashes. Pilots flying VFR, may opt to avoid the MOA causing delays, route finding and fuel issues. It is particularly troublesome to some VFR (visual flight rules) pilots to be applying “see and avoid” skills in the vicinity of UAV’s. Those operators instituting IFR (instrument flight rules) will be forced to seek alternate routes. The inclusion of the Richardson Highway corridor in the MOA will be a loss to aviators using it to safely navigate area terrain. Many small operators do not have the communication capabilities to utilize SUAIS (Special Use Airspace Information Service) and other mitigation tools proposed in the EIS.	alternatives, those measures that have proven successful in providing for the safe, compatible use of the current training environment would continue to be pursued for these proposals. This would include expanding those important communications capabilities that would help inform pilots of the scheduled and real-time use of the airspace. Aircraft operators without communications capabilities are always encouraged to use available advisory services prior to their flights so they can be aware of airspace uses and other conditions that could affect their flight experiences.
N0047-6	Remote Airfields- Many Talkeetna businesses depend on civil and commercial aviation: hunting guides, fishing guides, hiking and adventure guides, rafting tours, and flightseeing operators.	The importance of civilian and commercial aviation to the local economy, including Talkeetna, is recognized throughout the EIS. The potential impacts to civilian and commercial aviation from the Fox 3 Expansion and New Paxon MOAs have been determined to be a significant potential impact on socioeconomic resources. As stated in Section 3.1.1.2, any procedures and practices to mitigate the potential impacts of an airspace proposal on all airspace uses would be examined by the FAA, Air Force, Army, and other affected interests, as appropriate, in the EIS and aeronautical study review process.
N0047-7	The JPARC EIS has determined that there will be significant impacts to civil aviation using airfields in the proposed areas.	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. This comment is duly noted. Military operations must be conducted in harmony with the needs of other uses and users of Alaska’s lands and airspace. General aviation is particularly important in Alaska as a means of commerce, subsistence, recreation and emergency transportation. In preparing the Final EIS the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska’s value to the military in the twenty-first century.
N0047-8	On page 3-11 of the above mentioned table 3-0, a list of airfields is included with a few lodges and lakes noted- it is extremely limited. The proposed expansion encompasses an area of the Talkeetna Mountains containing numerous additional airfields and popular lakes not noted.	The FEIS Airspace Management and other resource discussions and Appendix D, Table D-5 note those public and private airfields that were identified in aeronautical charts and other available resources and from scoping comments as being potentially affected by the different airspace proposals. While the Fox 3/Paxon Alternative E was proposed to avoid many of these airfields, it is acknowledged that there are other uncharted airstrips within the region that may be affected by these proposals. The proposed mitigations and other viable options would be considered to help minimize

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		overall effects on general aviation activities in this region and promote the safe, compatible use of this airspace.
N0047-9	The expanded southern and western boundary includes the Iron Creek area, all of the Talkeetna Mountain glacial headwaters, the Sheep River and many other highly used areas for hunting, subsistence and recreation.	Sections 3.1.10.1 and 3.1.13.1 of the EIS identified areas within the project area used for recreation (including hunting) and subsistence, respectively.
N0047-10	The EIS suggests that “analysis should identify small landing strips and private airfields affected by the action, particularly those providing IFR services”. This analysis has not been thoroughly conducted.	As noted previously, the FEIS does identify and address those public and private airfields within the affected region that are shown on aeronautical charts and other resource documents. While each of the many locations was not analyzed individually, consideration was given to the overall potential effects on these airfields and those mitigation measures to be considered to minimize any adverse effects.
N0047-11	In conjunction with this weak analysis, TCCI has determined that the Impact Assessment Methodology does not adequately quantify general aviation use of the proposed areas. The JPARC EIS continually cites that civil aviation use is either unavailable from the FAA or “cannot be quantified”. A cursory review of operators in the area shows no attempts by the JPARC to survey area aviators or contact local flight service operators for information regarding number of annual flight plans into the Talkeetna Mountains. A full survey of commercial and general aviation users of the area should be undertaken.	Surveys, interviews, or other means of obtaining detailed information on the number of VFR flights conducted through this region was not feasible for this NEPA effort, nor would that information have been conclusive since many flights are unreported and not all pilots elect to file VFR flight plans. The FAA could only provide documented information on the IFR flights conducted along the different airways and jet routes transiting this airspace. Rather, the analyses do acknowledge the high density general aviation operations conducted throughout the affected areas and the impact the airspace proposals could have on these operations.
N0047-12	Impacts to Wildlife - The proposed expansion encompasses GMU 13 and GMU 20 which are some of the most productive and heavily used in the state.	Section 3.1.10.1 of the EIS indicates that the proposal area overlaps with GMUs 13A, 13B, 13C, 37 13E, 14A (small portion), 14B (small portion), 20A (small portion), and 20D (small portion). Descriptions of the management priorities and recreational uses for these units are provided in Appendix I, Land Use, Public Access, and Recreation.
N0047-13	None of the proposed mitigation concepts in the EIS will completely protect area wildlife from the threats posed from supersonic noise and low level flight.	Section 3.1.8.3 in the DEIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 feet AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Supersonic flight and sonic booms are also addressed in the document. As stated in the DEIS Section 3.1.2, supersonic aircraft operations are permitted in the existing Fox 3 MOA/ATCAA down to 5,000 feet AGL or 12,000 feet MSL, whichever is higher. Overpressures from sonic booms for a variety of military jet aircraft in Mach 1.2 level flight at 10,000 feet AGL range from 4.4 to 5.7 pounds per square foot for F-16 and F-22, respectively (Table 3-6). Near the centers of Fox 3 MOA/ATCAA and the Paxon MOA/ATCAA sonic booms would increase from about 4.6 to 5.2 per

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>day on average. Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights and sonic booms, on wildlife species.</p> <p>In addition, the U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them.</p>
N0047-14	TCCI is adamantly against the dropping of the MOA floor to 500 feet AGL.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0047-15	The 1997 Record of Decision (that followed the 1995 EIS) raised the proposed minimum flight altitude to its current 5,000 ' due to impacts from noise. Scattering the Nelchina Caribou herd and impacting breeding and birthing of other mammals are just some of the many potential impacts to area wildlife. These impacts will have socio-economic and subsistence impacts on our community.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. In preparing the Final Environmental Impact Statement (EIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. Once the Army and Air Force select the preferred alternatives for each proposal, specific measures will be developed in order to avoid, minimize, and, in some cases, fully mitigate adverse impacts to the environment, natural resources, and public communities to the extent feasible and practicable. Such measures are required in accordance with the implementation regulations the Army and Air Force were required to adopt per the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] 4321 et seq.) and the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508. Additionally, mitigation measures to offset potential adverse impacts on socioeconomics and subsistence will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
N0047-16	TCCI supports the ADF&W working closely with JPARC to manage these sensitive resources.	Thank you for your comment.
N0047-17	Recreational Impacts- The Talkeetna Mountains are a popular area for hunting, fishing, hiking and rafting - for both visitors and locals. The increased military presence will detract from the wilderness experience. Night operations will be particularly unappealing to campers.	Section 3.1.10.1 of the EIS acknowledges that popular recreational areas are located below the proposed airspace. Sections 3.1.10.3.1 of the DEIS acknowledges that noise associated with low-level overflight could lessen recreational experiences for some persons. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
N0047-18	The proposed southern expansion will now include the upper sections of the Talkeetna River (the longest stretch of Class IV white water in North America) which is accessed by commercial air taxi's out of Talkeetna.	While the Fox 3/Paxon Alternative E configuration reduces the area that was potentially affected by Alternative A, it is acknowledged that this alternative may not fully alleviate concerns with this expansion. Pending FAA study of this proposal, the Air Force would consider those FEIS mitigations and other options for minimizing impacts on air taxi and other civil aviation flights requiring access within this area.
N0047-19	Not only will transportation to the headwaters of the river be potentially compromised by inclusion in the MOA, but the combination of supersonic, low level flights, noise, and mock combat maneuvers could cause the type of anxiety many campers look forward to leaving behind in their urban homes.	Section 3.1.10.3.1 of the DEIS acknowledges that noise associated with low-level overflight and supersonic flights could lessen recreational experiences for some persons. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation.
N0047-20	Socio - Economic Impacts to Talkeetna - Many visitors to Talkeetna are lured to the area by the promise of abundant wildlife, pristine wild lands, clear air, and the quiet found in remote locations. These "intrinsic values" of our area support tourism, local businesses and wilderness outfitters. The JPARC Modernization and Enhancement contradicts these values.	The Air Force recognizes that recreation and tourism are important economic generators for the local and regional areas of Alaska and that there will potentially be significant impacts to economic resources associated with the proposed action. As Stated in Section 3.1.10.3.1, the BLM and ADNR will continue to manage lands to meet multiple objectives including approval of new activities, leases and permits that require air access or construction of major infrastructure. The Air Force would continue coordination with these agencies and develop mitigations to address any specific concerns and minimize any potential impacts to users.
N0047-21	The quality of the Talkeetna Mountain hunting/recreational experience will be greatly reduced by these proposed actions, and will in turn have negative impacts on the local economy.	The Air Force recognizes that there will potentially be impacts to hunting/recreation activities (Section 3.1.10.3) and economic and social resources from noise (Section 3.1.12.2) under the proposed action. As stated in Section 3.1.10.3.1, the BLM and ADNR will continue to manage lands to meet multiple objectives including approval of new activities, leases and permits that require air access or construction of major infrastructure. The Air Force would continue coordination with these agencies and develop mitigations to address any specific concerns and minimize any potential impacts to users.
N0047-22	Impacts to wildlife numbers coupled with the overall noise and military presence in the backcountry could easily lead a hunter to alternative venues in the state.	Section 3.1.10.3 of the EIS evaluates impacts of the proposed action to recreation, including hunting. The analysis acknowledges that low-flying military aircraft can startle humans and animals and that the suddenness and unpredictability of low-level overflights and sonic booms during major flying exercises (MFEs) may result in annoyance and could lessen a recreational experience for some persons. However, the effect of these infrequent noise sources is not expected to change the behavior of game animals such that hunting resources would be impacted. Section 3.1.10.4 lists proposed mitigation measures that could be implemented to reduce the impacts to

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		recreation.
N0047-23	Hikers and fishermen may have difficulty getting to their desired locations on small strips within the expanded area.	Ground access and travel are not affected by this proposal. Section 3.1.10.3 of the EIS acknowledges that indirect effects of changes in civilian air access (reported in Section 3.1.1.2) would affect spatial and temporal availability to specific areas, and associated recreational sites and trails. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation.
N0047-24	Local air taxi's may have to charge higher rates due to re-routing or avoidance of MOA's.	The potential economic impacts of military and other civilian aviation aircraft being delayed or diverted to any extent around the proposed airspace are discussed in Section 3.1.12.3. As stated in Section 3.1.1.2, any procedures and practices to mitigate the potential impacts of an airspace proposal on all airspace uses would be examined by the FAA, Air Force, Army, and other affected interests, as appropriate, in the EIS and aeronautical study review process.
N0047-25	Compromised safety could exclude the once productive Talkeetna Mountains from many itineraries.	Flight safety is of utmost importance to the military and is noted in response to your similar concerns. The FEIS mitigations and other options would be pursued to the reasonable extent possible to help ensure the safe, cooperative, and compatible use of this airspace by all aviation interests.
N0047-26	Cumulative Impacts - The EIS neglects to include cumulative impacts incurred with the proposed Susitna Watana Dam. The dam site is at Watana Creek in the heart of the expansion and will require excessive use of air support for many years of potential construction.	<p>The Alaska Airspace Manager for the Air Force has reviewed the documents on your website and has identified an area where your project and the Air Force's operations may impact one another:</p> <p>If you pursue instrument approaches to your runways for inclement weather operations (instrument flight rules, or IFR), you will require changes to the Federal Aviation Administration (FAA)-designated airspace to use them. When the Air Force is operating in the Fox 3 Military Operations Area (MOA) above the airfields, you will not have the necessary IFR access to the instrument approaches. Prior planning is the easiest way to avoid delays and diversions due to active military airspace.</p> <p>Outside of days with low visibility or clouds, we suspect that the majority of your operations would be visual flight rules (VFR), and therefore not require the instrument procedures. During VFR flights, your aircraft would not be restricted from flying in the MOA with the Air Force aircraft. When we share airspace, the best way to avoid conflicts is through communication which will be enhanced with our Special Use Airspace Information Service (SUAIS). We will provide a radio frequency to talk to our Range Controller on; he is then able to assist with aircraft locations to keep our operations</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>separate. Ensuring your aircraft are transponder-equipped (transmitting a signal from the aircraft) will assist the SUAIS, as the aircraft are easier to see on radar by the range controller and the fighter aircraft in the area.</p> <p>Finally, your transmission lines are most likely low enough to be of no concern to the Air Force operations as 500 feet is the proposed floor of the new Fox 3 MOA.</p> <p>The 11th Air Force chairs an Alaska Civil-Military Aviation Council (ACMAC) that meets twice annually to discuss shared airspace issues and ways to avoid conflicts. Military, FAA, Alaska Department of Fish and Game (ADFG), Aircraft Owners and Pilots Association (AOPA), Alaska Airmen and other community groups attend this meeting to enhance the safety of all users of the National Airspace System.</p> <p>Alaska Energy Authority contact information has been added to the list of invitees for the next meeting scheduled tentatively for November 2012.</p> <p>A summary of the information on the Susitna-Watana hydroelectric project and an analysis of potential cumulative effects have been added to the EIS (see Section 4.8).</p>
N0047-27	<p>The EIS also does not include current mining operations being surveyed by MMG/Alaska Earth Sciences. These surveys also require numerous air hours and air taxi transportation of personnel. The mining survey is south of the Denali Highway and consists of ground crews as well as aerial surveys.</p>	<p>While this EIS may not specifically note mining operations surveyed by MMG/Alaska Earth Sciences, the Land Use, Biological, and other resource area discussions address the aerial access needed by the various interests for conducting wildlife, archeological, mining, and other survey activities within the affected airspace areas. The Air Force and Army understand the importance of these surveys and, pending FAA review and approval of the proposed airspace actions, they would continue to work with the respective agencies to help accommodate scheduling of those flights so as not to be adversely affected by the military airspace uses.</p>
N0047-28	<p>Supersonic flights, UAV's, live munitions, strafing. dog fighting and all that this proposal encompasses has been seen by some area residents as a denial of their rights to a peaceful lifestyle.</p>	<p>The Air Force recognizes that there will potentially be some impacts to the population in the affected region of influence under the proposed actions. Some persons may experience diminished quality of life. However, quality of life is a subjective term and is highly dependent on various factors that are subject to bias and arbitrariness. Common factors for how people define their quality of life include wealth, employment, health, recreation, leisure time, access, safety, wildlife, climate, and the surrounding natural environment. These and additional factors are addressed under separate resource areas (i.e.,</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		airspace management and use, noise, biological resources, land use and recreation, socioeconomics, safety, air quality, subsistence, etc.) in the EIS so that the significance of each action on each resource area considers both context and intensity as required under NEPA.
N0047-29	The proposed Expansion of the FOX MOA and addition of the Paxson MOA cover an area heavily used by Alaskans and tourists.	Section 3.1.10.1 acknowledges that the project area lies over areas used for recreational purposes. General recreational uses in the region are described in Appendix B, Definition of the Resources and Regulatory Settings, Section B.10.3.3. Recreational uses and values of the special use areas are described in Appendix I, Land Use, Public Access, and Recreation.
N0047-30	TCCI supports the NO ACTION ALTERNATIVE and encourages JPARC to seek alternative locations for training which do not present such high levels of conflict with civilians and wildlife.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0048-1	The Denali Citizens Council (DCC) is a locally founded (1974), non-profit, grassroots community education and advocacy organization. We write to express concern about the proposed expansions outlined in the JPARC Modernization and Enhancement Draft EIS. We support the “No Action” alternatives, and have provided our concerns below. Denali Citizens Council (DCC) works to promote the natural integrity of Denali National Park and Preserve and foster responsible planning in the greater community. These expansions will affect lands within our area of concern, including several hundred square miles of land inside the Denali Borough, and airspace throughout the Borough, and over Denali National Park and Preserve. While our concerns do not end at these boundaries, our primary area of concern includes this land. Our board has heard from a number of members, and others within our communities. There have been a number of local meetings where residents have expressed concerns about the proposed training expansions. The Denali Borough Assembly passed a resolution in support of the “No Action” alternatives in 2011, and reasserted this opinion in 2012. The Middle Nenana Fish and Game Advisory Committee has done the same.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0048-2	Denali Citizens Council also supports the “No Action” alternatives due to the following concerns: 1. Much of the land and airspace included in the proposed expansions is used for travel by hunters and recreational users. Expanded land and airspace use, intensified use of existing areas, live ordnances, extended nighttime training hours, and lowered flight levels in these areas would greatly change	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska’s resources. JPARC is an important and vital component of the national defense strategy of the United States and is a key attribute of Alaska’s value to the military in the twenty-first century. The Army and Air Force are required by NEPA to make the efforts required to harmonize mission requirements and community needs in order that user conflicts be avoided,

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	their nature, and also raises safety concerns for those using the area.	minimized, or mitigated to the extent feasible and practicable.
N0048-3	The proposed expansion to the Fox MOA would relocate 1,250 overflights from the Stony MOA to the Fox MOA. We feel that dispersing use is more appropriate than concentrating use (even in a larger Fox MOA) and that the action would be inappropriate over the sensitive lands and valuable resources located below the airspace, especially considering the hazardous materials, noise, air quality, disturbance to wildlife, and human uses.	Thank you for your comment on the JPARC EIS. This comment is duly noted. The airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 and fifth-generation fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower altitude airspace to reflect the types of combat in which fifth-generation fighters would be engaged. These fighters have the capability to reach out at greater distances than fourth-generation fighters, so fourth-generation fighters must apply diverse tactics that require airspace expansion in distance and altitude that the existing Military Operations Areas (MOAs) do not provide. Additionally, military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. In preparing the JPARC Final EIS, the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century.
N0048-4	The addition of the Paxson MOA would more than double the amount of aircraft overflights across and around the Denali Highway region. As with the Fox MOA expansion, we feel that concentrating this type of aircraft use, rather than dispersing it, is too drastic to be appropriate.	The proposed Fox 3 and Paxson MOAs would expand the airspace in which generally the same level of routine training and major flying exercise operations would be conducted as occurs in the current training environment. Therefore, it is anticipated that these flights may be more widely dispersed rather than more concentrated with the airspace proposals. As noted in the FEIS proposal descriptions, the lower Paxson altitudes (below 14,500 feet MSL) would be limited to the six annual, two-week periods when major flying exercises are conducted.
N0048-5	How did the need for an additional 11,000+ overflights arise so suddenly?	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The need did not arise suddenly. Advance planning for the Fox 3 MOA and New Paxson MOA and the other JPARC proposals have been underway for a number of years. A master planning and requirements development process formally began in 2009 and was completed with the preparation of the JPARC Master Plan in July 2011.</p> <p>The plan's purpose is to guide the development of JPARC for the next 30 years by coordinating the efforts of the Army and Air Force and championing joint training (including the Navy and other service components). The Master Plan was a precursor to the JPARC EIS and is a living document that will evolve with military requirements, changes in the baseline, and input from all</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		stakeholders throughout the EIS process.
N0048-6	Why is there a need for such a drastic expansion, rather than an incremental one?	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 and fifth-generation fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower altitude airspace to reflect the types of combat in which fifth-generation fighters would be engaged. These fighters have the capability to reach out at greater distances than fourth-generation fighters, so fourth-generation fighters must apply diverse tactics that require airspace expansion in distance and altitude that the existing Military Operations Areas (MOAs) do not provide. JPARC is a key attribute of Alaska's value to the military in the twenty-first century.
N0048-7	The areas these expansions would impact contain complex environments unique not only to the United States but to the entire world, not simply uninhabited terrain available for training. DCC is concerned about impacts to sensitive ecological factors, such as habitat quality, calving areas, rutting areas, sensitive aquatic areas, and migration routes for both mammals and birds.	<p>Section 3.1.8.3 in the DEIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 feet AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. All known calving, lambing, and important bird areas within the JPARC project area were taken into consideration during effects analysis. Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p> <p>The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection. To reduce potential for disturbance under new airspace areas, the following new measure was included in text under the Fox/Paxon Section 3.1.8.4 Mitigations: "Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information."</p>
N0048-8	3. The Draft EIS states "The Air Force would encourage and facilitate the continued study of chaff alternatives (e.g., biodegradable chaff) to reduce hazardous waste-related impacts on soils, surface water, air, and biological resources within and underlying the MOAs, such that no beneficial or adverse impacts would occur (page 3-37)." Considering the massive increase of debris from chaff and flares from increased airspace use through the	As indicated on page 3-37, Section 3.1.7.3.1, there would not be an increase in chaff and flare use within the overall airspace. Rather, this use would be redistributed over a larger expanse of airspace. The Air Force would encourage and facilitate the continued study of chaff alternatives (e.g., biodegradable chaff) to reduce hazardous waste-related impacts on soils, water, air, and biological resources within and underlying the MOAs, such

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	proposal to expand MOA areas and operating hours (combined with identified future actions), deferring hazardous waste management to a later time is inadequate.	that no beneficial or adverse impacts would occur.
N0048-9	In approving any expansion of flights in this area, the plan must come to terms with the special use designations and high standards for habitat quality that support subsistence, sport hunting and fishing, and other recreation uses.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Section 3.1.10.1 of the DEIS identifies Federal and State lands with legislatively designated protection, other lands that are managed for multiple uses, and GMUs designated by ADFG in the proposal area. Federally and State-designated recreation areas and lands within the ROI for this proposal are listed in Figure 3-11. Recreational uses and values of the special use areas are described in Appendix I, Land Use, Public Access, and Recreation. Section 3.1.10.3 of the EIS evaluates impacts of the proposed action on recreational uses within these special use areas. Section 3.1.10.4 of the EIS provides mitigation measures that could be implemented to reduce impacts.
N0048-10	b. The EIS states that: "Depending on the chaff used, plastic or nylon pieces, a felt piece, or 2- by 3-inch squares of parchment paper can fall to the ground with each released chaff bundle." It adds that: "The existing use of flares as defensive countermeasures results in small plastic, nylon, and aluminum-coated Mylar pieces falling to the ground." The proposed addition to the hazardous waste (and non-hazardous garbage) littered on land below would be dramatically increased by this proposal and should not be allowed.	As indicated on page 3-37, Section 3.1.7.3.1, there would not be an increase in chaff and flare use within the overall airspace. Rather, this use would be redistributed over a larger expanse of airspace. The Air Force would encourage and facilitate the continued study of chaff alternatives (e.g., biodegradable chaff) to reduce hazardous waste-related impacts on soils, water, air, and biological resources within and underlying the MOAs, such that no beneficial or adverse impacts would occur.
N0048-11	Chaff and flare should never be allowed during regular training and should never be allowed at altitudes lower than 5,000 feet AGL (or higher) to reduce impacts to wildlife (including wildfire potential in associated habitat), subsistence and other human uses.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The definitive biological sections included the following in the Draft EIS: "Defensive flare use would adhere to existing restrictions on flare use in the Alaskan airspace to above 5,000 feet AGL from June through September and above 2,000 feet AGL for the remainder of the year, including the SUAs."</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
N0048-12	The “flare safe & initiation (S&I) device” is garbage that is unaccounted for as increased litter and/or hazardous waste, and should be explained in the same areas as chaff and flares are.	As required, training areas would be cleared of munitions debris (including S&I devices) to reduce hazards and provide a safe and constructive training environment for all training units. Any cleared areas that become impacted during live-fire exercises/training would again be cleared when the exercise is completed.
N0048-13	If nighttime training hours must be changed to allow for changes to Daylight Savings, this change should only be for one hour, and should accordingly be one hour earlier in the morning departures. Requesting 2 or more hours of additional nighttime training in the evening, without changing morning departure would be solely for expansion of training opportunities (not continued activities) and should not be presented under the guise of accommodating for Daylight Saving time changes. Because this EIS bases most of the need for Night Joint Training on Daylight Saving time changes, it should be revised to fully disclose that this is not the case.	Thank you for your comment on the JPARC EIS. This comment is duly noted. The purpose and intent of the extended hours is to accomplish a full Major Flying Exercise (MFE) in the hours of darkness only during the months of March and October in accordance with Alternative A. Alternative B would include both MFEs and routine training sorties. The morning departure times noted in the comment have nothing to do with meeting nighttime flight training objectives.
N0048-14	We do not support changes to nighttime training hours unless it is only to accommodate the Daylight Saving time changes, thus only changing to one hour later in the evening, and one hour later in the morning.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0048-15	a. Increased night joint training will increase the overall number of flights in the airspace above sensitive habitats, soundscapes and critical lands outlined above. For reasons stated elsewhere, this is not acceptable.	The potential effects of the later evening hours of training are noted in the different EIS analyses relative to other airspace uses, noise, land uses and other resource areas. While there are few civilian airspace uses during those later hours that would be of major concern, any other adverse effects would be appropriately mitigated through those proposed measures noted in the EIS Appendix K and other viable options to be considered with the different agency interests for minimizing those effects.
N0048-16	b. No increased night joint training should occur over or near areas of heavy recreational and subsistence use (such as the Denali Highway), near noise sensitive areas, or near sensitive wildlife habitat such as calving or wintering grounds.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		The Air Force will be consulting with the Alaska Department of Fish and Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of waterfowl concentration areas.
N0048-17	5. Many documented noise sensitive areas are located nearby and within existing and proposed MOAs. The Susitna MOA overlaps with Denali National Park and Preserve. DCC is concerned about the impacts increased Night Joint Training could have on the soundscapes in and adjacent to these noise sensitive areas, as well as the potential noise impacts to residents and others using the area.	The Air Force recognizes that there are many documented noise-sensitive areas located nearby and within existing and proposed MOAs. Noise management and noise-sensitive areas are discussed in Appendix B, Section B.2.3.5. Susitna MOA would not be directly affected by any of the proposed actions. Under the Night Joint Training (NJT) proposal, sortie-operations would be permitted to occur during the late-night period after 10:00 p.m. and before 7:00 a.m. However, under the NJT proposal, these late-night operations are expected to make up a relatively small percentage of total operations - estimated to be 3 percent or less (see Section 3.5.3.2.1).
N0048-18	a. Noise pollution over Denali National Park and Preserve and other noise sensitive areas must be maintained at current levels or reduced altogether. Additional noise pollution over noise sensitive areas should not be expanded. Stating that impacts will be “minimized” is inadequate.	Denali National Park would not be directly affected by any part of the proposed action. The DoD would consider requests for establishment of avoidance areas at specific noise-sensitive locations.
N0048-19	b. The National Park Service has established standards for amount of noise disturbance consistent with park values in all areas of Denali, and we recommend you consult with NPS regarding the impact of the training expansion on these standards, and comply with their existing policies and standards.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
N0048-20	c. The Draft EIS dismisses drastic increases to noise pollution as an “annoyance” to human users.	Human annoyance is an indicator of several more specific categories of impacts such as interference with a conversation or disruption of the enjoyment of a quiet evening. Because these impacts are situation-specific and impossible to predict accurately, annoyance, which can be measured through social surveys, is a useful proxy. Noise impacts associated with the

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>proposed action would not be expected to include impacts to human health.</p> <p>Because noise can potentially impact several resource areas (e.g., socioeconomics, cultural resources, etc.), noise impacts are discussed in several sections of the EIS. The biological resources section, for example, focuses on noise impacts on animals.</p>
N0048-21	<p>Subsistence users and other consumptive and nonconsumptive wildlife users will be more than “annoyed” when wildlife is affected by noise, even if temporarily. Still, while “annoyed” may sometimes be an adequate description, the impacts would usually be much greater considering the increased intensity and abundance of overflights.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Potential impacts to subsistence resources and activities from the proposed actions in the EIS are evaluated in Section 3.X.13 where X represents the specific section number of the proposed action. Where potentially adverse impacts are identified, proposed mitigations are provided in Section 3.X.13.4.</p>
N0048-22	<p>This impact to humans and wildlife is exacerbated along with the increased noise from sonic booms and other maneuvering, as well as the scare factor (not necessarily quantifiable, but worth considering) of a low-altitude training or dry target maneuvers. These impacts should be given more weight in the consideration of cumulative impacts, and because of the impacts to these areas, training should not occur above or near areas of heavy recreational and subsistence use (such as the Denali Highway), near noise sensitive areas, or near sensitive wildlife habitat such as calving or wintering grounds.</p>	<p>The Air Force recognizes the potential for low-altitude, high-speed aircraft operations to generate noise events that could be startling to persons on the ground. A ‘penalty’ of 0 to 11 decibels is included in Ldnmr, the primary metric used to communicate noise levels beneath training airspace, for noise events with sudden noise onset.</p> <p>Your comments regarding avoidance of noise-sensitive areas will be incorporated into the Final EIS and considered as part of the decisionmaking process.</p>
N0048-23	<p>d. All training (including, but not limited to supersonic training) should be done in higher altitude over areas of heavy recreational and subsistence use (such as the Denali Highway), near noise sensitive areas, or near sensitive wildlife habitat.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>Supersonic operations in the Fox 3 MOA and the proposed expanded MOAs are limited to above 12,000 feet MSL or 5,000 feet AGL, whichever is higher.</p>
N0048-24	<p>6. What ground uses or closures would be implemented for dry target runs? The EIS claims there would be no changes to land use, yet refers to the use</p>	<p>From page 2-6 of the Draft EIS: "Pilots use dry targets to practice bombing tactics without the release of actual ordnance. According to plans, the dry</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	of “nonfunctional threat vehicles and trailers beneath MOA airspace approved by the Alaska Department of Transportation.” Are these dry targets located then along the Denali Highway? If they are located along the road they present additional safety and other human impacts and should not be increased or added to military training.	target sites would be temporary and would not require permanent supporting infrastructure... There is little to no environmental impact or compromise of safety from this type of target use. No ordnance is dropped and nothing permanent is added on the ground.
N0048-25	No dry target should be located near areas of heavy recreational and subsistence use (such as the Denali Highway), near noise sensitive areas, or near sensitive wildlife habitat such as calving or wintering grounds.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
N0048-26	7. We believe that Table 3.9 only accounts for currently emitted air pollutants, and not permitted air pollutants. Permitted air pollutants (for example, the Healy Unit 2, currently not operating but predicted to in the near future) would cause a substantial increase in actual emissions. According the Alaska Regional Haze State Implementation Plan (regarding Healy Unit 2), “If brought on line, the point source NOx emitted within the Denali Borough would increase by a factor of 4.0 and the Sox would increase by a factor of 2.8 (based on permitted not actual emissions). This increase would make the Denali Borough the largest sources of anthropogenic emissions and the second largest source of all emissions impacting the Denali monitors.”	There are no proposed changes to the stationary equipment at the ranges that would require air permits as a result of the proposed actions. Consequently there will be no increases in stationary source emissions from the proposed project. Although the emissions from the Healy Unit 2 may be considered from a cumulative impacts standpoint, since there is litigation regarding the proposed air permit for the coal burning power plant, and it is not clear whether EPA will approve this permit, it would be speculative to include the emissions from the Healy Unit 2 in the EIS.
N0048-27	Aside from this, the fact that the Denali Borough currently has lower emissions than other Boroughs should not be used as an excuse to incrementally increase air pollution near Denali National Park’s Class I airshed. Denali’s Class I airshed requires different levels of air quality than other regions, and should be treated accordingly.	As indicated in Section 1.3 of the EIS, the vision for JPARC is a live-virtual-constructive range for all Services that leverages Alaska’s unique attributes of space, air, land, and water to enable a full spectrum of twenty-first century Joint Interagency, Intergovernmental, and Multinational (JIIM) training while meeting current and future testing requirements. The selected locations leverage existing infrastructure and associated efficiencies. As discussed in Section 3.0 of the EIS, although there will be some increases in emissions in areas surrounding Denali’s Class I area, the emissions occur at high altitudes and are dispersed over large areas and would not be expected to result in

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		significant air quality impacts at this sensitive area.
N0048-28	8. In the event of an aircraft crash or other accident involving spillage of potential hazardous waste, recovery and cleanup would be difficult, if not impossible. This is evidenced by the November 2010 crash of an F-22 in the existing Fox 3 MOA, which not only resulted in the death of military personnel, but also brought about a large-scale cleanup effort. DCC is concerned that the proposed expansions will magnify the risk of this happening again.	Standard operating procedures are currently in place to respond to the cleanup of any spills or releases of hazardous materials that may occur as a result of an accident or an aircraft mishap.
N0048-29	For these reasons, the Denali Citizens Council supports “No Action” on proposals in the JPARC Modernization and Enhancement EIS.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
N0049-1	<p>The Greater Fairbanks Chamber of Commerce would like to take this opportunity to comment on the referenced Draft JPARC EIS.</p> <p>The Fairbanks Chamber supports the United States Air Force and the United States Army and its missions in Alaska and welcomes the expansion of the JPARC to accommodate modern and future training needs. We support the increased use of the JPARC and its planned expansion as this action is beneficial to the training of our military and the defense of our Nation, with no unmanageable negative impacts on our community under the current force structure at Eielson Air Force Base and Fort Wainwright.</p> <p>The JPARC military training ranges and facilities, as a whole, far surpass in quality and quantity those found in other U.S. locations. The sheer size of the ranges:</p> <ul style="list-style-type: none"> • allows for the use of live ammunition from all Army, Air Force, and Navy platforms and weapons systems; • allows for the Air Force to fly at combat speeds well over Mach 1; • allows for joint exercises between the Army, Air Force, Marines, Navy, Coast Guard and our Allies in weather conditions ranging from sub-zero arctic temperatures to hot humid summer days; and • results in the finest training opportunities for soldiers, sailors, and airmen • within the United States. 	<p>Thank you for taking part in the public and agency review process for the JPARC EIS. This comment is duly noted. Military operations must be conducted in harmony with the needs of other uses and users of Alaska’s lands and airspace. General aviation is particularly important in Alaska as a means of commerce, subsistence, recreation and emergency transportation. In preparing the EIS the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska’s value to the military in the twenty-first century.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>A recent proposal by the Air Force to move the F-16 Aggressor squadron from Eielson Air Force Base (Eielson) to Joint Base Elmendorf-Richardson (JBER) could change the dynamic of the JPARC and affect our support for JPARC use and expansion.</p> <p>The Fairbanks Chamber encourages the military to consider expansion of their missions and manning within Interior Alaska, and in return we will consider supporting associated reasonable requests to increase Alaska land and air space usage that accommodates this increased military activity. However, we will reconsider our position of support if the military proposes actions that may lead to a reduction of missions and manning in Interior Alaska without a corresponding reduction in military restrictions and use of Alaska land and air space assets.</p> <p>We also encourage DOD to continue to work cooperatively and closely with the State of Alaska to develop the natural resources within the JPARC and the surrounding environment.</p> <p>Thank you for the opportunity to offer comment on the Draft JPARC EIS. The Greater Fairbanks Chamber of Commerce looks forward to continuing a productive relationship with Alaska Command, the U.S. Air Force, and the U.S. Army. without a corresponding reduction in military restrictions and use of Alaska land and air space assets.</p>	
N0049-2	<p>A recent proposal by the Air Force to move the F-16 Aggressor squadron from Eielson Air Force Base (Eielson) to Joint Base Elmendorf-Richardson (JBER) could change the dynamic of the JPARC and affect our support for JPARC use and expansion.</p>	<p>The F-16 aggressor squadron proposed relocation from Eielson AFB to Joint Base Elmendorf-Richardson is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. The airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower-altitude airspace to reflect the types of combat in which fifth-generation F-22 fighters would be engaged. The F-22s have the capability to initiate combat at greater distances than fourth-generation fighters, such as the F-16, so fourth-generation fighters must apply diverse tactics that require airspace expansion in distance and altitude. The F-22s must train to combat all such threats regardless of where the aggressor aircraft are based.</p> <p>The location of the F-16 Aggressor Squadron within Alaska is not a connected action to the JPARC proposals. The majority of the JPARC</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		proposals that involve Eielson AFB are Army proposals and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft. The details of the proposed F-16 relocation and training , including Major Flying Exercises such as RED FLAG Alaska, will be worked out in the coming months. An environmental analysis will be prepared to address the environmental consequences of the proposed F-16 relocation within Alaska.
N0050-1	<p>October 26, 2012</p> <p>Re: JPARC Modernization and Enhancement DEIS</p> <p>Gentlemen:</p> <p>Copper Country Alliance is a non-profit conservation organization serving the Copper River Basin and Wrangell Mountains area of Alaska. Most of our members live in the Copper Basin; the others are very familiar with the region. Many of our members have been disturbed, and even terrified, by low-flying Air Force jets, often creating sonic booms, in the Copper Basin and the adjoining Denali Highway region. They have been perplexed by the Air Force's lack of corrective action in the face of complaints that these aircraft were straying outside of the existing Fox 3, that they were below 5000 AGL, and that they were flying at supersonic speeds below 10,000 AGL, all in seeming violation of Fox 3 requirements. Finally, only last month, we learned of the existence of a Military Training Route (MTR #937) that crosses Fox 3 and goes beyond it, to cross the Gulkana Wild and Scenic River and the Richardson Highway, and that has a branch near Lake Louise and Nelchina.</p> <p>The existence of these MTRs is difficult to discover in the JPARC Modernization and Enhancement DEIS. They are not listed in the Index. They are not described with reference to geographic features, such as Maclaren River; they have only numbers. Almost all maps omit them. (One would expect them to be shown on Figure 1-1, "Joint Pacific Alaska Range Complex Assets and Region of Influence," or Figure 1-4, "JPARC Master Plan Objectives," and a number of other maps.) I finally found them on Figure 4-1, which is 691 pages into the Volume 1 PDF, and on Figure D-2, page 365 of the Volume II PDF. Because their titles give no hint about MTRs, and because figures do not come up when using the Search function, it is easy to miss these maps in such long documents.</p>	<p>Thank you for your comments. Your concerns are duly noted. The Alaska MTRs depicted on Sectional Aeronautical Charts that were fully assessed in the 1992 "Environmental Assessment of the Expansion and Upgrade of Military Training Routes, Alaska" and the 2006 "Environmental Assessment of the Modification of Military Training Routes" have long been used by the Air Force for tactical training operations in conjunction with MOA and Restricted Area mission activities. They are approved for use at subsonic airspeeds down to 100 feet AGL, which is below the higher 500 feet AGL altitude proposed for the Fox 3 and Paxon MOAs. These MTRs are used most typically during routine training activities by F-16 aircraft while used to a lesser extent during major flying exercises(MFEs). Considering that there would be no changes in the structure or current use of these MTRs with the JPARC proposed airspace actions, it was not deemed necessary to reassess those routes relative to these proposals. However, in response to your comments, additional information was added to the EIS Section 3.1.1.1 on the MTR use and Figures 4-1 and D-2 were updated, as necessary, to more clearly distinguish these routes. Section 4.8.1 was also updated to address these MTRs relative to cumulative impacts on airspace management and use. It was determined that the continued future use of the Alaska MTRs at their current levels and lower altitudes would not result in any cumulative impacts on the existing and proposed JPARC airspace areas through which these routes presently transit.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Likewise, their significance is almost indiscernible. Only if one happens upon Table D-4 (PDF page 368 of Volume II), does one discover that jets in MTRs can fly as low as 100 feet Above Ground Level. I still have not found within the DEIS the fact that jets may travel up to sonic speeds within MTRs, but such is the case, according to another Air Force document.[1]</p> <p>Finally, the DEIS fails to adequately consider MTRs with regard to cumulative impacts. In the cumulative impacts section, MTRs merely appear on a map (Figure 4-1) and on a table (Table 4.5), and an MTR document is listed on a table (Table 4.5). The document, cited as “Modification of Military Training Routes (MTRs) Draft EA June 2005,” is described thus on the table:</p> <p>The Air Force is proposing to modify existing MTRs within the state of Alaska to better connect the MTRs with existing SUA. These changed MTRs would be used by aircraft with low level navigation missions. MFE training in the proposed Delta MOA includes low-level flight in the Birch and Buffalo MOAs.[2]</p> <p>Cumulative impacts are crucial components of Environmental Impact Statements. The Environmental Protection Agency[3] states:</p> <p>The combined, incremental effects of human activity, referred to as cumulative impacts, pose a serious threat to the environment. While they may be insignificant by themselves, cumulative impacts accumulate over time, from one or more sources, and can result in the degradation of important resources. Because federal projects cause or are affected by cumulative impacts, this type of impact must be assessed in documents prepared under the National Environmental Policy Act (NEPA).</p> <p>Listing an MTR document on a table, (Table 4.5) does not constitute a meaningful assessment. The JPARC DEIS fails to discuss the interaction between the MTRs and the proposed new and expanded MOAs. And there are interactions. According to a long-time resident of Maclaren and Paxson, “The moose are on edge, our dogs in the kennel hide trembling in their houses and my three-year-old daughter is afraid to go outside when the jets are overhead; ‘Daddy, I’m scared of the jets.’” He adds, “Caribou will have a hard time; they are along the Denali mostly during the spring and summer months. Caribou are more flighty than moose. They tend to jump and run</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>when startled; that is their defense mechanism.”[4] The incidents referred to occurred within MTR #937, which is also within the existing Fox 3. If the Fox 3 expansion and Paxon MOA are added, that increases the area where wildlife, hunters, recreationists, and visitors are stressed by jets. If the floor is lowered to 500 AGL in the current and proposed MOAs, that greatly exacerbates the problem.</p> <p>Copper Country Alliance requests that the Final JPARC DEIS give the reader a clear understanding of what jets do in MTRs, show them on maps at the beginning of the document, list them in the index, and give them the discussion they deserve in cumulative impacts. We do understand that the JPARC DEIS does not propose to change MTRs, but understanding them is essential to comprehending what is happening in the present and proposed MOAs within the region that is our home.</p> <p>Sincerely, COPPER COUNTRY ALLIANCE Ruth McHenry, Volunteer Staff</p> <p>FOOTNOTES:</p> <p>1 “All routes would be capable of flight operations at up to sonic speeds, low altitude (as low as 100 feet above ground level [AGL], daylight or darkness, and in all weather conditions,” per Finding of No Significant Impact for Improvements to Military Training Routes in Alaska, June 2006. The date of the Final EA to which the FONSI relates is repeatedly cited as 2007 instead of the correct 2006. This adds to the difficulty of learning about MTRs.</p> <p>2 On the table, the timeframe for the Draft EA action is given as past and present, but not future. The Final EA is not listed on the table, even though it had been published almost six years before the JPARC DEIS was released.</p> <p>3 Consideration of Cumulative Impacts in EPA Review of NEPA Documents, EPA 315-R-99-002/May 1999.</p> <p>4 John Schandelmeier, in his Sports Section article, Anchorage Daily News, July 31, 2012.</p>	
I0001-1	<p>The expanded Fox MOA covers my private land, private cabin & private air strip. If you are insisting on doing this expanded Fox with the lower ceiling then buy me out as I am the only private inholding in this expanded Fox MOA.</p>	<p>While the location of your property may be less affected by the Alternative E proposal, the potential effects of both the Fox 3 and Paxon MOA proposal alternatives on land and airspace uses, as noted in the scoping and Draft EIS comments, were considered in the EIS analyses included in Sections 3.1.1</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		(Airspace Management and Use), 3.1.2 (Noise), 3.1.3 (Flight Safety), and 3.1.10 (Land Use). Section 3.1.1 describes how the existing and proposed airspace would be used during the active periods relative to average daily flights and lower-altitude use by select aircraft types. These projections provide a general perspective on the extent to which military flight activities may occur and be distributed throughout this vast airspace complex and would not likely affect the same areas on a continuous daily basis.
I0001-2	I have owned this property for 30 years and your proposal will destroy the peace and quiet that I spent considerable money on to acquire.	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.</p> <p>Military operations must be conducted in harmony with other uses and users of Alaska’s lands and airspace. In preparing the Final Environmental Impact Statement, the Army and Air Force will make every effort to harmonize mission requirements and community needs to avoid or mitigate conflicts to the maximum extent feasible.</p> <p>JPARC is a key attribute of Alaska’s value to the military in the twenty-first century. There is no other place in America where the military has the opportunity to conduct state-of-the-art training in such diverse terrain and large areas required by fifth-generation aircraft. The Air Force recognizes that there will potentially be some noise impacts to the population in the affected region of influence under the proposed actions. Individuals concerned with a particular area or groups of areas that would potentially be impacted by noise or military presence are encouraged to contact the Air Force representatives and inquire about potential mitigation measures over their personal property.</p>
I0001-3	The new airspace also deprives me of my ability to easily access my private property as my access would only be feasible during periods when the MOA was not active. My earlier comments (last time your requested comments) provided you with the Lat & Lon for my property. More generally I am on the Oshetna River about 1 mile down stream from the confluence of the Little Oshetna River. This put me squarely into the active (long axis) of Fox & Paxson MOA	Section 3.1.10.3 of the DEIS acknowledges that the expansion of the Fox 3 MOA and the establishment of the Paxson MOA would result in indirect effects on civilian air access to areas below or in the vicinity of communities reliant on air access. Civilian pilots can technically operate in active MOAs using VFR. However, as indicated in the EIS, many pilots choose not to do so because of higher risk when aircraft with vastly different performance capabilities are using the airspace. The EIS acknowledges that the proposed action requires increased vigilance by both military and civilian pilots to maintain continued awareness of each other’s presence while sharing this MOA airspace. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts including coordinating the schedule of MFEs with local communities in advance. In addition, Section 3.1.1.4

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		(Airspace) lists mitigation measures that could be implemented to reduce the impacts such as use of the SUAIS and establishing or expanding existing VFR flyway corridors as necessary to provide VFR aircraft transit through areas that may be affected by high density military flight activities within/near the proposed airspace. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0001-4	Please provide me with some form of contact so that I know my comments have at least been read by someone involved with this project.	Thank you, your comment has been received. All comments are treated equally, regardless of method of submission; and in accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0002-1	Will their be enhanced radio coverage to assist both military and civilian pilots in the lower levels of southern airspaces?	The FEIS Appendix K proposed mitigations include a measure to pursue funding for any communications enhancements that may be needed to expand coverage within those expanded Special Use Airspace areas where such coverage may be lacking.
I0003-1	38 1.5.1.6 Unmanned Aerial Vehicle Access A 12 1.5.1.1 Fox 3 Military Operations Area Expansion: As a pilot who utilizes a lot of area around Fairbanks I worry about more restrictions and larger control of existing airspace by the military. I have seen jets flying vertically through a hole in a large cloud near the Parks Highway south of Clear. I was not in an MOA at the time and wondered if he ever saw me and could avoid me if he did. I feel larger areas would just provide more of these excursions outside for GA.	Alaska military flight training activities are currently conducted within those existing Military Operations Areas (MOAs), restricted areas, military training routes (MTRs), and the low-altitude tactical navigation (LATN) area described in the FEIS Section 3.1.1 (Airspace Management) and Appendix D (Airspace). You may have observed an aircraft operating along MTR IR900/VR1900 which transits south of Clear as shown on aeronautical charts and depicted in this Appendix. Any future expansion or additions to the existing airspace training environment would also be charted for scheduled use and containment of these flight training activities.
I0003-2	1.5.1.12 Missile Live-Fire for AIM-9 and AIM-120 This concerns me due to the possibility of contamination to wildlife and water-shed in the area. What toxins would be left to leach out after large amounts of live ordnance in a concentrated area?	As stated in the DEIS Section 3.11.8, the Navy is already training with these weapons in this area so the programmatic Missile Live-Fire for AIM-9 and AIM-120, if implemented, would represent an incremental increase in operations and possibly an expansion of season of use but not a completely new effect for this area. No new impacts to biological organisms are expected. The missiles may have live explosive warheads or inert telemetry packages. As described in 3.11.8, expended training materials that come to rest on the ocean floor may: <ol style="list-style-type: none"> 1. Lodge in oxygen-poor sediments; 2. Remain on the ocean floor and corrode; or

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>3. Remain on the ocean floor and become encrusted by marine organisms.</p> <p>The limited amount and spatial dispersion of such residual concentrations of hazardous substances would not result in concentrations considered harmful. The Hazardous Materials Section 3.11.7 has more details on munitions-related residues.</p> <p>A full analysis of potential military impacts to the marine ecosystem from GOA missile activities is provided in the Gulf of Alaska Navy Training Activities Final Environmental Impact Statement/Overseas Environmental Impact Statement (Navy 2011). The JPARC project would not utilize any activities that differ from those analyzed in this EIS.</p>
I0003-3	1.5.1.12 Missile Live-Fire for AIM-9 and AIM-120 This concerns me due to the possibility of contamination to wildlife and water-shed in the area. What toxins would be left to leach out after large amounts of live ordnance in a concentrated area?	The hazardous substances deposited by the AIM-9 and AIM-120 include unexpended propellants (ammonium perchlorate), battery constituents (lead, silver, copper, and lithium), undetonated explosive warheads (ammonium perchlorate, and heavy metals (chromium, lead, tungsten, nickel and cadmium) (Navy 2011-1). More detail on the types of hazardous substances will be added to the water resources section. The hazardous substances consist of approximately 0.83 percent of the missiles by weight and disperse to leach to minimal concentrations in the ocean environment. The TMAA is over 42,000 square nautical miles and missiles would be dispersed throughout this area. With the low frequency and high dispersion of the missiles, there would be no substantial adverse impacts on biological resources (See discussion in 3.11.8.3.1). Additionally, this is a programmatic proposal; any actual mitigations would be included in a follow-on NEPA document.
I0003-4	1.5.1.13 Low-Altitude Tactical Navigation Training: Having seen what low altitude jets have done in the wilderness I object to prolonged low altitude flights over wilderness. I have witnessed a birds nest blown out of a tree along with a large percussion to my chest with low flight and sonic booms. I believe pilots in the air over wilderness don't realize there is 'something down there' by the way they fly over it. They act as if the terrain is theirs to 'play with'. I have witnessed glass in my cabin break and saw a helmeted pilot zoom past with frost on the nose of his jet while low-flying along the Nowitna River. I do not see noisy low-flight in any way compatible with human or wild-life in Alaska's wilderness areas. Thank you	Sections 3.1.10.3.1 of the DEIS acknowledges that noise and low-level overflight could affect wildlife and land use including recreation. Sections 3.1.8.4 (Biological Resources) and 3.1.10.4 (Land Use) list mitigation measures that could be implemented to reduce the impacts to wildlife and land use such as seasonal avoidance areas; no Major Flying Exercises during January, September, December and June 27 to July 11; and coordinating the schedule of Major Flying Exercises with local communities in advance. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0004-1	I have already attempted to submit comment via this Internet based system. Did you receive them?	Thank you, your comment has been received. All comments are treated equally, regardless of method of submission; and in accordance with the National Environmental Policy Act, the U.S. Departments of Army and the

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0005-1	I have already attempted to submit comment via this Internet based system. Did you receive them?	Thank you, your comment has been received. All comments are treated equally, regardless of method of submission; and in accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0006-1	I realize that training is the key to having an effective military and I support training, training, training!	Thank you for your comment.
I0006-2	However, some of the proposals for the expanded Fox 3 MOA and the new Paxon MOA will undoubtedly impact my use of the state and public lands in these areas. My wife and I fish, float, camp, hike and x- country ski in these areas each year. I am very concerned about the following areas: Gulkana River, Tangle Lakes, Delta River, Lake Louise, and Crosswind Lake. The Denali Hwy corridor is also of great concern to me. The noise of low level (500 ft AGL) jet flights will be more than startling in my estimate. If these occur at night the noise will be downright stunning.	Sections 3.1.10.3.1 of the DEIS acknowledges that noise associated with low-level overflight could lessen recreational experiences for some persons. Sections 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation such as seasonal avoidance areas; expanding the existing Delta National Wild and Scenic River and Gulkana National Wild River to include all portions within the new MOA boundaries; and avoiding overflight of popular hunting areas, campgrounds, and trails between June 27 and July 11. These areas including Brushkana Creek campground, Tangle Lakes campground, Paxon Lake campground, Clearwater Wayside, One Mile Creek/Wolverine Mountain, Tangle Lakes trail, Gulkana River raft trail, Castner Glacier trail Sourdough campground, Lake Louise State Recreation Area, Crosswind Lake, and Matanuska Valley Moose Range.
I0006-3	The size of the EIS (700 and some pages) combined with the detailed nature of the presentation makes comprehension of the proposed action, alternatives and impact analysis challenging.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Draft EIS was written to be technically accurate and as understandable to the extent practicable, given the number of proposals and complexity of the subject matter. The Army and Air Force strived to translate technical data into terms that render it an effective disclosure of the environmental impacts of the proposals to all intended readership, including the general public, government agencies, and other organizations. The Executive Summary was designed to provide those statistics and summary information that members of the public would be most interested in. The structure of the Draft EIS is presented in the first few pages of the EIS in order to give the reader an indication of specific issues addressed and overall organization. A description (including location) of all the proposed actions and alternatives and their locations is provided in Chapter 2 of the EIS. Finally, an index is provided at the end of the EIS so a reader may locate

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
I0006-4	<p>Since you stated the majority of the scoping concerns were directed at the two MOAs I suggest you present perhaps in table form a list of the actions proposed for these MOAs the pace of operations and comparisons to noise levels a normal person can relate to. What in the world does 100 or 62 db sound like? It was difficult to understand how many passes aircraft would be making over any given area and at what altitude during normal training, during MFEs major flight exercises and at night. Without some understanding of the numbers of aircraft the number of passes and the associated noise levels of each pass it is impossible to understand what the on the ground experience will be. Please describe to me what I will experience if I were standing on one of the ridges above Tangle Lakes or some other high use location during normal training, during major flight exercises and during joint night training. Please include the intensity of the noise, duration of the noise and how many repetitions may occur each hour and each day. Please relate the noise levels to something I can relate to, I.e. thunder clap, distant thunder, rifle shot, etc.</p>	<p>specific phrases or subjects of interest.</p> <p>Training activities during both MFE and non-MFE operations are varied in terms of areas and altitudes used. This variation keeps aircrews flexible in preparation for unknown conditions during future combat.</p> <p>Altitudes most frequently used by aircraft are shown in Appendix D, Table D-3. The number of times that a particular location will be overflown is variable from one exercise to another, depending on the combat training scenario being flown. On a given day, training operations will be concentrated in one area and on subsequent days operations may be concentrate in other areas. Over time, the frequency of overflights is generally even throughout the central portion of a MOA. The numbers of sortie-operations (i.e., a single aircraft entering the MOA) expected to occur per year are listed in Table 2-2. The representative baseline and action alternative numbers of sortie-operations listed in Table 2-2 are inclusive of MFE operations. Training operations tempo Night Joint Training would be similar to other training, but would occur later.</p> <p>Noise levels generated by subsonic aircraft overflights are listed in Table 3-5 and sound level generated by common sound sources (i.e., a garbage disposal) are listed in Appendix E, Figure E-1. It should be noted that aircraft overflight noise is qualitatively different from many other sounds. The Sound Exposure Level metric used to describe overflight noise levels in Table 3-5 incorporates sound energy of the entire overflight event, and is slightly higher than the sound level heard at any given moment. It should also be noted that aircraft sound levels will vary depending on aircraft configuration, weather, and several other factors.</p> <p>Sonic booms consist of sudden changes in air pressure caused by a very fast moving object and sound similar to thunder. The pressure change generated by a sonic boom is generally about the same as that experienced when you go down a few floors in an elevator, but happens much more quickly. Sonic boom overpressures are listed in Table 3-6. As is the case with subsonic noise, overpressure levels are highly dependent on several factors including aircraft speed, aircraft maneuvers, and atmospheric conditions.</p>
I0006-5	<p>It was unclear to me if 6 MFEs annually occurred for a total of 60 days or each MFE lasted for 60 days.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. MFEs are conducted up to six times annually and no more than 60 days per year for all MFEs.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
I0006-6	<p>I believe you have incorrectly dismissed the potential for the flares to start wildfires under the MOAs. Flight exercises at the Top Gun School at the Fallon Naval Airstation in Nevada have started a number of fires on BLM lands that required the initiation of suppression activities. I believe that the BLM office located in Carson City Nevada has documentation of these fires. I know that the end of a flare was identified at the origin of one fire. The climate, habitat, and potential for fire may be different here in Alaska but this issue should be investigated more thoroughly. I do agree that flares released at 5K feet should not reach the ground but they did in Nevada.</p>	<p>The potential for fire from the use of flares is considered low. Additionally, the following measures would be implemented to minimize the potential for fire. First, a fire danger rating system based on the weather (weather index) is used to reduce the likelihood of a fire by limiting military activities. Certain military activities are restricted when thresholds of wildfire risk are reached (including the use of flares). Second, wildfire danger is reduced through the removal of accumulated fuels (e.g., prescribed burning and/or construction and maintenance of fire or fuel breaks). Third, an Initial Attack Response Team remains available during military training activities during high and extreme fire danger to provide a rapid initial response to wildfires in the area. These actions are designed to minimize the potential for wildfires from training activities.</p> <p>In addition to monitoring the fire weather index and modifying planned training activities accordingly, military personnel use other prevention measures, such as establishing nontraining buffers within 0.5 miles of training areas adjacent to non-military land to protect the surrounding areas. Prescribed burns and mechanical thinning would also be conducted for the training areas.</p> <p>Wildfire suppression is conducted by the BLM, Alaska Fire Service, and/or the military fire department. Suppression operations are dependent on the fire management category status of the respective area. Fire planning within the training areas is guided by practices of the Integrated Wildland Fire Management Plan and management practices for each training area by Alaska Wildland Fire Management Plan priorities.</p>
I0006-7	<p>Alaska Department of Fish and Game currently conducts or at least sponsors aerial shooting of wolves in Game Management Unit 13 that I believe is under a large portion of the Fox 3 MOA. ADFG recently reports that these numbers have been reduced from around 500 animals to around 150 animals. The remaining wolves may be more sensitive to low level flight noise than populations of wolves that are not hunted from airplanes. I suggest the military support ADFG in studies or at least observations of wolves and other animals of interest such as caribou, moose, migratory waterfowl and other birds responses to the sounds and sights generated by low level jet flights in these MOAs.</p>	<p>Sections 3.1.8.4 (Fox/Paxon MOAs) and 3.5.8.4 (Night Joint Training) include a mitigation measure that is consistent with the recommendation in your comment. The mitigation measure states, "Continue to monitor effects of military training, including overflights on select wildlife species (especially herd animals, waterfowl, and raptors) and fisheries during critical seasons such as breeding, young-rearing, and migration. Use knowledge to develop and implement strategies to minimize disturbance to priority wildlife in existing and new SUAs. This would help natural resources and range managers to coordinate training schedules that minimize impacts on wildlife populations."</p> <p>Most large wildlife populations in Alaska are monitored and counted by ADFG by aircraft, and low-flying private planes are fairly common so it</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>would seem reasonable to assume most wildlife have some experience with and some level of habituation to low-level flights. There is literature that suggests that wolves that have been hunted from aircraft have a greater response to approaching aircraft at a given distance than wolves that lack such experience.</p> <p>Also, pilots are aware of and attempt to avoid sensitive wildlife and migratory bird reproduction and congregation areas for their own safety (e.g., to avoid bird strikes) as well as to minimize disturbance to the animals.</p>
I0006-8	I suggest the military support ADFG in studies or at least observations of wolves and other animals of interest such as caribou, moose, migratory waterfowl and other birds responses to the sounds and sights generated by low level jet flights in these MOAs.	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>Additional studies of overflight effects to wildlife were reviewed and summarized in Appendix E (Noise). The Final EIS identified mitigation measures for definitive projects under Biological Resources as follows: "Monitor effects of military training including overflights on select wildlife species (especially herd animals, waterfowl, and raptors) and fisheries during critical seasons such as breeding, young-rearing, and migration. Use knowledge to develop and implement strategies to minimize disturbance to priority wildlife in existing and new SUAs and restricted airspace. This would help natural resources and range managers to coordinate training schedules that minimize impacts on wildlife populations."</p>
I0006-9	I suggest the following: 1. The military agrees to pay for all suppression activities related to fires started by military operations. 2. Avoid low level jet flights (day or night) over known high use areas such Lake Louise, Tangle Lakes, Delta River, Gulkana River. And campgrounds along the Denali Hwy. 3. Select an alternative that minimizes noise impacts on high use areas. 4. Select an alternative that excludes high use areas from the MOAs. 5 Adopt an adaptive management strategy that will reduce noise impacts on large	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	ungulates, predators and large migratory birds if they are found to respond adversely to low level jet flights or other aspects of military operations. 6. Low level jet flights will not be conducted parallel to or directly over high use river corridors such as the Delta River, Gulkana River etc. Low level jet flights, when absolutely necessary, should cross these high use corridors at angles approaching perpendicular. This should also be applied to the Denali Hwy.	implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
I0006-10	Low level jet flights, when absolutely necessary, should cross these high use corridors at angles approaching perpendicular. This should also be applied to the Denali Hwy.	While military pilots are constantly vigilant for other aircraft operating within an active MOA, they are particularly observant around those higher use areas/corridors where general aviation aircraft commonly operate using both onboard radar system capabilities and visual awareness.
I0007-1	I have never seen a reason for the military to need the use of 1/3 of Alaska for their exercises. I have live here for more than 50 years and had interference of my hunting and fishing areas of a great deal of Alaska by military aircraft and other vehicles. There is enough area already designated for you to use and you need no more.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources.
I0008-1	I am writing to express my concerns over the proceed expansion of military fly zones. Much of the area the expansion will cover includes settlements, lodges, subsistence areas, and recreation areas such as Paxson and Meiers Lakes, Sourdough, Maclaren, Lake Louise, and the Tangle Lakes/Delta Wild and Scenic River system, s well a most of the Denali Highway. Most people who live in rural areas do so in part to escape the stresses, including noise, of more settled areas. They forsake many conveniences—water and sewer service, supermarkets, hospitals—in order to do so. Alaska's rural and backcountry areas should provide an alternative to city and suburban life, for locals as well as visitors.	The Air Force is considering several measures to reduce the impact of low-level overflights on sensitive locations and communities.
I0008-2	I am writing to express my concerns over the proceed expansion of military fly zones. Much of the area the expansion will cover includes settlements, lodges, subsistence areas, and recreation areas such as Paxson and Meiers Lakes, Sourdough, Maclaren, Lake Louise, and the Tangle Lakes/Delta Wild and Scenic River system, s well a most of the Denali Highway..... Visitors (tourists) expect nothing less. Many of them spend their lives dreaming of the Alaskan adventure; having that dream shattered by low flying military aircraft all hours of the day or night, almost anywhere they choose to travel in the state, is unacceptable.	Section 3.1.10.3.1 of the DEIS acknowledges that noise associated with low-level overflight could lessen recreational experiences for some persons. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation such as seasonal avoidance areas; expanding the existing Delta National Wild and Scenic River and Gulkana National Wild River to include all portions within the new MOA boundaries; and avoiding overflight of popular hunting areas, campgrounds, and trails between June 27 and July 11. These areas including Brushkana Creek campground, Tangle Lakes campground, Paxson Lake campground, Clearwater Wayside, One Mile Creek/Wolverine Mountain, Tangle Lakes trail, Gulkana River raft trail, Castner Glacier trail Sourdough campground, Lake Louise State Recreation Area, Crosswind Lake, and Matanuska Valley

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		Moose Range. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0008-3	JPARC is already huge. It takes up a great swath of Alaska. We believe that our Armed Forces are fully capable of finding ways to perform their necessary training within the present 65,000 square miles.....Existing restricted areas already provide thousands of square miles of land over which aircraft can practice low level high speed flight and maneuvers.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
I0008-4	On a personal note, I live 3 miles southwest of the Eielson AFB runway, in the Eielson Farm Road. Eielson AFB owns thousands of acres of land to the northeast of the runway; why is it that the touch and go practice is always conducted over populated areas like the Eielson Farm Road instead of over the unpopulated lands the base already owns?	Airfield closed traffic patterns, such as those located southwest of Eielson AFB Runway 14/32, are established in accordance with formal siting criteria that consider obstacle clearances, terrain, populated areas (to include base housing/facilities), and other such safety and noise factors. These closed patterns are normally used for multiple touch-and-go practice landings.
I0008-5	This question has direct bearing on the proposed expansion; if current military practice does not take into consideration the peace and quiet of current residents, why should we believe any attempts to minimize noise/nuisance would occur over vastly expanded land areas in the future? Past personal experience tells me that AGLs and sonic boom restrictions will be violated. For instance, I have had at several such experiences in the Tanana Flats Training Area. I live on the flight path between EAFB and Blair Lakes bombing range. Numerous times I have had low flying (less than 500 feet AGL) come right over my house, just barely above tree-top level.	To submit a noise complaint about Air Force aircraft anywhere in Alaska, call the 11th Air Force Public Affairs Office at 1-800-538-6647, or the 3rd Wing Public Affairs Office in Anchorage at 907-552-5756 or 354th Fighter Wing Public Affairs Office in Fairbanks at 907-377-2116. Additional information on the complaints process can be found at http://www.eielson.af.mil/questions/topic.asp?id=1249 . Reports of perceived deviations from published flying procedures will be investigated.
I0008-6	I live on the flight path between EAFB and Blair Lakes bombing range. Numerous times I have had low flying (less than 500 feet AGL) come right over my house, just barely above tree-top level. Worse than that nuisance and noise is the fact that they also fly right over my personal runway; if a plane were taking off from this runway when a violating chopper went over, disastrous consequences could arise.	Please contact the Eielson AFB or Fort Wainwright Public Affairs Office representatives to better determine what flight activities may be conducted at lower altitudes in your locale. Some Air Force aircraft types operate at approved lower altitudes along military training routes or within the low-altitude tactical navigation training area in the general region while Army helicopters would normally transit at lower altitudes during their training missions.
I0008-7	The proposed extension covers thousand of square mies of prime hunting and flight-seeing lands, where dozens of light aircraft are to be found fling at similarly low levels AGL on a daily basis. Having high speed military aircraft mixing with these light aircraft is unsafe.	These conditions can exist anywhere military flight training is conducted and the Air Force in Alaska is especially proactive and engaged in promoting flight safety. The FEIS Sections 3.1.1.1 (Airspace Management) and 3.1.3.1 (Flight Safety) discuss those programs used to promote and enhance flight safety to include the Special Use Airspace Information Service, JBER and Eielson AFB Midair Collision Avoidance pamphlets, participation in the Alaska Civil/Military Aviation Council, and frequent interactions with the civil aviation community. These measures provide information on when and

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		where military flight activities are conducted, guidance for maintaining vigilance and ensuring flight safety, and contacts for requesting additional information and reporting flight safety concerns. Collectively, these measures have helped maintain a safe operating environment for all concerned.
I0008-8	High noise levels at night are even worse than in daylight. Night flying time should not be extended!	The Air Force recognizes that military training noise at night is potentially disturbing and tries to minimize it to the extent practicable while still maintaining required proficiency in night combat. The onset rate-adjusted day-night average sound level metric used to express military aircraft training noise includes a 'penalty' for overflights occurring after 10:00 p.m. or before 7 a.m. that effectively makes each late-night event equivalent to 10 daytime events. Sortie-operations after 10 p.m. are expected to be relatively rare, making up less than 3 percent of total annual operations under the Night Joint Training proposal (see Section 3.5.2.3.1). Mitigation measures to offset adverse impacts of night flight training will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0008-9	Sonic booms aside, the noise and sight of jet aircraft at 500 AGL is unacceptable..... High noise levels at night are even worse than in daylight. Night flying time should not be extended! Wildlife is likely to be stressed by the low flights, with or without sonic booms.	<p>Potential effects from the extension of night training hours under Night Joint Training (NJT) are discussed in Section 3.5.8.3. The discussion focuses on wildlife. The noise analysis takes into account the intrusiveness of noise at nighttime, adding a 10-decibel penalty for sounds after 10:00 p.m. and before 7:00 a.m. The effect of low-level flight on wildlife is also addressed under Fox/Paxon (3.1.8.3). Animal responses to low-level flights have been characterized in recent studies as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter.</p> <p>Given the potential for loss or injury to aircrews and aircraft as a result of a bird-aircraft strike, extensive efforts are made by the Military to avoid areas with high concentrations of birds (also described in the Safety section, under Mitigation 3.5.8.4, and Appendix G). Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p>
I0008-10	EIS Should Include: 1. All alternatives should include monitoring and enforcement of flight levels and flight speeds. Random but frequent checks should be made of flight tapes. Look into the feasibility of beepers than warn pilots when they are below prescribed flight levels and when they are approaching Mach 1. 2. All alternatives should include more and continued	Much of what you have suggested are standard procedures and practices for investigating noise complaints and reports of any hazardous air traffic conditions involving military aircraft. Advisory services provide scheduled and real-time information on use of the training airspace and the Special Use Airspace Information Service and Midair Collision Avoidance pamphlets

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>publicity about the number that people should call to report sonic booms and violations of prescribed flight levels and training area boundaries. Publicity should include what types of information people should be prepared to provide. Consideration must be given to the fact that a few days may elapse before people can make the report. Some of us do not carry cell phones, and even if we did, cell phone coverage in the FOX areas is spotty.</p>	<p>provide contact information for reporting complaints and obtaining information about military activities in Alaska.</p>
I0008-11	<p>3. It is important to understand how dozens of species of birds and mammals are affected by low level flights and sonic booms. This information is not readily available for most species, because Alaska’s wildlife managers, operating on restricted budgets, tend to concentrate their research on those species most used by humans. Anecdotal reports alone cannot be relied on; they lack rigor, and they often conflict. Research is especially important for those species with small populations and/or special vulnerability to other stressors like climate change. Examples include wolverine and pika. The military should contract with independent scientists, possibly at the University of Alaska, to undertake research.</p>	<p>Effects of overflight on wildlife are addressed in Sections 3.1.8.3 and 3.5.8.3 and mitigation measures are identified in Sections 3.1.8.4 and 3.5.8.4, respectively. We acknowledge the points made in the comments that research tends to focus on economically important and easily visible species and the limitations of anecdotal reports.</p> <p>The Air Force can and does contract with independent scientists, including University of Alaska scientists, to conduct research on the effects of overflight. Air Force-sponsored studies on effects of overflight on caribou cited in Section 3.1.8.3, for example, involved scientists from the National Park Service, Alaska Department of Fish and Game, and University of Alaska.</p> <p>Mitigation identified in the document for three of the definitive projects (Fox/Paxon MOA, RLOD, and BAX Restricted Area Expansion) is consistent with the recommendation in your comment. The mitigation states, “Continue to monitor effects of military training including overflights on select wildlife species (especially herd animals, waterfowl, and raptors) and fisheries during critical seasons such as breeding, young-rearing, and migration. Use knowledge to develop and implement strategies to minimize disturbance to priority wildlife in existing and new SUAs and restricted airspace. This would help natural resources and range managers to coordinate training schedules that minimize impacts on wildlife populations.”</p> <p>Given the logistical difficulties of conducting studies on wildlife response to overflight, with rare and secretive animals such as the wolverine, it would probably be infeasible to find a large enough sample size and to be able to observe them during occasional overflights to obtain adequate data to support rigorous analysis.</p>
I0008-12	<p>4. What is the possibility of an avalanche being triggered by a sonic boom? The proposed Paxson MOA includes popular winter climbing, backcountry skiing, and snowmachining areas.</p>	<p>Section 3.1.10.3 of the DEIS (page 3-77, line 42 through 3-78, line 2) indicates that avalanches are a risk to skiers and other outdoor recreation in high mountain areas. Studies and reports have generally concluded that it is</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		very unlikely that a sonic boom would trigger an avalanche unless the area is already critically unstable. A study performed in the Swiss Alps concluded that sonic boom is a poor means to produce avalanche (Perroud and Lecomte 1986).
I0008-13	5. Low level flights over areas where birds are concentrated could be hazardous to both birds and airplanes. For instance, large flocks of ducks and a number of swans utilize a series of lakes around mile 48 to 50 of the Denali Highway, in the existing FOX 3 MOA. The tragic, fatal collision of a jet with geese at Elmendorf illustrates this hazard. A similar hazard would exist during migrations.	The potential for bird-aircraft strikes is always a flight safety concern, as addressed in the FEIS, Section 3.1.3.1. The Air Force will continue to pursue all means possible for maintaining awareness of the presence of bird activities within all areas where flight operations occur.
I0008-14	. Low level flights over areas where birds are concentrated could be hazardous to both birds and airplanes. For instance, large flocks of ducks and a number of swans utilize a series of lakes around mile 48 to 50 of the Denali Highway, in the existing FOX 3 MOA. The tragic, fatal collision of a jet with geese at Elmendorf illustrates this hazard. A similar hazard would exist during migrations.	The potential for bird-aircraft strike is addressed in Section 3.5.8.3 (Night Joint Training) and 3.5.3.1 and 3.5.3.3 (Safety). Animal responses to low-level flights have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Given the potential for loss or injury to aircrews and aircraft as a result of a bird-aircraft strike, extensive efforts are made by the military to avoid areas with high concentrations of birds, which are published in a handbook. The U.S. Air Force Handbook specifies where sensitive areas are located and lists any flight restrictions applied to them. Please see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.
I0008-15	6. Household subsistence studies, now twenty years old, should be updated to give a current picture of current consumptive uses of wildlife. The National Park Service has been able to research only a few communities so far.	As noted in Section 3.1.13.1 of the Draft EIS, state subsistence is managed by the Alaska Board of Fisheries and the Alaska Board of Game. Federal subsistence is managed by the Federal Subsistence Board, which is composed of several agency heads, including that of the National Park Service. The Alaska Department of Fish and Game is primarily responsible for collecting data on subsistence, including the development of the household subsistence surveys. The Draft EIS uses the best information and data available.
I0009-1	You're hereby invited to come sit on my deck above the Copper River, watch the bald eagles soar, see the bears down on the river--and then hold your ears as one of your Hercs or Apaches blasts up the Canyon level with the river bluffs. Your fly guys don't play by the existing rules--and you seriously want to give them a bigger playpen? I've experienced the same flagrant disregard for MOA rules at Mountain Home ID AFB and Davis-Monthan AFB in Tucson. Might be better to enforce the existing rules before you seek to expand your turf.	Any observed violations of published flight rules and those airspace areas and altitudes that have been approved for military flight training activities in Alaska should be reported to the respective Army or Air Force safety office, so that such violations can be appropriately investigated. To submit a noise complaint about Air Force aircraft anywhere in Alaska, call the 11th Air Force Public Affairs Office at 1-800-538-6647, the 3rd Wing Public Affairs Office in Anchorage at 907-552-5756, or the 354th Fighter Wing Public Affairs Office in Fairbanks at 907-377-2116. Additional information on the complaints process can be found at

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>http://www.eielson.af.mil/questions/topic.asp?id=1249. Reports of perceived deviations from published flying procedures will be investigated.</p>
I0010-1	<p>I attended the last session JPARC had in Healy, and, because nothing much seems to have change, I won't be attending the one on May 21st. I agree with the attendee in Palmer who told you that it is an outrage that the military is taking over Alaska's playground, turning it into a war game zone, which will make it extremely inhospitable to the Alaskans who have been recreating there for many years (not to mention the native Alaskans who have been hunting there for time immemorial). Most of the military war-gamers will likely be kids from the lower 48, who have no love or care for our Alaskan land, environment, plants, and animals. This is not ethical!!! As a long time Alaskan, 67 years of age, who has lived all over the state, I have seen the devastation caused by the military taking over Alaskan terrain (Long Island off of Kodiak town, for example). There are old, rusting, polluting oil drums all over the tundra, in many villages where I have taught, remmants of the military presence. As an avid environmentalist, I am aware of other places that the U.S. military has ruined with their war games, such as Makua in Hawaii. I am adamantly OPPOSED to any additional military presence in Alaska! Please take your war games and weapons and polluting, expensive aircraft elsewhere. Keep them on the bases already established in the lower 48. Sincerely, Dianne Herman</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force are required by Federal and State of Alaska public statutes to comply with applicable regulations to protect, conserve, and preserve the environment and prevent and remediate pollution on lands within their jurisdiction.</p>
I0011-1	<p>I am all in favor of training areas that will be used by Our Armed Forces to keep finely honed on specialized warfare. I do not, however, give them Carte Blanche to BLOCK ME OR MY FAMILY OUT FROM THESE recreational areas. My Family and I are willing to share--not take over so we can never enjoy these remote areas. However you need to do that--scheduling or notifications or whatever.</p>	<p>The Army and Air Force also do not want to block the use of these recreational areas. The manner in which these areas may be affected by the individual JPARC proposals is addressed extensively within the applicable FEIS resource area analyses and Appendix K identifies existing and proposed mitigations for minimizing any adverse effects on recreational areas. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.</p>
I0011-2	<p>I do not, however, give them Carte Blanche to BLOCK ME OR MY FAMILY OUT FROM THESE recreational areas. My Family and I are willing to share--not take over so we can never enjoy these remote areas. However you need to do that--scheduling or notifications or whatever.</p>	<p>Mitigations that could be implemented to reduce the impacts to recreational use are provided in Sections 3.1.10.4, 3.2.10.4, 3.3.10.4, 3.4.10.4, 3.5.10.4, and 3.6.10.4 of the EIS. Proposed measures include coordinating military schedules with local communities in advance and providing updated information and maps on the USARTRAK website to identify public access restrictions for military activities. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
I0012-1	The Talkeetna Mountain, Nelchina Basin should not be used for extensive military training as it is a high use recreational area. Use areas over National Parks, etc. as the recreational use is restricted there.	Section 3.1.10.3 of the DEIS acknowledges that the proposed action would impact recreational areas in the project area, including the Nelchina Public Use Area, and areas within the Talkeetna Mountains Subregion. Sections 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation such as seasonal avoidance areas; expanding the existing Delta National Wild and Scenic River and Gulkana National Wild River to include all portions within the new MOA boundaries; and avoiding overflight of popular hunting areas, campgrounds, and trails between June 27 and July 11. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0013-1	JPARC The Joint Pacific Alaska Range Complex Modernization and Enhancement of Ranges and Training Areas program has recently released an Executive Summary. I have spent 2 ½ hours trying to understand the changes that might affect me and am baffled.	See comment response I0006-3.
I0013-2	Rather than the military saying “HERE IS WHAT WE ARE GOING TO DO, WATCH OUT!” They really need to identify the 24-7-365 SAFE CORRIDOR for General Aviation Aircraft flying from Tok to Fairbanks. I’m sure pilots in other communities would express a desire for similar SAFE CORRIDOR routes in their areas.	<p>The Air Force is sensitive to the general aviation activities occurring throughout this region and the flight safety concerns raised by this community over the proposed Military Operations Area expansion and lower altitudes. Pending the Federal Aviation Administration’s (FAA’s) study of the airspace proposals and decisions on how each may be implemented without impacting their management of the Alaska airspace uses and air traffic control system capabilities, the Air Force would pursue those existing and proposed mitigation measures addressed in EIS Sections 3.1.1 (Airspace Management and Use) and 3.3.1 (Flight Safety) and Appendix K (Mitigations, BMPs, and SOPs) as a first step in minimizing any significant impacts. These measures include expanding/establishing Visual Flight Rule (VFR) flyway corridors where necessary to enhance the safe transit of VFR aircraft through such areas as you noted that could be potentially affected by high density military flight activities.</p> <p>The Air Force and U.S. Army Alaska will be working with the FAA and key stakeholders in seeking those viable options that would permit the safe, mutual use of this airspace. Be assured that all reasonable efforts will be made to resolve civil aviation concerns over the JPARC airspace proposals and that mitigation measures for offsetting any impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0013-3	On the afternoon of 4-18-12 a rogue military 4 engine turbo-prop buzzed	Military flight training is conducted within the Military Operations Areas

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>over Tok several times @ 4-5 hundred feet above ground level! This scared the be-jeebers out of me...Approximately one hour earlier I had returned from a General Aviation flight at that same altitude and same location. My little Super Cub wouldn't stand a chance avoiding an Orion – Hercules size 4 engine military aircraft flying at 200+ mph. The prop wash and wing tip vortices would roll me right out of the sky...provided that we missed a collision in the first place. This kind of flying is going to kill someone. Yet, with the proposed ceilings and floors of the JPARC this is exactly the kind of flying situation that is being set up.</p>	<p>(MOAs), restricted areas, Military Training Routes (MTRs), and the low-altitude tactical navigation (LATN) training area approved for these activities as described in the Final EIS, Section 3.1.1.1, and Appendix D, Airspace Management. You may have observed a C-130 operating within the LATN area, which is described and depicted in Section 3.1.1.1 and Appendix D. Section 3.1.3.1 describes those means used by the Air Force to promote flight safety within their training airspace through the Special Use Airspace Information Service (SUAIS), midair collision avoidance pamphlets, and other media resources that provide information on when and where military flight activities are conducted, guidance for maintaining vigilance and ensuring flight safety, and contact information for obtaining information and reporting flight safety concerns.</p> <p>Pilots can call SUAIS at 1-800-758-8723 or (372-6913 from the Fairbanks area). If airborne, contact Eielson Range Control, VHF 125.3. SUAIS information can also be found on the Joint Base Elmendorf-Richardson home page at: http://www.jber.af.mil/11af/alaskaairspaceinfo (select "Special Use Airspace Information Service"). Beyond SUAIS radio range, Flight Service Stations can give status of special use airspace, to include MTRs.</p> <p>Regarding midair collision avoidance, for statewide Air Force flying information, refer to the "Alaska Airspace Info" link at www.jber.af.mil, or call the 611th Air Operations Squadron at (907) 552-5103. For Joint Base Elmendorf-Richardson, please call the 3rd Wing (Active Duty) Flight Safety offices at (907) 552-4681 and/or the 176th Wing (Air National Guard) Safety offices at (907) 551-0248/0263 with any questions or suggestions about local flying. If you have any questions about military flying at Eielson Air Force Base, or any of our MOAs, please call the Eielson Safety Office at (907) 377-1155.</p>
I0013-4	<p>Please take whatever steps are available to require establishment of 24-7-365 SAFE CORRIDORS along General Aviation routes. REMEMBER: IT'S OUR SKY TOO!!</p>	<p>The Air Force is sensitive to the general aviation activities occurring throughout this region and the flight safety concerns raised by this community over the proposed Military Operations Area expansion and lower altitudes. Pending the Federal Aviation Administration's (FAA's) study of the airspace proposals and decisions on how each may be implemented without impacting their management of the Alaska airspace uses and air traffic control system capabilities, the Air Force would pursue those existing and proposed mitigation measures addressed in EIS Sections 3.1.1 (Airspace Management and Use) and 3.3.1 (Flight Safety) and Appendix K</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>(Mitigations, Best Management Practices, Standard Operating Procedures) as a first step in minimizing any significant impacts. These measures include expanding/establishing Visual Flight Rule (VFR) flyway corridors where necessary to enhance the safe transit of VFR aircraft through such areas as you noted that could be potentially affected by high density military flight activities.</p> <p>The Air Force and U.S. Army Alaska will be working with the FAA and key stakeholders in seeking those viable options that would permit the safe, mutual use of this airspace. Be assured that all reasonable efforts will be made to resolve civil aviation concerns over the JPARC airspace proposals and that mitigation measures for offsetting any impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0013-5	<p>Rather than the military saying “HERE IS WHAT WE ARE GOING TO DO, WATCH OUT!” They really need to identify the 24-7-365 SAFE CORRIDOR for General Aviation Aircraft flying from Tok to Fairbanks. I’m sure pilots in other communities would express a desire for similar SAFE CORRIDOR routes in their areas.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
I0013-6	<p>On the afternoon of 4-18-12 a rogue military 4 engine turbo-prop buzzed over Tok several times @ 4-5 hundred feet above ground level! This scared the be-jeebers out of me...Approximately one hour earlier I had returned from a General Aviation flight at that same altitude and same location. My little Super Cub wouldn’t stand a chance avoiding an Orion – Hercules size 4 engine military aircraft flying at 200+ mph. The prop wash and wing tip vortices would roll me right out of the sky...provided that we missed a collision in the first place. This kind of flying is going to kill someone. Yet, with the proposed ceilings and floors of the JPARC this is exactly the kind of flying situation that is being set up.</p>	<p>The aircraft you observed was most likely operating within the low-altitude tactical navigation (LATN) training area described in the EIS Section 3.1.1 and shown in Appendix D (Figure D-2). This rectangular LATN area encompasses much of the JPARC airspace and is used mostly by C-17 and C-130 aircraft for nonhazardous, low-level training. These aircraft are limited to 500 feet AGL and above and airspeeds of 250 knots (288 statute miles per hour) while operating within this LATN; are precluded from flying over the same points more than once per day; and are required to avoid airfields, towns, noise-sensitive areas, and wilderness areas by prescribed vertical and/or horizontal distances. LATN areas are not shown on aeronautical charts. All military aircraft operating within this LATN and the other training airspace areas are constantly vigilant for nonparticipating aircraft within those areas to ensure a safe operating distance is maintained from these aircraft.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>The same will be true for any new training airspace that may be established as part of the JPARC proposals.</p> <p>Regarding the Special Use Airspace Information Service (SUAIS), pilots can call SUAIS at 1-800-758-8723 (or 372-6913 from the Fairbanks area). If airborne, contact Eielson Range Control, VHF 125.3. SUAIS information can also be found on the Joint Base Elmendorf-Richardson homepage at: http://www.jber.af.mil/11af/alaskaairspaceinfo then select "Special Use Airspace Information Service." Beyond SUAIS radio range, Flight Service Stations can give status of special use airspace, to include Military Training Routes (MTR).</p> <p>Regarding Midair Collision Avoidance, for statewide Air Force flying information, refer to the "Alaska Airspace Info" link at www.jber.af.mil, or call the 611th Air Operations Squadron at (907) 552-5103. For Joint Base Elmendorf-Richardson, please call the 3rd Wing (Active Duty) Flight Safety offices at (907) 552-4681 and/or the 176th Wing (Air National Guard) Safety offices at (907) 551-0248/0263 with any questions or suggestions about local flying. If you have any questions about military flying at Eielson Air Force Base or any of our military operating areas, please call the Eielson Safety Office at (907) 377-1155.</p>
I0013-7	<p>Please take whatever steps are available to require establishment of 24-7-365 SAFE CORRIDORS along General Aviation routes. REMEMBER: IT'S OUR SKY TOO!!</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
I0014-1	<p>As a property holder of nearly 20 years, I respectfully request that all of the Lake Louise, Susitna, and Tyone Lakes be excluded from Alternative E of the Joint Alaska Pacific Range Complex Mordernization and Enhancement Environmental Impact Statement (statement). I further respectfully request that there be no action alternative of the proposals within Alternative E of the statement.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
I0014-2	As a property holder of nearly 20 years, I respectfully request that all of the Lake Louise, Susitna, and Tyone Lakes be excluded from Alternative E of the Joint Alaska Pacific Range Complex Mordernization and Enhancement Environmental Impact Statement (statement). I further respectfully request that there be no action alternative of the proposals within Alternative E of the statement.	The U.S. military has a great record of environmental stewardship in Alaska. There are mitigations being considered that alleviate impacts on certain areas of the proposed airspace. The need for low-altitude flight to accomplish training includes areas large enough for maneuvering and tactical deception utilizing terrain. It is not feasible to declare every cabin, animal, lake, and recreation area as "noise-sensitive" for the purpose of avoiding overflight. Any remaining areas would be too small and unusable for the stated purpose. The Air Force will attempt to avoid or minimize low-level flight where the most significant adverse impacts exist if the training can still be accomplished.
I0015-1	First I'd like to clarify that the MOA only separates the military traffic from the IFR traffic. VFR traffic can fly in the MOAs unrestricted. I've been out in the MOAs during hunting season and had sonic booms, I've had airplanes come over me at 250 feet or less, and I feel the Paxon addition at 500 feet AGL in a major corridor, VFR corridor, between Gulkana and Greely, Fairbanks, is a hazard and a major safety hazard to light airplanes and to the military aircraft using it. At 250 knots they have no reaction time at that altitude and a lot of the VFR traffic do not have transponders so they will not be able to see them.	You are correct that VFR aircraft may operate within an active MOA and for that reason the Air Force has been very proactive in promoting flight safety for those VFR pilots who elect to operate within this airspace while military operations are in progress. As noted in the FEIS, Sections 3.1.1.1 (Airspace Management) and 3.1.3.1 (Flight Safety), the Air Force uses media resources such as the Special Use Airspace Information Service, JBER and Eielson AFB Midair Collision Avoidance pamphlets, participation in the Alaska Civil/Military Aviation Council, and frequent interfaces with the general aviation community to provide information on when and where military flight activities are conducted, guidance for maintaining vigilance and ensuring flight safety, and contacts for requesting additional information and reporting flight safety concerns. Collectively, these measures have helped maintain a safe operating environment for all concerned.
I0015-2	And the lowering of the Fox 3 from 5,000 feet down to 500 over a major hunting and recreational area is another major safety hazard as that is altitudes that all the light planes use from about surface to about 5,000, 3,000 feet. So lowering it from 5,000 down to 500 feet is just asking for an accident to happen.	The FEIS Sections 3.1.1 (Airspace Management), 3.1.3 (Flight Safety) and 3.1.10 (Land Use) and other resource areas, as applicable, address the potential effects of the proposed lower altitudes on airspace and land uses. Airspace Management describes how the existing and proposed airspace would be used during the active periods relative to average daily flights and lower altitude use by select aircraft types. These projections provide a general perspective on the extent to which military flight activities may occur and be dispersed throughout this vast airspace complex. Also, as noted in the FEIS, only the more limited annual MFE operations would operate within the Paxon MOA. The Air Force has been and will continue to be very proactive

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		in promoting flight safety through the different media sources discussed in Sections 3.1.1 and 3.1.3.
I0016-1	<p>I'm an energy activist. This is a business card I'd like to give into the record and also a list of links and these links represent a new energy design that is now expected to come online within the next six to 18 months. Most of you know it as cold fusion . . .</p> <p>You'll be looking at something called an E cat, energy catalyzer, by Mr. Rossi and they're getting what they call COP, coefficients of performance or production. They're six to 30 times the energy out that they put in. They're suggesting that these units can run for six months under temperatures of 1,500 degrees Celsius on five grams of hydrogen and about 55 grams of nickel and they produce zero pollution. They can also drive a five KW electrical unit at the same time. Scientists are now talking the time has come to where oil pipelines, there's no need for those or power lines. They're talking about energy that can be looped. When you can loop energy it's infinite. And if that weren't enough, another competitor came out with a 45 KW unit which will run for a year and a half on a limited amount of hydrogen and nickel. And if that weren't enough, last week a company by the name of Brilllovin, which you can find on pesn.com out of Berkeley, proposes that they have found a frequency which separates these subatomic particles and you can run a boiler in Nome, Alaska for three years on a quart of water. And if you bring that same boiler -- and that's with no gas lines attached to it. And if you bring that same boiler to Berkley you can run it for 20 years.</p> <p>And the reason I bring this to you folks tonight is that we have a coal fire power plant in Healy. They're about to fire that plant up on coal and I would think with your funding and your leading edge technology as defenders of which there's a DIA document on that list which refers to this as the greatest potential transformation of the U.S. battlefield forces since the change from horses to gasoline. I would suggest that you intervene as quickly as you can and go into that coal fire power plant with these units which produce tremendous amounts of energy when hooked in sequence. And if that weren't enough, we think the U.S. Navy has purchased one of these small shipping containers that can generate about 15 to 30 KW in electricity. Once it kicks itself off it makes its own energy.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>And I realize some of these things sound preposterous, but the chief scientist at NASA has weighed in on this. Stanford Research Institute has validated some of the tests, Los Alamos Laboratories. Some of the most renowned names around the world are now coming online with this, including the Royal Society of Swedish People out of Switzerland, and even they made the comment that Mr. Rossi is credible. There are now six companies vying to come online with a residential unit within the next six to 18 months. And the Swedish scientist said they don't -- the design is credible, they had a big press conference, but they don't understand what it's doing, how it's doing or anybody that does. This is something transformational, what we call, it's almost a metamorphosis of this society. They think they will move through a world production covering the market within three years at the max 25 percent of the world houses with these devices. They are suggesting the military and the DIA document, they're referring to this as disruptive technology. They're saying that this has up to 10 million times the energy per unit of chemical mass of anything we're using on the planet today.</p> <p>I have never seen anything unfolding quite like this in my lifetime. I do think it has a tremendous amount of credibility, but you should see the scientists arguing. You have a chance here with your military operation to be a part of our community to help build that new society almost overnight in a great and wondrous land with many challenges and I think it could play a historical role. And you can't -- surely can't let the Navy get ahead of you with one of these units without you knowing it.</p> <p>And thank you very much.</p> <p>-----ATTACHMENT PROVIDED-----</p> <p>[BUSINESS CARD] PAUL D. KENDALL MAGNETIC FIELDS and HYDROGEN as divine energies http://mfh20.blogspot.com http://h2omf.blogspot.com http://alaskaenergypolicy.com AAA</p> <p>[INFORMATOIN SHEET] Date: 4-25-12 LINKS PAGE (local cell for now xxx-xxx-xxxx -- see below) To: Citizens of Alaska</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Ladies and Gentlemen,</p> <p>Our Alaska Newspapers, most Talk Radio, Other Media Platforms, Schools, Utilities, Oil Producers, Community and Political Leaders WILL NOT PUBLISH or PUBLICLY TALK about the Energy Documents Sites below. (I have standing challenges to have a public discussion and they will not)</p> <p>Thank You, If you have any questions, please call or contact me.</p> <p>Paul D. Kendall (Energy in Harmony activist, researcher, commentator and consultant)</p> <p>You tube / Google</p> <p>#1 E-CAT Cold Fusion (ROSSI REACTOR) http://ecat.com http://pesn.com/2012/04/19/9602076_LENRE-to-Market_Weekly_April-19/; http://www.youtube.com/watch?v=RICTvUiuv4k; http://www.defkalion-energy.com; http://coldfusionnow.org/; http://ecatnews.com; http://www.scoop.it/t/rossi-s-ecat.com (Residential and Commercial Code Fusion Units launching late 2012/13. Scientist are discussing this as a potential World Changing Event - nearly unlimited clean energy - a small nuclear fusion furnace in every dwelling on the planet); http://www.e-catworld.com/ Google</p> <p>#2 DIA-08-0911-003 (A MUST READ - WOW!); http://en.wikipedia.org/wiki/File:2009DIA-08-0911-003.pdf (Unclassified Defense Intelligence Agency 8 page report on LENR low energy nuclear reactions - COLD FUSION - Paradigm Shifting Results - possibly 10 millions times the chemical energy per units used today)</p> <p>#3 LoU-fuelcell-cars.pdf (DAIMLER test.pdf) (Hydrogen Economy Launched); http://www.hydrogenlink.net/download/LoU-fuelcell-cars.pdf (7 biggest auto mfg launching Elec Vehicles, Fuel Cell, Compressed Air, Hydrogen & they want the HYDROGEN HWY in place by 2015)</p> <p>#4 People wanting to sign up for an E-CAT, HYPERION - other HOME OR BUSINESS REACTOR UNIT when available in late 2012-13 ...contact http://www.e-cat.com/ or http://www.leonardo.com; http://www.defkalion-energy.com/; http://www.brillouinenergy.com/ www.pesn.com ALSO CHECK OUT</p> <p>#5 http://www.pluginamerica.org/vehicles/all (list of electric and fuel cell</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>vehicles)</p> <p>In closing,</p> <p>We have begun the "Voice Recognition", "Home Cold Fusion Reactor Evolution", "Hydrogen Economy Infrastructure", "hydrogen generation at will", and "Electrifying up the Planet" using many new technologies that are now coming forward in residential, transportation and commercial sector designs and devices;</p> <p>Its all about Individual Clean Energy; Period !..</p> <p>Our leaders fear this new "Energy in Harmony" Age because it brings us true individual freedoms, true free markets, and real individual accountability.</p> <p>END -- thanks, [email and cell number redacted to protect privacy] http://mfh2o.blogspot.com see FINAL_DRAFT_23.pdf and Alaska River Ocean Energy Ideas</p>	
I0016-2	<p>I'm an energy activist. This is a business card I'd like to give into the record and also a list of links and these links represent a new energy design that is now expected to come online within the next six to 18 months. Most of you know it as cold fusion . . .</p> <p>You'll be looking at something called an E cat, energy catalyzer, by Mr. Rossi and they're getting what they call COP, coefficients of performance or production. They're six to 30 times the energy out that they put in. They're suggesting that these units can run for six months under temperatures of 1,500 degrees Celsius on five grams of hydrogen and about 55 grams of nickel and they produce zero pollution. They can also drive a five KW electrical unit at the same time. Scientists are now talking the time has come to where oil pipelines, there's no need for those or power lines. They're talking about energy that can be looped. When you can loop energy it's infinite. And if that weren't enough, another competitor came out with a 45 KW unit which will run for a year and a half on a limited amount of hydrogen and nickel. And if that weren't enough, last week a company by the name of Brilliovin, which you can find on pesn.com out of Berkeley, proposes that they have found a frequency which separates these subatomic particles and you can run a boiler in Nome, Alaska for three years on a quart of water. And if you bring that same boiler -- and that's with no gas lines</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>attached to it. And if you bring that same boiler to Berkley you can run it for 20 years.</p> <p>And the reason I bring this to you folks tonight is that we have a coal fire power plant in Healy. They're about to fire that plant up on coal and I would think with your funding and your leading edge technology as defenders of which there's a DIA document on that list which refers to this as the greatest potential transformation of the U.S. battlefield forces since the change from horses to gasoline. I would suggest that you intervene as quickly as you can and go into that coal fire power plant with these units which produce tremendous amounts of energy when hooked in sequence. And if that weren't enough, we think the U.S. Navy has purchased one of these small shipping containers that can generate about 15 to 30 KW in electricity. Once it kicks itself off it makes its own energy.</p> <p>And I realize some of these things sound preposterous, but the chief scientist at NASA has weighed in on this. Stanford Research Institute has validated some of the tests, Los Alamos Laboratories. Some of the most renowned names around the world are now coming online with this, including the Royal Society of Swedish People out of Switzerland, and even they made the comment that Mr. Rossi is credible. There are now six companies vying to come online with a residential unit within the next six to 18 months. And the Swedish scientist said they don't -- the design is credible, they had a big press conference, but they don't understand what it's doing, how it's doing or anybody that does. This is something transformational, what we call, it's almost a metamorphosis of this society. They think they will move through a world production covering the market within three years at the max 25 percent of the world houses with these devices. They are suggesting the military and the DIA document, they're referring to this as disruptive technology. They're saying that this has up to 10 million times the energy per unit of chemical mass of anything we're using on the planet today.</p> <p>I have never seen anything unfolding quite like this in my lifetime. I do think it has a tremendous amount of credibility, but you should see the scientists arguing. You have a chance here with your military operation to be a part of our community to help build that new society almost overnight in a great and wondrous land with many challenges and I think it could play a historical role. And you can't -- surely can't let the Navy get ahead of you with one of</p>	

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	<p>these units without you knowing it.</p> <p>And thank you very much.</p> <p>-----ATTACHMENT PROVIDED-----</p> <p>[BUSINESS CARD] PAUL D. KENDALL MAGNETIC FIELDS and HYDROGEN as divine energies http://mfh20.blogspot.com http://h2omf.blogspot.com http://alaskaenergypolicy.com AAA</p> <p>[INFORMATOIN SHEET] Date: 4-25-12 LINKS PAGE (local cell for now xxx-xxx-xxxx -- see below) To: Citizens of Alaska</p> <p>Ladies and Gentlemen,</p> <p>Our Alaska Newspapers, most Talk Radio, Other Media Platforms, Schools, Utilities, Oil Producers, Community and Political Leaders WILL NOT PUBLISH or PUBLICLY TALK about the Energy Documents Sites below. (I have standing challenges to have a public discussion and they will not)</p> <p>Thank You, If you have any questions, please call or contact me.</p> <p>Paul D. Kendall (Energy in Harmony activist, researcher, commentator and consultant)</p> <p>You tube / Google</p> <p>#1 E-CAT Cold Fusion (ROSSI REACTOR) http://ecat.com http://pesn.com/2012/04/19/9602076_LENr-to-Market_Weekly_April-19/; http://www.youtube.com/watch?v=R1CTvUiu4k; http://www.defkalion-energy.com; http://coldfusionnow.org/; http://ecatnews.com; http://www.scoop.it/t/rossi-s-ecat.com (Residential and Commercial Code Fusion Units launching late 2012/13. Scientist are discussing this as a potential World Changing Event - nearly unlimited clean energy - a small nuclear fusion furnace in every dwelling on the planet); http://www.e-catworld.com/ Google</p> <p>#2 DIA-08-0911-003 (A MUST READ - WOW!);</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>http://en.wikipedia.org/wiki/File:2009DIA-08-0911-003.pdf (Unclassified Defense Intelligence Agency 8 page report on LENR low energy nuclear reactions - COLD FUSION - Paradigm Shifting Results - possibly 10 millions times the chemical energy per units used today)</p> <p>#3 LoU-fuelcell-cars.pdf (DAIMLER test.pdf) (Hydrogen Economy Launched); http://www.hydrogenlink.net/download/LoU-fuelcell-cars.pdf (7 biggest auto mfg launching Elec Vehicles, Fuel Cell, Compressed Air, Hydrogen & they want the HYDROGEN HWY in place by 2015)</p> <p>#4 People wanting to sign up for an E-CAT, HYPERION - other HOME OR BUSINESS REACTOR UNIT when available in late 2012-13 ...contact http://www.e-cat.com/ or http://www.leonardo.com; http://www.defkalion-energy.com/; http://www.brillouinenergy.com/ www.pesn.com ALSO CHECK OUT</p> <p>#5 http://www.pluginamerica.org/vehicles/all (list of electric and fuel cell vehicles)</p> <p>In closing,</p> <p>We have begun the "Voice Recognition", "Home Cold Fusion Reactor Evolution", "Hydrogen Economy Infrastructure", "hydrogen generation at will", and "Electrifying up the Planet" using many new technologies that are now coming forward in residential, transportation and commercial sector designs and devices;</p> <p>Its all about Individual Clean Energy; Period !..</p> <p>Our leaders fear this new "Energy in Harmony" Age because it brings us true individual freedoms, true free markets, and real individual accountability.</p> <p>END -- thanks, [email and cell number redacted to protect privacy] http://mfh2o.blogspot.com see FINAL_DRAFT_23.pdf and Alaska River Ocean Energy Ideas</p>	
I0017-1	<p>I'm not sure when I've had the opportunity to do this before in my lifetime. I've been in lots of places here, but I am going to seize the opportunity. I think that you need to understand something, ladies and gentlemen, and this is why this is very important. Our society is founded on energy. And in regards to this EIS I have to tie this into here if you'll give me a moment to construct this, but even though the EIS looks to find harmony and your</p>	<p>Thank you for your comment. These comments indicate issues that are outside of the purview of this EIS either because they describe current operations or because they describe broader Department of Defense policy decisions. For further assistance with the issue please contact your local base Public Affairs Office or Alaskan Command Public Affairs at (907) 552-2341.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>society is chasing money, but there isn't a creature in the universe that eats the money. It's all an after energy moment and I think that it is imperative that you add the energy consideration in this EIS. And when you look at the constructs of that energy you will find that most of it, if not all of it, is hydrogen based. So I'm trying to wedge something in here as best I can in your EIS. It would seem to me the fact that you don't have this included in your EIS is a profound statement about the lack of connection in a properly formed society. And to make an example of that so that you understand the relevance of that, your children do not drink a glass of water. That is an ancient term, it is a primordial term, it is a tricked up term or a sling term. You drink hydrogen and oxygen and when you drink that your body makes electricity, it fires you up. You come online, onboard with synaptic impulses and then you hunt carbon to form frame and hair and infrastructure. And when you begin to realize that you begin to realize the connection. There's no such thing as gasoline. It's hydrogen, pop and carbon. There's no such thing as diesel. It's hydrogen, pop and carbon. There's no such thing as jet fuel. It's hydrogen, pop and carbon. Every creature out there in the universe, ladies and gentlemen, is a transportation system that is specialized in this design. All of those designs are fired by hydrogen living in harmony with its hydrogen. And for you to have an EIS without a hydrogen reference point to the impact of all those things. Anything that's consuming hydrogen, generating a current and altering its mass most likely has a state of being of which we have not recognized in our evolution yet. But when this new cold fusion comes online you're going to find whole new economies and the reason you will is they will not be able to use fuel to be able to give foundation to the dollar. And if you have energy you can tool up, tech up, light up, arm up, transport, communicate, grow food, you are a creature with a new mindset and a new set of priorities and that will evolve your society. And to see an EIS in a magnitude of outlay of this in such a credible body of -- there are so few credible bodies of commentary anymore that are not talking and dodging points that to see such a credible body as our military of which we have conveyed the greatest hope and trust in not have an EIS reference I think is -- needs to be addressed as a concern in your next EIS. And I think without getting -- doing some kind of sideshow up here I should probably sit down and thank you for the opportunity. I just can't stress enough that our societies are going to be based upon energy and as complex and as cascading as the problems are nest -- now that have become nested problems with the proper amount of energy you can hold your family secure</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>while we take five to 10 years to settle these problems out. You cannot do that with money, ladies and gentlemen. You cannot eat the gold, you cannot eat the silver, you cannot eat the money. Those are false constructs of pursuits which disconnect you from understanding that all around you it is the wonders of the universe which was our mission and we lost that mission. And you are about to see that transform almost overnight if these units come online in the next 18 months. And I assure you there's more, but I can't get into the realm of that because of the time constraints and -- but I -- but due to the -- your accommodating me with your -- due to your generous accommodation, I mean I'm beginning to feel particularly embarrassed here so I'll sit down. But please, I think that it's imperative that you address our more concrete values and those fundamental values are individual freewill and complete and undeniable truth and if you miss those along with the energy you will continue to have us in a society that simply circles itself in some predatory mode of disruption and lack of evolution. And so I think as a military and a large body, a credible body, I am as obligated to bitch at you as you are to lis -- to complain as you are to listen to me in some ways and if I don't exercise that right then I'm as guilty as those people who simply become disconnected and suddenly push back in some malcontented position which harms somebody.</p>	
I0017-2	<p>Our society is founded on energy..... it is imperative that you add the energy consideration in this EIS. And when you look at the constructs of that energy you will find that most of it, if not all of it, is hydrogen based.</p>	<p>Thank you for your comment. The Army and the Air Force share your concerns about Alaska's resources. Lower fuel consumption and lower energy costs are important factors for the JPARC proposals in this EIS. Additionally, energy is a consideration of the infrastructure discussion as it applies to transmission and capacity as affected by the proposed actions.</p>
I0018-1	<p>Proposed Action 1 Fox 3 MOA Expansion: I support no action alternative. Our recreational cabin would be encompassed (or nearly) by the proposed expansion (Alternatives A and E). We already hear military training (sonic booms). We do not want to hear them any closer or louder. We go out there for peace and quiet and spend a lot of time there. Expansion would negatively impact our quality of life.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. As explained in Sections 1.2 and 1.3 of the Draft EIS, the decision on which alternatives the Army and Air Force will pursue will be made in light of the Purpose and Need by Army and Air Force representatives following the review of all relevant facts, impact analyses, and comments received via the JPARC EIS public participation process.</p>
I0018-2	<p>Proposed Action 5 Night Joint Training: I support no action alternative to minimize the noise impacts on wildlife.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. As explained in Sections 1.2 and 1.3 of the Draft EIS, the decision on which alternatives the Army and Air Force will pursue will be made in</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		light of the Purpose and Need by Army and Air Force representatives following the review of all relevant facts, impact analyses, and comments received via the JPARC EIS public participation process.
I0018-3	All other proposals: My comments are not specific to alternatives as I don't have time to study them, but I do have concern about air and ground impacts on the biological resources, air quality and water resources involved.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0019-1	I feel safety issue of flight levels is a concern for separation between Alaskas general aviation and gov. aircrafts. (Gov) Military aircraft over monuments 1,000 feet higher than the mountains flown over. Flat land 2,000 AGL to help in separation.	The FEIS Airspace Management and Flight Safety sections address those initiatives that have been implemented to help increase awareness of those scheduled times and airspace areas in which military flight activities are conducted. These initiatives would continue to be used along with those proposed in Appendix K to further increase situational awareness and enhance flight safety for all military and general aviation aircraft operating within the active Military Operations Areas.
I0020-1	Initially I asked the question about restricted areas that were proposed just south of Delta and to the east of the highway. Proposal A leaves a fairly wide corridor for VFR traffic going north and south. It's the main route, we all know that, we've (indiscernible) that area. Proposal B butts right up against the highway, comes right close to the pipeline and it follows VFR traffic into an extremely small corridor that goes north or south. If you've ever been in that area you more than know that a lot of aircraft do not have radios. They go through there in marginal weather and to put everyone in that small little corridor is basically giving a high risk for the possibility of a midair. I would like to see proposal B give an extra buffer to take it further to the east of approximately maybe one kilometer or even two kilometers. This way people who do follow highways, and a lot do, will be able to know that they're well clear of any restricted area. As far as flying the pipeline, it is clear for us, however I would still like to see it either 2202 (indiscernible), proposed east restricted areas (indiscernible) so at least you could go either to the west and stay away from the east restricted area or vice versa.	The concerns you have expressed for the potential effects of the proposed BAX restricted area alternatives on the existing VFR corridors are noted in the FEIS Section 3.3.1. As noted in the FEIS Appendix K, the U.S. Army Alaska will continue its programs for coordinating with local civilian aviation interests and the U.S. Air Force to reduce potential conflicts in corridors used heavily by both military and civilian air traffic.
I0020-2	I would like to see proposal B give an extra buffer to take it further to the east of approximately maybe one kilometer or even two kilometers. This way people who do follow highways, and a lot do, will be able to know that they're well clear of any restricted area.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
I0020-3	As far as the MOA is concerned at Paxon, this area is not supposed to be active as a MOA except under certain circumstances. However, I believe 500 AGL for the base of it when it is active is far, far too low. Many aircraft transit in that area between Glenallen, Black Rapids, through the Alaska Range or in through Tok and giving us only 500 feet when it is active for all of us is just not enough. I would like to see a base of 2,000 feet, but I would accept 1,000.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
I0020-4	And we must have some form of radio communication such as there is to the north where we can call up radar on -- on range rather on 125-3. They will tell us if they're active. If they're not, of course we get the recording. If we have the same to the south that at least you can actively find out if you're going into an active MOA or not at the time that you are flying as opposed to doing it the day before or the night before.	One of the proposed mitigation measures identified in the FEIS Appendix K notes that enhancement of radio communications will be considered to the extent that funding or other options can be pursued for expanding the means by which information can be provided for the active status of all Special Use Airspace areas.
I0020-5	Many aircraft transit in that area between Glenallen, Black Rapids, through the Alaska Range or in through Tok and giving us only 500 feet when it is active for all of us is just not enough. I would like to see a base of 2,000 feet, but I would accept 1,000.....All in all I think the area, the MOA itself at Paxon being 500 and the undulating land between Summit, Black Rapids, it undulates quite a bit, probably 1,500 to 2,000 feet. I would like to see an MSL altitude and not an AGL.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
I0021-1	I have several reasons that I don't think that any of the MOAs in this corridor of the rail belt should be activated, only on the military bases. There's way too many reasons. We have a large population in the rail belt now and there's a lot of hunting activity and fishing activity and camping activity and what have you that goes on that be accessed by the largest population area. You	Section 3.1.10.3 of the DEIS acknowledges that suddenness and unpredictability of low-level overflight may result in annoyance and could lessen a recreational experiences for some people. The Air Force would provide advance schedules of training missions in the MOA and the public would have access to information about low-level MOA activation during

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>know, hunting season from August 15th to October 15th would probably be the outside parameters. You currently have an MOA for a 5,000 foot fly zone in part of the area that you're proposing. I've had friends that have had some of the pilots come, they're not sure, 100 feet above the top of them. And they don't see them, they hear them. I mean it's just kind of a shock when they go over.</p>	<p>scheduled training and/or NOTAMs. Communication of MFE schedules well in advance could help reduce or avoid impacts on recreation from MFEs. In addition, Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation such as seasonal avoidance areas; expanding the existing Delta National Wild and Scenic River and Gulkana National Wild River to include all portions within the new MOA boundaries; and avoiding overflight of popular hunting areas, campgrounds, and trails between June 27 and July 11. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0021-2	<p>You currently have an MOA for a 5,000 foot fly zone in part of the area that you're proposing. I've had friends that have had some of the pilots come, they're not sure, 100 feet above the top of them. And they don't see them, they hear them. I mean it's just kind of a shock when they go over. And so if they are -- if they're breaking the 5,000 feet down to 100 foot or whatever, the 500 feet is going to be put aside I'm sure.</p>	<p>The EIS Section 3.1.1.1 and Appendix D (Airspace Management) describe and depict existing military training routes and a large low-altitude tactical navigation (LATN) training area where some select military aircraft types may be observed operating at the varied lower altitudes approved for these areas. Please contact the Eielson AFB or JBER Public Affairs Office if you have any further questions on the relatively infrequent use of these training activities.</p> <p>Eielson Public Affairs (907) 377-2116 354fw.pa.publicaffairs@us.af.mil</p> <p>JBER Public Affairs (907) 552-8151 pateam@elmendorf.af.mil</p>
I0021-3	<p>Fish and Game I'm sure has all kinds of activities that they would like to do in this area. When they are taking surveys and their windows for taking surveys on game are very narrow and to have them disrupted because of activity. I wrote some of these down. You know, six events for 10 days each or 60 a year and then there was the Army would have 242 days if I heard that right. And then there's 14 days per battalion. I don't know how many battalions there are. So I'm not even sure of the -- whether there's a weekend open in this thing.</p>	<p>The Air Force currently coordinates closely with the Alaska Department of Fish and Game (ADFG) each year to restrict overflight of the Fortymile Caribou Herd at the proper locations and times during calving season and during aerial surveys. We will continue to work with the ADFG to develop timely and location-specific mitigations for other game populations as deemed necessary.</p> <p>The Army continues to recognize the importance of conducting annual surveys for ADFG and the U.S. Fish and Wildlife Service (USFWS) to meet their requirements to manage wildlife species on behalf of the American people. The Army partners with ADFG and USFWS (as required by the Sikes Act) to manage fish and wildlife resources on Army lands. Fort Wainwright cooperates with ADFG and USFWS to conduct fish and wildlife surveys as part of the Fort Wainwright Integrated Natural Resources Management Plan</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		and Cooperative Agreement (AK-MOA-250). Coordination between the three agencies will continue to occur to allow surveys during important timeframes for wildlife while maintaining safety for agency personnel, soldiers, civilians and wildlife. "
I0021-4	But I think the whole operation except for your bases, if you want to have a fly zone to do these things should be moved east now. I was thinking west before, but east to the Wrangell St. Elias. That's federal land and we can't go in there without a note from God.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources. The comment to move existing Army and Air Force training areas to other Federal lands in Alaska, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Section 1.2 and 1.3.
I0021-5	So that would be a good place for you to take that operation I think. So I think that's about all I have. I just don't think that it's advisable to put this right in the populated areas accessible by the largest group of people in the rail belt. I am the local chair of the Fish and Game Advisory for the Mat Valley, however, and I think most of them will agree with everything I've said, but we're going to get some consensus as a group and put in some comments later. So I guess that's all I had to say. Thanks.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0022-1	Thank you, Colonel. For the record, my name is Jim Stocker. And before I start my testimony or my comment period I want to make something really clear to all the military personnel here. Anything that I say please don't take it personally. I have a high degree for all of you and for the military itself and I know that this didn't come out of your think tank. Thin probably came out of Washington somewhere, somebody sitting at a desk that doesn't live here, doesn't really understand the area, doesn't understand the issues.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0022-2	But with that said, I've been here for 40 years. I've been a pilot for 40 years. I have extensive time flying in this proposed MOA or Military Operation Area 3 up in the Talkeetna mountains, game management units 13 and 14. And when I first heard about this, and I'll be up front about this, I don't know a lot about it and I should know more about it. When you take into consideration that the largest population of Alaska sits right here in the Mat Su Valley in Anchorage and the playground for the -- the epicenter of Alaska is the Kenai Peninsula and the Talkeetna mountains. It's accessible -- let's talk about the Talkeetna mountains, MOA 3 area and that little area that's to the east of it there, that magenta area. It's accessible by airplane, it's accessible by foot, it's accessible by boat, it's accessible for four-wheelers and by vehicles. That's the playground for Alaskans right there and for	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources. The comment to move existing Army and Air Force training areas to other Federal lands in Alaska, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Section 1.2 and 1.3.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>somebody in Washington to come down and want to put a military operation right over the top of it is absolutely ludicrous. I cannot believe that somebody would be so arrogant to do that. There's areas in the state that would do just as fine as that area right there. And Bill Folsom, you stole some of my thunder. The Wrangell St. Elias National Park, I've been in it. There's nobody there. It's empty. The Wrangell St. Elias gate to the arctic, you've got the parks out to the west, the Lake Clark Park, you have Mt. McKinley Park. You have all these federal areas. This is a state -- mostly state property. Why don't you think about taking those areas out to a federal park or taking it out of this area. It doesn't belong here, this is wrong. This is just totally wrong. And I don't mean to be so outspoken, but I've been here for a long time.</p>	
I0022-3	<p>I've been a guide. I know what goes on here. I know how many caribou permits are given out, how many moose are taken. I've been on the Board. I used to be the Fish and Game advisory chairman here at one time and I've worked with Fish and Game, I've worked with the biologists, I've worked and done counts. This area right here is a very sacred area for people that live in Alaska and, like I said, this is the epicenter right here as far as hunting and fishing. Sure, Alaska's big, but as we all know, if you want to hunt in the Brooks Range or you want to hunt out west or you want to hunt down on the Alaska Peninsula it's a logistical nightmare, it costs a fortune and it's not practical for a lot of people. This area here should be left to Alaska, it should be left to Alaskans.</p>	<p>The same factors that make the proposal area practical for most Alaskans are part of the reason why this area is feasible for this proposed action. The expansion areas are situated between existing military installations and are therefore accessible to local training units. The Air Force is leveraging existing infrastructure to meet its needs. Establishing new airspace infrastructure in remote locations is not only a lengthy process, but not a viable option given the flying distances of training aircraft and lack of supporting infrastructure for training operations in remote regions.</p> <p>The Air Force will consider all reasonable measures to reduce the effects of training on the many varied and valued uses of this area in mitigations included in the decision on this proposal.</p>
I0022-4	<p>And again, nothing against the military, but this is wrong and I would like to have the group of people here that proposed this, you know, the people that really came up with this idea in the first place because I'd really like to talk to them. But anyway, with that said, this is wrong and I don't think it should be here. I think it should be moved and I think this whole idea, this whole area of the military operation, MOA, I see it on my flight map all the time, in this case three, Fox 3, and that other area should be changed and I think there should be a great deal of consideration given to that.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. As explained in Sections 1.2 and 1.3 of the Draft EIS, the decision on which alternatives the Army and Air Force will pursue will be made in light of the Purpose and Need by Army and Air Force representatives following the review of all relevant facts, impact analyses, and comments received via the JPARC EIS public participation process.</p>
I0023-1	<p>Thank you for the opportunity to testify. My name is Rod Arno, A-R-N-O. I'm the Executive Director of the Alaska Outdoor Council which is a group of over 10,000 Alaskan outdoors folks. The Outdoor Council has looked over this plan and been part of the process since the beginning. Our concerns remain the same.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0023-2	<p>It's been well pointed out that GMU-13 is one of the close accessible state</p>	<p>As stated in Section, 3.1.10.1, over 90 percent of hunter success in GMUs 13,</p>

Table N-5. Government Response to Comments (continued)

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	<p>land. The State only has about 24 percent of the land and this state is managed by the State. Sixty-four percent of it is federal and 12 is private ANCSA land. So this is extremely important to our membership for hunting, fishing, trapping and recreational use of the Nelchina basin. The 500 foot lower level, you know, that's just totally not going to work out just because of the way the Alaskans use the aircraft for access up here. You know, what happens up in GMU-20, which is another really important part of game management and state land, well, you know, the military lands there, you're -- you know, obviously you can do what you want on those. But on this one little piece of state land here it's extremely important for Alaskans to be able to access that.</p>	<p>14, and 20D occurs between mid-August and late September, with another short surge from the end of October to early November. Section 3.1.10.3 of the DEIS acknowledges that indirect effects on civilian air access would affect spatial and temporal availability of recreational areas underlying the expanded Fox 3 MOA and new Paxon MOA. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts such as avoiding overflight of popular hunting areas, campgrounds, and trails during peak use periods between June 27 and July 11 and from mid-August through September and other important seasons determined with ADFG. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0023-3	<p>Another point I'd like to make is in the last couple decades I've participated in a number of EISs that the federal government's put up, BLM, their resource management plans and comprehensive conservation plans for refuges and I hope the same standards are used by the military on their EIS as the standards that are put on the Alaskans when we try to participate and actively be on federal lands. Thank you.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Each Federal agency having a potential impact on the environment is required to enact and publish regulations to implement NEPA. The Army follows 32 CFR Part 651 - Environmental Analysis of Army Actions and the Air Force follows 32 CFR Part 989 - Environmental Impact Analysis Process (EIAP). While each Federal agency provides different services to the public, all agencies are required to include NEPA and Council of Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508) as part of their overall planning process.</p>
I0024-1	<p>Lisa Moorehead, M-O-O-R-E-H-E-A-D. And I have a cabin just south of the existing MOA 3. Is that what it's called? Fox 3 Military Operations Area. Our recreational cabin's staked in a remote parcel staking 27 or eight years ago and I go out there for peace and quiet. There's really not anything else to say. I'd like it to stay that way. We occasionally hear what are probably sonic booms from the existing MOA and we would be probably encompassed in the expansion.</p>	<p>Section 3.1.10.3.1 of the EIS acknowledges that changes to quiet settings due to increased aircraft noise would cause potentially significant impact on communities underlying the Fox 3 MOA and expansion area and new Paxon MOA. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts such as coordinating the schedule of MFEs with local communities in advance. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0024-2	<p>So my alternative would be a no action alternative recommendation. Thank you.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0025-1	<p>Yeah, I'm Peter M. Probasco and I have a couple comments.</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		provided, as applicable.
I0025-2	The first one is about communications and I have the draft copy of this plan and it is a very, very difficult study I think from the perspective of many of us that are civilians. I got out of the Air Force in 1960 and I was never that familiar with that many acronyms then. But there are five pages of acronyms that go with this draft copy and if you start studying it, I took them out so I could refer to them all the time, but it's very, very confusing. And I think when you want to communicate something you need to do it with some clarity and recognition to the audience you're trying to communicate with and I thought that was very confusing.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Draft EIS was written to be technically accurate and as understandable to the extent practicable, given the number of proposals and complexity of the subject matter. The Army and Air Force strived to translate technical data into terms that render it an effective disclosure of the environmental impacts of the proposals to all intended readership, including the general public, government agencies, and other organizations. The Executive Summary was designed to provide those statistics and summary information that members of the public would be most interested in. The structure of the Draft EIS is presented in the first few pages of the EIS in order to give the reader an indication of specific issues addressed and overall organization. A description (including location) of all the proposed actions and alternatives and their locations is provided in Chapter 2 of the EIS. Finally, an index is provided at the end of the EIS so a reader may locate specific phrases or subjects of interest.
I0025-3	I think there is more clarity with this meeting than the one we had last fall in Wasilla at the Menard Center.	We appreciate your comment. As we receive more public and government agency and representative inputs, we are able to further refine these proposals.
I0025-4	Another thing, the comments that the individuals have made about this being the playground center and the aspects of this and the amount of it that's state land I think is very, very significant. And I think state land is different from federal land and is different from park land. Park land is federal land. And I agree totally that there should be park land that's part of this. Some of the park land is never even looked at by anybody and it's not going to have any impact as far as populations or probably not going to have any great impact on our wildlife populations.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources. The comment to move existing Army and Air Force training areas to other Federal lands in Alaska, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Sections 1.2 and 1.3.
I0025-5	But state land are -- have to be managed supposedly in compliance with the Alaska Constitution and so you need to take into consideration sovereignty of the state.	The JPARC proposals do not involve acquisition of new lands, but involve using airspace overlying Federal, State, Native and private lands, and in one case, the intermittent exclusive use of State land as a hazardous operations safety area. The military is not intending to grab land or expand its holdings. The Army and Air Force are listening to the concerns of the public and managing agencies and will incorporate as many measures and methods as possible to minimize impacts of the proposals. The intent of these measures is to share the use of land and airspace assets in a way that both meets the needs of the military (a national interest) and preserves the qualities of Alaska that are important for its residents. Through the EIS process, Alaskan Command (ALCOM), along with the Army and Air Force, are working with

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		federal, state, and local regulators to find the best way to accomplish the military missions in a way that respects varied goals and objectives for managing airspace and land. The ROD will include commitments and requirements for conducting proposed activities to achieve this balance.
I0025-6	And I think coordination was mentioned in one of the presentations about coordination with FAA and a couple of other entities. I think a coordination group should be actively involved should be the department of Alaska Fish and Game	Coordination of the EIS with numerous government agencies, including the Federal Aviation Administration (FAA), the Alaska Department of Fish and Game, the Alaska Department of Natural Resources and others is important and mandated by Federal law. The FAA officially became a cooperating agency in preparing the EIS on March 10, 2011. ALCOM, along with the Army and Air Force, have met with these agencies on several occasions both in person and over the phone, along with engaging in written correspondence. Written endangered species consultation correspondence from these and other agencies is contained in Appendix A, Section A.4.3 of the Draft EIS and Appendix L of the Final EIS.
I0025-7	I think a coordination group should be actively involved should be the department of Alaska Fish and Game because game populations are very dynamic and the things that game populations do is dynamic and what could be reasonably acceptable one year may not be totally out of line the next year because of changes in population, migrations, route and everything else. So I think all of these things -- I think it'd be very important if there were clear statements in there that this has been evaluated and assessments made by the Alaska Department of Fish and Game.	<p>The U.S. military has a long record of environmental stewardship in Alaska. There are mitigations being considered that alleviate impacts on certain areas of the proposed airspace. Calving and lambing areas have long been established as overflight avoidance areas as a result of efforts by the Air Force and the Alaska Department of Fish and Game (ADFG). The Air Force will continue to work with them to avoid critical habitats beneath the old and new airspace during the appropriate seasons.</p> <p>The Air Force is considering reconvening the Resource Protection Council (RPC) that was established for several years after the Alaska Military Operations Area (MOA) EIS in the 1990s. The RPC would be the venue where mitigation efforts and their effectiveness and/or need for more analysis or protection would be discussed.</p> <p>The Army is required by law (Sikes Act) to partner with the ADFG and the USFWS to manage wildlife populations on military lands. The Army partners with the ADFG and the USFWS (as required by the Sikes Act) to manage fish and wildlife resources on Army lands. Fort Wainwright cooperates with the ADFG and the USFWS to conduct fish and wildlife surveys as part of the Fort Wainwright Integrated Natural Resources Management Plan and Cooperative Agreement (AK-MOA-250). Coordination between the three agencies will continue to occur to allow surveys during important timeframes for wildlife while maintaining safety for agency personnel, soldiers, civilians and wildlife.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
I0025-8	<p>Another concern, and coordination was a big one, but you talked about biological refer -- or biological resources and the evaluation indicated in a couple cases that this was not significant, the impact on the biological resource. I think that if you evaluate a biological resource, be it caribou or what, during calving season, during any stage of pregnancy, any kind of impact, it's very significant. I know in domestic animals it's not difficult to cause a whole flock of sheep to abort by stress and I'm sure that the same thing can happen in caribou and I'm sure with dall sheep. I don't know about moose, whether they're prone to that sort of thing, but I think if you harass them enough they do abort too. So these are significant considerations that need to be made and I think there needs -- you'd communicate much better if there were references made in the publication that there were assessments made by the Alaska Department of Fish and Game, coordination with other entities within the state clearly stated. The fact that you went to studies is very, very good, but where these studies came from, who made them and when is very, very important.</p>	<p>Sections 3.1.8.3 and 3.1.8.4 provide impact analysis and mitigations with regard to aircraft overflight and noise (Fox/Paxon MOAs). All known calving, lambing, and important bird areas within the JPARC project area were mapped (please see Figures B-11, B-13, and B-14 that cover entire project area, and Figures 3-4 through 3-8 for sensitive wildlife species, including Caribou, Dall Sheep, and Moose, under the proposed Fox/Paxon MOA) and have been taken into consideration during effects analysis.</p> <p>The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection. The noise analyses review studies by scientists with many affiliations, including the Alaska Department of Fish and Game. Please see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p>
I0026-1	<p>I was -- with my question earlier about the MOA 3 area and the groups of cabins which were included in the new extension of it I was glad to hear that the -- there was an alternative E that moves that over -- away from over the heads of all the cabins that are out there. And so I would like to support at least that, but I would like to go further and support a non-alternative for that particular MOA because that was -- I've had a cabin out there for 25 years and it was presented by the state as a remote parcel and the reason we were interested in having a cabin out there was to go out and live remotely and quietly and sonic booms are going to be just a short distance to the north of this sort of goes counter to the reasons that we wanted to go out there to begin with. So I'd like to support a no alternative or an alternative E at the least.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about quality of life. As explained in Sections 1.2 and 1.3 of the Draft EIS, the decision on which alternatives the Army and Air Force will pursue will be made in light of the Purpose and Need by Army and Air Force representatives following the review of all relevant facts, impact analyses, and comments received via the JPARC EIS public participation process.</p>
I0026-2	<p>I would like to go further and support a non-alternative for that particular MOA because that was -- I've had a cabin out there for 25 years and it was presented by the state as a remote parcel and the reason we were interested in having a cabin out there was to go out and live remotely and quietly and sonic booms are going to be just a short distance to the north of this sort of goes counter to the reasons that we wanted to go out there to begin with.</p>	<p>Your comment is noted. The DEIS describes the potential for adverse impacts on communities and a range of sensitive uses in Section 3.1.10.2 and 3.1.10.3. The FEIS and ROD will include reasonable and feasible methods to minimize noise impacts on underlying areas, particularly over communities and specially protected areas. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0027-1	<p>My name is Frank Kreger, K-R-E-G-E-R, and today I live in Wasilla. I don't have anything new to say. What I want to do is attempt to underscore some of the things that have already been said.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0027-2	I would say it is not simply inadvisable to do this, it is wrong. It is dead wrong. Not 99 percent, 100 percent. The federal government already has control of 61 percent of this state. Do it there, period. End of discussion. Go away now.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
I0028-1	I just want to be put on the record that alternative E is not enough. The border needs to move further north and -- because there's too much at stake here and it is a recreational area and that's what it has been and it should continue. But it should -- the -- alternative E, the border needs to be moved further north.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Alternative E was created in response to public comments after the scoping process in order to avoid impacts to the Lake Louise area and other areas in this vicinity.
I0028-2	Hello. My name's Jean Holt, H-O-L-T, and I just want to be put on the record that alternative E is not enough. The border needs to move further north and -- because there's too much at stake here and it is a recreational area and that's what it has been and it should continue. But it should -- the -- alternative E, the border needs to be moved further north. Thank you.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
I0029-1	My name is Beverly Matthews and I live at Lake Louise and we have about 200 -- over 250 cabins up there. Now in the summertime lots of people fly and they -- I don't know that they fly 500 feet, but they're coming back and forth to their cabins and this just isn't going to work. That's why they like having property on the lake. It's a beautiful place and we just got to get the military up higher.	Section 3.1.10.3 of the DEIS acknowledges that the expansion of the Fox 3 MOA and the establishment of the Paxon MOA would result in indirect effects on civilian air access to areas below or in the vicinity of communities reliant on air access, including Lake Louise. Civilian pilots can technically operate in active MOAs using VFR. However, as indicated in the EIS, many pilots choose not to do so because of higher risk when aircraft with vastly different performance capabilities are using the airspace. The EIS acknowledges that the proposed action requires increased vigilance by both military and civilian pilots to maintain continued awareness of each other's presence while sharing this MOA airspace. Sections 3.1.10.4 (Land Use) and 3.1.1.4 (Airspace) of the DEIS listed mitigation measures that could be implemented to reduce the impacts such as avoiding overflight of popular recreational areas, including the Lake Louise State Recreation Area, during peak use periods between June 27 and July 11 and from mid-August through

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>September.</p> <p>The proponent has gathered input from comments on the DEIS and is considering measure to reduce impacts. The FEIS includes final proposed mitigations and the ROD will designate those that the proponent will implement for the selected actions and alternatives.</p>
I0030-1	I agree with all that's been said so far for the most part.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0030-2	But another thing that concerns me is a gentleman that we were talking to back in the room when we first came in mentioned that one of the reasons for the area that is under consideration, Fox 3, is because it is close, it's in close proximity to JBER. It would be cheaper, more economically feasible, for -- and more cost effective to do training there, but I think for us as a nation to look at something in terms of economic considerations only and not human, animal and the land resources and sell out for that reason is wrong.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. Lower fuel consumption and lower energy costs are important factors for the JPARC proposals in this EIS, but are two of many others. Chapter 1, Purpose and Need for the Proposed Actions provides all of the requirements and elements that went into the development of the purpose and the need for each of the proposals planned to modernize and enhance future training at JPARC.
I0031-1	Accidents happen, we burn fuel. That's one of my concerns.	Accidents can happen and for that reason the military continues to make flight safety and accident prevention a high priority in their flight training activities and operations within any airspace that is shared with nonparticipating aircraft. While every effort is made to prevent accidents, as you noted, accidents can happen with a military or civilian aircraft where it is equally important that safety be maintained within the land and airspace areas surrounding any accident scene. Flight safety is addressed extensively in the EIS Airspace Management and Use and Flight Safety sections, while Appendix K notes those existing and proposed mitigations that would be aimed at providing for the safe, compatible use of the Alaska airspace for all airspace users.
I0031-2	I don't want to be worrying all the time if I'm flying in the wrong airspace or if I'm going to have some jet come up and escort me down or I'm going to get turned into the FAA and have a hassle with them.	The Army and Air Force share your concern and for that reason every effort would be made to publicize those areas and times the Special Use Airspace will be scheduled for flight training activities. The FEIS Sections 3.1.1. (Airspace Management) and 3.1.3 (Flight Safety), and Appendix K (Mitigations, Best Management Practices, and Standard Operating Procedures) address those existing and proposed measures that are intended to help ensure the safe use of all shared airspace. Flight training activities are halted when any nonparticipating aircraft is observed flying within an area

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		that would put any aircraft at risk.
I0031-3	Another comment I wanted to make, as far as the fuel's concerned, I can tell some of you military folks in the back exactly how much fuel was used in Iraq per day. It was a lot and I don't have a problem with that. If you need to use it, use it, burn it up. But for us to say that -- or for you guys to say, or the people that are, you know, proposing this, to say that we're going to have to save some fuel, that doesn't work, that doesn't work for me at all. You know, we move militaries to Iraq, to Afghanistan. If we have to do it we do it, fuel's not an issue, and I don't think it should be an issue here.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Lower fuel consumption and lower energy costs are important factors for the JPARC proposals in this EIS, but are two of many others. Chapter 1, Purpose and Need for the Proposed Actions provide all of the requirements and elements that went into the development of the purpose and the need for each of the proposals planned to modernize and enhance future training at JPARC.
I0031-4	I just basically wanted to state what happened here a few months ago with shut down airspace, big inconvenience to what we were actually doing at the time.	Flight safety is of utmost importance in any airspace environment to include those circumstances when an aircraft mishap occurs. The military, as well as its civilian counterparts, have established emergency response procedures that provide for the safety of those land and airspace uses surrounding an aircraft accident scene. As you have noted, this may involve shutting down airspace and taking other precautions so as not to put anyone at risk. Flight safety is addressed extensively in the EIS Airspace Management and Use and Flight Safety sections while Appendix K notes those existing and proposed mitigations that would provide for the safe, compatible use of the expanded airspace by all concerned.
I0031-5	And it was a few months ago, I don't know, five or six months ago the Air Force lost a jet up in the Talkeetna mountains. Correct? As a pilot it shut me down. You guys -- and again, nothing personal, but you put a big corridor around that area, blocked everything off, and if that's just one example of what might happen when there's, you know, training exercises on the ground or other exercises or if you have an accident and accidents happen.	Flight safety is of utmost importance in any airspace environment to include those circumstances when an aircraft mishap occurs. The military, as well as its civilian aviation counterparts, have established emergency response procedures that provide for the safety of those land and airspace uses surrounding an aircraft accident scene. In the event of any aircraft mishap such as you reference in your comment, those standing emergency response actions would be activated, as necessary, to further protect the affected airspace while search, rescue, and recovery operations are in progress. This may involve shutting down airspace and taking other precautions that may require flight divisions so as not to put anyone at risk. Flight safety is addressed extensively in the EIS Airspace Management and Use and Flight Safety sections, while Appendix K notes those existing and proposed mitigations that would provide for the safe, compatible use of the expanded airspace by all concerned.
I0032-1	I would just like to make public comment that alternative E hasn't done anything except move the border boundary 20 miles and that isn't addressing the ceiling from 5,000 to 500. That's very crucial.	The FEIS Sections 3.1.1 and 3.1.3 describe the average daily operations and the proportion of an aircraft's mission time that would typically be conducted within the MOA altitudes to provide some general sense of the relatively limited extent to which those lower altitudes may be used during both routine

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		and MFE operations. These sections and Appendix K also address those measures that would continue to be used and proposed within the proposed expanded airspace to help ensure flight safety is maintained for all concerned. As described for the Paxon MOA proposal, only MFE aircraft would operate at the lower altitudes during those limited times of the year these exercises are conducted.
I0032-2	And also the increase of sonic booms from 35 to 50 decibels. All these three impacts will -- these impacts and the six adverse impacts on the MOA 3 haven't been addressed just by expanding 20 miles and we do need to address the -- especially the flight ceilings and the sound.	The JPARC EIS acknowledges that adverse noise impacts including but not limited to human annoyance and activity interference, potential effects on animal behavior, and potential effects on subsistence activities would be associated with operations in the proposed airspace. It is also recognized that shifting the boundary of the proposed airspace will not alleviate all impacts. The EIS considers mitigation measures including designation of additional avoidance areas.
I0033-1	I've been to a lot of hearings on proposals right here in this same building, you know, Bogard or this and that and the other and every time so far it's been a pre-drawn conclusion as to what's going to happen and no matter what the testimony is it's always gone the way they want it to go. I've never seen one time where we've turned anything around. Well, yeah, one time when they burned an FRG (ph) out here at the Butte school (ph). But -- and I hope that that's not what's happening here. It seems like a lot of effort's been put into this and that you give lip service to listening to people and their concerns, but then you continue to do exactly what you intend to do with maybe a few little modifications.	Public and agency input do make a difference. Thank you for your input. The National Environmental Policy Act (NEPA) requires Federal government agencies to consider public input during preparation of the Draft EIS. The purpose of the input obtained during the scoping process is to assist the EIS preparers in identifying and addressing the issues that are important to the public. The Federal agency then has agency discretion as to whether or not or how to modify proposed actions and alternatives. The Draft EIS addresses the potential environmental impacts from the alternatives proposed once they have been more clearly defined. In the Final EIS, the government must not only consider public and agency input, but also must respond to substantive input in the Final EIS and before making final decisions. Alaskan Command (ALCOM), the U.S. Army, and the U.S. Air Force have considered Draft EIS comments in this Final EIS preparation.
I0033-3	It does not belong in the rail belt other than your bases. It just is not going to work.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
I0033-4	Now you have a small representation of people here, but as soon as all this hits the fan and it actually starts happening then people are going to come out of the woodwork and I mean there'll be hundreds and hundreds of people that are going to be upset.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0033-5	And so I hope that the whole thing is reversed except for whatever you do on your existing bases and get all the MOAs out of this rail belt area, these other expansions.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
I0033-6	I've been to a lot of hearings on proposals right here in this same building,	Public and agency input do make a difference. Thank you for your input.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>you know, Bogard or this and that and the other and every time so far it's been a pre-drawn conclusion as to what's going to happen and no matter what the testimony is it's always gone the way they want it to go. I've never seen one time where we've turned anything around. Well, yeah, one time when they burned an FRG (ph) out here at the Butte school (ph). But -- and I hope that that's not what's happening here. It seems like a lot of effort's been put into this and that you give lip service to listening to people and their concerns, but then you continue to do exactly what you intend to do with maybe a few little modifications.</p>	<p>The National Environmental Policy Act (NEPA) requires Federal government agencies to consider public input during preparation of the Draft EIS. The purpose of the input obtained during the scoping process is to assist the EIS preparers in identifying and addressing the issues that are important to the public. The Federal agency then has agency discretion as to whether or not how to modify proposed actions and alternatives. The Draft EIS addresses the potential environmental impacts from the alternatives proposed once they have been more clearly defined. In the Final EIS, the government must not only consider public and agency input, but also must respond to substantive input in the Final EIS and before making final decisions. Alaskan Command (ALCOM), the U.S. Army, and the U.S. Air Force have considered Draft EIS comments in this Final EIS preparation.</p>
I0033-7	<p>It does not belong in the rail belt other than your bases. It just is not going to work.</p> <p>Now you have a small representation of people here, but as soon as all this hits the fan and it actually starts happening then people are going to come out of the woodwork and I mean there'll be hundreds and hundreds of people that are going to be upset. And so I hope that the whole thing is reversed except for whatever you do on your existing bases and get all the MOAs out of this rail belt area, these other expansions.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0034-1	<p>I think that a lot of people don't understand what an acronym named JPARC means and I think that my comment -- one of my comments, and I will make more online, is that we need to be better communicated in layman's terms to the community than just acronyms that really don't -- even JPARC really doesn't mean anything to me until I was alerted to the issue and did some of my own research.</p>	<p>In general, acronyms are utilized in a large document such as an EIS for the sake of brevity and clarity, as well as to reduce potentially awkward sections of text. For this EIS, a list of all acronyms and their explanations are provided just after the Table of Contents in Volume I and after the Table of Contents of each individual Appendix in Volume II, where applicable.</p> <p>An explanation of the Joint Pacific Alaska Range Complex (JPARC) is provided in several places in the EIS, most notably in Section 1.2 (Purpose of the Proposed JPARC Actions. Chapter 2 (Description of Proposed Action and Alternatives) offers a detailed description of all the definitive and programmatic actions proposed for JPARC.</p> <p>For additional information, the Joint Pacific Alaska Range Complex website (http://www.jparceis.com/) also provides a detailed account of the program, the proposed actions, and answers frequently asked questions.</p>
I0034-2	<p>And so I think people will be blindsided and I think what we can do is to spread the word in our community that people should be educated about this</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	proposal, but it feels like time is of the essence. We have less than a month to comment. So I would encourage all of us here to tell everyone you know at least about this and let them form their own opinion, but at least make it more widely known what this obscure acronym means.	will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0034-3	And there are great materials here and it seems like there is a lot of information online, but I would say clearly by the numbers here it is not very well known to the general public that will be impacted by JPARC.	<p>NEPA public notification requirements for the EIS process are outlined in 32 CFR 989.24 and the public involvement program is explained in EIS Section 1.6. Requirements for public notification have been carefully followed throughout the EIS process.</p> <p>Knowing the importance of the JPARC EIS proposals to Alaskan citizens, ALCOM exceeded NEPA notification requirements for the JPARC EIS and associated public hearings. As required by NEPA, ALCOM published the notice of availability for the Draft EIS in the Federal Register on March 30, 2012 (see EIS Appendix M Draft EIS Review Process, Section 1), and published recognizable newspaper advertisements in six newspapers in the region of impact at least two weeks prior to public hearings, as shown below:</p> <ul style="list-style-type: none"> • Anchorage Daily News: June 8, 2012 and April 27, 2012 • Chugiak-Eagle River Star: June 14, 2012 and April 26, 2012 • Copper River Record: June 14, 2012 and April 26, 2012 • Delta Wind: June 14, 2012 and April 26, 2012 • Fairbanks Daily News Miner: June 8, 2012 and April 30, 2012 • Frontiersman: June 8, 2012 and April 27, 2012 <p>Every advertisement provided readers the dates and locations of the public hearings, avenues for obtaining a copy of the Draft EIS, the closing date for the public comment period, the EIS website address, and the ALCOM address and phone number for submitting comments or obtaining additional information.</p> <p>Above and beyond basic NEPA requirements, ALCOM notified the public of the availability of the Draft EIS and public hearings in the following ways:</p> <ul style="list-style-type: none"> • Project Website, www.jparceis.com, advertising hearings and accepting comments from March 30, 2012 to July 9, 2012 • Press Releases and Public Service Announcements (PSAs), issued April to May 2012 to media venues throughout the region of impact

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<ul style="list-style-type: none"> • Direct Mailings or Email Notifications: From March 22 to April 3, 2012, ALCOM distributed letters and/or emails to persons and entities on the project mailing list. The project mailing list was established throughout the EIS process. ALCOM originated the mailing list from other Air Force and Army Alaskan environmental assessment or environmental impact statement mailing lists and then added agencies and entities who ALCOM anticipated to have an interest in the JPARC EIS. ALCOM then supplemented the mailing list with entities or citizens expressing interest in the JPARC EIS, commenting at any point throughout the EIS process, and/or attending scoping meetings or public hearings. ALCOM distributed letters to all physical mailing addresses on the project mailing list and emails to individuals where ALCOM had only an email address in their records. Included as an attachment to these letters and emails was a flyer for posting of dates, times, and locations of the public hearings. ALCOM requested recipients to post the flyers in a public location. Some letters also included copies of the Draft EIS and/or the Executive Summary if a copy was specifically requested. The following letters and distributions lists are located in the Final EIS Appendix M, Section 2. <ul style="list-style-type: none"> a. Draft EIS Cover Letter – Congressional Delivery and Governor Letters b. Memorandum for Federally Recognized Tribes and Distribution List c. Memorandum for Libraries and Repositories, Organizations, Public Groups, and Government Agencies d. Memorandum for State Historic Preservation Offices and Distribution List e. Memorandum Regarding Endangered Species Act Section 107 and Distribution List f. Memorandum for Interested Individuals Announcing Draft EIS Availability and Public Hearing Dates and Distribution List g. Email Announcement for Interested Individuals Announcing Draft EIS Availability and Public Hearing Dates • Flyers posted in public locations by agencies and citizens from April to May 2012 • Copies of the flyers and full Draft EIS at the following libraries and locations: Anchorage Z. J. Loussac; UAA Alaska Resources Library and Information Services; Fairbanks North Star Borough (Noel Wien); Fairbanks Elmer E. Rasmuson Library; Palmer Public Library; Copper Valley

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>Community Library; Alaska Department of Fish and Game in Glennallen; Paxson Lodge; Delta Community Library; Tri-Valley School/Community Library; Talkeetna Public Library; Willow Public Library; and Wasilla Public Library.</p> <p>Additionally, once ALCOM extended the comment period on the Draft EIS from June 7 to July 9, 2012, ALCOM posted a Notice of Continuation in the Federal Register, issued a press release to local media, mailed postcards and issued emails to the project mailing list, and sent out direct letters announcing the comment period extension. Newspaper display advertisements were also placed to announce the extension in the following newspapers on the following dates:</p> <ul style="list-style-type: none"> • Anchorage Daily News: March 30, 2012 • Chugiak-Eagle River Star: April 5, 2012 • Copper River Record: April 12, 2012 • Delta Wind: April 5, 2012 • Fairbanks Daily News Miner: March 30, 2012 • Frontiersman: March 30, 2012
I0034-4	I think that a lot of people don't understand what an acronym named JPARC means and I think that my comment -- one of my comments, and I will make more online, is that we need to be better communicated in layman's terms to the community than just acronyms that really don't -- even JPARC really doesn't mean anything to me until I was alerted to the issue and did some of my own research.	See comment response I0006-3.
I0034-5	And so I think people will be blindsided and I think what we can do is to spread the word in our community that people should be educated about this proposal, but it feels like time is of the essence. We have less than a month to comment. So I would encourage all of us here to tell everyone you know at least about this and let them form their own opinion, but at least make it more widely known what this obscure acronym means. And there are great materials here and it seems like there is a lot of information online, but I would say clearly by the numbers here it is not very well known to the general public that will be impacted by JPARC.	<p>Thank you for educating your local community as ALCOM has prepared and shared numerous public materials. Requirements for public notification have been carefully followed throughout the EIS process.</p> <p>The response to I0034-3 explains the extensive notification process undertaken by ALCOM.</p> <p>Given the feedback provided during the public hearings and Draft EIS review process, the U.S. Army and U.S. Air Force, on behalf of ALCOM, extended the Draft EIS comment period from 70 days to 102 days. This extension took place on May 31, 2012. The comment period, originally scheduled to close on June 7, 2012, was extended to July 9, 2012 to provide more than month for public comments following the hearings.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
I0035-1	<p>Peter M. Probasco. And as to the question you stated and that's a very good question, as to what we can do. Don Young spoke at the Palmer Chamber here a month or so ago and one of the questions came up to him, the commentary made about the amount of land up here that's controlled by the federal people and the amount of land in parks. And of course everybody thinks park land is totally sacred, they're not tread or anything else, but there is a lot of park land that isn't even looked at. And this was brought up to Don and he thought that was one thing that possibly that there could be some changes made is to recognize that there is a lot of land available there not being utilized that isn't going to hurt people if we do use it. One of the comments was made that this area up here, Unit 13, is the breadbasket of Alaska. Don did come back and very rightfully so say that to much of Alaska military payrolls are a breadbasket also. So we do need to be very conscious of the role that military plays in our economy. But that park land up there that's available to get away from using state land, there is no reason why they can't do many of these things over. It's not going to hurt it at all and it's not even going to hurt our game populations because none of those probably migrate into areas where we can utilize them as prescribed by the Alaska Constitution. So I think that's -- Don was sensitive to that and maybe there is an outlet to do something.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources. The comment to move existing Army and Air Force training areas to other Federal lands in Alaska, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Sections 1.2 and 1.3.</p>
I0036-1	<p>I have grown up in the Chickaloon area and realize how much recreation goes on in the area, and how important it is, in the air and on the ground. I also realize that we have a safe country because of what our military does. I don't want our military to have insufficient training, but I want recreation and economic bases to continue. I don't think that the military realizes how much recreation and revenue there is in the areas behind Eureka and Lake Louise.</p>	<p>In consideration of public and agency scoping comments, an alternative was added to the Expanded Fox 3 MOA and new Paxon MOA action, Alternative E. The overall airspace structure proposed under Alternative E is smaller in size than the airspace structure proposed for Alternative A. The southern boundaries for both Alternative A and Alternative E do not overlap Chickaloon. A smaller portion of Lake Louise resides under the southern boundary of Fox 3 MOA Expansion (Alternative E) as compared to Alternative A. The potential impacts to recreation and socioeconomic resources from actions proposed under the expanded Fox 3 MOA and new Paxon MOA alternatives have been determined to result in significant impacts; additional mitigation measures such as creation of designated avoidance areas, particularly around all areas of Lake Louise, and limitations on the number of military flying exercises (MFEs) permitted per year and the dates on which MFEs can occur are under consideration and would be anticipated to minimize potential adverse affects on recreation and revenue-generating businesses.</p>
I0036-2	<p>The idea of the Fox 3 MOA expansion is that the general public could still</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	use it hot or cold for VFR, but you are asking for more airspace now, what will keep you from getting more later? What will keep you from making it a cold only entry? Making it extend to the ground? The government rarely gives land back to the public after they obtain it, so even if the military does not use the airspace in the future, it would never be the same.	duly noted. The questions posed in the comment are not part of the purpose and need for the modernization and enhancement requirements for JPARC covered in this EIS. The Air Force has developed the Fox 3 MOA and New Paxon MOA Addition proposal based on the specific airspace size, altitudes, maneuvers, and tactics required for future fifth generation fighter training activities. It is also noted that this proposal involves only airspace, as no land acquisition is involved.
I0036-3	I have flown in the area a lot and know that both Fox 3 expansions are over lots of private facilities, and the Paxon one as well. I am not trying to be a selfish recreator or aviator, just trying to get the word out. I know I am only one of many who feel this way. I want the military to be properly trained too, but I don't see a practical need for them to get that much more airspace in an area of such high public traffic, making it much more inconvenient for all the private activities that go on their. Thank you.	Section 3.1.10.3 of the DEIS acknowledges that the expansion of the Fox 3 MOA and the establishment of the Paxon MOA would result in indirect effects on civilian air access to areas below or in the vicinity of communities reliant on air access. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts including coordinating the schedule of MFES with local communities in advance. In addition, Section 3.1.1.4 (Airspace) lists mitigation measures that could be implemented to reduce the impacts such as use of the SUAIS and establishing or expanding existing VFR flyway corridors as necessary to provide VFR aircraft transit through areas that may be affected by high density military flight activities within/near the proposed airspace. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0037-1	I do not favor having live missiles tested or used in the Gulf of Alaska, I don't think the casings are biodegradable, nor I like the idea of errant projectiles interfering with fisheries activities and whale habitat.	<p>As stated in the DEIS Section 3.11.8, the Navy is already training with these weapons in this area so the programmatic proposal would represent an increase in operations and possibly an expansion of season of use but not a completely new effect for this area. No new impacts to biological organisms are expected. As described in Section 3.11.8, expended training materials that come to rest on the ocean floor may:</p> <ol style="list-style-type: none"> 1. Lodge in oxygen-poor sediments; 2. Remain on the ocean floor and corrode; or 3. Remain on the ocean floor and become encrusted by marine organisms. <p>The infrequency and limited volume of such residual concentrations of hazardous substances would not result in concentrations considered harmful.</p> <p>The Hazardous Materials Section 3.11.7 has more details on munitions-related residues. Please refer to the Recreation (under Land Use 3.X.10) and Subsistence (3.X.13) sections for fishing-related impacts.</p>
I0037-2	The last thing I need is a robot plane hitting a goose and crashing into my	As discussed in the FEIS Flight Safety sections for all the airspace proposals,

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	house.	both the Air Force and the Army have bird/wildlife aircraft strike hazard (BASH) programs in place that would also be adhered to for unmanned aircraft system operations, as appropriate, to help reduce the potential for any bird strikes in those areas/altitudes of concern.
I0037-3	Also, the idea of "Eyes in the Skies" above private citizens doesn't appeal to me.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Department of Defense Executive Order 12333 (Amended 2008) states that "no foreign intelligence collection by such elements may be undertaken for the purpose of acquiring information concerning the domestic activities of United States persons".
I0038-1	Alternative E for the Fox 3 and Paxon MOAs is a substantial improvement over Alternative A. It does not however adequately mitigate impacts to airspace safety caused by the planned low-level flight activities.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
I0038-2	Also there is a socioeconomic "intangible" ignored by your document. Strangely in a document representing an effort to increase the protection of American freedoms through flight training, no mention is made of the substantial reduction in civilian freedoms that the establishment and expansions of yet more Alaska military operations areas represents.	During the scoping process, the Air Force solicited input from the public and other agencies regarding the breadth and depth of issues to be addressed and the significant issues related to the proposed actions. Potential environmental consequences are addressed in terms of separate resource areas so that the significance of each action on each resource area considers both context and intensity as required under NEPA.
I0038-3	You, the planners, and it, the document, absolutely do not understand what it means that you are taking away the sky.	The critical needs of both military and civil aviation airspace users were taken into account in both the planning of the JPARC proposals and the assessment of their environmental consequences in the FEIS. The ultimate objective of these proposals is to modernize and enhance JPARC to support twenty-first century Army and Air Force training needs, while trying to avoid, minimize, or mitigate impacts on all airspace uses to the maximum extent reasonable and practicable. Additionally, military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. General aviation is particularly important in Alaska as a means of

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		commerce, subsistence, recreation and emergency transportation. In preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century.
I0038-4	There are large ragged holes all over the state in our ability to travel, to access our homes, to look for and manage mineral and biological resources, to expand our badly-in-need-of-expansion economic opportunities.	As noted for your previous comment, all airspace user needs were considered in the planning of the JPARC airspace proposals and the FAA will be examining the preferred alternatives further to determine if and how each proposal can be established and managed in a manner that can best serve all military and civil aviation needs without impacting Air Traffic Control system capabilities.
I0038-5	You are restricting the very freedoms you have sacrificed so much to defend. And you have put the burden on us to find out what you have taken away from us.	The Army and Air Force will continue to work closely and cooperatively with the State of Alaska to enhance both the JPARC and State resources for the benefit of the State and its citizens. Public participation is one of the cornerstones of the NEPA process. The purpose of public involvement of NEPA is to encourage agencies and facilitate public involvement in decisions which affect the quality of the human environment.
I0038-6	Saving gas, a stated goal of this expansion, is a worthwhile goal, but it does not justify the losses that will result.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Lower fuel consumption and lower energy costs are important factors for the JPARC proposals in this EIS, but are two of many. Chapter 1, Purpose and Need for the Proposed Actions provide all of the requirements and elements that went into the development of the purpose and the need for each of the proposals planned to modernize and enhance future training at JPARC.
I0038-7	This big picture concern for the JPARC expansion has no expression in this EIS document. You should put it there, and allow it to amend these proposals.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. This EIS has been prepared in accordance with the standards and information requirements pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] 4321 et seq.) and the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508. The purpose and need for the modernization and expansion of JPARC is expressed in Chapter 1, Purpose and Need for the Proposed Actions. As explained in Sections 1.2 and 1.3 of Chapter 1, the decision on which alternatives the Army and Air Force will pursue will be made in light of the purpose and need by Army and Air Force representatives following the review of all relevant facts, impact analyses, and comments received via the JPARC EIS public participation process.

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
I0038-8	The EIS also does not take into account this loss of airspace as part of the cumulative effects of past losses caused by the establishment of the large National Parks and their restrictions of airspace use and recreation, nor present losses of climate change, nor future plans for a Susitna Dam and mineral development around the Denali Highway.	The FEIS Chapter 4 reflects the additive and interactive effects of each proposed JPARC action for each resource area in consideration of all the identified past, present and reasonably foreseeable projects, activities and processes in the region of influence.
I0038-9	We are being "pinched" between these elements, and yet your EIS does not take them into account.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0038-10	You have created a 1400 page document which we are invited to pick apart, and yet it is blind and incoherent on the issue of freedoms being lost.	During the scoping process, the Army and Air Force solicited input from the public and other agencies regarding the breadth and depth of issues to be addressed and the significant issues related to the proposed actions. Potential environmental consequences are addressed in terms of separate resource areas so that the significance of each action on each resource area considers both context and intensity as required under NEPA.
I0038-11	We are grateful that the southern boundary of the proposed Fox 3 MOA has been withdrawn somewhat from the highest civilian activity level areas (in alternative E), but the problems presented by low level flights remain.	The FEIS Section 3.1.1 (Airspace Management) describes the average daily operations and the proportion of an aircraft's mission time that would typically be conducted within the MOA altitudes to provide a sense of the relatively limited extent to which those lower altitudes may be used during both routine and MFE operations. This section, coupled with Section 3.1.3 (Flight Safety) and Appendix K also addresses those measures that would continue to be used and proposed within the proposed expanded airspace to help ensure flight safety is maintained for all concerned. As described for the Paxon MOA proposal, only MFE aircraft would operate at the lower altitudes during those limited times of the year these exercises are conducted.
I0038-12	The Nelchina Public Use Area and the Copper Basin should remain free of low-level military flights March-October to avoid conflict with bird and animal breeding and migration, wildlife and other resource management activities, transportation and access, recreation and hunting.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>impacts and locations of the proposals in this EIS.</p> <p>The proponent is coordinating with other land and resource management agencies to acquire best available data for planning mitigations and avoidance procedures. These will reduce effects of aircraft overflight and noise on sensitive wildlife locations and human activities. The decisionmakers will consider all available information prior to making a decision.</p>
I0038-13	<p>What you have said to us in the meetings and in writing, as evidenced in this EIS process, indicates that you still do not understand how active this sky is, or how the importance of your military service depends on the integrity of civilian lives.</p>	<p>Current and future airspace needs of both military and civilian aviation interests have been taken into account throughout the proposal planning and EIS processes to attempt to find solutions that will most effectively meet all those needs. This will continue to be a high priority as the military and FAA go forward in assessing if and how the preferred alternative proposals can best be implemented/managed to accommodate all airspace uses in the safest and most efficient manner possible. Suggestive comments from the general aviation community on how to best to accomplish these objectives are also an important consideration throughout the DEIS review and decisionmaking processes. Additionally, military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. General aviation is particularly important in Alaska as a means of commerce, subsistence, recreation and emergency transportation. In preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century.</p>
I0038-14	<p>What will you be fighting for when you take away our freedoms?</p>	<p>The actions proposed under the JPARC EIS would not affect, nor take away, the freedoms guaranteed by the First Amendment to the United States Constitution or any of the Constitutional Amendments which constitute the Bill of Rights.</p>
I0038-15	<p>Whether you know it or not, we are fighting for this place and the people who live here. Respect us.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0038-16	<p>Keep low-level (500' - 5000') military flights out of the Fox 3 and Paxon MOAs March through October to avoid substantial conflicts.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
I0038-17	<p>Alternative E for the Fox 3 and Paxon MOAs is a substantial improvement over Alternative A. It does not however adequately mitigate impacts to airspace safety caused by the planned low-level flight activities. Keep low-level (500' - 5000') military flights out of the Fox 3 and Paxon MOAs March through October to avoid substantial conflicts.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
I0038-18	<p>Also there is a socioeconomic "intangible" ignored by your document. Strangely in a document representing an effort to increase the protection of American freedoms through flight training, no mention is made of the substantial reduction in civilian freedoms that the establishment and expansions of yet more Alaska military operations areas represents.</p>	<p>During the scoping process, the Air Force solicited input from the public and other agencies regarding the breadth and depth of issues to be addressed and the significant issues related to the proposed actions. Potential environmental consequences are addressed in terms of separate resource areas so that the significance of each action on each resource area considers both context and intensity as required under NEPA.</p>
I0038-19	<p>You, the planners, and it, the document, absolutely do not understand what it means that you are taking away the sky. There are large ragged holes all over the state in our ability to travel, to access our homes, to look for and manage mineral and biological resources, to expand our badly-in-need-of-expansion economic opportunities.</p>	<p>Section 3.1.10.3 of the DEIS acknowledges that the expansion of the Fox 3 MOA and the establishment of the Paxon MOA would result in indirect effects on civilian air access to areas below or in the vicinity of communities reliant on air access. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts including coordinating the schedule of MFEs with local communities in advance. In addition, Section 3.1.1.4 (Airspace) lists mitigation measures that could be implemented to reduce the impacts such as use of the SUAIS and establishing or expanding existing VFR flyway corridors as necessary to provide VFR aircraft transit through areas that may be affected by high density military flight activities within/near the proposed airspace. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
I0038-20	You are restricting the very freedoms you have sacrificed so much to defend. And you have put the burden on us to find out what you have taken away from us.	The Army and Air Force will continue to work closely and cooperatively with the State of Alaska to enhance both the JPARC and State resources for the benefit of the State and its citizens. Public participation is one of the cornerstones of the NEPA process. The purpose of public involvement of NEPA is to encourage agencies and facilitate public involvement in decisions which affect the quality of the human environment.
I0038-21	Saving gas, a stated goal of this expansion, is a worthwhile goal, but it does not justify the losses that will result. Are you even aware of what this loss of the sky means to all of us?	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's airspace. Lower fuel consumption and lower energy costs are important factors for the JPARC proposals in this EIS, but are two of many. Chapter 1, Purpose and Need for the Proposed Actions provides all of the requirements and elements that went into the development of the purpose and the need for each of the proposals planned to modernize and enhance future training at JPARC. Also, the airspace will not be "lost" and will be available for current and future users. General aviation is particularly important in Alaska as a means of commerce, subsistence, recreation and emergency transportation. The Army and Air Force plan to make the effort necessary to harmonize military mission requirements and community needs in order that user conflicts be avoided, minimized or mitigated to the extent feasible and practicable.
I0038-22	Are you even aware of what this loss of the sky means to all of us? President John Adams (who by the way established the US Navy) once disbanded the standing US Army because he believed soldiers should never again be garrisoned in American homes. Because of President Adams, this concern is part of our Bill of Rights. What would he think about you taking the sky? This big picture concern for the JPARC expansion has no expression in this EIS document. You should put it there, and allow it to amend these proposals.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Please see comment response I0038-21 regarding the fact that airspace will not be "lost" to any current or future user as the result of implementing JPARC proposals described in this EIS.
I0039-1	How much fuel will be consumed by military aircraft flying under 30,000 feet over areas that do not currently have exhaust emissions? Will there be a Title V air pollution permit for the impacted region instead of the point of takeoff?	Thank you for your comment. The altitude of concern with respect to ground level air pollutant concentrations is aircraft operations that are below 3,000 feet and not 30,000 feet as indicated in the comment. It is feasible to estimate the overall change in JP-8 fuel use that would result from the proposed JPARC, but it is not feasible to identify the amount of fuel consumed over areas that do not currently have exhaust emissions as requested in the comment, as the exact locations of the baseline emissions in the region is not identified in EPA's 2008 National Emissions Inventory. Proposed JPARC aircraft operations below 3,000 feet would result in an estimated net increase in fuel consumption of around 102,193,000 gallons per year in all areas of the

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>Fox 3 and New Paxon MOAs, and a net decrease of 11,928,000 gallons per year at the Stony MOA. The UAV corridors would potentially result in a maximum increase in fuel usage of around 6,750,000 gallons per year if all corridors are active. These numbers were calculated using conservative estimations of potential operations as presented in Appendix F of the JPARC EIS Volume II. However, as indicated in the EIS, these estimated increases in fuel usage are not expected to result in adverse air quality impacts.</p> <p>With respect to EPA’s Title V permitting program: it addresses emissions from stationary sources (such as an industrial facility or a military base); as the emissions from military aircraft operations are mobile in nature, they will not require any Title V permitting as these sources are not regulated under the Title V permitting program.</p>
I0039-2	<p>What studies have been conducted related to the effect of sonic concussion on wildlife, on livestock, on people?</p>	<p>The strongest sonic boom ever recorded had an overpressure of 144 pounds per square foot and it did not cause injury to the researchers who were exposed to it (Nixon et al 1968). The boom was produced by an F-4 flying just above the speed of sound at an altitude of 100 feet. Sonic booms experienced beneath military training airspace in which the lowest allowed supersonic operations are not below 5,000 above ground level (AGL) or 12,000 feet above mean sea level (MSL), whichever is higher, would typically be more than an order of magnitude less intense. No direct health effects on humans or animals would be expected to occur as a result of sonic boom exposure.</p> <p>As described in Appendix E, Section E.2, noises such as sonic booms have the potential to elicit indirect effects through behavioral reactions and induction of stress. Potential indirect effects of sonic booms on animals are discussed in the Biological Resources impacts section for each component proposed action. Indirect effects of sonic boom noise on humans are discussed in Cultural Resources, Land Use, Socioeconomics, Subsistence, and Environmental Justice sections.</p>
I0039-3	<p>Have there been economic impact studies conducted to assess the impact on private, native and State property values within proposed training range?</p>	<p>Section 3.1.12.3.1 provides a qualitative discussion of the potential impact of noise on property values associated with the proposed actions. As stated in Section 3.1.12.3.1, the complex nature of property valuation factors makes any estimation of the potential effects of noise from airspace modifications on land values highly speculative. Land values are highly dependent on other socioeconomic characteristics.</p>
I0039-4	<p>What is the impact of sonic concussion on marine mammals? Are there</p>	<p>None of the definitive projects include supersonic flight over marine</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	permits required for this impact?	mammals or exposure of marine mammals to sonic booms. The programmatic Missile Live-Fire for AIM-9 and AIM-120 is addressed in Section 3.11.8.3, which considers the effects of this programmatic action on marine mammals. A full analysis of potential military training impacts to marine mammals from GOA missile activities is provided in the Gulf of Alaska Navy Training Activities Final Environmental Impact Statement/Overseas Environmental Impact Statement (Navy 2011) (see Section 3.8.7.3). The JPARC project would not utilize any activities that differ from those analyzed in that FEIS. However, if the Missile Live-Fire for AIM-9 and AIM-120 project is developed into a "Definitive Action," because of the presence of endangered and threatened species in the project area, compliance with ESA Section 7 requirements is necessary, including formal or informal consultation with NOAA Fisheries and USFWS.
I0039-5	Who has priority use of the areas encompassed by the range? If the people of Alaska have open access to State lands and air space, then how will the Department of Defense request permission to operate to avoid conflicts and assure safety?	Part of the purpose of this EIS is to present proposals to use airspace, and in some cases, surface areas, to support new military capabilities. In existing military land, the military has priority use. For State lands, under most of the proposals, the military is not attempting to change the use of underlying areas, although the analysis describes how military activities may affect these uses. Through consultation and coordination with State and other Federal resource managers, the military will negotiate restrictions and methods so they can meet their mission purposes without unduly compromising the mandates of other agencies. Procedures for use of airspace and for establishing changes in Special Use Airspace will be decided by and in cooperation with the Federal Aviation Administration. These procedures will be aimed at minimizing conflicts and assuring safety for all users.
I0039-6	Who has priority use of the areas encompassed by the range? If the people of Alaska have open access to State lands and air space, then how will the Department of Defense request permission to operate to avoid conflicts and assure safety?	FAA regulations govern those standing priorities, limitations, and restrictions that apply to the different airspace classifications. The responsible Department of Defense organization coordinates and schedules use of Special Use Airspace through those procedures outlined in Letters of Agreement with the controlling FAA facility. The FEIS Airspace and Flight Safety sections address those measures that have been implemented by the Air Force and Army to promote flight safety when Special Use Airspace is activated for military training activities.
I0039-7	Major Concerns - An environmental permit is not a deed to the land and air space. The Alaska Constitution assures Alaskan residents equal access to resources or	The Army and Air Force, in cooperation with ALCOM, understand that decisions on this EIS are not consummate with a deeded interest. None of the proposals include acquisition of land, but one proposal, the Realistic Live Ordnance Delivery proposal described in Sections 1.3 and 2.1.2, requests intermittent exclusive use of a portion of State land. This action would

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>compensation otherwise:</p> <p>§ 16. Protection of Rights</p> <p>No person shall be involuntarily divested of his right to the use of waters, his interest in lands, or improvements affecting either, except for a superior beneficial use or public purpose and then only with just compensation and by operation of law.</p>	<p>require an official change in regulation by the State of Alaska, in order to provide for this special use. To do this, the ADNR must undergo a full public input process on a Special Use Designation package and subsequent regulatory change. ADNR and the proponents will define suitable mitigations to alleviate impacts on public use and users and any affected real estate interests. Any regulatory change is an appealable action. The public input process is intended to gauge and define superior public beneficial use or public purpose in light of the proposal, and suitable compensation.</p> <p>Airspace above all Federal, State, and private land is part of the national airspace, and managed by the Federal Aviation Administration. Several proposals involve requests for Special Use Airspace for military operations. The FAA will work closely with the proponent to define the extent of this airspace (both lateral and vertical and special procedures prior to approving any changes). The FAA will focus on ensuring safety for all airspace users, civilian access and use of airspace balanced with the national interest to provide suitable airspace for military training and operations.</p>
I0039-8	<p>More and more often we hear "the main reason we are leaving is the increasing activities and restrictions of military in the area." I am not sure what all of the environmental impacts will be, nor do I think anyone will until the impacts are obvious; however, I do think that there is a huge potential for a negative effect on residential and recreational property values and quality of life due to the JPARC designation.</p>	<p>Section 3.1.12.3 acknowledges and addresses the concern for the potential affects to property values. The Air Force recognizes that there will potentially be some impacts to the population in the affected region of influence under the proposed actions. Some persons may experience diminished quality of life. However, quality of life is a subjective term and is highly dependent on various factors that are subject to bias and arbitrariness. Therefore, impacts to quality of life are subjective experiences and not all residents and/or visitors may feel their quality of life or experience would be severely impacted. Common factors for how people define their quality of life include wealth, employment, health, recreation, leisure time, access, safety, wildlife, climate, and the surrounding natural environment. These and additional factors are addressed under separate resource areas (i.e., airspace management and use, noise, biological resources, land use and recreation, socioeconomics, safety, air quality, subsistence, etc.) in the EIS so that the significance of each action on each resource area considers both context and intensity as required under NEPA.</p>
I0039-9	<p>Ideas for Consideration and Comment</p> <p>- Restricting training activities to no longer than two week period, and not more than once per quarter of the year. Publicize the times and plans and take public comment before the training activities.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
I0039-10	<p>Ideas for Consideration and Comment</p> <p>- Restrict to sub-sonic air speeds within 50 miles of any residence and 100 miles from any designated community.</p>	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
I0039-11	<p>Ideas for Consideration and Comment</p> <p>- Publish all radio frequencies bands and power levels that will be used within the training area.</p>	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
I0039-12	<p>Ideas for Consideration and Comment</p> <p>- Restrict drone flight to uninhibited areas only.</p>	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		impacts and locations of the proposals in this EIS.
I0039-13	<p>Ideas for Consideration and Comment</p> <p>- Disclose any possibility or occurrences of surveillance on any Alaskan, whether intentional or unintentional by any Department of Defense related technology deployed in the region encompassed by JPARC, whether defined by FISA or otherwise.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The statement expressed in the comment, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Purpose and Need for the Proposed Actions, Sections 1.2 and 1.3 of the Draft EIS.</p> <p>Department of Defense Executive Order 12333 (Amended 2008) states that "no foreign intelligence collection by such elements may be undertaken for the purpose of acquiring information concerning the domestic activities of United States persons."</p>
I0039-14	<p>Ideas for Consideration and Comment</p> <p>- Relocate the activity to the Arctic and off shore. It would be wise to increase our presence there and it would not devalue our State and private land due to noise, safety, and the potential for inadvertent surveillance on US citizens.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources and quality of life. The comment to move existing Army and Air Force training areas to the Arctic or offshore, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Sections 1.2 and 1.3.</p>
I0040-1	<p>I am concerned with access and use of the Granite Mountain area between the Richardson Hwy. and Alaska Hwy. This is a great subsistence and Recreational use area that should remain open to the public and area residents.</p>	<p>The proposed action would not directly impact subsistence or recreational use of the Granite Mountain area. However, access to this area could be limited by the Realistic Live Ordnance Expenditure and Battle Area Complex Restricted Airspace proposals. Section 3.2.10.3.1 of the EIS acknowledges that access through DTA-East for Dall sheep hunting in other areas off-post, including Granite Mountains located to the east of DTA-East) would be limited by the Realistic Live Ordnance Expenditure proposal. Section 3.2.10.4 lists mitigation measures that could be implemented to reduce the impacts. For example, the Air Force would provide advance schedules of training missions in R-2202 and the public would have access to information about MOA activation during scheduled training and/or NOTAMs.</p> <p>Section 3.3.10.3.1 of the EIS acknowledges that the Battle Area Complex Restricted Airspace proposal would prevent use of portions of the Richardson Highway-Gerstle River Trail, the 33-Mile Loop Road, and the 12-Mile Crossing. Elimination of these access points could limit access to recreational areas including the Granite Mountains, which are used by the public for sheep hunting, caribou and small game hunting and other activities. However, as noted in the EIS, while the 12-Mile Crossing may be the easiest</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		access into the Granite Mountains, alternative access trails exist off military lands. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0040-2	This is a great subsistence and Recreational use area that should remain open to the public and area residents. It is my strongest hope that restricted areas south of Ft. Greely and east of the Delta River NOT be expanded any further. The Coal Mine Road Recreational Use Area is one of the best local trails/lakes etc.	The Coal Mine Road Lakes area is not located beneath restricted areas proposed by the JPARC actions.
I0040-3	Noise on the Ranges and in the air (sonic booms) effect our quality of life.	The Air Force recognizes that there will potentially be some impacts to the population in the affected region of influence under the proposed actions. Some persons may experience diminished quality of life. Appendix E, Noise, of the EIS provides several indicators of noise level, which can be used to predict quality of life. Estimates of the percentage of the population that would be highly annoyed by noise, for example, are one indicator of a decreased quality of life. Quality of life is a subjective term and is highly dependent on various factors that are subject to bias and arbitrariness. Therefore, impacts to quality of life are subjective experiences and not all residents and/or visitors may feel their quality of life or experience would be severely impacted. Common factors for how people define their quality of life include wealth, employment, health, recreation, leisure time, access, safety, wildlife, climate, and the surrounding natural environment. These and additional factors are addressed under separate resource areas (i.e., airspace management and use, noise, biological resources, land use and recreation, socioeconomics, safety, air quality, subsistence, etc.) in the EIS so that the significance of each action on each resource area considers both context and intensity as required under NEPA.
I0040-4	Fire potential and resulting air quality is of utmost importance! All precautions and possibly delay of planned exercises need to be considered depending on prevailing fire (wild fire) conditions.	As stated on page 3-118 of the JPARC EIS Volume I and other locations throughout the document, the fire weather index is monitored before and during operations that propose a fire risk to minimize risk of wildfires and any potential air quality impacts resulting from a wildfire. For more information see Section 3.2.3 of the JPARC EIS Volume I.
I0041-1	I am particularly concerned with access to Coal Mine Rd. camping and the old cat trail down to the Jarvis Creek area. This open forum shows there will be no changes in that particular area – land or airspace. If that is correct, fine. I appreciate the opportunity to examine this information and be a part of the planning process.	Neither the Coal Mine Road area and associated access or the Cat Trail to the Jarvis Creek area would be located within the project boundaries proposed under the JPARC action.
I0041-2	I also think the land road into Tanana Flats is a good idea. Hopefully to	Section 3.8.10.3 of the EIS discusses the beneficial and adverse impacts of

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	minimize ATV's tearing up the trails. Again, of course if it doesn't impact hunters or hunting seasons.	the Tanana Flats Training Area access road proposal to public access and recreation. Section 3.7.10.3.1 describes the recommended pre-planning process and siting criteria that could be implemented to reduce impacts such as coordinating with affected landowners and managers, publishing training schedules, avoiding existing low-water crossings used for public access for hunting and recreation, and avoiding areas near stocked lakes that provide a recreational benefit.
I0042-1	1st I am retired from the Army/Army Reserve with 37 yrs, 11 mo, 22 days, starting as a draf volunteer and retiring as a Major.	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.
I0042-2	2nd I am opposed to the proposed land-air use as presented. I would like to see a minimum 5,000 ft. air cieling, and no restrictions to the current use of the land for both subsistance and recreation.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. As explained in Chapter 1, Purpose and Need for the Proposed Actions, Sections 1.2 and 1.3 of the Draft EIS, the decision on which alternatives the Army and Air Force will pursue will be made in light of the Purpose and Need by Army and Air Force representatives following the review of all relevant facts, impact analyses, mitigations, and comments received via the JPARC EIS public participation process. Additionally, the proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use.
I0042-3	2nd I am opposed to the proposed land-air use as presented. I would like to see a minimum 5,000 ft. air cieling, and no restrictions to the current use of the land for both subsistance and recreation. 3rd The reasons for the recommended changes are: A. Pilots will NOT keep a 500 ft cieling when game, mostly caribou and moose, are visible for "buzzing." I have personally known too many pilots to allow this, and pilots have not changed since I have had them try to blow me off a motorcycle between El Paso and Alamogordo.	Pilots are training as they are expected to perform in combat. Although it is possible for a pilot to momentarily be below an airspace's minimum altitude, pilots and aircrews are required to adhere to established airspace boundaries and altitudes and can be disciplined if they "spill out" of the airspace. Because aircrews who maneuver outside the established dimensions and/or altitudes of the airspace can be disciplined, pilots have been found to avoid the edges of airspace during training. That avoidance behavior is documented in the noise models to provide an accurate representation of noise overflight effects.
I0042-4	2nd I am opposed to the proposed land-air use as presented. I would like to see a minimum 5,000 ft. air cieling, and no restrictions to the current use of the land for both subsistance and recreation. 3rd The reasons for the recommended changes are:	Section 3.1.8.3 in the DEIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 feet AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Also see Appendix E for a review of research on noise

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>...</p> <p>B. The noise level will stress game, in particular cariou during calving and early growth. The caribou have been tightly managed to continue a healthy herd, and added stress by low level jets would adversely impact their health.</p>	<p>effects, primarily from aircraft overflights and sonic booms, on wildlife species.</p> <p>In addition, the U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. The JPARC DEIS includes retaining the 3,000-foot overflight restriction on the Delta Herd calving areas (see Appendix G, Table G-1, #9). In addition, mitigation measures included for the Fox/Paxon proposal (Section 3.1.8.4) include: "Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information."</p>
I0042-5	<p>2nd I am opposed to the proposed land-air use as presented. I would like to see a minimum 5,000 ft. air cieling, and no restrictions to the current use of the land for both subsistance and recreation.</p> <p>3rd The reasons for the recommended changes are</p> <p>....</p> <p>C. Subsistance and game harvesting use will become restricted if access to the lands is denied/impacted. Recreational use should not be denied, nor the ability to acquire meat for families. Costs here are extremely high, and many if not most of the residents of the area depend on this land for food.</p>	<p>Section 3.1.13.3.1 and Section 3.1.13.3.2 of the EIS note that the expansion of Fox 3 MOA and the new Paxon MOA would not restrict ground access for subsistence activities. These users would have the same access and availability to subsistence resources from the ground as current conditions. The new and expanded airspace may result in a restriction of access by aircraft to areas or landing fields within the vicinity or below the proposed airspace. Section 3.1.13.4 of the EIS describes the proposed mitigation measures which could be implemented to minimize potential impacts to access via aircraft. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0042-6	<p>2nd I am opposed to the proposed land-air use as presented. I would like to see a minimum 5,000 ft. air cieling, and no restrictions to the current use of the land for both subsistance and recreation.</p> <p>3rd The reasons for the recommended changes are:</p> <p>...</p> <p>D. I have worked in joint operations commands, and as a tacticle surveillane officer been instrumental in TSO's, hence I have some familiarity with air operations. While I recognize the need for training, I believe there are sufficient areas for low level training without denying us access to the land we currently use.</p> <p>4th. In closing, I recommend no restrictions be placed on the land not now employed to prevent civilian usage. I recommend limiting the cieling to above 5,000 feet. I recommend no training during the calving season, and</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. For the Fox 3 MOA and New Paxon MOA proposal, no restrictions will be placed on the use of the land. This proposal only involves the proposed use of new airspace.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	limited use during subsistence and game harvesting seasons.	
I0043-1	I would like to express my concern about the possible expansion of JPARC. I do not think it would be a good idea. In fact, it would be very dangerous.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0043-2	There are too many air taxi operators in the area where this is proposed. Military aircraft flying at 500 feet above ground level would be a danger to these pilots, their aircrafts, and their passengers.	The FEIS Airspace Management and Flight Safety discussions for each airspace proposal acknowledge the civil aviation activities that occur within the affected regions, to include those involving air taxi operations. Flight safety risks would also be of great concern for military pilots when mission activities require their use of those areas and lower altitudes where such civil aircraft may be operating. For that reason, every effort would continue to be made to ensure the safe and compatible use of this airspace through scheduling and real-time advisories, use of on-board radar systems, and other measures described in the FEIS analyses and proposed mitigations.
I0043-3	The speed at which military aircraft fly would be a deadly combination with slow flying Super Cubs, 185's, Beavers and Otters.	The varied aircraft types and the different speeds and altitudes at which they may operate within the same airspace comprise the key basis for information provided through the JBER and Eielson AFB Midair Collision Avoidance programs, Special Use Airspace Information Service, and other initiatives promoting flight safety practices, as discussed in the FEIS Section 3.1.3 (Flight Safety). While VFR pilots are encouraged to avoid those periods MOAs are active, military pilots constantly maintain situational awareness for any nonparticipating aircraft that may be operating within their vicinity using both visual and radar "see-and-avoid" practices to remain clear of these aircraft.
I0043-4	The November 16, 2010 F-22 Raptor crash is an example of how things can go wrong. With more low flying high speed aircraft in the area with slow flying aircraft, there would be even greater chances of accidents occurring.	This accident was most unfortunate as aircraft mishaps resulting from equipment failures and other contributing factors can always be a risk for both military and civilian aircraft in any operating environment. Flight safety and mishap prevention programs are always a top Department of Defense priority and, as addressed in the FEIS Airspace Management, Flight Safety, and Mitigation sections, the Air Force and the Army will continue to implement, enhance, and promote those measures needed to help ensure a safe flying environment for all concerned.
I0043-5	This same region is a major hunting, camping, and recreational area. I have hunted in the region for over 40 years. Many people of all ages go there to pick berries.	Section 3.1.10 of the EIS indicates the areas beneath the proposed Fox 3 MOA expansion and new Paxon MOA are used for recreation. During scoping, specific recreational uses, including hunting, fishing, mountain climbing, backpacking, camping, and berry picking, were noted as noise-

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		sensitive. Section 3.1.10.3 of the EIS acknowledges that the proposed action could result in impacts to recreational use in popular locations from intermittent, intensive, and repetitive aircraft overflights during MFEs, particularly during the most critical recreation period between approximately June 15 and September 15. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts, such as providing advance schedules of training missions in the MOA and avoiding MFEs in the peak seasonal times and/or flying at higher altitudes during these periods. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0043-6	It is a huge wildlife area, especially being a caribou migrating/calving area and a moose calving area. Migratory birds (such as Trumpeter swans) pass through the area and have their nesting grounds there.	<p>Animal responses to low-level flights have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. All known calving, lambing, and important bird areas within the JPARC project area were mapped (please see Figures B-11, B-13, and B-14 that cover entire project area, and Figures 3-4 through 3-8 for occurrences of sensitive wildlife species, including caribou, Dall sheep, moose, and trumpeter swans, under the proposed Fox/Paxon MOA) and have been taken into consideration during effects analysis.</p> <p>Given the potential for loss or injury to aircrews and aircraft as a result of a bird-aircraft strike, extensive efforts are made by the Military to avoid areas with high concentrations of birds (also described in the Safety section, under Mitigation 3.5.8.4, and Appendix G). The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight-restricted areas for pilot/aircraft safety and wildlife protection. Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p>
I0043-7	Most of the hunters from Mat-Su, Anchorage and Fairbanks use this area to hunt moose and caribou. This would completely disturb this traditional hunting area. Many people who hunt live a subsistence life style. It is distracting enough with the MOA the way it is now.	Section 3.1.13.3.1 of the EIS acknowledges that noise and low-level overflight could affect wildlife and subsistence activities including the distraction of subsistence hunters. Section 3.1.13.4 lists mitigation measures that could be implemented to reduce the impacts such as seasonal avoidance areas, no Major Flying Exercises between August 20 and September 20, and conducting regular meetings with communities reliant on subsistence activities and regulating agencies to identify adjustments to avoidance areas

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		or propose new avoidance areas.
I0043-8	This would infringe upon the rights of Alaskans.	The DEIS addresses "rights" of Alaskans under the associated resource topic for each proposal; for example, subsistence rights are addressed in the Subsistence section, access to public lands for recreation and other purposes is addressed in the Land Use section, and preservation of cultural, historic and tribal resources is addressed in the Cultural Resources section. In addition, the Environmental Justice analysis addresses any disproportionate effects on minority, low-income, and Alaska Native populations. In cases where the proposals would create adverse impacts on resources, the DEIS identified mitigations and other management actions that would reduce these effects.
I0043-9	We did not choose to live amid noise. We came here for quiet and solitude.	The Air Force recognizes that there will potentially be some impacts to the population in the affected region of influence under the proposed actions. Some persons may experience diminished quality of life. Appendix E, Noise, of the EIS provides several indicators of noise level, which can be used to predict quality of life. Estimates of the percentage of the population that would be highly annoyed by noise, for example, are one indicator of a decreased quality of life. Quality of life is a subjective term and is highly dependent on various factors that are subject to bias and arbitrariness. Therefore, impacts to quality of life are subjective experiences and not all residents and/or visitors may feel their quality of life or experience would be severely impacted. Common factors for how people define their quality of life include wealth, employment, health, recreation, leisure time, access, safety, wildlife, climate, and the surrounding natural environment. These and additional factors are addressed under separate resource areas (i.e., airspace management and use, noise, biological resources, land use and recreation, socioeconomics, safety, air quality, subsistence, etc.) in the EIS so that the significance of each action on each resource area considers both context and intensity as required under NEPA.
I0043-10	I oppose the expansion of JPARC (Fox 3 expansion, the new Paxon MOA, the lowering of the MOA to 500 feet AGL) in every way.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0043-11	War games should not interfere with the rights of Alaskans.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0044-1	I would like to express my concern about the possibility of expanding JPARC. I do not think it would be a good idea. In fact, it could be very hazardous.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0044-2	The speed at which military aircraft fly would be a lethal combination with slow flying Super Cubs, 185's, Beavers and Otters.	The varied aircraft types and the different speeds and altitudes at which they may operate within the same airspace comprise the key basis for information provided through the JBER and Eielson AFB Midair Collision Avoidance programs, Special Use Airspace Information Service, and other initiatives promoting flight safety practices, as discussed in the FEIS Section 3.1.3 (Flight Safety). While VFR pilots are encouraged to avoid those periods MOAs are active, military pilots constantly maintain situational awareness for any nonparticipating aircraft that may be operating within their vicinity using both visual and radar "see-and-avoid" practices to remain clear of these aircraft.
I0044-3	The November 16, 2010 F-22 Raptor crash is an example of things gone wrong. With more low flying high speed aircraft in the area with slow flying aircraft, the odds are even greater for accidents.	This accident was most unfortunate as aircraft mishaps resulting from equipment failures and other contributing factors can always be a risk for both military and civilian aircraft in any operating environment. Flight safety and mishap prevention programs are always a top Department of Defense priority and, as addressed in the FEIS Airspace Management, Flight Safety, and Mitigation sections, the Air Force and the Army will continue to implement, enhance, and promote those measures needed to help ensure a safe flying environment for all concerned.
I0044-4	In addition to this hazard, this same region is a major hunting, camping, berry picking, and recreational area.	Section 3.1.10 of the EIS indicates the areas beneath the proposed Fox 3 MOA expansion and new Paxon MOA are used for recreation. During scoping, specific recreational uses, including hunting, fishing, mountain climbing, backpacking, camping, and berry picking were noted as noise-sensitive. Section 3.1.10.3 of the EIS acknowledges that the proposed action could result in impacts to recreational use in popular locations from intermittent, intensive, and repetitive aircraft overflights during MFEs, particularly during the most critical recreation period between approximately June 15 and September 15. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts, such as providing advance schedules of training missions in the MOA and avoiding MFEs in the peak seasonal times and/or flying at higher altitudes during these periods. Mitigation measures to offset adverse impacts will continue to be reviewed

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		and refined when the preferred alternative is selected during the Final EIS preparation process.
I0044-5	It is a huge are for wildlife, especially being a caribou migration/calving area and a moose calving area. Migratory birds (such as Trumpeter swans) pass through the area and have their nesting grounds here.	<p>Animal responses to low-level flights have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. All known calving, lambing, and important bird areas within the JPARC project area were mapped (please see Figures B-11, B-13, and B-14 that cover entire project area, and Figures 3-4 through 3-8 for occurrences of sensitive wildlife species, including caribou, Dall sheep, moose, and trumpeter swans, under the proposed Fox/Paxon MOA) and have been taken into consideration during effects analysis.</p> <p>Given the potential for loss or injury to aircrews and aircraft as a result of a bird-aircraft strike, extensive efforts are made by the Military to avoid areas with high concentrations of birds (also described in the Safety section, under Mitigation 3.5.8.4, and Appendix G). The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection. Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p>
I0044-6	Most of the hunters from Mat-Su, Anchorage and Fairbanks use this area to hunt moose and caribou. This would completely disturb this traditional hunting area. Many people who hunt live a subsistence life style.	Section 3.1.13.3.1 of the EIS acknowledges that noise and low-level overflight could affect wildlife and subsistence activities including the distraction of subsistence hunters. Section 3.1.13.4 lists mitigation measures that could be implemented to reduce the impacts such as seasonal avoidance areas, no major flying exercises between August 20 and September 20, conducting regular meetings with communities reliant on subsistence activities, and regulating agencies to identify adjustments to avoidance areas or propose new avoidance areas.
I0044-7	This would infringe upon the rights of Alaskans.	Please see the response to Comment I0043-8.
I0044-8	Peace, solitude, and quiet are things that Alaskans treasure. It is why we live here.	The Air Force recognizes that there will potentially be some impacts to the population in the affected region of influence under the proposed actions. Some persons may experience diminished quality of life. Appendix E, Noise, of the EIS provides several indicators of noise level, which can be used to predict quality of life. Estimates of the percentage of the population that would be highly annoyed by noise, for example, are one indicator of a decreased quality of life. Quality of life is a subjective term and is highly

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		dependent on various factors that are subject to bias and arbitrariness. Therefore, impacts to quality of life are subjective experiences and not all residents and/or visitors may feel their quality of life or experience would be severely impacted. Common factors for how people define their quality of life include wealth, employment, health, recreation, leisure time, access, safety, wildlife, climate, and the surrounding natural environment. These and additional factors are addressed under separate resource areas (i.e., airspace management and use, noise, biological resources, land use and recreation, socioeconomics, safety, air quality, subsistence, etc.) in the EIS so that the significance of each action on each resource area considers both context and intensity as required under NEPA.
I0044-9	I completely oppose the expansion of JPARC (Fox 3 expansion, the new Paxon MOA, the lowering of the MOA to 500 feet AGL).	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0044-10	There are countless air taxi operators in the area where this is proposed. Military aircraft flying at 500 feet above ground level would endanger these pilots, their aircrafts, and their passengers.	The FEIS Airspace Management and Flight Safety discussions acknowledge the civil aviation activities that occur within the proposed airspace areas, to include those involving air taxi operations. Flight safety risks would also be of great concern for military pilots when mission activities require their use of those areas and lower altitudes where such civil aircraft may be operating. For that reason, every effort would continue to be made to ensure the safe and compatible use of this airspace through scheduling and real-time advisories, use of on-board radar systems, and other measures described in the FEIS analyses and proposed mitigations.
I0045-1	More specificity as to actual required use times would be extremely helpful. For example - flight training will close the airspace for 2 hrs 2x per training day.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The JPARC Draft EIS has been prepared with the most current data and information available at the time. The Air Force will review the request to add more specificity for actual times of use. Should new or updated information become available during the preparation of the Final EIS for military training activity times of use, it will be included.
I0046-1	I am a long time Alaskan. The Federal Government has taken over the majority of land here in Alaska. After the take over this land was closed to use by most Alaskans. It was closed for subsistence only on Federal land to those that were chosen by the Federal Government....I am not willing as an Alaska resident to give you any more land or air space here in our State.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0046-2	The Federals took over management of Fish and Game on all Federal land in Alaska. You do not respect Alaska or our State Constitution. Why should	The JPARC proposals do not involve acquisition of additional land, although the Realistic Live Ordnance Delivery proposal does request intermittent

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>we trust you after all of your broken promises. I am not willing as an Alaska resident to give you any more land or air space here in our State. You could earn back some of our respect again if you turn over management of Fish and Game on all Federal land as stated in the Statehood agreement.</p>	<p>exclusive use of some State land to provide a safe environment for specific hazardous training events. Also, the JPARC proposals would not change current roles and responsibilities for fish and game management on Federal or State lands. The Department of Defense (DoD) is responsible for managing wildlife resources on military lands in accordance with its policies and State and Federal regulations. The Alaska Department of Fish and Game (ADFG) would continue to manage hunting permits on military land in Alaska. DoD and the local installations work cooperatively with State and Federal wildlife resource managers to achieve the best outcomes of mutual concern. The Federal Aviation Administration (FAA) must approve JPARC airspace actions and ensure that safety and civilian airspace needs are adequately maintained.</p>
I0046-3	<p>Why do we allow foreign nations to come into our State and train thier military? All training should be done to benefit and train only U.S. military personnel.</p>	<p>There is significant training value in replicating the joint, interagency, intergovernmental, multinational environment of combat. Throughout history, the majority of world conflicts have involved multinational forces on one side or the other. Training the way we fight is the best way to ensure success on the future battlefield. Alaska’s unique JPARC environment allows an unequalled training experience for U.S. forces and our allied partners.</p>
I0046-4	<p>I support the military but not the Federal land grab here in Alaska. The Federal Government is using the military to grab more land. It will never end, you will never be satisfied. I do not trust you.</p>	<p>The Army and Air Force, in cooperation with Alaskan Command (ALCOM), understand that decisions on this EIS are not consummate with a deeded interest. None of the proposals include acquisition of land, but one proposal, the Realistic Live Ordnance Delivery proposal described in Sections 1.3 and 2.1.2, requests intermittent exclusive use of a portion of State land. This action would require an official change in regulation by the State of Alaska to provide for this special use. To do this, the Alaska Department of Natural Resources (ADNR) must undergo a full public input process on a Special Use Designation package and subsequent regulatory change. ADNR and the proponents will define suitable mitigations to alleviate impacts on public use and users and any affected real estate interests. Any regulatory change is an appealable action. The public input process is intended to gage and define superior public beneficial use or public purpose in light of the proposal, and suitable compensation.</p>
I0046-5	<p>You could earn back some of our respect again if you turn over management of Fish and Game on all Federal land as stated in the Statehood agreement.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska’s resources. The statement expressed in the comment, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		modernize and enhance existing JPARC training areas in accordance with Chapter 1, Purpose and Need for the Proposed Actions, Sections 1.2 and 1.3.
I0047-1	I would like to express my opposition to expanding the JPCA area. I believe the noise, sonic booms, night flights will have a negative effect on the local wildlife & migrating wild birds. We use this areas for hunting and recreation. And live in Unit [deleted for privacy]. We believe that the areas MOA Fox 3 are not necessary. We would like to see Fox 3 MOA eliminated from your proposed expansion.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's natural resources. The statement expressed in the comment to eliminate the Fox 3 MOA and New Paxon MOA Addition proposal, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Section 1.2 and 1.3, which includes this important Air Force proposal. The decision on which alternatives the Army and Air Force will pursue in the Final EIS will be made in light of the purpose and need by Army and Air Force representatives following the review of all relevant facts, impact analyses, mitigations, and comments received via the JPARC EIS public participation process.
I0048-1	I just got the environmental impact statement for JPARC from you and wanted to thank you. Also to tell you that if you got any public meetings that you need somebody that's really on your side, give me a heads up as I'm on your side. That's John Dickens at XXX-XXX-XXXX. I totally support what you are doing and let me know what I can do to help you.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
I0049-1	Our family has a cabin on Lake Louise that has been in the family since my husband's grandfather homesteaded the land in the 1950s. The family has been enjoying the area ever since. It is a wonderful recreation area, decently populated, but not the busy party place that Big Lake was during my childhood. I want to see the area remain a family recreational area so that our children and grandchildren can enjoy the area just as my husband and his parents have. It's hard to enjoy the solitude of a nice calm, quiet lake when a high-speed aircraft, such as an F-22, flies over you at low altitude.	The EIS describes impacts to residential, community, and recreational uses in Sections 3.1.10.2 and 3.1.10.3. Both average noise levels from military operations and single event noise (and startle effects) are considered. The Air Force has existing flight avoidance procedures in place to reduce noise on particular locations underlying airspace in which they train. In response to many concerns about the Lake Louise area during initial scoping for the EIS, the Air Force developed Alternative E that shifted the southern boundary of the proposed Fox 3 MOA to the north to avoid most of the inhabited areas around the lake. The Air Force is using further input from the public and agencies to continue this process and to define suitable flight avoidances to preserve the quiet qualities of this region to the extent possible in existing and proposed expanded airspace. The FEIS and ROD will include those measures that can be incorporated and preserve the integrity of training that is needed to provide the best and most cost-effective training.
I0049-2	Not to mention the moose and caribou, which are well documented in the area, may be driven out of the area due to the noise.	Animal responses to low-level flights have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. All known calving, lambing, and important bird areas within the JPARC project

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>area were mapped (please see Figures B-11, B-13, and B-14 that cover entire project area, and Figures 3-4 through 3-8 for occurrences of sensitive wildlife species, including caribou, Dall sheep, moose, and trumpeter swans, under the proposed Fox/Paxon MOA) and have been taken into consideration during effects analysis.</p> <p>The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentrations and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection.</p>
I0049-3	<p>We are strong supporters of the military, having friends and family who serve. We understand that training is important, but feel that a proposal exists that will meet both military and civilian needs. It comes down to concurrent use.</p> <p>While I understand that the EIS process is a Federal process, I personally believe the State of Alaska, Article 8 Constitutional Mandate "encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest" is a statement that should be followed with all public land and resources. And that is exactly what we have here, a resource that needs to be shared.</p> <p>I feel that Alternative E, with an additional stipulation to add an OverFlight Avoidance Area of an additional 20 miles north and parallel to the southern border of Alternative E. This would move the southern boarder back and additional 20 miles from the proposed Alternative E boundary and when maintained year round would address resource concerns.</p> <p>In short with the additional stipulation to Alternative E would benefit both parties – the military to do their training maneuvers and the public to have recreational and subsistence uses.</p>	<p>The proposed Fox 3 MOA expansion does not restrict access to the airspace or the land beneath it. Nor does the proposal limit the State of Alaska in its mandate to "encourage the settlement...by making (resources) available for maximum use..." A Military Operations Area (MOA) is by definition a shared, see-and-avoid airspace. MOAs do not include any control of the surface beneath them.</p> <p>Moving Alternative E's southern boundary north 20 miles would actually provide less airspace than the Fox 3 MOA has today. The need for multi-axis engagement of "enemy" aircraft would not be met with this smaller MOA.</p>
I0050-1	<p>My cabin is approximately 18 miles south of Ft. Greely. It is U.S. Survey 5357. It is a short distance from the pipeline. No one lives there at present but we intend to fix it up and have it available for family.</p> <p>One of my concerns is that rockets frequently go astray and explode in vulnerable places. Have any added precautions been put in place to prevent this? [contact information removed for privacy]</p>	<p>The EIS currently describes range safety procedures for the use of munitions. These procedures would continue to be followed.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
I0051-1	The lot and cabin are east of the highway at mile 242 Richardson Highway behind the old State Gravel pit. Thank you, Noel Robinson	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
I0052-1	The vast expansion of the military training ranges in Alaska under the Joint Pacific Alaska Range Complex proposal to use the 25,000 square miles of land in the Talkeetna, Lake Louise, Paxson, and Cantwell areas greatly disturbs me. Although I am a staunch supporter of our military and its needs, of all places in Alaska, I don't want it there. To me, that has to be the worst choice of location in Alaska. It is my favorite camping, hunting, and fishing recreational area that is within range of my home. It's loaded with fish and game. Given the size of Alaska and the wide array of suitable terrain available in Alaska, please, put it somewhere else and don't destroy our opportunities there. No matter where you put it, the military can get there.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's natural resources. The proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use. A number of the proposals request expanded and additional Military Operations Area (MOA) or airspace for restricted areas in order to meet the purpose and need expressed in Chapter 1, Purpose and Need for the Proposed Actions. Additionally, as explained in Chapter 1, Purpose and Need for the Proposed Actions, Sections 1.2 and 1.3 of the Draft EIS, the decision on which alternatives the Army and Air Force will pursue will be made in light of the Purpose and Need by Army and Air Force representatives following the review of all relevant facts, impact analyses, and comments received via the JPARC EIS public participation process.
I0053-1	I am a strong supporter of our Military and the need for training.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0053-2	I must submit a strong resistance to this expansion of land consumption by the Military. I live in Delta Junction and have first hand experience and knowledge of the misuse and mismanagement of the land already under "training areas". The military could use better management and do all needed training in half the space they already have. The military does not clean up its mess and just expects to move on to new land. The Military abuses the rules and regulations of their own making. Until the military is willing to clean up its left behind pollution and problems, I do not wish to have then consume more land that I use to hunt and fish on. I strongly oppose this expansion and will voice my feeling to all that I come in contact with.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources. The proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use. The Army and the Air Force are required by Federal and State of Alaska public statutes to comply with applicable regulations to protect, conserve, and preserve the environment and prevent and remediate pollution on lands within their jurisdiction.
I0054-1	The proposed MOA expansion near Paxson is outrageous. At the present time, the Air Force doesn't monitor its own activities---frequent violations of their own rules regarding flight levels, MOA boundaries and sonic booms along the Denali Highway and in the Paxson area are a testimony to this. Instead they ask the public to call in, after the fact.	The need for modernization of the MOA structure is spelled out in Chapter 1 of the EIS. A larger area with low airspace is required to conduct realistic training for Air Force pilots. The MOAs will continue to be shared airspace with general aviation and the impacts are anticipated to be manageable with appropriate mitigations to avoid noise-sensitive areas.

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>Airspace boundaries are monitored by FAA and multiple organizations within the Air Force. All flight parameters are reviewed thoroughly in debriefs that amount to approximately five hours for every one hour of MOA time. Infractions do occur and there can be additional training up to removal from an exercise or even loss of a pilot's wings if gross negligence is involved.</p> <p>The Air Force makes great efforts to educate the public on what type of activity to expect in the different airspaces in Alaska. Supersonic flight is permitted anywhere in the United States at high altitude (30,000 feet) and in most MOAs in Alaska; Paxson can experience sonic booms daily from high-flying fighters. Low-level flight already occurs in the Fox MOA using a Military Training Route (MTR) that crosses the Denali Highway. Knowing what type and where to expect aircraft operations will lessen the impact on many people. The Alaskan Military Airspace Info website provides information and schedules that will heighten the public awareness of Air Force operations.</p>
I0054-2	<p>There is no need to expand the current MOA. Instead, I would ask for 10 mile wide corridors along both the Richardson and Denali Highways. To have low-level F-16 traffic in populated areas is not only disrupting, it is unsafe. In an area with poor communications, there is little opportunity for local citizens and the many out-of State and out-of-country visitors to the area to be informed when the MOA is live.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
I0055-1	<p>I am just learning and understanding the changes and additions.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0056-1	<p>I am requesting an extension of the JPARC initiative. The volume and complexity of the JPARC initiative should necessitate a minimum of 90 days for public comment. To move forward without ample public review opportunity would be contrary to the spirit of the National Environmental Policy Act and will have a continued negative impact on the relationship</p>	<p>Given the feedback provided during the public hearings and Draft EIS review process, the U.S. Army and U.S. Air Force, on behalf of ALCOM, extended the Draft EIS comment period from 70 days to 102 days. This extension took place on May 31, 2012. The comment period, originally scheduled to close on June 7, 2012, was extended to July 9, 2012. The proponents of the</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	between the public and military.	proposals considered the extension carefully in an effort to balance military training requirements with the importance of ensuring adequate time for citizens and organizations to thoroughly review the Draft EIS.
I0057-1	Well, I hope to give a better more detailed and objective statement written. This is a perhaps emotional reaction or perhaps socioeconomic, whatever you want to call it.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0057-2	We are mostly concerned with the Fox 3 MOA expansion and especially with the low level and the effects on commercial aviation, general aviation, people getting to their homes, wildlife management.	<p>Section 3.1.10.3 of the DEIS acknowledges that the expansion of the Fox 3 MOA and the establishment of the Paxon MOA would result in indirect effects on civilian air access to areas below or in the vicinity of communities reliant on air access. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts including coordinating the schedule of MFEs with local communities in advance. In addition, Section 3.1.1.4 (Airspace) lists mitigation measures that could be implemented to reduce the impacts, such as use of the SUAIS and establishing or expanding existing VFR flyway corridors as necessary to provide VFR aircraft transit through areas that may be affected by high density military flight activities within/near the proposed airspace.</p> <p>With respect to wildlife management, land management agencies are particularly concerned with having access to lower-altitude airspace to conduct game surveys. Section 3.1.10.1 of the EIS acknowledges that operations of an MFE would constitute a potential significant impact on time-sensitive land management activities. To overcome this impact would require close coordination and schedule planning between military operators and State and Federal land use managers to allow for adequate access to low-altitude airspace (below 1,500 feet AGL) to perform critical tasks.</p>
I0057-3	<p>But we're concerned in general about the appropriation of land and sky resources in Alaska in general and we're not unappreciative of what the military is doing for us, so please don't think that we are.</p> <p>John Adams, second President, father of the U.S. Navy, established the U.S. Navy, once disbanded the standing U.S. Army of the United States even under the threat of conflict with France at that time because he believed the soldiers should never again be garrisoned in our homes. He thought that was a substantial reduction of our freedoms that Americans should never be subjected to and because of his concerns that is in our Bill of Rights today.</p>	Thank you for your comment. These comments indicate issues that are outside of the purview of this EIS either because they describe current operations or because they describe broader Department of Defense policy decisions. For further assistance with the issue please contact your local base Public Affairs Office or Alaskan Command Public Affairs at (907) 552-2341.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>We do not have soldiers garrisoned in our homes, Americans do not. What would John Adams think about the military taking our sky above our homes in so many areas? What should we think about it, what should you think about it as members of the military?</p>	
<p>I0057-4</p>	<p>You've heard about what we think is a treasure chest of resources in our area. Some of the only recreation area, the public -- Nelchina public use area that we've worked hard since the 1970s to maintain for snow machines, for airplanes, for hunting, for the exploration for oil and gas, for many levels of public use and we didn't want the restrictions that were put elsewhere by the national park. We didn't want the restrictions on people's basic freedom to do those things. We wanted to share the use. It's not empty space. We've worked hard to keep that space free for the development -- economic development, maintenance of our wildlife stocks, our fish.</p>	<p>The Air Force will consider and implement feasible procedures to limit disruption to the various passive and productive uses of the areas underlying proposed training airspace, including the Nelchina Public Use Area. The Air Force recognizes that noise effects and constrained air access are two of the primary concerns for preserving the free atmosphere for development and use of this area as expressed by your comment.</p>
<p>I0057-5</p>	<p>You've heard about the noise levels at Paxson Hatchery, that they can't slam a door at certain times a year, they cannot play music in the fish hatchery where this very important red fishery hatchery for the whole Copper River loses the fry. We have deep concerns about the expansions of these MOAs.</p>	<p>Variables affecting what noise levels will be experienced below the MOAs include the type of aircraft, altitude, speed, and power level in addition to the amount of cover and background noise present. While we don't want to minimize the losses the hatchery may have experienced, experiments with noise and fish eggs and fry do not tend to corroborate noise causing mortality to fish. Additional research findings for fish were added to Appendix E, Noise, and will be added where applicable to the Final EIS text in Section 3.8.1.</p> <p>A 1987 survey to inquire about the effects of low-altitude aircraft operations on fish and wildlife included hatchery managers. This type of survey focused on the most extreme examples of responses and was more informational than scientific. The fish responses reported included sonic booms having no effect on fish eggs at Nevada, Arizona, and Missouri hatcheries to intense, "focused" sonic booms resulting in the death of striped bass due to the fish jumping out of their tanks or dying of seizures in the water at an Alabama lab (Gladwin and Mancini 1988).</p> <p>The potential loudest noise from aircraft is the sonic boom. One study looked specifically at trout and salmon eggs after exposure during a critical phase of development to a variety of simulated sonic boom overpressures similar to those produced by military airplanes. Comparisons with control groups of eggs spawned at the same time indicated that the sonic boom exposure caused no increase in egg or fish fry mortality (Rucker 1973).</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>Stadler and Woodbury (2009) reported the criteria NOAA Fisheries uses to assess the risk to fishes. They found that onset of physical injury would be expected if the peak impulsive sound pressure level (SPL) in water exceeds 183 dB for fish smaller than 2 grams. By convention, sound levels in water are expressed in a slightly different way from sound levels in air. Taking into account this unit conversion as well as reflection of much of the inbound noise energy from the water's surface and conversion from A-weighted to unweighted sound metric, in-water SPL is typically in the neighborhood of 35 dB greater than the A-weighted sound level just above the water's surface. According to the JPARC Noise section Table 3-6, none of the sound exposure level (SEL) from 10 various aircraft flying as low as 300 feet above ground level (AGL) currently used are higher than 120 dB, which would equate to about 155 dB in-water SPL. (The lowest proposed flight level proposed for JPARC operations is 500 feet AGL in the Fox 3 and Paxon MOAs and other airspace units.)</p> <p>Another study investigated the effects of seismic air guns on eggs, larvae and fry and found significant mortality in three species at a variety of ages but only when the specimens were within about 5 meters of the source, and the most substantial effects were to fish that were within 1 to 4 meters of the source.</p> <p>Most studies on noise effects to fish looked at long-term sound exposure, which is not applicable in the case of intermittent overflights.</p> <p>Because of the amount of concern we received, a request has been submitted to add the hatchery to the sensitive areas that have seasonal flight restrictions published in the pilot's handbook.</p>
I0057-6	<p>This is the age of digital reality. We don't want you to kill young pilots. We want you to have the simulations, we want you to be able to go over the terrain. We've worked in Alaska, since the 1970s we've worked around the MOAs out at McGrath, up north at Fort Yukon. We know that you spend the same amount of gas when airplanes go like this or if they go like this. That's the same amount of gas. The reality is that the MOA does not have to come over the top of us. You can keep it north, you can keep it further north than 20 miles and we believe that you should stay above, caution, 5,000 feet...You have an airplane at point A and point B and they want to do an exercise between them. They spend the same amount of gas if they meet in the middle or if airplane A stays where it is and point -- and airplane at point</p>	<p>The distance to the proposed Fox 3 MOA would be less than 60 nautical miles (NM). The distance to the current low-altitude MOA (Yukon) used for major flying exercises (MFEs) is over 200 NM. With the addition of low airspace in Fox 3, fighters from JBER would be able to enter the exercise airspace in about one-third of the time, thereby requiring less time and fuel to accomplish the same amount of training.</p> <p>One of the needs associated with the Fox 3 expansion proposal is for low-altitude threat training and low-altitude attack training. When flying 1,000 feet above ground level (AGL) or more, the effects of terrain masking are largely nonexistent. To accomplish the purpose of this proposal, a floor of</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	B goes to meet it.	500 feet AGL is necessary.
I0057-7	Okay. You who have given much to us to protect, our freedom, and we know what that means. There's people in this area that have lost their kids to the wars overseas. Do not proceed with plans which reduce our freedoms. We've lived here a long time. This is important to us. Be careful, careful how you do this. Thank you.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0058-1	I've just begun to read this EIS. A lot of this is new to me, so I'm trying to read through it and understand what I'm reading through. I want to first say that I have family members that are in the Navy and in the Army and I'm proud of them. I respect the military. I respect what you're doing for our country.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0058-2	I just want to say that I have a concern about the low level flights, especially when we're out camping, hunting, fishing, you know, how it'll affect our subsistence, customary and traditional use of the areas when we're out there. You know, how it's going to affect the caribou and the moose and other wildlife. Those are my concerns.	Section 3.1.13.3 describes the potential impacts to subsistence as a result of low-level flights as well as proposed mitigations and management measures to minimize any impacts to the extent possible. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0058-3	The other one I'm concerned about is the hunting and fishing season dates. Every year the Board of Game meets and they change the season dates. So when you say late August, you know, that doesn't -- that isn't in -- doesn't time with our seasons. It should be August 1st through the end of September in the report or the EIS.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
I0058-4	Those are my concerns mostly is the hunting and fishing and being able to continue that and -- without interruption or a lot of noise and to the wildlife management, being able to make sure those wildlife stay out there and they're healthy and they're not being destroyed, or damaged, or ruined, or taken away from us. Thank you.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources. The Army and the Air Force are required by Federal and State of Alaska public statutes to comply with applicable regulations to protect, conserve, and preserve the environment and prevent and remediate pollution on lands within their jurisdiction. Once the Army and Air Force select the preferred alternatives for each proposal, specific measures will be developed in order to avoid, minimize, and in some cases fully mitigate adverse impacts to the environment, natural resources, and public communities to the extent

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		feasible and practicable. Such measures are required in accordance with the implementation regulations the Army and Air Force were required to develop to adopt the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] 4321 et seq.) and the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500–1508.
I0058-5	just want to say that I have a concern about the low level flights, especially when we're out camping, hunting, fishing, you know, how it'll affect our subsistence, customary and traditional use of the areas when we're out there.	Sections 3.1.13.3 (Subsistence) and 3.1.10.3 (Land Use/Recreation) discuss the potential for adverse impacts on subsistence and recreation activities from low-level overflights. Sections 3.1.13.4 (Subsistence) and 3.1.10.4 (Land Use/Recreation) discusses proposed mitigations the Air Force is considering in order to minimize adverse impacts to the extent possible. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0058-6	just want to say that I have a concern about the low level flights, especially when we're out camping, hunting, fishing, you know, how it'll affect our subsistence, customary and traditional use of the areas when we're out there. You know, how it's going to affect the caribou and the moose and other wildlife. Those are my concerns.	<p>The effects of the proposed action on caribou, moose, and other wildlife are addressed and mitigations identified as applicable throughout the document, for both definitive and programmatic actions. Sections 3.1.8.3 and 3.1.8.4 provide impact analysis and mitigations with regard to aircraft overflight and noise (Fox/Paxon MOAs).</p> <p>Please also see the Subsistence sections for potential effects to those activities. The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight-restricted areas for pilot/aircraft safety and wildlife protection.</p> <p>Please see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p>
I0059-1	Thank you. I am Audubon Bakewell, B-A-K-E-W-E-L-L from Paxson and I'd like to take this time to thank the members of the Air Force and Army who came to Paxson tonight to present your statements and I yield the balance of my time.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0060-1	So probably my biggest concern is with the hatchery and stuff too because I think that's such a huge deal. But I really feel the need, you know, to have these live exercises and stuff and -- but probably don't want it right here where it's going to damage the hatchery.	Variables affecting what noise levels will be experienced below the Military Operations Areas (MOAs) include the type of aircraft, altitude, speed, and power level in addition to the amount of cover and background noise present. While we don't want to minimize the losses the hatchery may have experienced, experiments with noise and fish eggs and fry do not tend to

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>corroborate noise causing mortality to fish. Additional research findings for fish were added to Appendix E, Noise, and will be added where applicable to the Final EIS text in Section 3.8.1.</p> <p>A 1987 survey to inquire about the effects of low-altitude aircraft operations on fish and wildlife included hatchery managers. This type of survey focused on the most extreme examples of responses and was more informational than scientific. The fish responses reported included sonic booms having no effect on fish eggs at Nevada, Arizona, and Missouri hatcheries to intense, "focused" sonic booms resulting in the death of striped bass due to the fish jumping out of their tanks or dying of seizures in the water at an Alabama lab (Gladwin and Mancini 1988).</p> <p>The potential loudest noise from aircraft is the sonic boom. One study looked specifically at trout and salmon eggs after exposure during a critical phase of development to a variety of simulated sonic boom overpressures similar to those produced by military airplanes. Comparisons with control groups of eggs spawned at the same time indicated that the sonic boom exposure caused no increase in egg or fish fry mortality (Rucker 1973).</p> <p>Stadler and Woodbury (2009) reported the criteria NOAA Fisheries uses to assess the risk to fishes. They found that onset of physical injury would be expected if the peak impulsive sound pressure level (SPL) in water exceeds 183 decibels (dB) for fish smaller than 2 grams. By convention, sound levels in water are expressed in a slightly different way from sound levels in air. Taking into account this unit conversion as well as reflection of much of the inbound noise energy from the water's surface and conversion from A-weighted to unweighted sound metric, in-water SPL is typically in the neighborhood of 35 dB greater than the A-weighted sound level just above the water's surface. According to the JPARC Noise section Table 3-6, none of the sound exposure levels (SELs) from 10 various aircraft flying as low as 300 feet above ground level (AGL) currently used are higher than 120 dB, which would equate to about 155 dB in-water SPL. (The lowest proposed flight level for JPARC operations is 500 feet AGL in the Fox/Paxon MOAs and other airspace units).</p> <p>Another study investigated the effects of seismic air guns on eggs, larvae and fry and found significant mortality in three species at a variety of ages but only when the specimens were within about 5 meters of the source, and the</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>most substantial effects were fish that were within 1 to 4 meters of the source.</p> <p>Most studies on noise effects to fish looked at long-term sound exposure, which is not applicable in the case of intermittent overflights.</p> <p>Because of the amount of concern we received, a request has been submitted to add the hatchery to the sensitive areas that have seasonal flight restrictions published in the pilot's handbook.</p>
I0060-2	<p>But the other thing I'm thinking is I know -- now, you know, our pilots I'm sure would not violate any, you know, drop down and go for it, but we also have other pilots, right, that do these things from all over the world, you know, England and whatever. So, you know, maybe our guys might get in a little bit of trouble if they did something like that, but you might not be able to control the people from the other countries. And so, you know, it just takes one jet, go down there go right over the hatchery and just like wasn't that a blast. But -- you know, and then that's done.</p>	<p>All participating RED FLAG-Alaska aircrews are thoroughly briefed on how and where they are to operate during the MFE mission activities. Range controllers monitor these flight activities throughout the duration of each scheduled mission to help ensure all participants remain within their assigned Special Use Airspace boundaries. Any observed violations are dealt with accordingly.</p>
I0061-1	<p>My question comment is about the alternative E for the Paxson MOA. It's stating that there's the potential for moving the southern boundary of the Paxson MOA north by approximately 20 miles because residents around Lake Louise complained about potential noise and there are also impacts to residents, tourism companies and other organizations in that area. And the alternative E was proposed after the public comment -- the first public comment period. Well, my question is a number of us here in the Paxson community also made public comments about noise and impacts to residents and tourism companies in this area. So my question is if you're listening to the people in Lake Louise and moving the southern boundary of the Paxson MOA by 20 miles why not move it 20 miles north of Paxson as well. You already state in your literature that there are significant adverse impacts for socioeconomics, land use and noise. You already know that these are potentially big problems and we know it too. So I'll just make the comment again verbally that we'd like for you to listen to us here in Paxson just the same as you listened to the folks down by Lake Louise.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Alternative E was created in response to public comments after the scoping process in order to avoid impacts to the Lake Louise area and other areas in this vicinity.</p>
I0062-1	<p>I work at the hatchery and I support what everybody's said about the flyovers. I know for sure that -- I mean I know if you drive by one of those incubators and it -- even the truck throws a rock and hits one of those incubators you've killed thousands and thousands of fish. And that's not including the wild stock and what it's doing to them because they're just as fragile and it's the same time.</p>	<p>Variables affecting what noise levels will be experienced below the Military Operations Areas (MOAs) include the type of aircraft, altitude, speed, and power level in addition to the amount of cover and background noise present. While we don't want to minimize the losses the hatchery may have experienced, experiments with noise and fish eggs and fry do not tend to corroborate noise causing mortality to fish. Additional research findings for</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>fish were added to Appendix E, Noise, and will be added where applicable to the Final EIS text in Section 3.8.1.</p> <p>The question of how sounds affect fishes is relatively new, and it is very difficult to do field studies on acoustic behavior of wild fishes. The few studies that have been done with animals in their natural habitats thus far provide only very limited data. Davidson et al. (2009) stated that sound pressure levels within aquaculture systems are likely greater than underwater sound levels of most natural habitats and indicated that fish in natural systems could escape from areas with less than optimal sound conditions.</p> <p>A 1987 survey to inquire about the effects of low-altitude aircraft operations on fish and wildlife included hatchery managers. This type of survey focused on the most extreme examples of responses and was more informational than scientific. The fish responses reported included sonic booms having no effect on fish eggs at Nevada, Arizona, and Missouri hatcheries to intense, "focused" sonic booms resulting in the death of striped bass due to the fish jumping out of their tanks or dying of seizures in the water at an Alabama lab (Gladwin and Mancini 1988).</p> <p>The loudest potential noise from aircraft is the sonic boom. One study looked specifically at trout and salmon eggs after exposure during a critical phase of development to a variety of simulated sonic boom overpressures similar to those produced by military airplanes. Comparisons with control groups of eggs spawned at the same time indicated that the sonic boom exposure caused no increase in egg or fish fry mortality (Rucker 1973).</p> <p>Stadler and Woodbury (2009) reported the criteria NOAA Fisheries uses to assess the risk to fishes. They found that onset of physical injury would be expected if the peak impulsive sound pressure level (SPL) in water exceeds 183 decibels (dB) for fish smaller than 2 grams. By convention, sound levels in water are expressed in a slightly different way from sound levels in air. Taking into account this unit conversion as well as reflection of much of the inbound noise energy from the water's surface and conversion from A-weighted to unweighted sound metric, in-water SPL is typically in the neighborhood of 35 dB greater than the A-weighted sound level just above the water's surface. According to the JPARC Noise section Table 3-6, none of the sound exposure levels (SELs) from 10 various aircraft flying as low as 300 feet above ground level (AGL) currently used are higher than 120 dB,</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>which would equate to about 155 dB in-water SPL. (The lowest proposed flight level proposed for JPARC operations is 500 feet AGL in the Fox/Paxon MOAs and other airspace units).</p> <p>Another study investigated the effects of seismic air guns on eggs, larvae and fry and found significant mortality in three species at a variety of ages but only when the specimens were within about 5 meters of the source, and the most substantial effects were fish that were within 1 to 4 meters of the source.</p> <p>Most studies on noise effects to fish looked at long-term sound exposure, which is not applicable in the case of intermittent overflights.</p> <p>Because of the amount of concern we received, a request has been submitted to add the hatchery to the sensitive areas that have seasonal flight restrictions published in the pilot's handbook.</p>
I0062-2	<p>I work at the hatchery and I support what everybody's said about the flyovers. I know for sure that -- I mean I know if you drive by one of those incubators and it -- even the truck throws a rock and hits one of those incubators you've killed thousands and thousands of fish. And that's not including the wild stock and what it's doing to them because they're just as fragile and it's the same time.</p>	<p>A review of literature on the topic suggests that subsonic and supersonic noise levels at the fishery would not be expected to increase mortality among fish eggs or fry.</p> <p>Stadler and Woodbury (2009) reported the criteria NOAA Fisheries uses to assess the risk of noise to fishes. They found that onset of physical injury would be expected if the peak sound pressure level (SPL) in water exceeds 183 decibels (dB) for fish smaller than 2 grams. By convention, sound levels in water are expressed in a slightly different way from sound levels in air. Taking into account this unit conversion as well as reflection of much of the inbound noise energy from the water's surface and conversion from A-weighted to unweighted sound metric, in-water SPL is typically in the neighborhood of 35 dB greater than the A-weighted sound level just above the water's surface. According to the JPARC Noise section Table 3-6, none of the SEL from 10 various aircraft flying as low as 300 feet above ground level (AGL) currently used are higher than 120 dB, which would equate to about 155 dB in-water SPL. In the proposed expanded Fox 3 MOA and Paxon MOA, aircraft training would not occur at altitudes below 500 feet AGL.</p> <p>In 1973, Rucker reported results of tests of sonic boom noise on fish eggs. No increase in egg mortality was found when eggs were exposed to sonic boom noise at the most critical stages of development or any other stage.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>Detailed information has been added to the EIS in the Biological Resources section on the results of tests run on the effect of noise on fish and fish eggs. Although physical harm to fish and eggs resulting from overflight noise is not expected, Gulkana Hatchery is an area of concentrated activity during certain times of the year and may be considered to be particularly noise-sensitive. The hatchery could be designated as an avoidance area to reduce potential visual and auditory impacts.</p>
I0063-1	<p>my first concern is with the hatchery. They are -- they do a wonderful job and they're a very necessary part and they're a great part of our community.</p> <p>But again, I go back to the hatchery. The hatcheries are wonderful neighbors of ours. They rent from us. They're great people, they do a wonderful, wonderful job and I do not want to see anything happen to their fish.</p>	<p>Variables affecting what noise levels will be experienced below the MOAs include the type of aircraft, altitude, speed, and power level in addition to the amount of cover and background noise present. While we don't want to minimize the losses the hatchery may have experienced, experiments with noise and fish eggs and fry do not tend to corroborate noise causing mortality to fish. Additional research findings for fish were added to Appendix E, Noise, and will be added where applicable to the Final EIS text in Section 3.8.1.</p> <p>A 1987 survey to inquire about the effects of low-altitude aircraft operations on fish and wildlife included hatchery managers. This type of survey focused on the most extreme examples of responses and was more informational than scientific. The fish responses reported included sonic booms having no effect on fish eggs at Nevada, Arizona, and Missouri hatcheries to intense, "focused" sonic booms resulting in the death of striped bass due to the fish jumping out of their tanks or dying of seizures in the water at an Alabama lab (Gladwin et al. 1988).</p> <p>The potential loudest noise from aircraft is the sonic boom. One study looked specifically at trout and salmon eggs after exposure during a critical phase of development to a variety of simulated sonic boom overpressures similar to those produced by military airplanes. Comparisons with control groups of eggs spawned at the same time indicated that the sonic boom exposure caused no increase in egg or fish fry mortality (Rucker 1973).</p> <p>Stadler and Woodbury (2009) reported the criteria NOAA Fisheries uses to assess the risk to fishes. They found that onset of physical injury would be expected if the peak impulsive sound pressure level (SPL) in water exceeds 183 decibels (dB) for fish smaller than 2 grams. By convention, sound levels in water are expressed in a slightly different way from sound levels in air. Taking into account this unit conversion as well as reflection of much of the inbound noise energy from the water's surface and conversion from A-</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>weighted to unweighted sound metric, in-water SPL is typically in the neighborhood of 35 dB greater than the A-weighted sound level just above the water's surface. According to the JPARC Noise section Table 3-6, none of the sound exposure levels (SELs) from 10 various aircraft flying as low as 300 feet above ground level (AGL) currently used are higher than 120 dB, which would equate to about 155 dB in-water SPL. (The lowest proposed flight level proposed for JPARC operations is 500 feet AGL in the Fox/Paxon MOAs and other airspace units).</p> <p>Another study investigated the effects of seismic air guns on eggs, larvae and fry and found significant mortality in three species at a variety of ages but only when the specimens were within about 5 meters of the source, and the most substantial effects were fish that were within 1 to 4 meters of the source.</p> <p>Most studies on noise effects to fish looked at long-term sound exposure, which is not applicable in the case of intermittent overflights.</p> <p>Because we received so much concern, a request has been submitted to add the hatchery to the sensitive areas that have seasonal flight restrictions published in the pilot's handbook.</p>
I0063-2	<p>my first concern is with the hatchery. They are -- they do a wonderful job and they're a very necessary part and they're a great part of our community.</p> <p>But again, I go back to the hatchery. The hatcheries are wonderful neighbors of ours. They rent from us. They're great people, they do a wonderful, wonderful job and I do not want to see anything happen to their fish.</p>	<p>A review of literature on the topic suggests that subsonic and supersonic noise levels at the fishery would not be expected to increase mortality among fish eggs or fry.</p> <p>Stadler and Woodbury (2009) reported the criteria NOAA Fisheries uses to assess the risk of noise to fishes. They found that onset of physical injury would be expected if the peak sound pressure level (SPL) in water exceeds 183 dB for fish smaller than 2 grams. By convention, sound levels in water are expressed in a slightly different way from sound levels in air. Taking into account this unit conversion as well as reflection of much of the inbound noise energy from the water's surface and conversion from A-weighted to unweighted sound metric, in-water SPL is typically in the neighborhood of 35 dB greater than the A-weighted sound level just above the water's surface. According to the JPARC Noise section Table 3-6, none of the SEL from 10 various aircraft flying as low as 300 feet AGL currently used are higher than 120 dB, which would equate to about 155 dB in-water SPL. In the proposed expanded Fox 3 MOA and Paxon MOA, aircraft training would not occur at altitudes below 500 feet AGL.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>In 1973, Rucker reported results of tests of sonic boom noise on fish eggs. No increase in egg mortality was found when eggs were exposed to sonic boom noise at the most critical stages of development or any other stage.</p> <p>Detailed information has been added to the EIS in the Biological Resources section on the results of tests run on the effect of noise on fish and fish eggs.</p>
I0063-3	<p>And I also look as a lodge owner. As you can look around and see, my windows. I would hate like a sonic boom to take out any windows here for - also with guests coming in here. We rely on our summer business to get us through the winter because we are open 365 days a year. And so, you know, if we get into being known as complaints about people not being able to sleep here, being scared, you know.</p>	<p>The Air Force recognizes that there will potentially be some noise impacts to the population in the affected region of influence under the proposed actions that could have subsequent economic impacts. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p> <p>The lowest supersonic aircraft would be at 12,000 feet above mean sea level (MSL) in the proposed expanded Fox 3 and new Paxon Military Operations Areas (MOAs). In the Fox 3 MOA this is not a change from current restrictions.</p> <p>From pages 3-22 and 3-23 of Draft EIS: The noise level from a sonic boom at this altitude has been shown to be approximately 6.0 [pounds per square foot] psf. Laboratory tests of glass (White 1972) have shown that properly installed window glass will typically not break at overpressures below 10 psf, even when subjected to repeated booms. However, sonic boom structural damage is possible at lower overpressures, particularly if the affected structure is old or in poor condition.</p> <p>Time-averaged noise levels beneath the proposed airspace areas would not exceed 54 dB, remaining below the EPA-identified noise level “requisite to protect the public health and welfare with an adequate margin of safety.” However, increases in noise levels in areas not currently overlain by MOAs would be greater than 10 dB and would be expected to be easily noticeable, particularly because the ambient noise level in the region of influence (ROI) is low.</p>
I0064-1	<p>I represent just me. But as a citizen of Delta I know that tonight is a major scheduling conflict for our small town in that it is high school graduation and so many of the leaders in our community are not available to come here tonight. I also noticed that there were no signs posted up at our grocery store where everyone goes or at our post office about this meeting. There was nothing published on our website about this meeting or in our local</p>	<p>Advertisements announcing the availability of the Draft EIS and the public hearings were published in the Delta Wind on June 14, 2012 and again on April 26, 2012. Direct notices were also sent directly to over 40 citizens, businesses and organization based in Delta Junction, including the City of Delta Junction, deltawindonline, deltanewsweb, Delta Chamber of Commerce, Delta Junction Fish and Game Advisory, Delta Sportsman’s</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>newspaper. So I feel as if trying to engage the public in this very important meeting was not really done in earnest or not done with truly getting to know who we are. Thank you</p>	<p>Association, Salcha-Delta Soil and Water Conservation District, Delta Sportsman's Association, and the Delta Junction Library. Each direct mailing included a flyer and requested the citizen or entity to post the flyer in a public location.</p> <p>The response to I0034-3 explains the extensive notification process undertaken by Alaskan Command (ALCOM) across Alaska. Because of the large team sent to the hearings, ALCOM planned the public hearings to avoid military training schedule conflicts in addition to avoiding holiday, weather, summer break, and religious conflicts. Unfortunately ALCOM did not know about the high school graduation. The proponents of the proposals considered the hearing dates carefully in an effort to balance military training requirements with public needs.</p>
I0065-1	<p>I'm a private pilot and a hunter and I'm here to represent myself. But maybe what I have is a request and some observations, but, you know, I preface this with saying that we appreciate everything you fellows do. Not only fellows, Armed Forces Service. We don't want to jeopardize your mission and training and we want you to be the best prepared that there are when we ask you to step into harm's way and so we all appreciate that.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0065-2	<p>Game Management 20A which is out here to the west of Delta and south of Fairbanks is one of the most intensively managed game management units in the state. It currently has a very healthy population of most -- in fact you could probably pick up a Sports Afield or a Petersen's Hunting magazine and read about 20A in there. As I look at the EIS and what is planned for that activity, and I've hunted over there for over 30 years. It's beautiful, nestled in between Mount Hayes and Mount Moffit where I go and it looks like it's over. Unless we look at all the opposition, if you will, I don't even know what's controlled opposition, people that have concerns as Representative Feige mentioned over on Lake Louise and the pilots and things like that. This area is accessed by a number of air taxis and transporters, it's accessed by a number of guides, it's accessed by a whole array of private hunters and recreators of which the military is well represented. I hate to lose that and I wish we could share it and I think we can. And the way we can share that is if there was some way we can impress upon the military to maybe adjust their scheduling just -- because I would guess that 90 some percent of the use over there, recreational use, is during the month of September, maybe from August 15th on. And Range Manager Sharp that retired from Fort Greely was a hunter, like probably all of you are.</p>	<p>Section 3.3.10.3 of the EIS acknowledges that the Realistic Live Ordnance Expenditure action would result in changes in civilian access that would affect the spatial and temporal availability to specific areas, and associated recreational uses and activities including GMUs. Section 3.2.10.4 lists mitigation measures that could be implemented to reduce the impacts such as suspending Air Force MFE operations during January, September, and December and between June 27 and July 11, in order to allow access for public use and recreation during these popular seasons; coordinating MFE schedules with local communities in advance; and providing updated information and maps on the USARTRAK website to identify public access restrictions for RLOD activities on Army lands. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>He had the ability to schedule maintenance on the range during September. An OCA who was in a Cub could putz around out there, you know, and go hunting and whatever we had to do and we didn't conflict with anybody. Past couple of years we've had a little bit of an off flavor with the scheduling because we've had people that schedule years in advance, for example, especially with commercial operators. With me it's my relatives coming up when we go hunting. And they're sitting there with airline tickets and all of a sudden they close it, the air space is closed. And that's the way we get in there. Most of that's all fly in. And then of course we call Representative Feige or Murkowski or whatever happens and then the day before hunting season they open it back up again, but that really didn't help the person that changed their ticket. I mean they lost that opportunity.</p>	
I0065-3	<p>I hate to lose that and I wish we could share it and I think we can. And the way we can share that is if there was some way we can impress upon the military to maybe adjust their scheduling just -- because I would guess that 90 some percent of the use over there, recreational use, is during the month of September, maybe from August 15th on. And Range Manager Sharp that retired from Fort Greely was a hunter, like probably all of you are. He had the ability to schedule maintenance on the range during September. An OCA who was in a Cub could putz around out there, you know, and go hunting and whatever we had to do and we didn't conflict with anybody.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
I0065-4	<p>Past couple of years we've had a little bit of an off flavor with the scheduling because we've had people that schedule years in advance, for example, especially with commercial operators. With me it's my relatives coming up when we go hunting. And they're sitting there with airline tickets and all of a sudden they close it, the air space is closed. And that's the way we get in there. Most of that's all fly in. And then of course we call Representative Feige or Murkowski or whatever happens and then the day before hunting season they open it back up again, but that really didn't help the person that changed their ticket. I mean they lost that opportunity. And I don't know who to ask, but I think there's some pretty good minds in here that could probably get that to the right place. And so if there's any way possible to schedule this.</p>	<p>RED FLAG-Alaska and other major flying exercises are scheduled and publicized well in advance of these events. Otherwise, the scheduled and real-time use of the airspace is publicized via the Special Use Airspace Information Service and other sources to help inform the public of these training activities. It is suggested that you contact the Eielson AFB or JBER Public Affairs office to obtain available information on any training/exercise events that may scheduled during your visitor planning efforts.</p> <p>Eielson Public Affairs (907) 377-2116 354fw.pa.publicaffairs@us.af.mil JBER Public Affairs (907) 552-8151 pateam@elmendorf.af.mil</p>
I0065-5	<p>because I would guess that 90 some percent of the use over there,</p>	<p>The FEIS Flight Safety and Biological Resources sections address the</p>

Table N-5. Government Response to Comments (continued)

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	recreational use, is during the month of September, maybe from August 15th on.... You know, in addition to us flying around, at that time there's lots of cranes and waterfowl and things like that and it's a little bit hazardous too, even for us, you know. We don't -- they can almost out fly me, so they can get out of my way but not with an F-16 or a 22.	different birds/wildlife species in the region of influence and the potential flight safety risks of a bird/wildlife-aircraft strike. As noted in these discussions, both the Air Force and the Army have implemented bird/wildlife-aircraft strike hazard (BASH) programs to help monitor and increase pilot awareness of those areas/altitudes where such hazards may exist. The Eleventh Air Force Airspace Handbook lists noise/flight sensitive areas, including bird migratory locations, which pilots are instructed to avoid by stated vertical and lateral parameters.
I0065-6	I guess that's, you know, the gist of my request is look at scheduling, see if there isn't some way we can accommodate both of us. Thank you.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0066-1	We're glad that -- for the opportunity to make a comment and all the effort that they have obviously put into this. Some people don't agree with pieces and parts of it, but I personally appreciate the fact that we have a military and we want them to keep strong and capable. And of course at any -- sometime in the future what they may need as far as equipment will change and that's something that we don't really know. So I can see why it would be -- it would -- might look like something of a land grab because they're not really sure what their capabilities might require at some time in the future. But I personally don't feel that it's going to be that large of an effect on, you know, most little guys. And, you know, when it comes to the bigger airlines or the -- say the air taxis that do emergency flights, I think they've got some provisions to take care of most of that. So I don't see a really big problem with this personally.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0067-1	My request this time is to the Army and it -- I made some comments earlier about the Eielson range control and that special use airspace information service that they have where we can call an 800 number and talk to them in the air. And, you know, they'll really accommodate us pilots that are flying around because if the 16s or 15s or whatever it is are out of the way they'll tell us how long is it going to take you to get across there and I tell them 35 minutes. You can hear them gasp a little, you know, but they'll say go ahead but call us when you get there and of course you don't ever forget that because they'll -- be out there with them.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
I0067-2	But the -- what I really want -- would like from the Army is they will take --	Individual MOAs and restricted areas are normally scheduled for a window

Table N-5. Government Response to Comments (continued)

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	<p>a prime example is restricted area 2202 alpha out here and that's where they're apparently flying these UAVs. And they will inform the Air Force that this -- they're going to be hot, active, tonight from 5:00 o'clock to forever and it'll be that way sometimes through Monday or Tuesday. You know, and I realize I can't hear one, can't hear much anyway, but -- and you can't see them. So after awhile it's kind of like hollering wolf, you know, I don't think anybody's out there. But the Air Force will let us through, you know, they know the current status. And I don't know what the complications are to be able to provide the same kind of service, but if you could do that it would be deeply appreciated.</p>	<p>of time during which flight mission activities are scheduled to occur. Both the Air Force and Army will use all available means at their disposal to inform the public of the scheduled and real-time use of their training airspace. The Air Traffic Control or range control function(s) having control over that airspace may be able to route air traffic through these areas during those intervals when military flight activities are either not in progress or would not be a conflict. This is accomplished on a case-by-case basis as conditions may permit. You are encouraged to contact the Air Force or Army Public Affairs Office for further assistance on obtaining the status of the scheduled airspace uses.</p> <p>Eielson Public Affairs (907) 377-2116 354fw.pa.publicaffairs@us.af.mil</p> <p>JBER Public Affairs (907) 552-8151 pateam@elmendorf.af.mil</p> <p>USARAK Public Affairs (907) 384-1542 usarak.pao@us.army.mil</p>
I0067-3	<p>My request this time is to the Army and it -- I made some comments earlier about the Eielson range control and that special use airspace information service that they have where we can call an 800 number and talk to them in the air. And, you know, they'll really accommodate us pilots that are flying around because if the 16s or 15s or whatever it is are out of the way they'll tell us how long is it going to take you to get across there and I tell them 35 minutes. You can hear them gasp a little, you know, but they'll say go ahead but call us when you get there and of course you don't ever forget that because they'll -- be out there with them.</p>	<p>Both the Air Force and Army use all available means to help inform the public of those time periods the Military Operations Areas (MOAs) and Restricted Areas are scheduled and used for their respective training activities. Funding will be pursued to expand these communications capabilities within those proposed airspace areas where such coverage may not be available. If you are having difficulties obtaining information on current airspace uses, you are encouraged to contact the Public Affairs Office at any of the Army or Air Force installations to be directed to those points of contact that should be able to assist you.</p> <p>Eielson Public Affairs (907) 377-2116 354fw.pa.publicaffairs@us.af.mil</p> <p>JBER Public Affairs (907) 552-8151</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>pateam@elmendorf.af.mil</p> <p>USARAK Public Affairs (907) 384-1542 usarak.pao@us.army.mil</p>
I0068-1	<p>I'm a resident of Delta Junction and I'm just speaking for myself. And I grew up here and it's been an uneasy partnership with the military most of the time because we had different goals and different, you know, directives. And I do appreciate the military and I thank the young men for their service to our country, but I would like to feel that we had more respect for each other in these kind of proceedings that what we say will actually be heard.</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. This comment is duly noted.</p>
I0068-2	<p>I have some of the same concerns that other people mentioned tonight and wildfires are definitely one of them. At times the military will choose not to fight a wildfire that they may or may not have caused across the river with ordinance fire and that's -- it's not threatening the town or anything, but it can -- it impacts our air quality and over the course of a summer, depending on how many fires happen, air quality can be a significant thing in Alaska. You don't -- you know, you don't think about that, but wildfire season is -- can be pretty hazardous for people with any young children or respiratory problems, allergies and stuff.</p>	<p>Procedures for responding to wildland fires are described in Section 3.2.3.1, Ground Safety, Fire and Emergency Response in the DEIS. In addition, please see the response to comment I0098-17 describing text added to the FEIS Air Quality analysis addressing wildfires in Alaska from a health standpoint. This information applies to children as well as adults, and especially to the elderly and other individuals with pre-existing respiratory and heart conditions or related health vulnerabilities.</p>
I0068-3	<p>I'm concerned with access and use of the -- to the Granite Mountain area between the Richardson Highway and the Alaska Highway. This is a great subsistence and recreational use area that I hope will remain open to the public and area residents. It's really my strongest hope that this -- the reservation of Fort Greely not expand anymore southward into that area because it's already pretty close. And, you know, we're out there in the fall, I'm out there berry picking and fishing when Don's hunting. So it's just a great area. Noise is some concern, but I would have to say it would be access and wildfire for me.</p>	<p>The proposed action would not directly impact subsistence or recreational use of the Granite Mountain area. However, access to this area could be limited by the Realistic Live Ordnance Expenditure and Battle Area Complex Restricted Airspace proposals. Section 3.2.10.3 of the EIS acknowledges that access through DTA-East for Dall sheep hunting in other areas off-post, including Granite Mountains located to the east of DTA-East, would be limited by the Realistic Live Ordnance Expenditure proposal. Section 3.2.10.4 lists mitigation measures that could be implemented to reduce the impacts. For example, the Air Force would provide advance schedules of training missions in R-2202 and the public would have access to information about MOA activation during scheduled training and/or NOTAMs.</p> <p>Section 3.3.10.3 of the EIS acknowledges that the Battle Area Complex Restricted Airspace proposal would prevent use of portions of the Richardson Highway-Gerstle River Trail, the 33-Mile Loop Road, and the 12-Mile Crossing. Elimination of these access points could limit access to recreational areas including the Granite Mountains, which are used by the public for sheep hunting, caribou and small game hunting and other activities.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>However, as noted in the EIS, while the 12-Mile Crossing may be the easiest access into the Granite Mountains, alternative access trails exist off military lands.</p> <p>Wildfire prevention and response are key elements of the proposed action. Three primary management actions are used to prevent wildfires. First, a fire danger rating system is used to reduce the likelihood of a fire by limiting military activities. Certain military activities are restricted when thresholds of wildfire risk are reached. Second, wildfire danger is reduced through the removal of accumulated fuels (e.g., prescribed burning and/or construction and maintenance of fire or fuel breaks). Third, an Initial Attack Response Team remains available during military training activities during high and extreme fire danger to provide a rapid initial response to wildfires in the area. These measures are designed to minimize potential wildfire risks.</p>
I0069-1	I'm here today in protest of civilians being killed by drone attacks in Pakistan. I think that this should be addressed in this forum. My concern is that much of the testing that is being done isn't taking into account the need to protect civilians in battle zones and it's really my opinion that sometimes drones are misused to actually depopulate areas of northern Pakistan and I hope that this will be addressed today.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The statement expressed in the comment, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Purpose and Need for the Proposed Actions, Sections 1.2 and 1.3.
I0070-1	I would just like to point out that the federal government owns 67 percent of the lands in Alaska currently and I understand that the whole ordeal about having this added access is because the federal government and those people that manage those lands do not want to create anymore ordinance drops and so they want to ask Alaskans to give up some of their lands and their airspace to provide the safety for all Americans to support our men and women who honorably defend our freedoms. I think we ought to be asking the federal government to do the same and since they own 67 percent of Alaska that they could create a few more drop zones on their land and allow their activities and their training for our soldiers.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use. A number of the proposals request expanded and additional Military Operations Area (MOA) or airspace for restricted areas in order to meet the purpose and need expressed in Chapter 1, Purpose and Need for the Proposed Actions.
I0071-1	I don't have comments prepared and I regret that because I understood and last year for the scoping meetings the public comments were taken in a closet, so I wasn't inspired by that. So I didn't write these comments down, but I do object to this expansion on both local and global grounds.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0071-2	I personally find the sounds of fighter jets and bombs dropping very, very deeply disturbing. And I can hear them from my house way out in	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force

Table N-5. Government Response to Comments (continued)

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	northwestern Fairbanks and I'm on the other side of campus, you know, well away from Wainwright. But I can hear those bombs and it is disturbing, but that is certainly not why I object to this expansion.	will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0071-3	I -- mostly on the same grounds as Jay and some of the other folks here do not see our need for predator drones. I do not see assassination and targeted killings that do just happen to kill a lot of civilians as well as an appropriate method of dialogue with the world. I really think we need more peaceful methods and I don't think we need more predator drones that are indiscriminate and lethal. And pretty bad for the pilots who do the job too. The guys who are running these drone strikes from Arizona and Texas are not in real good shape. And the lie that we put to our kids when they're young and want to fly airplanes that they should join the Air Force and be trained as pilots is just another fallacy.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The statement expressed in the comment, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Purpose and Need for the Proposed Actions, Sections 1.2 and 1.3.
I0072-1	<p>I have spent much of the last two and a half years or so attending conferences as a systems integrator engineer at The Institute for Defense and Government Advancement conferences. I've been briefed by generals like General Peter Chiarelli, General Michael Vane, heads of DARPA, et cetera, on some of the new technologies that I think your JPARC expansion is going to be using.</p> <p>You talk in your preamble about these technologies. These are pretty horrific technologies. They're very invasive and they're also very destructive and there's no way to protect civilians from them. And they also find use inside Homeland Security in the United States.</p>	Comment noted. The proposed actions would involve employing only standard munitions or ordnance systems commonly used throughout the military.
I0072-2	I've heard the head of the Department of Homeland Security's commercialization department say to a group of Lockheed Martin and Rayzion (ph) people, hey, you write a 10 page white paper, you can get \$20 million to design some of these anti-terrorism systems. This is all linked together.	Thank you for your comment. These comments indicate issues that are outside of the purview of this EIS either because they describe current operations or because they describe broader Department of Defense policy decisions. For further assistance with the issue please contact your local base Public Affairs Office or Alaskan Command Public Affairs at (907) 552-2341.
I0072-3	And your weapons, your drone operators, your drone navigation operations and your drone sensor controls, all this are all based on commercial off the shelf technologies. These are technologies that anybody, a kid with facial jewelry, can learn how to program.	FEIS Sections 3.6.1 and 3.6.3 note that the FAA and DoD are continuing to discuss the most efficient and effective means of integrating UAV operations into the National Airspace System so as to provide for the safety of all airspace uses. The FAA continues to assess the potential flight risks of unmanned aircraft to other airspace uses and has limited military UAV operations to restricted airspace or authorized corridors that separate these operations from other aircraft. Significant progress has been made on technologies that enhance UAV flight safety; however, until such technologies can provide an equivalent level of flight safety as manned

Table N-5. Government Response to Comments (continued)

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		aircraft, these operations will not be permitted outside of protected airspace.
I0072-4	You know that it's going to be -- there's going to be proliferation of these technologies and I'll bet you that is why we now have a cyber command in the United States. This is going to come home to us in the United States. This network centric warfare that your -- Admiral Cebrowski started years ago and what your doctrine is all about is going to come home to bite the people in this country. And I'm sure opposed to it and if I can stop you any way and how I'm going to. Thank you.	Thank you for your comment. These comments indicate issues that are outside of the purview of this EIS either because they describe current operations or because they describe broader Department of Defense policy decisions. For further assistance with the issue please contact your local base Public Affairs Office or Alaskan Command Public Affairs at (907) 552-2341.
I0073-1	My name is Tom Lamal and the comments I have to make are mostly on the Paxson area for pilots. And I would like to see for this area for safety reasons two corridors in the area, one down the Richardson Highway that's high enough that if there's turbulence that private pilots can get out of that and also wide enough that if there's snow squalls or thunderstorms that they have enough room to maneuver around those. Also another corridor I'd like to see is on the Denali Highway going more east and west from Paxson over to Denali Park and also wide and high enough for safe flying for private pilots. And another area on the Paxson would be towards Tok that if the area was drawn farther away from the highway, maybe to the foothills of the Alaska Range, so that safe passage could happen along there and maybe have it up to an elevation of the foothills of 5,000 feet or something like that, I'm talking about ground elevation, so that people could fly towards the Canadian border without having air restrictions along that area. If that was pulled in I think it would make it a lot easier for people to travel back and forth, myself included. Thank you very much.	Thank you for your suggestions as all options will be considered to help ensure the safe use of this airspace. As noted in the FEIS Sections 2.1.1 and 3.1.1, the lower altitudes (below 14,000 feet MSL) within the proposed Paxson MOA would only be used during the more limited time periods MFEs are conducted each year. At all other times, routine flight training activities would be conducted at 14,000 feet MSL and above within this MOA. The FEIS Appendix K includes airspace mitigations that would be considered for such areas referenced in your comments where both military and civil flights would normally occur.
I0073-2	My name is Tom Lamal and the comments I have to make are mostly on the Paxson area for pilots. And I would like to see for this area for safety reasons two corridors in the area, one down the Richardson Highway that's high enough that if there's turbulence that private pilots can get out of that and also wide enough that if there's snow squalls or thunderstorms that they have enough room to maneuver around those. Also another corridor I'd like to see is on the Denali Highway going more east and west from Paxson over to Denali Park and also wide and high enough for safe flying for private pilots. And another area on the Paxson would be towards Tok that if the area was drawn farther away from the highway, maybe to the foothills of the Alaska Range, so that safe passage could happen along there and maybe have it up to an elevation of the foothills of 5,000 feet or something like that, I'm talking about ground elevation, so that people could fly towards the	Thank you for your suggestions as all options will be considered to help ensure the safe use of this airspace. As noted in the FEIS Sections 2.1.1 and 3.1.1, the lower altitudes (below 14,000 feet MSL) within the proposed Paxson MOA would only be used during the more limited time periods MFEs are conducted each year. At all other times, routine flight training activities would be conducted at 14,000 feet MSL and above within this MOA. The FEIS Appendix K includes airspace mitigations that would be considered for such areas referenced in your comments where both military and civil flights would normally occur.

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	Canadian border without having air restrictions along that area. If that was pulled in I think it would make it a lot easier for people to travel back and forth, myself included. Thank you very much.	
I0074-1	I've been up in -- living here in Alaska for 30 or 40 years and I like to hunt and trap and fish and I'm kind of concerned how this is going to affect the people who hunt and fish in that area. So I hope as soon as you can get that thing sorted out because if you have to restrict that area we'd like to know what these restrictions are before we go along with this thing.	<p>Chapter 2 of the EIS provides a description of the proposed actions and alternatives to achieve the vision for the Joint Pacific Alaska Range Complex (JPARC). Because the proposed actions analyzed in this EIS are in various stages of development and have varying timelines for implementation, this EIS has two levels of decisions —programmatic and definitive. The definitive proposed actions are described in sufficient detail to assess foreseeable environmental impacts while the programmatic proposed actions include baseline information and available information to assess the foreseeable environmental consequences, but require additional planning, programming, and design.</p> <p>Definitive (i.e., specific, project-level) decisions will be included in the Record of Decision (ROD) for proposed actions that have sufficient definition to allow detailed EIS analysis of potential discrete impacts. Decisions may incorporate specific measures identified in the analysis to avoid, reduce, or mitigate impacts. This EIS will serve to support the decisions for this class of actions.</p> <p>Programmatic decisions will be included in the ROD for proposed actions that have adequate detail for analysis of a general capability, but have flexibility relative to project definition, location, timing, programming, funding, or level of use. Also, actions that are currently not identified for funding or that would take many years to implement may also be decided programmatically. This class of decisions would form the basis for “tiering” future environmental analyses once actions are more fully defined or are closer to the time of implementation.</p> <p>The ROD for this EIS will include decisions on each proposed action, supported by analysis implementing the proposed action either on its own or in combination with the other proposed actions.</p>
I0074-2	Another concern that I have is that if this -- using these drones, it doesn't seem to be too good for the people that get hit by them and it seems there's quite a few where it's been used kids are getting killed because of the inaccuracy of these things. But apparently it gets accurate enough, sometimes it isn't.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.

Table N-5. Government Response to Comments (continued)

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I0074-3	So people -- my concern would be that when the military starts using this stuff it'll start using them on civilians. When the business communities come together with your military communities we end up getting more authoritarian type government and that's on a road to fascism. You got to be careful with that slide because we don't want to live and lose the republic that way.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
I0074-4	So that's another concern I have, not just the hunting and the fishing and the trapping, but how big of an area are you going to be taking over in square miles to do these exercises.	The area covered by each definitive action is provided in the respective land use section for each proposal as follows: 3.1.10.1 (Fox 3 MOA Expansion and New Paxon MOA), 3.2.10.1 (Realistic Live Ordnance Delivery); 3.3.10.1 (Battle Area Complex Restricted Area); 3.4.10.1 (Expanded Restricted Area R2205), 3.5.10.1 (Night Joint Training); and 3.6.10.1 (Unmanned Aerial Vehicle). The area covered by programmatic proposals is not provided as these projects have flexibility relative to project definition and location. However, the area covered by programmatic actions would be included in future environmental analyses once actions these proposals are more fully defined or are closer to the time of implementation.
I0074-5	<p>And we're kind of concerned you might have the people on the other side getting hit with this stuff regard us as terrorists and if we start mirroring that way of doing business with drones just dropping out of the sky, boom, if we start mirroring their behavior. And we've seen this with, you know, our government with torture even. They actually think it was okay at one point. If we start seeing us going that was this is not good for the republic.</p> <p>So besides hunting and fishing and trapping in those areas you're about to use is also the broader issue is this going to harm the republic as we know it. That's my concern, sir.</p>	Thank you for your comment. These comments indicate issues that are outside the purview of this EIS, either because they describe current operations or because they describe broader Department of Defense policy decisions. For further assistance with the issue please contact your local base Public Affairs Office or Alaskan Command Public Affairs at (907) 552-2341.
I0075-1	I've been here 45 years and I've come to love this place a great deal. My concern today is that I believe firmly that our nation is in decline. We are a hair breath away from insolvency in so many areas.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0075-2	I think there's no business whatsoever expanding the military presence in our state at this critical time. We need money for people and what they need, not to fight a phantom enemy which doesn't exist. There's no state actor in today's world that demands our high level of technology. That's a fallacy. So I would say I'm categorically opposed to expanding JPARC and that's a big thumbs down to JPARC.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force units based within the State of Alaska face an exceptional challenge to meet compelling and increasingly urgent needs borne out of fighting wars. In an era of persistent combat operations, the Army and Air Force need to continue to generate new technologies, learn from battlefield experiences, update tactics, and train intensively to face a

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		committed and agile enemy. Each of these challenges drives the purpose and the need for modernization and enhancements to the range and airspace infrastructure that replicate the modern battlefield for training and testing in Alaska.
I0076-1	I want to remind everyone here that the media grossly misrepresents the use of drones and their use in Pakistan. The evidence that I've been able to gather clearly indicates that the drones are being used for much more than isolated targeting of particular individuals. I believe that they're being used to actually depopulate north Pakistan and I think that more attention should be brought to this issue and this forum.	Thank you for your comment. These comments indicate issues that are outside of the purview of this EIS, either because they describe current operations or because they describe broader Department of Defense policy decisions. For further assistance with the issue please contact your local base Public Affairs Office or Alaskan Command Public Affairs at (907) 552-2341.
I0077-1	My name is Chris White and I mentioned in my comments previously about an area that I was concerned about and the area	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0077-2	I was specifically concerned about was the Tanana Flats and the -- well, I'm actually concerned about all of the area that the JPARC or Range Complex covers and what restrictions will be put on the citizens and how will we -- will we have to sign up to hunt in these areas? This is prime hunting and trapping areas and the -- many people are going to be concerned if you start closing this off to -- or restricting us too much out of it. That would not be good. So those are the areas I mentioned in my previous comments regarding the hunting, fishing and trapping in those areas.	The likely increase in military use of Tanana Flats Training Area that could result from implementing several of the proposals in the EIS could reduce the times that these areas are available for public access and use, including hunting. These impacts are described in the DEIS and FEIS in Sections 3.2.10.3.1 and 3.2.10.3.2 for the Realistic Live Ordnance Delivery project. Similar restrictions could also result from implementing the Enhanced Access to Ground Maneuver Space (see Sections 3.7.10.3) and Tanana Flats Training Area Road Access proposals (see Sections 3.8.10.3). These latter two proposals will require further analysis prior to implementation. The process for obtaining access onto military lands will remain the same and updated information on closures and military training schedules will continue to be published on the Fort Wainwright website. To the extent possible, schedules for training activities will avoid the peak hunting periods and seek to provide adequate access for hunting, fishing and trapping. For example, the Air Force will not schedule Major Flying Exercises during January, September, and December each year.
I0078-1	I guess my main concern is the unmanned drones. That's my main concern. I already know of several places in the United States where drones are being used to gather intelligence on American citizens. Now I understand the need for this as far as military training and everything, but nothing in the world is constant.	Thank you for your comment. These comments indicate issues that are outside the purview of this EIS, either because they describe current operations or because they describe broader Department of Defense policy decisions. For further assistance with the issue please contact your local base Public Affairs Office or Alaskan Command Public Affairs at (907) 552-2341.
I0078-2	We don't live in a vacuum and everything that's happening in our country and around the world is connected. We're seeing more and more people	Thank you for your comment. These comments indicate issues that are outside the purview of this EIS, either because they describe current

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>overseas who are discontented. We're seeing in our own country discontented people. I mean I was watching PBS news hour last night and the Congress just passed a huge defense bill. Now I understand we need a strong defense, we do, but we're living in a time where we just came through an economic collapse where they're -- many of our fellow citizens are hurting. I mean the latest figures, over 46 million people are out of work. There's a lot of discontented people. We see that on the news, we see that in protests, we see that in things that are happening.</p>	<p>operations or because they describe broader Department of Defense policy decisions. For further assistance with the issue please contact your local base Public Affairs Office or Alaskan Command Public Affairs at (907) 552-2341.</p>
<p>I0078-3</p>	<p>So my biggest fear is I understand that this is right now being used militarily, but, you know, it's happened before in history and I see it happening again, that we have a lot of citizens who are discontented and if this technology is already being used to gather intelligence on our fellow citizens who decides - - who is deciding what is a threat. I mean who makes the decision that says an American citizen is a threat? And if we're using this technology on citizens what's to stop us from using other tactics?</p>	<p>Thank you for your comment. These comments indicate issues that are outside the purview of this EIS, either because they describe current operations or because they describe broader Department of Defense policy decisions. For further assistance with the issue please contact your local base Public Affairs Office or Alaskan Command Public Affairs at (907) 552-2341.</p>
<p>I0078-4</p>	<p>I mean I remember reading a story in 2002 about the -- I believe it was Vice President Chaney at the time, I don't -- you know, I don't know, but I read a story about in Buffalo, New York, they were considering sending in Delta Force on American citizens and when I read that I was like wow, this is -- I don't know, this is strange. And I really hope that, you know, we ha -- we as a country do not allow ourselves to become so paranoid that we find it necessary to use this technology on our own citizens because I -- everything that I've seen what's going on in the world, I don't see it getting any better. I don't see our economic situation getting any better. Europe is already desperately in need of help as far as the Euro is concerned and that's just going to come over here. So I mean there's a lot of potential for a lot of bad things to happen and I guess I'm just hoping and praying that these things are not abused 20, 30, 40 years down the road, you know, when things do collapse here.</p> <p>I mean take a look at Hurricane Katrina for example. You know, that was a natural disaster and you had cops, you know, pretty much well meaning people, I'm sure when they joined the force, you know, were shooting American citizens. And this was a natural disaster. This wasn't an economic collapse, this wasn't, you know, hey, I can't put gas in my car anymore because there's no more gas flowing. You know, this was a natural disaster so I can only imagine with all of this technology we have when our society does get to that point, you know, do we have assurances that our own</p>	<p>Thank you for your comment. These comments indicate issues that are outside the purview of this EIS, either because they describe current operations or because they describe broader Department of Defense policy decisions. For further assistance with the issue please contact your local base Public Affairs Office or Alaskan Command Public Affairs at (907) 552-2341.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>technology will not be turned on our own people. That's what frightens me about all of this. As far as seeing this thing here about a helmet on the head of somebody sitting at a computer controlling drones, you know, is there going to be any psychological tests for the people who are controlling these drones? I mean what are the safeties? What are the stop gaps here? As far as the socioeconomic impact on Alaska, I mean, you know, we've al -- we're -- I mean -- okay.</p>	
I0079-1	<p>As far as the -- I'm coming back to the drones again because I'm sure we've all seen it on the news, we've all read the reports. I mean even using it militarily there are mistakes that are made by these drones. And my con -- my big concern about it is we haven't perfected this technology, but we're pushing forward with it. We're still using it and we haven't perfected it.</p>	<p>FEIS Sections 3.6.1 and 3.6.3 note that the FAA and DoD are continuing to discuss the most efficient and effective means of integrating UAV operations into the National Airspace System to provide for the safety of all airspace uses. The FAA continues to assess the potential flight risks of unmanned aircraft to other airspace uses and has limited military UAV operations to restricted airspace or authorized corridors that separate these operations from other aircraft. Significant progress has been made on technologies that enhance UAV flight safety; however, until such technologies can provide an equivalent level of flight safety as manned aircraft, these operations will not be permitted outside of protected airspace.</p>
I0079-2	<p>I'm reading on here about this quasar thing that they unveiled where somebody's sitting there controlling these things and I -- my thinking is are there standards that these people have -- that they have to meet to control this? You know, are there psychological tests, you know, like police officers have to take before they're allowed to join the force?</p>	<p>Thank you for your comment. These comments indicate issues that are outside the purview of this EIS, either because they describe current operations or because they describe broader Department of Defense policy decisions. For further assistance with the issue please contact your local base Public Affairs Office or Alaskan Command Public Affairs at (907) 552-2341.</p>
I0079-3	<p>I mean what are the safeguards and the assurances that these things are not going to be happening here and that's what concerns me about it.</p>	<p>As indicated in response to your previous comment, FEIS Sections 3.6.1 and 3.6.3 note that the FAA and DoD are continuing to discuss the most efficient and effective means of integrating UAV operations into the National Airspace System to provide for the safety of all airspace uses. The FAA continues to assess the potential flight risks of unmanned aircraft to other airspace uses and has limited military UAV operations to restricted airspace or authorized corridors that separate these operations from other aircraft. Significant progress has been made on technologies that enhance UAV flight safety; however, until such technologies can provide an equivalent level of flight safety as manned aircraft, these operations will not be permitted outside of protected airspace.</p>
I0079-4	<p>It's -- you know, it seems to me like our society, we're going -- we're getting to the point where we're trying to mask what war is really about. I'm a veteran myself. I was an infantryman and I did one combat tour to Iraq. And it seems to me with all of this, you know, we're about subtracting our manpower, but we're -- it seems to me we're masking the real pain and</p>	<p>Thank you for your comment. These comments indicate issues that are outside the purview of this EIS, either because they describe current operations or because they describe broader Department of Defense policy decisions. For further assistance with the issue please contact your local base</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>horror of war. When it gets to the point where it's -- where you can talk easily about war then something's wrong, you know, something's wrong in our society. And, you know, war should -- the pain and horror of war should be known because it should be the last resort of any government and it seems to me that we're getting to the point in our society where every -- where things are going to be controlled by computers and it's easier not to put a face to that. You know, and that scares me, the fact that war is becoming easy, almost like a video game, like we're sitting around on Xboxes playing Call of Duty or something. That's what it seems to me like real life is getting to and, you know, there's no reset button in real life. And I'm -- you know, anybody that's worn that uniform knows that. There's no reset button in real life and that's what scares me is that war is becoming a -- it's becoming too easy to consider as a resort and that's -- that tells me, you know, as a species, as humanity we've failed and I really hope and pray that at some point we get it together because that's not a good road to go down in the future. So that's all I got.</p>	<p>Public Affairs Office or Alaskan Command Public Affairs at (907) 552-2341.</p>
I0080-1	<p>I'm a missionary pilot up here in Alaska. I fly to and from the villages taking supplies, clothes, diapers, so on and so forth in. I've brought 400 missionaries up since 2008 and I just want to make sure that aviation traffic to the general public wouldn't be shut down and restrict when and where we fly already -- more than what it already is. That's pretty much all I have to say.</p>	<p>The Army and Air Force understand and appreciate the importance of such subsistence flights as you perform and it has never been their intent to shut down or otherwise adversely impact those flights. The Army and Air Force seek to ensure the safe and compatible use of those airspace areas in which they train and will continue to work with all concerned to help meet both military and civil aviation needs for this airspace. Implementation of the proposed new airspace may require some added attention when planning/conducting subsistence and other flights within the training airspace when scheduled for military operations. The Special Use Airspace Information Service, Alaska Civil-Military Advisory Council, and other means will continue to be used to publicize military airspace training needs and to address concerns with all those aviation interests with whom they share the airspace.</p>
I0081-1	<p>y name is Brian Okonek, last name is spelled O-K-O-N-E-K. Thank you for this opportunity to comment. I'm most familiar with the Fox 3 MOA area.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0081-2	<p>I'm most familiar with the Fox 3 MOA area. I understand the military's need for practice areas, but also feel that the military practice areas or the practicing that's being done on these areas has a huge impact to other users</p>	<p>The Fox 3 and New Paxon MOA proposal and the associated training activities would result in noise effects, as described in Section 3.1.10.3 of the DEIS and FEIS. The FEIS has added additional description in Chapter 4 of</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>on the ground.</p> <p>There's -- it's very, very hard, even as big as Alaska is, to find areas where there's truly natural soundscape and it's becoming ever more difficult. I used to run a guiding business and we would take people on wilderness backpacking trips and their stereotype image of the wilderness was a place for the most part devoid of human and mechanical noise.</p> <p>We had a business for quite a few years going to an area that we took very small groups. We didn't visit it very often. But as aircraft traffic continued to increase in this state we started getting comments from our visitors that they were surprised by the amount of aircraft noise and finally it got to the point that we got enough negative comments about aircraft noise that we had to quit using certain areas that we had traditionally used because of over flights. It just didn't -- it didn't go with their vision of what wilderness is. Quality wilderness really needs quality soundscape.</p>	<p>the progressive change in soundscape in this area due to a variety of uses and users, including the military. Many methods for reducing the impact of noise on underlying areas are under consideration. The FEIS and ROD will describe mitigations that are feasible and that the Services will commit to implementing.</p>
I0081-3	<p>We had a business for quite a few years going to an area that we took very small groups. We didn't visit it very often. But as aircraft traffic continued to increase in this state we started getting comments from our visitors that they were surprised by the amount of aircraft noise and finally it got to the point that we got enough negative comments about aircraft noise that we had to quit using certain areas that we had traditionally used because of over flights. It just didn't -- it didn't go with their vision of what wilderness is.</p>	<p>Potential noise impacts associated with activities proposed for the Fox 3 MOA are addressed in Section 3.1.2.1. Potential mitigation measures to reduce the impact of noise are identified in Section 3.1.2.4. Section 3.1.12.1 discusses the important contribution recreation and tourism make to Alaska's economy. Section 3.1.12.3 addresses the potential economic effects to regional business and communities associated with the proposed activities for the Fox 3 MOA and creation of the Paxon MOA. As stated in Section 3.1.12.3, the Federal Aviation Administration (FAA) and the Air Force would address any impacts and mitigation measures to be taken before implementation of any airspace proposals. Thus, the Air Force would be addressing such concerns further through consultation/interaction with appropriate agencies and organizations.</p>
I0081-4	<p>I was very disappointed to see that there were only two real alternatives left for the Fox 3 area, that alternative A and alternative E, and they both had flights -- minimum flight altitudes that went down to 500 feet. That's really low and it's really low when you have fast moving aircraft and aircraft coming like over a ridge top when you're in a valley. It's just amazing the impact it has on the ground. High flying aircraft you slowly hear it coming and the noise gradually gets louder and then as it goes over it's the loudest and then it dissipates as it flies away, but when you're in a valley and you suddenly have an aircraft, even a 185, pop over a ridge it's a real shock to the whole valley. You don't hear it coming and all of a sudden you've got</p>	<p>The EIS considers action alternatives for each component action as well as the No Action Alternative, which would not make any changes to airspace units or training operations. The Air Force recognizes the potential for low-flying aircraft to startle people overflown with rapid-onset noise. The primary noise metric used to communicate noise levels beneath training airspace, Ldnmr, includes a 'penalty' of between 0 and 11 dB which is applied to rapid-onset noise events. Appendix E, Section E.1.2.5 discusses the Ldnmr metric further. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>this full impact of the noise and it really changes an experience when you're on the ground, have this type of activity. I'd really encourage you to go back and reevaluate that minimum altitude.</p>	
I0081-5	<p>I was very disappointed to see that there were only two real alternatives left for the Fox 3 area, that alternative A and alternative E, and they both had flights -- minimum flight altitudes that went down to 500 feet. That's really low and it's really low when you have fast moving aircraft and aircraft coming like over a ridge top when you're in a valley. It's just amazing the impact it has on the ground. High flying aircraft you slowly hear it coming and the noise gradually gets louder and then as it goes over it's the loudest and then it dissipates as it flies away, but when you're in a valley and you suddenly have an aircraft, even a 185, pop over a ridge it's a real shock to the whole valley. You don't hear it coming and all of a sudden you've got this full impact of the noise and it really changes an experience when you're on the ground, have this type of activity.....This Fox 3 area is a very popular area for people on the ground, people backpacking, people fishing, people rafting, people hunting. There's a lot of use. Just look on the map of where it's at. It's close to Anchorage, it's close to lots of urban areas. It's between all the highway systems in the state. It's one of the easier places to access and actually get a wilderness experience from a road. But as you go into it you end up getting more and more air traffic.</p>	<p>Section 3.1.10.3 of the DEIS acknowledges that noise associated with low-level overflight could lessen recreational experiences for some persons. Sections 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation such as seasonal avoidance areas; expanding the existing Delta National Wild and Scenic River and Gulkana National Wild River to include all portions within the new MOA boundaries; and avoiding overflight of popular hunting areas, campgrounds, and trails between June 27 and July 11. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0081-6	<p>The natural soundscape matters for the animals too. There's -- it's very hard finding definitive sound studies and how they affect animals and birds. I -- I'm on a -- a member of a over flights committee for Denali National Park and we've had access to a long, long list of sound studies and many, many, many are inconclusive and hard to substantiate just the impacts, but some of them do indicate that there's -- puts animals at a high stress level, especially during calving and lambing periods. The Nelchina caribou herd is in this Fox 3 area. One of its main calving areas is right in the middle of your MOA, your MOA, and there's also a lot of sheep in the Talkeetna mountains and in the Alaska Range and their lambs are very sensitive to disturbance by noise. I encourage you to work very, very closely with the Alaska Department of Fish and Game to find out just where these areas are and consult with them each year to find out where the caribou are calving to try to create a bubble over those areas to protect them. It's quite a long period. It's not just the day they drop their calves that's the critical period. It's the first couple months of their life. They're very small young calves trying to</p>	<p>All known calving, lambing, and important bird areas within the JPARC project area were mapped (please see Figures B-11, B-13, and B-14 that cover entire project area, and Figures 3-4 through 3-8 for sensitive wildlife species, including caribou, Dall sheep, and moose, under the proposed Fox/Paxon MOA) and have been taken into consideration during effects analysis.</p> <p>The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection. Mitigation identified in the document for three of the definitive projects (Fox/Paxon MOA, RLOD, and BAX Restricted Area Expansion) states, "Continue to monitor effects of military training including overflights on select wildlife species (especially herd animals, waterfowl, and raptors) and fisheries during critical seasons such as breeding, young-rearing, and migration. Use knowledge to develop and implement strategies to minimize</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>stay with the cows and major noise disturbance can separate them and create problems.</p>	<p>disturbance to priority wildlife in existing and new SUAs and restricted airspace. This would help natural resources and range managers to coordinate training schedules that minimize impacts on wildlife populations.”</p> <p>Please see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p>
<p>I0081-7</p>	<p>I was very disappointed to see that there were only two real alternatives left for the Fox 3 area, that alternative A and alternative E, and they both had flights -- minimum flight altitudes that went down to 500 feet. That’s really low and it’s really low when you have fast moving aircraft and aircraft coming like over a ridge top when you’re in a valley.... And like I -- my question I had about the mitigating, many of your mitigating factors are very much educational. I’ll just continue just a few minutes here and wrap it up. And I -- and you did explain that there are other ongoing mitigating factors going on, but I think you need to really concentrate on some mitigating factors that will protect critical areas within these -- all these MOAs. Thank you very much.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
<p>I0082-1</p>	<p>I’m a retired local glacier pilot so my point of view will be that of a pilot rather than of a person interested in wildlife. I’m also interested in wildlife. We make many trips to see that from the air and do our best not to disturb anything.</p> <p>My main concern tonight is that this is like a planning stage and that our words won’t be heard by the FAA. The FAA should be here ultimately and so that’s my first comment. I would like to be able to say these words to people that will hear me rather than people that are putting them down on a piece of paper and hoping that the FAA will see them.</p> <p>I have flown all over Alaska during the last 40 years. I’ve been in the Naknek (ph) MOA, I’ve been in the MOAs to the west of the Alaska Range, I’ve been up all along the Tanana Valley. I’ve only had one negative experience in a MOA. A MOA for a pilot is a place where we can fly, but we have to look out and I’ve been very, very close to a couple of F-15s in the Galena area. That’s the only bad experience I’ve had in 10 years flying the Susitna MOA, not a problem. So I’m not concerned about those areas, I am concerned about the Fox 3 area and I am concerned about expanding that. I would like very, very much to have the Fox 3 area to be like the Buffalo area where there are altitude restrictions. The Buffalo MOA has a impact below 1,500 feet AGL. I’d like to see that moved up to 3,000 feet as a minimum.</p>	<p>The concerns you and many others have expressed over the lower altitudes proposed for the expanded Fox 3 and new Paxon MOAs were a key consideration in the planning and FEIS analyses of these proposals. Some critical mission training requirements for the newer fifth generation fighter aircraft and their wartime tactics cannot be fully met without use of those lower altitudes over a greater expanse of airspace. Some of the expanded airspace would only be used during MFEs when multiple types of aircraft from diverse locations engage in realistic combat exercises. The Air Force recognizes the potential adverse effects these requirements may have on other airspace uses and would seek all possible means to help ensure the safe and compatible use of this proposed airspace through those existing and proposed measures noted in the FEIS. The FAA is responsible for evaluating the preferred airspace proposals relative to all civil and military airspace uses in the affected regions to determine if and how each could be implemented, controlled, and managed in a manner that would safety and effectively these uses. As a Cooperating Agency for this EIS, the FAA is aware of the issues and concerns raised by all aviation interests and will be considering those while evaluating the proposal options.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Just north of that there's another MOA that does have the 3,000 foot restriction. I'd like to see that throughout the entire Fox area and I definitely would not like to see that expanded.</p> <p>I would certainly favor the expansion of the restricted airspace that is used for live targeting in the Fairbanks area. I don't think those people will necessarily appreciate that, but it is a necessary thing for the military to do and I would be in favor of that. We're already used to restricted airspace. It's very well defined, how we deal with it is well defined. The worst thing for me as a pilot is that the restrictions on altitude. The altitude flight rules start at 3,000 feet AGL, that is above ground level. These high speed military aircraft can penetrate that airspace and it's my responsibility to be aware of them. I don't have T Cass (ph), I don't have the ability of seeing them by using my transponder. I don't have the electronics to do that. So it's see and be seen and I am not in favor at all of military aircraft impinging upon the airspace that I'm already used to as an FAA pilot. So 3,000 feet AGL puts me or puts the MOAs in the same restricted region or in the same set of rules as the FAA already has and we don't have to worry. We have to look out for other small aircraft, but we don't have to worry about a high speed jet impinging upon that area.</p> <p>So if there's any changes going to be made in these expansions certainly make them so that the FAA rules for, you know, picking your flight altitude above the ground is consistent with the altitudes used in the MOAs. Thank you.</p>	
I0082-2	<p>I'm a retired local glacier pilot so my point of view will be that of a pilot rather than of a person interested in wildlife. I'm also interested in wildlife. We make many trips to see that from the air and do our best not to disturb anything.</p> <p>My main concern tonight is that this is like a planning stage and that our words won't be heard by the FAA. The FAA should be here ultimately and so that's my first comment. I would like to be able to say these words to people that will hear me rather than people that are putting them down on a piece of paper and hoping that the FAA will see them.</p> <p>I have flown all over Alaska during the last 40 years. I've been in the Naknek (ph) MOA, I've been in the MOAs to the west of the Alaska Range,</p>	<p>The concerns you and many others have expressed over the lower altitudes proposed for the expanded Fox 3 and new Paxon MOAs were a key consideration in the planning and FEIS analyses of these proposals. Some critical mission training requirements for the newer fifth generation fighter aircraft and their wartime tactics cannot be fully met without use of those lower altitudes over a greater expanse of airspace. Some of the expanded airspace would only be used during MFEs when multiple types of aircraft from diverse locations engage in realistic combat exercises. The Air Force recognizes the potential adverse effects these requirements may have on other airspace uses and would seek all possible means to help ensure the safe and compatible use of this proposed airspace through those existing and proposed measures noted in the FEIS. The FAA is responsible for evaluating the preferred airspace proposals relative to all civil and military airspace uses in</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>I've been up all along the Tanana Valley. I've only had one negative experience in a MOA. A MOA for a pilot is a place where we can fly, but we have to look out and I've been very, very close to a couple of F-15s in the Galena area. That's the only bad experience I've had in 10 years flying the Susitna MOA, not a problem. So I'm not concerned about those areas, I am concerned about the Fox 3 area and I am concerned about expanding that. I would like very, very much to have the Fox 3 area to be like the Buffalo area where there are altitude restrictions. The Buffalo MOA has an impact below 1,500 feet AGL. I'd like to see that moved up to 3,000 feet as a minimum. Just north of that there's another MOA that does have the 3,000 foot restriction. I'd like to see that throughout the entire Fox area and I definitely would not like to see that expanded.</p> <p>I would certainly favor the expansion of the restricted airspace that is used for live targeting in the Fairbanks area. I don't think those people will necessarily appreciate that, but it is a necessary thing for the military to do and I would be in favor of that. We're already used to restricted airspace. It's very well defined, how we deal with it is well defined. The worst thing for me as a pilot is that the restrictions on altitude. The altitude flight rules start at 3,000 feet AGL, that is above ground level. These high speed military aircraft can penetrate that airspace and it's my responsibility to be aware of them. I don't have T Cass (ph), I don't have the ability of seeing them by using my transponder. I don't have the electronics to do that. So it's see and be seen and I am not in favor at all of military aircraft impinging upon the airspace that I'm already used to as an FAA pilot. So 3,000 feet AGL puts me or puts the MOAs in the same restricted region or in the same set of rules as the FAA already has and we don't have to worry. We have to look out for other small aircraft, but we don't have to worry about a high speed jet impinging upon that area.</p> <p>So if there's any changes going to be made in these expansions certainly make them so that the FAA rules for, you know, picking your flight altitude above the ground is consistent with the altitudes used in the MOAs. Thank you.</p>	<p>the affected regions to determine if and how each could be implemented, controlled, and managed in a manner that would safety and effectively these uses. As a Cooperating Agency for this EIS, the FAA is aware of the issues and concerns raised by all aviation interests and will be considering those while evaluating the proposal options.</p>
I0083-1	<p>Thank you. Just want to say thanks for all of the work you guys have done presenting this. It's been very informative. My concern was the hunting, fishing, traveling with families and stuff out there. You seem to have addressed that fairly well. I hope everything goes as it seems and hope to see you all out there having a good time.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
I0084-1	I live in Wasilla. And I read this document previously on the internet some, it's large, and coming here tonight I appreciate the fact now that it's actually an Environmental Impact Statement and I have the same concerns as other people.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0084-2	<p>I don't want to get locked out of areas we've hunted in for years. I think that as a whole the military needs these training operations, but I also feel that as opposed to locking them out -- I mean personally I think that it'd be safer -- in the issue of live range fires certainly you don't want anybody in there. In other instances I think working among the citizen population say during the hunting season would be more of an opportunity than a hindrance because in Afghanistan and Iraq right now we're definitely working right through civilians. It just makes sense that for good real world training that there's really no need to remove the public from everywhere.</p> <p>...</p> <p>I just am more concerned with it seems like every time we have an impact statement, an agreement for something to happen in a certain specific way, a few years later it tends to be that the federal agency or the state agency starts to take total control and it doesn't turn out to be the thing that it started out as. And that's what I'd like to see avoided here, I'd like to see it -- that the military can train, they can operate in the state and that we can all still hunt and fish and enjoy our rights as citizens. Because the bottom line is this is America and each and every one of us is an American and this is our government, not a government above us, but a government of us. It's our decision and I think we can make a reasonable and wise decision</p>	<p>The EIS acknowledges that some proposals would affect the spatial and temporal availability of some recreational areas, including those used for hunting. Mitigations that could be implemented to reduce the impacts to recreational uses have been included in these proposals. Such measures include suspending MFE operations during January, September, and December and between June 27 and July 11 to allow access for public use and recreation; avoiding overflight of popular hunting areas during peak use periods; coordinating military schedules with local communities in advance; and providing updated information and maps on the USARTRAK website to identify public access restrictions for military activities. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.</p>
I0084-3	And as far as the environmental impact goes, I -- in all the years I've lived here since '68, since I was seven years old, and I -- I've never really seen that the military's impact on wildlife game populations was any more or less than any other person or group traveling through the country. So I don't hold that as something that I fear as a problem.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
I0085-1	As a general aviation user of this air space I am especially concerned about the expansion of the FOX3 MOA expansion and the new Paxon MOA. It does not make good sense to me for the Military to select this area to expand in. This is in the middle of the most heavily used GA portion of the state, directly in the middle of the main population centers of the state. To expand into more of this area and to go to such low AGL floors will place the military traffic directly in with the GA traffic. This is not good.	The area that has been proposed for this expansion was selected based the need for a greater expanse of airspace and lower altitudes in which fifth generation aircraft can effectively train in those tactics now required for combat conditions. The proposed Alternative E Fox 3/Paxon configuration for this critical training also provides close proximity to both Eielson AFB and JBER to minimize transient distances and optimize mission accomplishment for all fighter aircraft types while avoiding most of the

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		higher-traffic areas. Also, as described in the FEIS Chapter 2, only MFEs would be operating at the lower Paxon MOA altitudes during those fewer times of the year when those exercises are conducted.
I0085-2	I fully support the military but this is an action that is akin to being the 800 pound gorilla in the room. I respectfully request that the military truly respect the other users of this airspace and not just use the EIS process to check the required boxes and ram this through.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. This EIS has been prepared in accordance with the standards and information requirements pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] 4321 et seq.) and the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500–1508. NEPA and CEQ regulations require the Army and Air Force to follow a rigorous process to determine the feasibility of the alternatives and eventual preferred alternatives selected for each proposal in the JPARC EIS.
I0085-3	I have a small, slow tube and fabric GA airplane with no transponder; something very common in Alaska. I know from experience that Anchorage Tower has a difficult time identifying me on radar when I transition the terminal area. It will be nearly impossible for a military pilot to see and avoid me while traveling at 450+ knots at very low level and fully focused on terrain avoidance and their training target. I highly doubt that AWACS could positively identify me 100% either. This situation is just a disaster in the making. Not only would I and fellow GA pilots and passengers be dead from collisions or near miss turbulence, there is real possibility that the military traffic could be lost as well.	While FAA regulations only require use of transponder and altitude reporting equipment within specified airspace areas, their use in all areas frequented by military and civil aircraft operations helps enhance Air Traffic Control system and pilot awareness of all air traffic within the higher-use airspace areas. Because some aircraft owners/operators either cannot or elect not to use transponders for various reasons, Air Traffic Control and aircrews must rely on radar system capabilities, pilot position reporting, visual observations, and other means, as feasible, to help maintain a safe operating distance from nontransponder equipped aircraft. While this can be a somewhat greater challenge in maintaining an overall safe flight safety environment, be assured that military aircrews make every effort possible to detect, see, and avoid all nonparticipating aircraft that may be present within their training airspace.
I0085-4	The main thing is that this is not necessary. There are many other more remote MOA's in Alaska the military can expand with much less impact to the public and with the speed of modern military aircraft, the time to location is insignificant. For these reasons I respectfully request that the expansion of the FOX3 MOA and the new Paxon MOA not be done and the necessary expansion of MOA's be done in more remote areas of the state with less conflicting GA traffic use.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's airspace. The comment to move new fifth generation fighter training and exercises to other MOAs in JPARC does not, however, meet the purpose and need of the JPARC EIS. Chapter 1, Purpose and Need for the Proposed Actions provides all of the requirements and elements that went into the development of the purpose and the need for each of the proposals planned to modernize and enhance future training at JPARC.
I0085-5	The proposed Realistic Live Ordnance Delivery area is proposed to expand south and west into popular hunting and recreational use area with private cabins. It would be better and less impact if this was kept more within the limits of the Tanana flats and not encroach into the foothills of the Alaska Range mountains on the south side of the Tanana flats.	Two alternatives are proposed for the Realistic Live Ordnance Delivery (RLOD) proposal that meet the requirements and selection criteria outlined in Section 2.1.2 of the EIS. Section 3.3.10.3 of the EIS acknowledges that the RLOD action would result in changes in civilian access that would affect the spatial and temporal availability to specific areas, and associated recreational

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		uses and activities. Section 3.2.10.4 lists mitigation measures that could be implemented to reduce the impacts such as suspending Air Force major flying exercise (MFE) operations during January, September, and December and between June 27 and July 11, in order to allow access for public use and recreation during these popular seasons; coordinating MFE schedules with local communities in advance; and providing updated information and maps on the Army Recreational Tracking System (USARTRAK) website to identify public access restrictions for RLOD activities on Army lands. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0085-6	The Unmanned Aerial Vehicle area is a growing concern and with this expanded area will be a real concern for GA traffic in the Fairbanks area. Again, I think this is an unnecessary risk the Military is placing on the general public and the UAV use needs to be kept within the Tanana Flats area or more remote MOA's rather than placing them in airspace most heavily used by GA traffic.	The proposed locations for the UAV corridors provide the most direct link between each launch site and restricted areas where they would be expected to have the least impact on other air traffic. The potential effects each corridor may have on other aircraft would be a key consideration in scheduling only those corridors/altitude layers required to support individual UAV mission needs. As noted in the FEIS Section 2.1.6, the FAA, DoD, and other agencies continue to collaborate on those near-, mid-, and long-term solutions for integrating UAV operations and supporting ground elements into the National Airspace System while ensuring they do not present any flight risks to other airspace users.
I0085-7	I thank you for your solicitation of public comments and respectfully request that you consider these changes for the safety of the public and military alike.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0086-1	This is our second letter opposing the expansion of the Fox and Paxon Military Operations (MOAs). Lowering the Fox 3 MOA to 500 feet, to us, is unacceptable. This is our home. Wildlife will suffer. Civil aviation will be impacted. I and my husband picture ourselves working in our subsistence garden and having military fly overs at low levels. A sad picture. Our Alaskan Traditional lifestyle becomes more difficult daily it seems. We have something wonderful and special in Alaska, please help us to retain this gift.	The Air Force recognizes that there will potentially be some impacts to the population and the natural environment in the affected region of influence under the proposed actions. Potential environmental consequences to wildlife associated with the Fox 3 MOA expansion and creation of the Paxon MOA are addressed in Section 3.1.8.3. Potential environmental consequences to civil aviation associated with the Fox 3 MOA expansion and creation of the Paxon MOA are addressed in Section 3.1.1.3. As stated in Section 3.1.12.3, the Federal Aviation Administration (FAA) and the Air Force would address any impacts and mitigation measures to be taken before implementation of any airspace proposals. Thus, the Air Force would be addressing such concerns further through consultation/interaction with appropriate agencies

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		and organizations.
I0086-2	Alternative D proposing to keep the boundries as they currently exist. Please do not expand the military exercises over the Copper River Basin.	The Air Force has considered several alternative configurations for the proposed airspace and has evaluated two that meet its purpose and need. The proposed airspace overlies some of the upper reaches and headwaters of rivers that drain into the Copper River Basin.
I0087-1	We have a retirement home on a remote lake in the expansion area, Fox 3 MOA. We have spent a good deal of time & money building this home. We are there because it is remote and we enjoy quietness.	The Air Force recognizes that there will potentially be some noise impacts to the population in the affected region of influence under the proposed actions. Individuals concerned with a particular area or groups of areas that would potentially be impacted by noise or military presence are encouraged to contact the Air Force representatives or the ALCOM Public Affairs Office and inquire about potential mitigation measures over their personal property. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0087-2	We have a retirement home on a remote lake in the expansion area, Fox 3 MOA.... These are our concerns. 1.) Noise pollution	Sections 3.1.10.2 and 3.1.10.3 of the DEIS and FEIS describe noise effects under the Fox 3 and new Paxon MOA areas. To address concerns for Lake Louise, Alternative E was included in the DEIS with a boundary shifted north of the Lake Louise community. Other lakes and remote locations have been identified by commenters as sensitive to noise. The Air Force is evaluating these and will include all feasible avoidance locations in mitigations for this action in the Final EIS and the Record of Decision (ROD).
I0087-3	We have a retirement home on a remote lake in the expansion area, Fox 3 MOA...These are our concerns... 2.) Water pollution A) The lake is are only source of water.	The Fox 3 MOA involves the expansion of the MOA and would only allow increases in use of the airspace. There would be no ground disturbing impacts from this definitive action. The use of chaff and defensive flares would have minimal impacts to water quality in the lake. See discussion in Section 3.1.7. of the Draft EIS for additional details.
I0087-4	We have a retirement home on a remote lake in the expansion area, Fox 3 MOA...These are our concerns. 3.) Air space A) We are at the whim of the weather & fly when we can. The 500 ft AGL restriction could be troublesom & dangerous.	The many concerns you and others have expressed over the proposed Fox 3 MOA expansion and new Paxon MOA were certainly considered when planning this proposal. While the Alternative E configuration would lessen potential impacts on many lake recreational areas, we acknowledge this would not fully alleviate everyone's concerns. The expanded airspace and lower altitudes proposed for this area are essential in meeting essential combat training requirements for the newer (fifth) generation fighter aircraft that were not in the Air Force inventory when the Alaska training airspace was first established. Those existing and proposed mitigation measures addressed in the FEIS Airspace Management and Flight Safety discussions would be used to the greatest extent to help minimize impacts and ensure the

Table N-5. Government Response to Comments (continued)

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		safe, compatible use of this airspace by all concerned.
I0087-5	<p>We have a retirement home on a remote lake in the expansion area, Fox 3 MOA....These are our concerns.</p> <p>4.) This expansion has moved into a more populated area. Lake Louise has about 60 permanent residents and more permanent places are being built. This expansion has gone in the wrong direction. With a greater population, the chances of people getting ill or hurt increases. How will medivacs be worked out?</p>	<p>As stated in the FEIS Section 3.1.1.3, FAA and military coordination procedures must ensure that priority is given to any fire, Medevac, emergency, or other critical service flights requiring access through any airspace environment, both existing and any future areas that may be established as a result of the JPARC proposals.</p>
I0087-6	<p>5.) There MOA's all over the state & the Yukon MOA looks very large. How much space do you need? I bet there is more MOA space here than any other state. I feel the fuel savings is a mute point.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's airspace. The comment to move new fifth generation fighter training and exercises to other MOAs in JPARC does not, however, meet the purpose and need of the JPARC EIS. Lower fuel consumption and lower energy costs are important factors for the JPARC proposals in this EIS, but are two of many. Chapter 1, Purpose and Need for the Proposed Actions provides all of the requirements and elements that went into the development of the purpose and the need for each of the proposals planned to modernize and enhance future training at JPARC.</p>
I0087-7	<p>In conclusion, we feel the Fox 3 & Paxon expansion should not happen. It would intrude on our chosen life style and could cause economic depression to businesses and decrease property values.</p>	<p>Potential economic impacts associated with the Expanded Fox 3 MOA and New Paxon MOA are addressed in Section 3.1.12.3. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0088-1	<p>I have reviewed the JPARC Modernization and Enhancement Draft EIS. This missive is my response and public comment to the document and proposal.</p> <p>I am completely dismayed at the military's proposal, JPARC Modernization and Enhancement Draft EIS, and its lack of consideration for Alaskan people, Alaskan environment, national economics, and resources conservation.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0088-2	<p>This document is the most publicly and personally offensive plan proposed because of its disregard for REAL people with REAL lives, who live in Alaska and would be subject to non-stop noise pollution, aerial interference, reduced quality of life, and the increased safety risk on land and air. The proposed idea to increase training exercises does not justify the cost to all Alaskans.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. JPARC is an important and vital component of the national defense strategy of the United States and is a key attribute of Alaska's value to the military in the twenty-first century. There is no other place in the country where the military has the opportunity to conduct state-of-the-art</p>

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		training in diverse terrains without significant encroachment. The Army and Air Force are required by NEPA to make the efforts required to harmonize mission requirements and community needs in order that user conflicts be avoided, minimized, or mitigated to the extent feasible and practicable.
I0088-3	The only choice suitably presented in the JPARC draft is "No Action Alternative" on every document proposal. Do not add to or increase the military training that already exists in Alaska.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0089-1	To start this letter, let me be clear, that we do not oppose military training in Alaska. The expansion of the FOX 3 and Paxson MOAs is totally unacceptable. We are full time residents of Lake Louise. Both I and my wife are retired, but very active in the public and community. We are both Mat-Su Borough Emergency Medical Responders, my wife is president of the Lake Louise Community Non-Profit Corporation, and I am the Chief of the Lake Louise Volunteer Fire Dept. The Lake Louise Community comprises of the 3 major area lakes, Lake Louise, Lake Susitna, and Tyone Lake, as well as the surrounding small lakes and land areas. This is a state recreation area and home to about 60 year around residents. People have chosen this area because of its natural beauty, clean waters, abundant wildlife, and road access. The expansion of the MOAs over populated areas makes absolutely no sense. I understand that to someone sitting in the Pentagon, looking at a map, it looks like a vast wilderness. This is the recreation area for the largest population center in Alaska. This is the most accessible hunting area. This is Alaska's outdoor backyard. We have already experienced some out of area military air traffic that has strayed out of the existing MOA. This unplanned preview has not been a pleasant experience. We can only imagine the accidental air traffic if the MOAs are expanded. Alaska is a huge area, most of which is under Federal management. To pick an area that is mostly State of Alaska, and Mat-Su Borough lands are unacceptable. Use the vast Federal lands including the National Parks for MOA expansion.	The Air Force appreciates your comment and wishes to reinforce that the selection of locations for each proposal is primarily driven by operational factors. Some of these are similar to why the area of concern is in demand by Alaskans - relative proximity to population centers and supporting infrastructure. Alternative E was developed to avoid most of the populated areas around Lake Louise. The Air Force planners will consider the extent of the lakes district described in this comment and evaluate how to implement a flight avoidance procedure for this populated area. In addition, the Air Force will work with State and Federal land managers to define the most sensitive locations (for wildlife, wilderness, recreation, and other management objectives) and incorporate mitigations that are reasonable and feasible, and would not unduly compromise the training mission. The Record of Decision will include the mitigations that JPARC proponents will implement for their respective proposals.
I0089-2	Alaska is a huge area, most of which is under Federal management. To pick an area that is mostly State of Alaska, and Mat-Su Borough lands are unacceptable. Use the vast Federal lands including the National Parks for MOA expansion. We have listened to all of the reasons presented by the various public meetings; none of these make a justifiable case: fuel savings, proximity to airfields, terrain similar to the current war areas.	National parks and wilderness areas, by definition, are noise-sensitive areas. Pilots are requested to fly at 2,000 feet above ground level (AGL) in these areas. Altitudes above 1,000 feet AGL will not satisfy the need for low-level training. The Fox 3 MOA expansion and new Paxson MOA are the most suitable areas for low-level training with proximity to both Air Force bases.
I0090-1	These are my comments regarding the Draft EIS of the proposed expansion	Thank you for your comment. In accordance with the National

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	of the Joint Pacific Alaska Range Complex (JPARC) military training area. I support the NO ACTION alternative, which would keep the existing training areas and regimen in place.	Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0090-2	Alternative E is a smaller expansion and so would be marginally less detrimental to fish and wildlife and human use and enjoyment of the affected lands than would be Alternative A, but I do not support either of these action alternatives. Both would have an unacceptable level of adverse effect on the health and abundance of wildlife populations, on the Alaska Department of Fish and Game’s ability to conduct research and manage fish and wildlife,...	Sections 3.1.8.3 and 3.1.8.4 provide impact analysis and mitigations with regard to aircraft overflight and noise (Fox/Paxon MOAs). All known calving, lambing, and important bird areas within the JPARC project area were mapped (please see Figures B-11, B-13, and B-14 that cover entire project area, and Figures 3-4 through 3-8 for sensitive wildlife species, including caribou, Dall sheep, and moose, under the proposed Fox/Paxon MOA) and have been taken into consideration during effects analysis. Upon analysis, there were no indications that wildlife health and abundance would be adversely affected by the project alternatives. Regarding agency access to manage resources, the Land Use Section 3.1.10.3.1 addresses potential conflicts with restricted access. Implementation of any of the Fox/Paxon MOA alternatives would not preclude the Alaska Department of Fish and Game’s (ADFG’s) ability to conduct research and manage fish and wildlife. The ADFG is providing wildlife information and data for this DEIS, and commenting on the document. Please see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.
I0090-3	Alternative E is a smaller expansion and so would be marginally less detrimental to fish and wildlife and human use and enjoyment of the affected lands than would be Alternative A, but I do not support either of these action alternatives. Both would have an unacceptable level of adverse effect onthe Alaska Department of Fish and Game’s ability to conduct research and manage fish and wildlife, and the public’s use and enjoyment of the area. Both also represent concern with respect to aviation safety.	Alternative E was developed in response to input at scoping to avoid overflight of sensitive communities such as Lake Louise, while also using the boundaries of existing Special Use Airspace. The Air Force will work with State and Federal land managers to define the most sensitive locations (for wildlife, wilderness, recreation, and other management objectives) and incorporate mitigations that are reasonable and feasible, and would not unduly compromise the training mission. They would also identify important tasks and responsibilities that require routine, seasonal, or emergency response and ensure there are procedures in place to allow time-sensitive activities to take place in a safe airspace environment (when low-level training is not taking place). The FAA will also play a key part in defining procedures to ensure safety of all airspace users for new and modified Military Operations Areas (MOAs). Safety of all users is the first priority for all these procedures. The Record of Decision will include these mitigations as requisite actions when implementing the decisions.
I0090-4	I am concerned also because the military is fundamentally turning a blind	ALCOM concurs with this comment in that at the time of Draft EIS

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	<p>eye to the serious and legitimate impacts of its proposed expansion and modernization. I note that just over a year has passed since the public commented in the scoping phase of this proposal and now. That is not nearly enough time to comprehensively and meaningfully do the research and analysis and otherwise assess the effects on wildlife, the environment, and human use of the areas, so that the proposal can be modified and mitigating measures established accordingly.</p>	<p>publication, mitigation measures had not been identified. NEPA requires the EIS be prepared as soon as possible to provide full and fair discussion of significant environmental impacts and to provide decisionmakers and the public with reasonable alternatives. Draft EIS findings are based on the best available technical and scientific information, but NEPA does not necessarily require new studies or that mitigations be identified in the Draft EIS.</p> <p>Mitigations will be further defined in the Final EIS, which will be announced through the general media and the publication of a Notice of Availability (NOA) in the Federal Register. The NOA marks the beginning of a 30-day wait period. During that time, the public may review and submit additional comments for the Army and Air Force's consideration. After the 30-day wait period is over, the Army and Air Force will make a decision either to re-address aspects of the EIS or to sign the Record of Decision (ROD). The ROD will include specific mitigations adopted and define those impacts that are adverse and unavoidable if an action is taken. Within 90 days of the signing of the ROD, a mitigation plan will be prepared that specifies the mitigations, explains how any mitigations will be implemented, identifies who is responsible for funding and implementing mitigations, and specifies the proponent who will complete the mitigation (32 CFR 989.22 [d]).</p>
I0090-5	<p>Impact mitigation is more than just notifying the public of when and where training exercises will take place. To develop mitigating measures means first knowing what the effect of the training exercises would be, and where. Then it is necessary for the military to actively work with ADF&G and citizen groups at the front end, before the final EIS and Record of Decision, to redesign the proposal and develop specific mitigation measures necessary to avoid impacts or reduce the impacts to an acceptable level. For example, how, specifically, will the caribou calving, Dall Sheep lambing, nesting birds, etc. be impacted and how will they be protected?</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The proponent is coordinating with other land and resource management agencies to acquire best available data for planning mitigations and avoidance procedures. These will reduce effects of aircraft overflight and noise on sensitive wildlife locations and human activities. The decisionmakers will consider all available information prior to making a decision.</p> <p>The Air Force will be consulting with the Alaska Department of Fish and</p>

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		<p>Game prior to completing the Final EIS to determine what specific protective mitigation will be included in the Final EIS and Record of Decision to protect sensitive wildlife areas. Examples of typical measures in place appear in the 11th Air Force Airspace Handbook (2008) and include seasonal avoidance of Dall sheep lambing areas.</p>
I0090-6	<p>The MOAs (especially FOX 3) overlay very productive wildlife areas, including calving grounds for the Nelchina caribou herd and the Nelchina Public Use Area. The areas are very popular with the public for a variety of uses.... The military is proposing to significantly expand and intensify its training operations. According to information from the Talkeetna meeting on May 22, 2011, there would be training sessions, one in the morning and one in the afternoon, on weekdays. And the military aircraft would be flying as low as 500 feet above ground level (AGL). This is very frequent, repeated, low-level, intense flying. Obviously, this kind of activity would disturb and displace wildlife. The wildlife would be less successful because of the direct disturbance, but also because they would move away, to less productive habitat. Both Action Alternatives, A and E, would clearly put the health and numbers of wildlife populations at risk.</p> <p>And it not just mammals. Migratory birds would be disturbed during the critical time of nesting and rearing, and preparing for fall migration. The frequency and intensity of the low-level flying (i.e., less than 5000 feet AGL) represent a significant disturbance that would be detrimental to the nesting success rates.</p>	<p>Studies referenced in this EIS have shown that low-flying aircraft noise can have significant impacts to caribou calving, lambing, and certain avian nesting areas. Mitigations exist, and will be carried forward, that avoid low-flight activity in many of these designated "sensitive" areas within the proposed new airspace boundaries. Additional sensitive areas may be designated as a result of consultation with wildlife and natural resource agencies during the drafting of this EIS.</p> <p>The Air Force also has a bird/wildlife-aircraft strike hazard (BASH) program that places altitude restrictions on specific aircraft during heavy bird activity and in high bird traffic areas (migratory paths).</p>
I0090-7	<p>The MOAs (especially FOX 3) overlay very productive wildlife areas, including calving grounds for the Nelchina caribou herd and the Nelchina Public Use Area. The areas are very popular with the public for a variety of uses. It is not just about hunting and fishing. Folks enjoy the outdoors and they get out there for many reasons... often to find a little quiet solitude. There is filghtseeing, mining, trekking, subsistence, lodges, guiding, remote cabins, birding, mountain climbing, agency fixed wing and rotary aircraft (e.g., ADF&G doing research), and so on. The military is proposing to significantly expand and intensify its training operations. According to information from the Talkeetna meeting on May 22, 2011, there would be training sessions, one in the morning and one in the afternoon, on weekdays. And the military aircraft would be flying as low as 500 feet above ground level (AGL).</p>	<p>The Draft EIS and Final EIS describe the multiple resources (both wildlife and human activities) that you refer to in your comment in Sections 3.1.8.1 and 3.1.10.1. The potential impacts to various resources and uses are described in Sections 3.1.8.3 and 3.1.10.3. The pattern of morning and afternoon training sessions is typical of RED FLAG-Alaska exercises, which would occur up to about 60 days annually, concentrated into two-week blocks of activity. Because noise from low-level aircraft operations can be intermittently disruptive, the Air Force will work with State and Federal land managers to define the most sensitive locations (for wildlife, wilderness, recreation, and other management objectives) and incorporate mitigations that are reasonable and feasible, and would not unduly compromise the training missions. They will also identify important tasks and responsibilities that require routine, seasonal, or emergency response and ensure there are</p>

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		procedures in place to allow time-sensitive activities to take place. Safety of all users is the first priority for all these procedures. The Record of Decision will include these mitigations as requisite actions when implementing the decisions.
I0090-8	And there is the direct impairment of human on-the-ground activities, whether it be a backpacker seeking a wilderness experience (a large part of which is a natural soundscape), a hunter faced with less game, or a family camping along the Denali Highway seeking respite from city life.	Section 3.1.10.3 of the DEIS acknowledges that noise associated with low-level overflight could lessen recreational experiences for some persons and that indirect effects on civilian air access would affect spatial and temporal availability of recreational areas (including hunting areas) underlying the expanded Fox 3 MOA and new Paxon MOA. As stated in Section 3.1.10, over 90 percent of hunter success in GMUs 13, 14, and 20D occurs between mid-August and late September, with another short surge from the end of October to early November. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation such as seasonal avoidance areas; expanding the existing Delta National Wild and Scenic River and Gulkana National Wild River to include all portions within the new MOA boundaries; and avoiding overflight of popular hunting areas, campgrounds, and trails between June 27 and July 11 and from mid-August through September and other important seasons determined with ADFG.
I0090-9	The Matanuska-Susitna Valley is one of the fastest (if not the fastest) growing areas in the state. That means more people, more remote cabins, more hunting and fishing, more trekking, more mountain climbing, trekking, more flight seeing, more charter flights, and so on.... all of which increases the severity of the JPARC impacts, but also in themselves create pressure on wildlife. The EIS should analyze the effect of the Alternatives in the context of the increase in population and human use of the area, which will, by all accounts, occur. In addition, population increase is foreseeable, and its effect should be analyzed as part of the Cumulative Impacts section of the EIS.	Chapter 4 of the Draft EIS identifies many actions (past, present, and future) in the widest region affected by the JPARC proposals. The Final EIS will include some additions to those listed in the Draft EIS based on the comments received on the Draft EIS, and will also provide a brief summary of the trends described in your comment. The assessment of cumulative impacts from these trends (as a future baseline) is general and qualitative in the Final EIS, mostly captured for biological resources, land use, and economics; see Sections 4.8.8, 4.8.10, and 4.8.12.
I0090-10	Many of the impacts of the proposed expansion and intensification of the JPARC training area can be significantly reduced or eliminated altogether if the minimum AGL remained at 5000 feet. If I were to make one recommendation, it would be to add a zero to the proposed 500 feet AGL to keep the minimum AGL at 5000 feet.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
I0091-1	<p>These comments are submitted in response to the Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex in Alaska. Comments submitted by Robert Gerlach, 39 year resident of Talkeetna, Alaska, private pilot, guide, hunter, recreationalist, concerned citizen and property owner relatively near the proposed Fox 3 MOA expansion area. As a private citizen actively utilizing not only ground but also air space affected by this proposal, I have great concerns for the proposed military expansions made in this request. Before I extend my comments specific to the request, I am compelled to voice a few issues with the ‘public comment process’ I am participating in. 1. It is somewhat outrageous to me that we cannot easily decipher “who” is making this request. From the Joint Pacific Alaska Range Complex EIS website, it is not at all clear WHO is not only asking for the expanded military use of our State’s air, land and water, but worse, WHO is governing this decision. Digging deeper, we find the EIS report states reference to broad federal agencies involved, but honestly, it is still not clear or forthright for us to clearly understand WHO is actually involved, both on the request side and the decision side of this proposal. In my opinion that leans toward feeling more like this is done and out of our hands, and as such, a sign for how much this whole proposal reaches over the line.</p>	<p>impacts and locations of the proposals in this EIS.</p> <p>Several of the JPARC EIS proposals are being pursued to support joint training where different Services will train together to accomplish training requirements. In the past, each Service trained separately, using its own funding and authority. However, complex conflicts are requiring more joint operations that necessitate training together prior to conducting actual combat operations.</p> <p>Because the 12 JPARC proposals are being requested for joint training between several branches of the U.S. Military - Air Force, Army, Navy, and Marine Corps - it is confusing who is requesting each of the proposals and who has authority to manage and govern the decisions.</p> <p>This information was set forth in Chapters 2 and 3 of the Draft EIS, but has been further clarified both in the Executive Summary and Chapter 2 of the Final EIS. The following list shows in parentheses which branch of the military is requesting each proposal or is the proponent. Being a proponent means that even if other military branches train within the area, the proponent would provide the funding and have authority to manage the proposal and make final decisions.</p> <p>Six definitive JPARC EIS proposals:</p> <ul style="list-style-type: none"> • Expand Fox 3 MOA/New Paxon MOA (Air Force) • Realistic Live Ordnance Delivery (RLOD) (Air Force) • Add BAX Restricted Airspace (Army) • Expand R-2205, including the DMPTR (Army) • Night Joint Training (Air Force) • New UAV Corridors (Army) <p>Six programmatic proposals:</p> <ul style="list-style-type: none"> • Enhanced Ground Maneuver Space (Army) • Road Access to Tanana Flats Training Area (Army) • Joint Air-to-Ground Integration Complex (JAGIC) (Army) • Intermediate Staging Bases (ISBs) (Army)

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<ul style="list-style-type: none"> • Missile Live Fire in the Gulf of Alaska (Air Force) • Joint Precision Airdrop Program System (JPADS) Drop Zones (Air National Guard)
I0091-2	<p>2. Controlling the Public Comment Process. I am writing in response to an exhaustive document that the public has had very little time to understand. I can only imagine the extent of the professional team who created this document, and the exhaustive amount of time they took doing so, yet we as the public are given just 70 days, to not only just read it, but to digest, understand and decipher: what is being proposed, who is proposing it, what are the impacts said proposal will have on the lives, natural resources, communities, economies, fish and game, lifestyles and much more, for the public residing within the affected areas. And, we are expected to decide if the proposal seems feasible to allow. This is FAR too much. I am not even completely certain who I am addressing, precisely who the entities involved are, nor who is deciding the outcome, let alone clear about all the implications this proposal has upon my life and the lives of my fellow Alaskans. And still, I am required to decipher what is reasonable. I can say, THIS in itself is unreasonable.</p>	<p>Given the feedback provided during the public hearings and Draft EIS review process, ALCOM, on behalf of the U.S. Army and U.S. Air Force, extended the Draft EIS comment period from 70 days to 102 days. This extension took place on May 31, 2012. The comment period, originally scheduled to close on June 7, 2012, was extended to July 9, 2012. The proponents of the proposals considered the extension carefully in an effort to balance military training requirements with the importance of ensuring adequate time for citizens and organizations to thoroughly review the Draft EIS.</p>
I0091-3	<p>3. Conflict of Interest. The Public Hearing held in Talkeentna, Alaska, March 22, 2012, was moderated by a military judge, who allowed only four minutes per person to submit public comment. With all the military personnel hovering about, I was too intimidated to do verbal comments. It felt like an occupying force had taken over. THAT was unreasonable. Is it not an obvious conflict of interest to utilize military personnel (even uninvolved-to-this-request-military) as gatekeepers when collecting data on a project that aims to benefit the military? This meeting was a clear example of ‘the powers that be’ following ‘the letter of the law’ without following the ‘spirit of the law’ in adhering to the requirement to allow public involvement. Sincere interest for including public input would provide EASE and COMFORT in collecting public input. The process I have experienced has seemed more like an effort to control the public comment process, and ultimately limit the “obstacle” of the public, as opposed to actually encouraging public involvement in deciphering what is truly within the best interests of all parties involved while determining the true impacts of this proposal. Now, despite my displeasure with the process and the uncertainty for exactly who is involved, I DO have some very clear concerns that I am very certain must be expressed with regard to this request for expanded military use of Alaska’s land, air and water spaces.</p>	<p>Public hearings were conducted in accordance with the procedures specified in 40 Code of Federal Regulations (CFR) 989, Appendix C. All 11 public hearings were conducted in the same format to provide consistency and fairness to all Alaskans.</p> <p>ALCOM’s intent in having military personnel present at the public hearings was twofold: (1) to have personnel that are directly involved and impacted by the JPARC proposals available to answer public questions and inquiries and (2) to have the personnel that are directly involved and impacted by the JPARC proposals hear public concerns firsthand. ALCOM’s goal was to provide ease and comfort for public input.</p> <p>ALCOM went to extensive efforts to be available to the public and to seek public input. All individuals present at the hearings were able to ask questions and discuss their concerns with the Air Force team prior to and after the public hearing comments. In addition to public testimony, all individuals were invited to submit written comments either at the hearings or via mail or online. Written comments are given equal weight with oral comments. Individuals were also given the opportunity to enter their comments into the record with the court reporter transcribing the comments</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>on a one-on-one basis.</p> <p>With respect to verbal testimony, the four-minute time limit was in place to ensure every meeting participant had an opportunity to speak. If time was available at the end, the hearing officer opened the hearing to persons to have an opportunity to provide further testimony to the original four minutes. At all the hearings, additional time was available for all participants to be able to speak. Additionally, military staff stayed until the end of each four-hour hearing to ensure availability to the public and to be present to capture public concerns.</p> <p>ALCOM, the Army, and the Air Force have received, reviewed, and responded to written and verbal comments at this time. Oral and written statements will be part of the public record for decisionmakers to consider, along with other factors, prior to making any decision.</p>
I0091-4	<p>We Alaskans who live, work and recreate in the areas listed in this proposal are being encroached upon by the military. This place is our home. With the proposed areas listed in this expansion, it feels as if we are being literally squeezed out of our own backyards. With all due respect, I recognize the military needs space to train and conduct its exercises, and it needs to do so in areas where civilians will not be affected. Yet therein lies the problem. The proposed areas ARE occupied and heavily utilized by the public. The military has taken a lot of space from Alaskans already, and it is my concern that this request is going well over the line. About 15 years ago, the military came through our State with a similar EIS process, and at that time, they established a wide range of Military Operations Areas. The Fairbanks area and northeast of there is almost continuously air space dedicated to military operations. They have a low level ops area, a high level ops area, live-fire areas and restricted areas. I provide below a list of all the Restricted Areas, Military Operations Areas, and Area refueling tracks for air space alone that are already in use across our State, by the military. There are probably more military use areas that I am not aware of, not even to mention the numerous military bases that occupy our State. Restricted Area 2203 A Restricted Area 2203 C Restricted Area 2211 Restricted Area 2202 Susitna Naknek 1 Naknek 2 Sparrevohn Stoney A Stoney B Galena Utopia Fox 1 Fox 2 Fox 3 Eielson Birch Delta Junction Buffalo Viper Yukon 1 Yukon 2 Yukon 3 High Yukon 3A Low Yukon 3B Yukon 4 Yukon 5 Sand Point In the time since the military's last request roughly 15 years ago when they claimed a good</p>	<p>The Alaska air, land, and maritime training areas were originally developed to support Cold War weapons, tactics, and techniques. As joint warfighting doctrine has developed since the end of the Cold War and after September 11, 2001, as new weapons systems and platforms come on line, and as joint context training has evolved, JPARC, under its current configuration, can no longer fully meet the training and testing requirements for forces stationed in, and exercises occurring in and near, Alaska. The purpose of the JPARC proposed actions is to modernize and enhance JPARC for these units stationed in Alaska and to best support the exercises in and near Alaska. JPARC modernizations and enhancements would enable the Services to train both realistically and jointly, giving military personnel the best chance of success in their mutually supportive roles in actual combat.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>portion of our space then, the population of Alaska has grown considerably. Civilian use of our air and ground space has significantly increased, not decreased. We don't have less public use of our land and air space, we have considerably more. My concern is that air space already taken by the military (noted above), combined with a considerable increase in civilian population, says we do not have more space to give the military, we have less. The military has already taken enough. As stated in the EIS report itself, the military already occupies 65,000 square miles of our Alaska air space (not to mention additional land and water space already occupied by the military). It is entirely unacceptable to increase these amounts, now. Though the military may be trying to make it very easy on themselves, to have areas closer to their bases to avoid travel to war game practice locations, such convenience for the military creates far too much additional limitation on the public populations that live, work and recreate in these areas. The military has taken enough of our space. Asking for more is too much</p>	
I0091-5	<p>BIG CONCERN – Fox 3 and Paxon: I am extremely concerned with the requested expansion and changes for the Fox 3 MOA and the Paxon MOA addition. Expansion with these two areas are completely out of the question and entirely unacceptable for expanded military use. These two areas are the bread basket of Alaskan recreation. The military may think these areas are perfectly remote for their use. Well they ARE remote, and as such, they are PRIME locations where MANY Alaskans utilize the space – both ground AND air. It is entirely unacceptable for the military to expand there. Alaskans utilize these areas extensively all year long – skiers, snow machiners, hunters, recreational boaters – not to mention the wildlife abundance and the negative impacts any military involvement would bring to the natural resources in those pristine areas. The Paxon and Fox 3 areas are simply too close to human populations AND they are the cream of the crop for Alaskans utilizing the outdoors. Military use in these areas is entirely unacceptable. There should be NO expansion or changes to altitudes in these areas.</p> <p>Flying levels. This proposal has also asked for an extension of air space reaching to 500 AGL (above ground level) flying. This is entirely unacceptable in the Paxon and Fox 3 areas. Have you been on the ground and experienced the noise that comes with military fly overs? In NO WAY is it appropriate or acceptable to allow flying lower than 3000 AGL in ANY of the areas requested – especially not the Fox 3 and Paxon areas – in order to</p>	<p>The many concerns you and others have expressed over the proposed Fox 3 MOA expansion and new Paxon MOA were certainly considered when planning this proposal. While the Alternative E configuration and reserved use of the proposed Paxon MOA altitudes below 14,000 feet MSL for the six annual MFEs would reduce potential impacts on many recreational areas, we acknowledge this would not fully alleviate everyone's concerns. The expanded airspace and lower altitudes proposed for this area are essential in meeting combat training requirements for the newer (fifth) generation fighter aircraft that were not in the Air Force inventory when the Alaska training airspace was first established. The existing and proposed mitigation measures addressed in the FEIS Airspace Management and Flight Safety discussions would be used to the greatest extent possible to help minimize impacts and ensure the safe, compatible use of this airspace by all concerned.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	maintain the health and safety of the public, and protect the wild habitats that dwell in these places	
I0091-6	Flying levels. This proposal has also asked for an extension of air space reaching to 500 AGL (above ground level) flying. This is entirely unacceptable in the Paxon and Fox 3 areas. Have you been on the ground and experienced the noise that comes with military fly overs? In NO WAY is it appropriate or acceptable to allow flying lower than 3000 AGL in ANY of the areas requested – especially not the Fox 3 and Paxon areas – in order to maintain the health and safety of the public, and protect the wild habitats that dwell in these places.	The Air Force recognizes that aircraft flight level has a strong effect on noise impacts. However, low-altitude operations are a part of certain combat-realistic training scenarios. As shown in Appendix D, Table D3, the majority of flight training time is spent at relatively high altitudes. It is worth noting that current floor altitudes in several existing military training airspace units are 500 feet AGL or less. For example, Birch and Viper MOAs have floor at 500 feet AGL, Buffalo MOA has floor at 300 feet AGL, and Eielson, Yukon 1, and Yukon 2 MOAs have floors at 100 feet AGL. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0091-7	Flying levels. This proposal has also asked for an extension of air space reaching to 500 AGL (above ground level) flying. This is entirely unacceptable in the Paxon and Fox 3 areas. Have you been on the ground and experienced the noise that comes with military fly overs? In NO WAY is it appropriate or acceptable to allow flying lower than 3000 AGL in ANY of the areas requested – especially not the Fox 3 and Paxon areas – in order to maintain the health and safety of the public, and protect the wild habitats that dwell in these places.	The proposed Alternative E configuration and reserved use of the proposed Paxon MOA altitudes below 14,000 feet MSL for the six annual MFEs would reduce potential impacts on many recreational areas. However, we acknowledge this would not fully alleviate concerns over the use of those lower altitudes when other general aviation aircraft are operating within this airspace. As noted previously, newer (fifth) generation fighters must train at lower altitudes that are not sufficiently available in the current training environment. The extent to which those lower altitudes would be flown by fighter aircraft types would be limited to that necessary to successfully meet those low-level training objectives. The FEIS provides daily average estimates for those operations and includes existing and proposed mitigation measures that would be used to the greatest extent possible to help minimize impacts and ensure the safe, compatible use of this airspace environment by all concerned.
I0091-8	Flying levels. This proposal has also asked for an extension of air space reaching to 500 AGL (above ground level) flying. This is entirely unacceptable in the Paxon and Fox 3 areas. Have you been on the ground and experienced the noise that comes with military fly overs? In NO WAY is it appropriate or acceptable to allow flying lower than 3000 AGL in ANY of the areas requested – especially not the Fox 3 and Paxon areas – in order to maintain the health and safety of the public, and protect the wild habitats that dwell in these places.	Section 3.1.2 of the EIS provides the detailed analysis of proposed action noise levels and their impacts on the various environments. From 3.1.2.3.1: "Time-averaged noise levels beneath the proposed airspace areas would not exceed 54 dB Ldnmr, remaining below the EPA-identified noise level 'requisite to protect the public health and welfare with an adequate margin of safety.'"
I0091-9	It is with grave concern for the maintenance of our public areas that I present these comments. I cannot stand by and watch our military encroach upon our lands any further than they already have. The requests made within this	Thank you for your comment on the JPARC Draft EIS. The proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	proposal are simply unacceptable. I am calling for the NO ACTION ALTERNATIVE for the requests made in this proposal. Thank you for your time and consideration.	land-based military training will take place on existing lands currently withdrawn for military use. A number of the proposals request expanded and additional Military Operations Area (MOA) or airspace for restricted areas in order to meet the purpose and need expressed in Chapter 1, Purpose and Need for the Proposed Actions. Additionally, as explained in Sections 1.2 and 1.3 of the Draft EIS, the decision on which alternatives the Army and Air Force will pursue will be made in light of the purpose and need by Army and Air Force representatives following the review of all relevant facts, impact analyses, mitigations, and comments received via the JPARC EIS public participation process.
I0092-1	To Whom It May Concern: Since both my parents were in the Air Force, I am always interested in what the military has to say, particularly when it perceives it has needs. However, looking at the maps of the proposed JPARC enhancements raises some serious red flags for me: 1. IT WILL BECOME AN AREA TOO LARGE TO MANAGE I live where we shouldn't be hearing sonic booms, but do, and that makes me concerned that enlarging the MOA will lead to it being too large to supervise adequately. These booms startle me; I've thought 'Earthquake!' until my husband, who grew up around Beale Air Force Base, recognized it as a sonic boom. I was glad to find out about 1-800-JET-NOIS at our local scoping meeting in Glennallen, but if there are enough problems at the present size to need such a number, it will be impossible to manage an even larger area.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force are required by Federal and State of Alaska public statutes, and internal Army and Air Force policies to comply with applicable flight safety regulations to protect the public in airspace within their jurisdiction. Once the Army and Air Force select the preferred alternatives for each proposal, specific measures will be developed in order to avoid, minimize, and in some cases fully mitigate adverse impacts to the flying public, both commercial and general aviation, and public communities to the extent feasible and practicable. Such measures are required in accordance with the implementation regulations the Army and Air Force were required to develop to adopt the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] 4321 et seq.) and the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508.
I0092-2	3. QUALITY OF LIFE: -NUISANCE NOISE -REDUCED PROPERTY VALUES -PROPERTY DAMAGE There are rules in the Lower 48 and other countries severely limiting sonic booms because they are so annoying. They lower property values and can cause damage to buildings, as is to be expected from a noise that rattles a house like an earthquake. I object to that happening to my home, and it is especially worrisome that there is a request to lower the flying level to 500 feet, unheard of anywhere else.	The Air Force recognizes that there will potentially be some impacts to the population in the affected region of influence under the proposed actions. Some persons may experience diminished quality of life. Appendix E, Noise, of the EIS provides several indicators of noise level, which can be used to predict quality of life. Estimates of the percentage of the population that would be highly annoyed by noise, for example, are one indicator of a decreased quality of life. Quality of life is a subjective term and is highly dependent on various factors that are subject to bias and arbitrariness. Therefore, impacts to quality of life are subjective experiences and not all residents and/or visitors may feel their quality of life or experience would be severely impacted. Common factors for how people define their quality of life include wealth, employment, health, recreation, leisure time, access,

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>safety, wildlife, climate, and the surrounding natural environment. These and additional factors are addressed under separate resource areas (i.e., airspace management and use, noise, biological resources, land use and recreation, socioeconomics, safety, air quality, subsistence, etc.) in the EIS so that the significance of each action on each resource area considers both context and intensity as required under NEPA.</p>
<p>I0092-3</p>	<p>To Whom It May Concern: Since both my parents were in the Air Force, I am always interested in what the military has to say, particularly when it perceives it has needs. However, looking at the maps of the proposed JPARC enhancements raises some serious red flags for me: 1. IT WILL BECOME AN AREA TOO LARGE TO MANAGE I live where we shouldn't be hearing sonic booms, but do, and that makes me concerned that enlarging the MOA will lead to it being too large to supervise adequately. These booms startle me; I've thought 'Earthquake!' until my husband, who grew up around Beale Air Force Base, recognized it as a sonic boom. I was glad to find out about 1-800-JET-NOIS at our local scoping meeting in Glennallen, but if there are enough problems at the present size to need such a number, it will be impossible to manage an even larger area.</p> <p>...</p> <p>6. LACK OF PERTINENT STUDIES How far do sonic booms go in cold? Is that why we heard several recently? Do sonic booms bounce off mountains? There are probably no studies that will allow anyone to say what the true effects of sonic booms are in extreme cold or near high mountains.</p>	<p>As noted in Section 3.1.2.3.1, sonic booms generated in one location propagate both vertically and horizontally for long distances, and may be heard outside of training airspace units. If aircraft flying outside of areas designated for training appear to be generating sonic booms, a report should be made to the Eielson AFB Public Affairs Office so that the event can be investigated.</p> <p>The effect of cold on sonic booms is well understood. Booms are usually generated from flight at high altitude, where temperatures can be 60 degrees or more below zero. As discussed in Section B.2.3.2, booms propagate down through the atmosphere, where temperature differences and winds cause their paths to refract (i.e., bend). These effects are well-known, have been studied for some time, and are accounted for in sonic boom analysis models. Depending on temperature conditions, the area affected by a boom can increase or decrease. Under some conditions booms can propagate very long distances, but at much lower levels.</p> <p>As mentioned in section E.1.2.1, sonic booms and other sound waves can reflect from mountains or other large objects. A reflected boom is weaker than the original boom, but an echo can often be heard as a second boom. The BooMap model used for sonic boom analysis includes data collected near and on top of mountains. Sometimes atmospheric conditions cause artifacts that sound like echoes, even when there are no large reflecting objects nearby.</p> <p>Eielson Public Affairs (907) 377-2116 354fw.pa.publicaffairs@us.af.mil</p> <p>JBER Public Affairs (907) 552-8151 pateam@elmendorf.af.mil</p>
<p>I0092-4</p>	<p>2. WILDLIFE -DURING MATING & BIRTHING SEASONS If a boom</p>	<p>Animal responses to low-level flights have been characterized in recent</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>causes me to startle, it will do the same for wildlife. I'm sure there are studies that show both negative and no effects, but my experience indicates it would alarm wildlife. A scene I can imagine is a bird flying off the nest frequently during a training exercise, causing the eggs to cool down so much that they don't hatch. Repeated, this would be disastrous, and since it could affect other wildlife, it will have to be studied for each species, both during mating and birthing seasons. Much of the area proposed to be included is pristine wilderness. To disturb it would just be wrong, as well as disastrous and very difficult to make right. -MOOSE IN SPRING I also worry about moose in the spring when they are weakened from a hard winter with stressors like a lack of food and deep snow. They are just hanging on then, and running a few times from startling noises could be enough to kill them.</p>	<p>studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. Sonic booms are also addressed in the document. As stated in the Draft EIS, supersonic flight operations are permitted in the existing Fox 3 Military Operations Area (MOA)/ Air Traffic Control Assigned Airspace (ATCAA) down to 5,000 feet above ground level (AGL) or 12,000 feet above mean sea level (MSL), whichever is higher. Overpressures from sonic booms for a variety of military jet aircraft in Mach 1.2 level flight at 10,000 feet AGL range from 4.4 to 5.7 pounds per square foot for F-16s and F-22s, respectively (Table 3-6). There will be a text change in 3.1.8.3 noting that the area under Paxon MOA is currently exposed to sonic booms from planes in the overlying Paxon ATCAA, which has a "floor" altitude of 18,000 feet AGL and is used only during major flying exercise (MFE) operations (see Section 3.1.2.3.1). Near the centers of Fox 3 MOA/ATCAA and the Paxon MOA/ATCAA, sonic booms would increase from about 4.6 to 5.2 per day on average. Also, please see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p> <p>Given the potential for loss or injury to aircrews and aircraft as a result of a bird-aircraft strike, extensive efforts are made by the military to avoid areas with high concentrations of birds (also described in the Safety discussion in Section 3.1.3.3, under Mitigations in Section 3.1.8.4, and Appendix G, Biological Resources). The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection.</p>
I0092-5	<p>4. INCONSISTENT WITH NATIONAL PARK & PRESERVE VALUES The proposed expansion is between two national parks, and according to the handout, appears to be less than 10 miles from Wrangell-St. Elias. If I am being affected now, the enhancements will surely cause the sound and overflights to slop over into the parks. The kind of noise and activity that will accompany this extension is antithetical to the preservation of wilderness.</p>	<p>As noted in your comment, none of the proposals overlap directly with national parks (or monuments). Any noise from military aircraft operating within existing or proposed Military Operations Areas (MOAs) or restricted airspace would attenuate over a 10-mile distance. The Air Force will work with State and Federal resource managers to provide adequate avoidance of the areas considered most highly valued or sensitive to noise. The Record of Decision for the JPARC EIS will include these measures.</p>
I0092-6	<p>5. AVALANCHES If snow machines or even skiers can start avalanches, sonic booms certainly could, too, sending them roaring down on unsuspecting backcountry recreationalists. I may be a grandma, but I try to</p>	<p>As discussed in Appendix E (Noise), Section E.2.11.2 (Sonic Booms), it is possible for sonic booms to trigger an avalanche. However, such an event is rare under baseline conditions and would continue to be rare under the</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	get to the mountains to ski a few times every year.	proposed action. Avalanches are highly dependent on the status of the snow and also occur spontaneously. In a study published in 1986, aircraft were flown at supersonic speeds and low altitudes over the French Alps in a deliberate attempt to trigger avalanches. Although sonic boom overpressures as high as 12 pounds per square foot (psf) were measured in areas with snow conditions favorable to avalanches, 20 supersonic overflights failed to produce any avalanches (Perroud and Lecomte 1986). A study conducted by the Institute for Snow and Avalanche Research in Davos Switzerland concluded that sonic booms do not generally exert sufficient pressure to trigger an avalanche. Although pressure levels vary substantially with specific circumstances, a fairly intense sonic boom is about 4 psf, a skier generates 4 to 25 psf (depending on snow conditions and the skier), and detonations used to deliberately induce avalanches are greater than 31 psf (Reuter and Schweizer 2009). Information has been added to the body of the EIS describing the low level of risk associated with sonic boom-induced avalanches.
I0092-7	7. ECONOMIC DETRIMENTS Potential economic benefits would likely be at the expense of some existing businesses. -PRIVATE PILOTS A larger MOA means the chance for more restrictions for private pilots, who are often the lifeline to remote areas. They have worked hard in rough conditions to develop small businesses, and the possibility of new jobs for someone else does not make negative impacts to their established income and life style any less onerous. -TOURISM Why should tourists come all the way to Alaska and its rugged weather, when they can take a shorter, less expensive trip to see beautiful scenery if the Alaskan experience is going to include noise and Army, Navy, Marine Corps, and Air Force activity? I do love the sight of jets. I pay attention hoping to catch sight of them when I go by Eielson AFB—where I did CAP camp during high school –on my way to visit family in Fairbanks. That’s where my mother homesteaded in the late ‘40s while working at Ladd AFB and where she met my father, a WWII pilot stationed there. I appreciate the military and understand that Alaska might seem wide open and under populated, just the kind of place for this increase. But I feel that with all the potential negatives at the same time there are 65,000 square miles in the present JPARC, the military needs to stay within the already generous space it has to use in Alaska.	Potential economic impacts to businesses, particularly those that rely heavily on commercial or general aviation, are discussed in Section 3.1.12.3. Additional details regarding the potential impacts to airspace management and use are discussed in Section 3.1.1.3. Mitigation measures to offset adverse socioeconomic impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
I0092-8	I do love the sight of jets. I pay attention hoping to catch sight of them when I go by Eielson AFB—where I did CAP camp during high school –on my way	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The proposals included in the EIS to modernize and enhance

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	to visit family in Fairbanks. That's where my mother homesteaded in the late '40s while working at Ladd AFB and where she met my father, a WWII pilot stationed there. I appreciate the military and understand that Alaska might seem wide open and under populated, just the kind of place for this increase. But I feel that with all the potential negatives at the same time there are 65,000 square miles in the present JPARC, the military needs to stay within the already generous space it has to use in Alaska.	JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use. A number of the proposals request expanded and additional Military Operations Area (MOA) or airspace for restricted areas in order to meet the purpose and need expressed in Chapter 1, Purpose and Need for the Proposed Actions.
I0093-1	We would like to make written comment on the proposals submitted in the JPARC Modernization and Enhancement Environmental Impact Statement. After review of the executive summary draft study and attending two of the public meetings, let's hope the process with this EIS Study will once again show the military does listen to the public's important concerns of the Lake Louise Area as they did in 1996.	Public and agency input does make a difference. Thank you for your input. The National Environmental Policy Act requires Federal government agencies to consider public input during preparation of the Draft EIS. The purpose of the input obtained during the scoping process is to assist the EIS preparers in identifying and addressing the issues that are important to the public. The Federal agency then has agency discretion as to whether or not how to modify proposed actions and alternatives. The Draft EIS addresses the potential environmental impacts from the alternatives proposed once they have been more clearly defined. In the Final EIS, the government must not only consider public and agency input, but also must respond to substantive input in the Final EIS and before making final decisions. ALCOM, the U.S. Army, and the U.S. Air Force have considered Draft EIS comments in this Final EIS preparation.
I0093-2	<p>We did notice that the Alternative A to Alternative E Proposal in this draft study is exactly the same "mitigation proposal" that was proposed in 1995. This draft study has not come up with anything new, except to try and throw in an old "mitigation proposal" from 1995. But that ended with the military taking the No Alternative Proposal because of their findings of the impacts to the Lake Louise Area in the Final EIS Study of 1996.</p> <p>This Alternative E has moved the southern boundary of the proposed expansion 20 miles to the North. The proposed boundary now intersects the North end of Susitna Lake. Clearly, Alternative E does not take into consideration the entire lakes systems. All the proposals within Alternative E still stand from last year preliminary proposals (2011): Lower the flight deck from the existing 5,000 feet to 500 feet AGL, extend night flying hours and increase noise level from 35 to 50dB.</p> <p>It is clearly defined in the six "significant adverse impacts" to the Fox 3 MOA Expansion Area. These are airspace management and use, noise, safety-flight, land use-land management and use, land use-recreation and</p>	<p>The U.S. military has a long record of environmental stewardship in Alaska. There are mitigations being considered that alleviate impacts on certain areas of the proposed airspace. The need for low-altitude flight to accomplish training includes areas large enough for maneuvering and tactical deception utilizing terrain. It is not feasible to declare every cabin, animal, lake, and recreation area as "noise-sensitive" for the purpose of avoiding overflight. Any remaining areas would be too small and unusable for the stated purpose. The Air Force will attempt to avoid or minimize low-level flight where the most significant adverse impacts exist if the training can still be accomplished.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>socioeconomics. These six “significant adverse impacts” make it no more reasonable today as back in 1995. Thus the Lake Louise Area has met the NEPA implementing regulations criteria to be eliminated from any of the military’s proposals.</p> <p>In talking with the military at the last public hearing, they appear to be receptive to civilian concerns and they mentioned an Over Flight Avoidance Area. Our suggested additional proposed area would be an area, twenty (20) miles north and parallel to the southern border of Alternative E. The flight altitude would be restricted to the existing altitude of 5,000 feet AGL for high speed aircraft. As long as this proposal is added to Alternative E and maintained year round. It appears from the discussion with the military at the hearing, an Over Flight Avoidance Area has no draw backs in the future from my understanding? A clarification to the public would be appropriate before any final decision of the study is made if this option is considered. Otherwise, the other option is: Alternative E but all of the lake systems area should be excluded, further the boundary north and the No Action Alternative should be taken on all proposals within Alternative E.</p>	
I0093-3	<p>In talking with the military at the last public hearing, they appear to be receptive to civilian concerns and they mentioned an Over Flight Avoidance Area. Our suggested additional proposed area would be an area, twenty (20) miles north and parallel to the southern border of Alternative E. The flight altitude would be restricted to the existing altitude of 5,000 feet AGL for high speed aircraft. As long as this proposal is added to Alternative E and maintained year round. It appears from the discussion with the military at the hearing, an Over Flight Avoidance Area has no draw backs in the future from my understanding? A clarification to the public would be appropriate before any final decision of the study is made if this option is considered. Otherwise, the other option is: Alternative E but all of the lake systems area should be excluded, further the boundary north and the No Action Alternative should be taken on all proposals within Alternative E...</p> <p>It is complicated because of the ramifications of this draft summary. The military saw Lake Louise, as a wonderful recreational area back in the 1950’s for their personnel. There has to be a compromise with the stakeholders here, what is necessary for the military and Alaskan’s outdoor recreational needs.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
I0093-4	<p>Thank you for the opportunity to make comment on this important issue for</p>	<p>Thank you for your comment. In accordance with the National</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	the Lake Louise Area.	Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0094-1	Comment for Alternative E and my concern around Lake Louise as identified in the area of Fox 3 MOA. I would like to add my voice in agreement with the “Over-Flight Avoidance Area of an additional twenty (20) miles north and parallel to the southern border of Alternative E.” The flight altitude in this “additional twenty (20) miles would be restricted to the existing altitude of 5,000 AGL for high speed aircraft. It makes sense that this proposal of an Over-Flight Avoidance Area added to the existing Alternative E boundary and maintained year round, addresses some of the resource concerns about “significant adverse impacts” karen miller Lake susitna cabin owner	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Alternative E was created in response to public comments after the scoping process in order to avoid impacts to the Lake Louise area and other areas in this vicinity.
I0095-1	I am very much in support of alternate E for the proposed Fox 3 Operation Area (MOA). I appreciate that earlier comments from the Lake Louise area were heard and considered. Many of those earlier comments stated concerns about Lake Louise and I believe most of those commenters consider Susitna and Tyone Lakes to be part of the Lake Louise Area. It seems unfair to not to include these lakes in the proposed alternate E as all 3 lake are part of the Lake Louise community. Please consider a higher floor over these lakes to 5000’ or extend the alternate E boundry the few miles to include Sustina and Tyone Lakes.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Alternative E was created in response to public comments after the scoping process in order to avoid impacts to the Lake Louise area and other areas in this vicinity.
I0096-1	I appreciate this opportunity to comment on the JPARC Draft EIS. I am opposed to increasing JPARC particularly in the Fox MOA expansion, Paxon MOA Addition, JCALF areas to such a large extent both in terms of area and activities. While the subject of the EIS may be convenient for the military, the variety of uses, geographic areas, communities still presents a huge challenge to those who wish to comprehend all proposed changes and comment constructively. I am very concerned for taxpayers about the consequences with this development. The mitigation measures that suggest to “pursue funding” offer no certainty or serious follow-through. To finance this venture, “borrows” from somewhere else. To weigh in fully, we need to have those sources identified. The proposal imposes too many restrictions on traditional uses of public and private lands. I am concerned that levels of activity will increase over these areas in another short time period, with little need for review of the new impacts. Even though Alaska has the appearance of vast expanses of empty land, further expansion of training facilities would	A 500-foot above ground level (AGL) floor in the Fox 3 and Paxon MOAs does place military aircraft in the same airspace as nonparticipating aircraft. Just as the Air Force currently shares low airspace in MOAs near Delta Junction, the new airspace will be made safe for all aircraft with a robust Special Use Airspace Information System (SUAIS) and maximum participation from pilots. This communications network allows a range control operator to inform pilots of the status of military airspace as well as the location of other nearby aircraft. The current SUAIS system would require significant infrastructure additions to cover the new airspace adequately. Section 2 of the EIS addresses the amount of activity anticipated for each proposal. Proposals in this EIS do not require displacement of residents, humans or

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>displace others. This land and airspace is already used by miners, prospectors, outdoors enthusiasts of many interests, aviators of all capacities, etc. Expansion would restrict public use, current and future and has the appearance of a land grab. The Gulf of Alaska waters are contain a food source that cannot be duplicated and is a relatively unpolluted environment. If training could be done without harm to ecosystems that are necessary to the livelihood of Alaskans or in the ecosystems that we depend on, I would have no objections. Disturbance to sea creatures, pollution from explosives and exploded target drones would result to harm to this area. Unexploded ordinance would be a threat for future users. Making better use of the current training areas and not expanding is really the best real time solution for military training needs. Doing more with existing training areas makes the most sense.</p> <p>Environmental Resource Areas</p> <p>1. Airspace Operations</p> <ul style="list-style-type: none"> • Airspace: It appears to me that there are corridors selected and flight levels proposed that will impede private and commercial traffic traditionally using/routed along highways, rivers and access to hunting grounds. Enhanced mitigation regarding publicity should include PSA’s on local radio stations and community websites like www.deltanewb.com • Noise: Existing training in DTA and BAX has increased markedly over the last few years both in terms of volume, frequency and at all hours of the day. I can hear machine gunfire, bombing and sonic booms from my house. I have large low flying aircraft flying directly over my house. Why not move operations that resemble a warzone to training areas that are not within a couple of miles of residential areas? Supersonic operations continue to be more than an annoyance in populated areas. Mitigation suggests studying effects on animals, but not people who live close to these ranges. Some areas should also restrict MFE’s during sheep season (mid August...) Flight levels down to 500 ft. could easily have an adverse effect on a hunt. 	<p>animals. Several proposals for restricted area expansions will limit access during the times of activation. The Air Force and Army will continue to use local press outlets, the Alaska Airspace website, pamphlets, and the USARTRAK system to advertise future training dates when areas will be closed.</p> <p>The impact analysis does not identify any significant adverse effects from the proposed missile firings in the Gulf of Alaska. The proposal is programmatic such that further environmental analysis will be required when the proposed activity details are better known.</p> <p>The airspace comment refers to visual flight rules (VFR) flight being restricted. Only very small additions to restricted areas would keep these flights out. The MOAs by definition, are and will continue to be shared airspace with general aviation. The impacts are anticipated to be manageable with appropriate mitigations to avoid sensitive areas.</p> <p>The Air Force is considering reconvening the Resource Protection Council (RPC) that was established for several years after the Alaska MOA EIS in the 1990s. The RPC would be the venue where mitigation efforts and their effectiveness and/or need for more analysis would be discussed. Analysis of sonic booms could be a future effort targeted by the RPC.</p> <p>There are modifications to proposals and mitigations being considered that alleviate impacts on certain areas of the proposed airspace.</p> <p>The military will continue to adhere to its good neighbor policy of executing its training events to the greatest extent between the hours of 0600 and 2200. Other times will be publicized by notices in various public conveyances such as television, radio, internet, and newspapers. The Army remains steadfast in being a good neighbor by honoring its quiet hours to the greatest extent possible. There will be times when deployment schedules demand that the Army give notice of exception and execute training beyond the desired "quiet times."</p>
I0096-2	<p>I appreciate this opportunity to comment on the JPARC Draft EIS. I am opposed to increasing JPARC particularly in the Fox MOA expansion, Paxon MOA Addition, JCALFareas to such a large extent both in terms of area and activities. While the subject of the EIS may be convenient for the</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska’s resources. In preparing the Final EIS the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>military, the variety of uses, geographic areas, communities still presents a huge challenge to those who wish to comprehend all proposed changes and comment constructively. I am very concerned for taxpayers about the consequences with this development. The mitigation measures that suggest to “pursue funding” offer no certainty or serious follow-through. To finance this venture, “borrows” from somewhere else. To weigh in fully, we need to have those sources identified. The proposal imposes too many restrictions on traditional uses of public and private lands. I am concerned that levels of activity will increase over these areas in another short time period, with little need for review of the new impacts. Even though Alaska has the appearance of vast expanses of empty land, further expansion of training facilities would displace others. This land and airspace is already used by miners, prospectors, outdoors enthusiasts of many interests, aviators of all capacities, etc. Expansion would restrict public use, current and future and has the appearance of a land grab. The Gulf of Alaska waters are contain a food source that cannot be duplicated and is a relatively unpolluted environment. If training could be done without harm to ecosystems that are necessary to the livelihood of Alaskans or in the ecosystems that we depend on, I would have no objections. Disturbance to sea creatures, pollution from explosives and exploded target drones would result to harm to this area. Unexploded ordinance would be a threat for future users. Making better use of the current training areas and not expanding is really the best real time solution for military training needs. Doing more with existing training areas makes the most sense.</p> <p>Environmental Resource Areas</p> <p>1. Airspace Operations</p> <ul style="list-style-type: none"> • Airspace: It appears to me that there are corridors selected and flight levels proposed that will impede private and commercial traffic traditionally using/routed along highways, rivers and access to hunting grounds. Enhanced mitigation regarding publicity should include PSA’s on local radio stations and community websites like www.deltanewb.com • Noise: Existing training in DTA and BAX has increased markedly over the last few years both in terms of volume, frequency and at all hours of the day. I can hear machine gunfire, bombing and sonic booms from my house. I have large low flying aircraft flying directly over my house. Why not move 	<p>user conflicts be avoided or mitigated to the maximum extent feasible. Once the Army and Air Force select the preferred alternatives for each proposal, specific measures will be developed in order to avoid, minimize, and, in some cases, fully mitigate adverse impacts to the environment, natural resources, and public communities to the extent feasible and practicable. Such measures are required in accordance with the implementation regulations the Army and Air Force were required to adopt in the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] 4321 et seq.) and the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500–1508). Additionally, the proposals included in the Draft EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land or restrict usage as part of the Fox 3MOA expansion/Paxon MOA addition proposal. All land-based military training will take place on existing lands currently withdrawn for military use.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>operations that resemble a warzone to training areas that are not within a couple of miles of residential areas? Supersonic operations continue to be more than an annoyance in populated areas. Mitigation suggests studying effects on animals, but not people who live close to these ranges. Some areas should also restrict MFE's during sheep season (mid August...) Flight levels down to 500 ft. could easily have an adverse effect on a hunt.</p> <p>...</p> <p>2. Natural Resources</p> <ul style="list-style-type: none"> • Water: Increased live fire in PWS [Prince William Sound] could pose additional hazards in terms of pollution and safety. Paxon and Fox 3 include at least a half dozen bodies of water that are used regularly by residents and recreators. Mitigation sounds like those citizens will need to schedule their activities on public and private land around training schedules. • Biological: How realistic is it to propose that natural resources (who/what are these? What agency/personnel?) and range managers coordinate training schedules that are not dictated by animals on the move but personnel in an off-site office? Some of the mitigation suggestions name specifically ADFG others do not. Who is responsible for what needs to be firm. <p>4. Human Resources</p> <ul style="list-style-type: none"> • Land Use: Paxon and Fox 3 expansion restricts use by residents, recreators and cabin owners. USARAK website is not user friendly for civilians searching for access. For example, maps with range names mean nothing to the civilian who wants to know on a weekend whether an area is open or not. 	
I0096-3	<p>The proposal imposes too many restrictions on traditional uses of public and private lands. I am concerned that levels of activity will increase over these areas in another short time period, with little need for review of the new impacts. Even though Alaska has the appearance of vast expanses of empty land, further expansion of training facilities would displace others. This land and airspace is already used by miners, prospectors, outdoors enthusiasts of many interests, aviators of all capacities, etc. Expansion would restrict public use, current and future and has the appearance of a land grab. The Gulf of Alaska waters are contain a food source that cannot be duplicated and is a relatively unpolluted environment. If training could be done without harm to</p>	<p>This comment encompasses many different areas.</p> <p>The Air Force is not currently pursuing increased activities in the Gulf of Alaska. It is mentioned in the EIS as a "Programmatic Proposal," which will likely require additional NEPA analysis to pursue that proposal.</p> <p>Paxon and Fox MOAs are airspace actions only. They do not restrict the use of the land below them. The preferred alternative and exact mitigations have not been selected yet, but as an example to show we are concerned with access issues. If Alternative E were chosen, the Paxon Military Operations</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>ecosystems that are necessary to the livelihood of Alaskans or in the ecosystems that we depend on, I would have no objections. Disturbance to sea creatures, pollution from explosives and exploded target drones would result to harm to this area. Unexploded ordinance would be a threat for future users. Making better use of the current training areas and not expanding is really the best real time solution for military training needs. Doing more with existing training areas makes the most sense.</p> <p>...</p> <p>Paxon and Fox 3 include at least a half dozen bodies of water that are used regularly by residents and recreators. Mitigation sounds like those citizens will need to schedule their activities on public and private land around training schedules.</p> <p>...</p> <p>Land Use: Paxon and Fox 3 expansion restricts use by residents, recreators and cabin owners. USARAK website is not user friendly for civilians searching for access. For example, maps with range names mean nothing to the civilian who wants to know on a weekend whether an area is open or not.</p>	<p>Area (MOA) would have a floor of 14,000 feet above mean seal level (MSL) for day-to-day training, and therefore not be limiting access to lakes and cabins to low altitude. Both the Fox low MOA and the Paxon low MOA would see the greatest use during major flying exercises (MFEs) such as RED FLAG-Alaska. These are scheduled well in advance and can be easily avoided. They are typically two weeks long, weekdays only, and typically have two periods of use per day (up to 2.5 hours per period). A sat-phone call or radio call to the Special Use Airspace Information Service (SUAIS) will tell you if there is military low-flying in your area or along your proposed route. Also, visual flight rules (VFR) flight is not restricted in a MOA (only instrument flight rules [IFR] flight), however, caution is advised. It is recommended you use SUAIS every time you fly in/near the MOAs.</p> <p>Recreational activities are permitted on Fort Wainwright training areas provided those activities do not conflict with training activities. The Fort Wainwright U.S. Army Recreation Tracking System (USARTRAK) has been established to facilitate public recreational access to the Fort Wainwright training lands. USARTRAK is designed to keep the public informed of training area closures, and to help them check in to open training areas. USARTRAK information and rules can be found at www.usartrak.com. It allows users with a Fort Wainwright Recreational Access Permit to check in through the website or through an automated telephone system. Recreators must check in to USARTRAK every time they go into Army training lands. USARTRAK does not include information regarding airspace availability.</p>
I0096-4	<p>Recreation and Visual Resources: The extensive target of this proposal has tremendous effect on residents, tourists, hunters, hikers, dog mushers, snowmachiners, in particular #1 Paxon and Fox 3. These areas are used year round by many.</p>	<p>Section 3.1.10.3 of the DEIS acknowledges that the expansion of the Fox 3 MOA and the establishment of the Paxon MOA would affect spatial and temporal availability to specific areas and associated uses and activities due to changes in civilian air access. In addition, the EIS states that low-level overflights and overflights during major flying exercises (MFEs) would impact recreational uses in areas underlying the MOA. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts, such as suspending Air Force MFE operations during popular recreation seasons (i.e., January, September, and December and between June 27 and July 11) and avoiding overflight of popular hunting areas, campgrounds, and trails during peak use periods between June 27 and July 11 and from mid-August through September. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
I0096-5	<p>1. Airspace Operations • Airspace: It appears to me that there are corridors selected and flight levels proposed that will impede private and commercial traffic traditionally using/routed along highways, rivers and access to hunting grounds. Enhanced mitigation regarding publicity should include PSA's on local radio stations and community websites like www.deltanewb.com</p>	<p>Thank you for the suggestion. The Army would consider all appropriate means for publicizing the scheduled use of the proposed UAV corridors/altitudes to help all aviation interests plan their flight activities during those timeframes when these corridors would be active.</p>
I0096-6	<p>The Gulf of Alaska waters are contain a food source that cannot be duplicated and is a relatively unpolluted environment. If training could be done without harm to ecosystems that are necessary to the livelihood of Alaskans or in the ecosystems that we depend on, I would have no objections. Disturbance to sea creatures, pollution from explosives and exploded target drones would result to harm to this area. Unexploded ordinance would be a threat for future users. Making better use of the current training areas and not expanding is really the best real time solution for military training needs. Doing more with existing training areas makes the most sense.</p> <p>...</p> <ul style="list-style-type: none"> • Water: Increased live fire in PWS [Prince William Sound] could pose additional hazards in terms of pollution and safety. Paxon and Fox 3 include at least a half dozen bodies of water that are used regularly by residents and recreators. Mitigation sounds like those citizens will need to schedule their activities on public and private land around training schedules. 	<p>The Missile Live Fire would occur in an existing Navy training area and does not result in an expansion of military training areas, only in an increase in the number of sorties performed each year. The low frequency and high dispersion of the air-to-air missiles would not have substantial impacts on biological resources (See discussion in Section 3.11.8). The proposal also does not include any airspace or flight activities beyond those that currently exist with the Navy training and therefore would not pose additional hazards in the Temporary Maritime Activities Area (TMAA). Additionally, this is a programmatic proposal which will require a follow-on NEPA assessment when the project is ready to be implemented.</p>
I0096-7	<p>The Gulf of Alaska waters are contain a food source that cannot be duplicated and is a relatively unpolluted environment. If training could be done without harm to ecosystems that are necessary to the livelihood of Alaskans or in the ecosystems that we depend on, I would have no objections. Disturbance to sea creatures, pollution from explosives and exploded target drones would result to harm to this area. Unexploded ordinance would be a threat for future users. Making better use of the current training areas and not expanding is really the best real time solution for military training needs. Doing more with existing training areas makes the most sense.</p> <p>...</p> <ul style="list-style-type: none"> • Noise: Existing training in DTA and BAX has increased markedly over the last few years both in terms of volume, frequency and at all hours of the day. I can hear machine gunfire, bombing and sonic booms from my house. I 	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The Air Force will undergo further evaluation of potential impacts on the Gulf of Alaska ecosystems prior to implementing a Missile Live Fire action.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>have large low flying aircraft flying directly over my house. Why not move operations that resemble a warzone to training areas that are not within a couple of miles of residential areas? Supersonic operations continue to be more than an annoyance in populated areas. Mitigation suggests studying effects on animals, but not people who live close to these ranges. Some areas should also restrict MFE's during sheep season (mid August...) Flight levels down to 500 ft. could easily have an adverse effect on a hunt.</p> <p>...</p> <ul style="list-style-type: none"> • Biological: How realistic is it to propose that natural resources (who/what are these? What agency/personnel?) and range managers coordinate training schedules that are not dictated by animals on the move but personnel in an off-site office? Some of the mitigation suggestions name specifically ADFG others do not. Who is responsible for what needs to be firm. 	
I0096-8	<p>The Gulf of Alaska waters are contain a food source that cannot be duplicated and is a relatively unpolluted environment. If training could be done without harm to ecosystems that are necessary to the livelihood of Alaskans or in the ecosystems that we depend on, I would have no objections. Disturbance to sea creatures, pollution from explosives and exploded target drones would result to harm to this area. Unexploded ordinance would be a threat for future users. Making better use of the current training areas and not expanding is really the best real time solution for military training needs. Doing more with existing training areas makes the most sense.</p> <p>...</p> <ul style="list-style-type: none"> • Safety (Ground and Air): When training occurs in proximity to residential areas, any accident has the potential to claim more loss. AK citizens are not collateral. <p>5. Community Infrastructure</p> <ul style="list-style-type: none"> • Hazardous Materials: The Military does not have an admirable record of keeping track of hazardous substances/ordnance in AK. Introducing more to areas that are so close to the Delta Junction community is disturbing in terms of fire fighting, pollution and future use. 	<p>Safety (Ground): During training activities, personnel clear the affected training area to ensure that unauthorized personnel, vehicles, or aircraft are not in the area during training. Additionally, safety buffers are established to ensure that any effects from the use of ordnance are kept on the range. These safety buffers are established based on the capabilities of the individual ordnance and are set large enough to ensure that the ordnance is contained on the range even if it malfunctions.</p>
I0096-9	<ul style="list-style-type: none"> • Safety (Ground and Air): When training occurs in proximity to residential areas, any accident has the potential to claim more loss. AK citizens are not 	<p>Flight safety and mishap prevention are of utmost importance to the military in all their air and ground training activities and they will go to the greatest</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	collateral.	lengths possible to not put their personnel, operations, or the public at risk. For that reason, stringent flight safety procedures and practices are established to protect all concerned during these activities, to include avoiding population centers, airports, and other sensitive areas to help prevent any adverse noise effects or safety risks to those areas. Flight safety is addressed extensively in the EIS Airspace Management and Use and Safety sections, while Appendix K notes those existing and proposed mitigations that would further provide for the safe, compatible use of the existing and expanded airspace by all concerned.
I0096-10	<p>5. Community Infrastructure</p> <ul style="list-style-type: none"> • Hazardous Materials: The Military does not have an admirable record of keeping track of hazardous substances/ordinance in AK. Introducing more to areas that are so close to the Delta Junction community is disturbing in terms of fire fighting, pollution and future use. 	<p>With respect to hazardous waste from live ordnance, Delta Junction is closest to the BAX and the Oklahoma Impact Area in R-2202B of DTA. As indicated in EIS Section 3.2.7.2, Methodology, releases to the environment in the training areas require reporting to the EPA under the EPCRA Toxic Release Inventory (TRI) program. JPARC operations areas have procedures to comply with TRI reporting requirements and would track ordnance use associated with the proposed alternatives. As indicated in Section 3.2.7.4, Mitigations, the Air Force may augment the Army’s existing program to implement a program to identify possible munitions contamination at impact areas.</p> <p>As indicated in Section 3.2.7.3.1, Alternative A, General Hazardous Materials and Waste, the expansion of R-2202 would occur to the west, in the direction opposite from Delta Junction, thus minimizing additional hazardous waste-related impacts to Delta Junction. In addition, as indicated in Section 3.3.7, Hazardous Materials and Waste, the proposed action at the BAX does not require any additional land that would potentially be subject to releases of hazardous materials and waste associated with live ordnance. The proposed training would use existing impact areas for the discharge of ordnance, thus minimizing additional hazardous waste-related impacts to Delta Junction. Additionally, the Army and the Air Force are required by Federal and State of Alaska public statutes to comply with applicable regulations to protect, conserve, and preserve the environment and prevent and remediate pollution on lands within their jurisdiction.</p>
I0096-11	<ul style="list-style-type: none"> • Noise: Existing training in DTA and BAX has increased markedly over the last few years both in terms of volume, frequency and at all hours of the day. I can hear machine gunfire, bombing and sonic booms from my house. I have large low flying aircraft flying directly over my house. Why not move operations that resemble a warzone to training areas that are not within a 	<p>The BAX has come on-line in the past few years and provides a more realistic training environment than was previously available. Operations at the BAX were analyzed in the “Final EIS for the Construction and Operation of a Battle Area Complex and a Combined Arms Collective Training Facility Within U.S. Army Training Lands in Alaska.” Several operational and</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>couple of miles of residential areas? Supersonic operations continue to be more than an annoyance in populated areas. Mitigation suggests studying effects on animals, but not people who live close to these ranges. Some areas should also restrict MFE's during sheep season (mid August...) Flight levels down to 500 ft. could easily have an adverse effect on a hunt.</p>	<p>environmental considerations were taken into account when selecting the location of the BAX, as described in that Final EIS.</p> <p>The Air Force recognizes that supersonic noise is of concern to people living beneath supersonic-authorized airspace. Annoyance is expected to be the primary effect of supersonic noise. The annoyance may be a secondary effect of speech interference or interference with the enjoyment of a quiet evening. Although unlikely, it is possible for sonic booms to result in damage to structures. If there are other categories of impacts that should be considered or studies that should be conducted, please communicate those to the Eielson AFB Public Affairs Office.</p> <p>It is recognized in the Draft EIS in the Land Use sections that low-level overflight could potentially disturb a hunt. Proposed mitigations include meetings to discuss the effects of Air Force activities on subsistence hunting (see Section 3.1.13.4). Should this mitigation be incorporated into the Record of Decision for this EIS, these meetings would be an ideal forum for discussing the establishment of specific avoidance areas.</p> <p>Eielson Public Affairs (907) 377-2116 354fw.pa.publicaffairs@us.af.mil</p> <p>JBER Public Affairs (907) 552-8151 pateam@elmendorf.af.mil</p>
I0096-12	<p>• Noise: Existing training in DTA and BAX has increased markedly over the last few years both in terms of volume, frequency and at all hours of the day. I can hear machine gunfire, bombing and sonic booms from my house. I have large low flying aircraft flying directly over my house. Why not move operations that resemble a warzone to training areas that are not within a couple of miles of residential areas? Supersonic operations continue to be more than an annoyance in populated areas. Mitigation suggests studying effects on animals, but not people who live close to these ranges. Some areas should also restrict MFE's during sheep season (mid August...) Flight levels down to 500 ft. could easily have an adverse effect on a hunt.</p>	<p>Section 3.2.13.3 of the EIS describes potential impacts to subsistence resources near DTA. Section 3.3.13.3 of the EIS describes potential impacts to subsistence activities from the BAX proposed actions. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.</p>
I0097-2	<p>I am a resident of the Trapper Creek area and live under the Susitna MOA. I am also a frequent user of the Fox 3 area along the Denali Highway. I am concerned with the Fox 3 expansion and also with the Night Joint Training</p>	<p>Operations in the Susitna MOA would not change as a result of actions proposed in this EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>issue.</p> <p>Night Joint Training:</p> <p>I live under the Susitna MOA and am quite familiar with the noise from overhead practice flights. At times the noise is extremely annoying making it impossible to carry on a conversation or hear the radio. I would definitely not want to hear this noise at night when I am trying to sleep! I understand that this is proposed because of daylight savings time starting and ending so early. It seems a better solution would be to go back to the old dates of daylight savings time. Really, it is annoying to start daylight savings time so early not to mention that daylight savings time in Alaska is totally pointless. Perhaps if congress understood that the current daylight savings time interfered with military training they would be willing to change it. Additionally, I would recommend that the Air Force familiarize itself with the settlement areas under the various MOAs. I live in the Trapper Creek Glen subdivision which is a state land disposal of about 235 lots. Not all lots are developed, but there are a lot of people out here to be annoyed by flying when they are trying to sleep.</p> <p>Fox 3 Expansion:</p> <p>I am a frequent user of the area along the Denali Highway for backpacking, fishing and boating. My husband also uses the area for hunting. I am particularly concerned with the impacts of low altitude training flights in this area. Living under the Susitna MOA, I am familiar with the noise level from planes that are so high that they can't be seen. Frequently the noise makes having a conversation impossible. I can't imagine how loud the noise would be from planes flying at low altitudes. I really don't ever want to have to hear it. The Denali Highway area is an area used for a lot of recreational activities. When people come out to their weekend cabins in my area, they always comment on how quiet it is. I think the quiet is one of the things that people go out into the wilds to enjoy. I think the noise from low altitude flights would totally ruin their experience. This area is one of the few areas easily accessible by road for the average Alaskan or tourist. It is as scenic as Denali Park and offers a lot of diverse recreational activities. I think that the ability of people to enjoy the area should be preserved and that low altitude training would be totally unacceptable in this area. I am also concerned with the impact of low altitude training flights on the wildlife. I once had a</p>	<p>Thank you for your comments regarding daylight saving time. Revising Federal regulations with regards to daylight saving time is beyond the scope of this EIS.</p> <p>The potential for night flights to generate annoyance in persons overflow is recognized in the EIS. It is expected that the number of late night operations would be relatively small -- less than 3 percent of total annual operations.</p> <p>As acknowledged in this EIS, noise is often particularly noticeable and annoying in quiet environments, such as that found in Alaska. Specific locations that are particularly noise-sensitive can be established as avoidance areas. Trapper Creek Glen subdivision will be considered for an avoidance area.</p> <p>The potential for overflight noise to startle animals is recognized in this EIS. However, it is not expected that animals would make long-term adjustments in forage patterns to avoid areas affected by overflights.</p> <p>Potential impacts to recreation are also recognized in this EIS.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>military jet fly low over my barn. It totally scared my animals. A lot of people depend on the caribou herd in the Fox 3 area. It would be a disaster if the herd decided to move to get away from the low flights. It would seem that it could also have serious negative impacts at calving time. The same would be true for other wildlife in the area. I am also concerned with the proposed Paxson MOA addition. The area along the Denali Highway (Tangle Lakes) and along the Richardson Highway also see a lot of recreational use. Again, it is an area easily accessible for a lot of people. I think that it is important to reserve some areas where people can enjoy the wilds without a bunch of annoying, loud aircraft overhead. There is already too much noise from small planes in the area. Perhaps the far eastern edge of this area could be used without disrupting too many people's experience.</p>	
I0097-3	<p>Fox 3 Expansion: I am a frequent user of the area along the Denali Highway for backpacking, fishing and boating. My husband also uses the area for hunting. I am particularly concerned with the impacts of low altitude training flights in this area. Living under the Susitna MOA, I am familiar with the noise level from planes that are so high that they can't be seen. Frequently the noise makes having a conversation impossible. I can't imagine how loud the noise would be from planes flying at low altitudes. I really don't ever want to have to hear it. The Denali Highway area is an area used for a lot of recreational activities. When people come out to their weekend cabins in my area, they always comment on how quiet it is. I think the quiet is one of the things that people go out into the wilds to enjoy. I think the noise from low altitude flights would totally ruin their experience. This area is one of the few areas easily accessible by road for the average Alaskan or tourist. It is as scenic as Denali Park and offers a lot of diverse recreational activities. I think that the ability of people to enjoy the area should be preserved and that low altitude training would be totally unacceptable in this area. I am also concerned with the impact of low altitude training flights on the wildlife. I once had a military jet fly low over my barn. It totally scared my animals. A lot of people depend on the caribou herd in the Fox 3 area. It would be a disaster if the herd decided to move to get away from the low flights. It would seem that it could also have serious negative impacts at calving time. The same would be true for other wildlife in the area. I am also concerned with the proposed Paxson MOA addition. The area along the Denali Highway (Tangle Lakes) and along the Richardson Highway also see a lot of recreational use. Again, it is an area easily accessible for a lot of people. I</p>	<p>Section 3.1.10.3.1 of the Draft EIS acknowledges that noise associated with low-level overflight could lessen recreational experiences for some persons. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation, such as seasonal avoidance areas; expanding the existing Delta National Wild and Scenic River and Gulkana National Wild River to include all portions within the new MOA boundaries; and avoiding overflight of popular hunting areas, campgrounds, and trails between June 27 and July 11. These areas include Brushkana Creek campground, Tangle Lakes campground, Paxson Lake campground, Clearwater Wayside, One Mile Creek/Wolverine Mountain, Tangle Lakes trail, Gulkana River Raft trail, Castner Glacier trail, Sourdough campground, Lake Louise State Recreation Area, Crosswind Lake, and Matanuska Valley Moose Range. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	think that it is important to reserve some areas where people can enjoy the wilds without a bunch of annoying, loud aircraft overhead. There is already too much noise from small planes in the area. Perhaps the far eastern edge of this area could be used without disrupting too many people's experience.	
I0097-4	I am also concerned with the impact of low altitude training flights on the wildlife. I once had a military jet fly low over my barn. It totally scared my animals. A lot of people depend on the caribou herd in the Fox 3 area. It would be a disaster if the herd decided to move to get away from the low flights. It would seem that it could also have serious negative impacts at calving time. The same would be true for other wildlife in the area.	<p>Animal responses to low-level flights have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor, and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. Please see Appendix E, Noise, for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p> <p>The U.S. Air Force publishes a handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight-restricted areas for pilot/aircraft safety and wildlife protection.</p>
I0097-5	I am also concerned with the impact of low altitude training flights on the wildlife. I once had a military jet fly low over my barn. It totally scared my animals. A lot of people depend on the caribou herd in the Fox 3 area. It would be a disaster if the herd decided to move to get away from the low flights. It would seem that it could also have serious negative impacts at calving time. The same would be true for other wildlife in the area.	Sections 3.1.13.3 and 3.5.13.3 describe the potential impacts to subsistence resources, such as the caribou herd in the proposed Fox 3 MOA. Section 3.1.13.4 describes proposed mitigations the Air Force could implement to minimize to the extent possible potential adverse impacts to wildlife and subsistence activities, including direct overflight avoidance of the caribou herd. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0098-1	<p>The military in Alaska seems to be on course to try to tie up large areas of air space and land for training purposes. In the case of the proposals to increase FOX 3 MOA and create the Paxson MOA, these areas are accessible to civilians by road as well as general aviation aircraft. They contain some of the most beautiful road accessible wilderness in interior Alaska. There are also areas that support a large number of hunters. Creating large longitudinal training corridors with access from multiple directions may be important, but should not be allowed in this area of the state....</p> <p>Page 265 Vol 1 paragraphs 5 & 6 cover the impact of low level high speed operations on people in the area. The EIS proposes to lower the FOX 3 MOA air space to 500 ft AGL and use the same restriction in the Paxson MOA. This is far too low and would seriously impact civilians trying to enjoy this wilderness.</p>	As the commenter mentions, the noise impacts from proposed military training in the proposed expanded Fox 3 MOA and new Paxson MOA are described in the Draft EIS in Section 3.1.10.3.1. Given the low percentage of military operations that occur at lower altitudes and the size of the MOAs, the potential for direct low-level overflight at any given location would be extremely infrequent. Noise and startling effects from low-level overflights could impact wilderness qualities of solitude for the duration of the overflight. Some level of routine training would take place all year, but major flying exercises would not be scheduled during the months of January, September, and December, which are peak use periods. The Air Force will consider feasible additions to the current flight avoidance procedures to account for sensitive locations under the new airspace. These may include both an adjustment to the overflight altitude and a seasonal restriction on overflight during popular hunting periods. The Record of Decision will

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		include a list of all mitigations the Air Force will implement to reduce noise impacts on communities and specially managed areas and recreational sites.
I0098-2	The Air Force is trying to move its' last fighter squadron out of Fairbanks so proximity to Fairbanks should not be considered a valid justification...The Air Force is trying to transfer the last F-16 squadrons out of Eielson and move them to Elmendorf. This plan undermines the argument that proximity to Fairbanks is important.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The location of the F-16 Aggressor Squadron within Alaska is not connected to the JPARC proposals. The Air Force restructuring action to move the F-16 Aggressor Squadron from Eielson AFB to JBER is not included in the JPARC Modernization and Enhancement EIS. This move is a completely separate NEPA action and a separate NEPA document will be prepared to address the impacts of the restructuring program. The F-16 proposed relocation is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. The details of the proposed F-16 relocation and military training, including Major Flying Exercises such as RED FLAG-Alaska, will be worked out in the coming months. The majority of the JPARC proposals that involve Eielson AFB are Army proposals and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft.
I0098-3	Dropping thousands of pounds of chaff in the area is written off as having little impact. There is no mention of the biodegradable status of the chaff.	As indicated in Section 3.1.7.3.1, the Air Force would encourage and facilitate the continued study of chaff alternatives (e.g., biodegradable chaff) to reduce hazardous waste-related impacts on soils, surface water, air, and biological resources within and underlying the MOAs, such that no adverse impacts would occur.
I0098-4	Long hours of operation and 240 days a year of exercises mean the area will be heavily used for both low and high level training. The EIS acknowledges more civilian and commercial aircraft will be using GPS navigation at lower altitudes and this impact is unknown on the NEXTGEN system coverage . low level transiting of the passes through the Alaska Range by civilian and commercial aircraft should not have to mix with high speed military aircraft doing low level training. The Air Force should find other places to do low level training of F-22 and F-35 aircraft.	The safe, shared use of all Alaska airspace in which military aircraft operate and train is of extreme importance to the Air Force. Both Eielson AFB and JBER provide Midair Collision Avoidance program pamphlets (see the respective home websites) that contain helpful information on those actions all pilots can take to increase awareness of each other's presence while operating within the same airspace. These pamphlets also provide contact information and guidelines for hazard or incident reporting and will continue to be updated, as necessary, to include any additional information that will help maintain vigilance and ensure safety in the air.
I0098-5	The Air Force should find other places to do low level training of F-22 and F-35 aircraft. I support the 2.1.1.2 No Action Alternative.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0098-6	Expansion of Night Ordnance Use beyond 10pm is not in the best interest of residents of interior Alaska. Residents should not have to listen to explosions	The proposed night ordnance use would expand on current night ordnance use by the Army at Stuart Creek and Oklahoma Impact Areas. The projected noise effects outside of the installation boundary are described in Section

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	or other aircraft operations after 10pm.	3.5.10.3.1. The proposed activities would only occur during one two-week period each year and may be audible (as a distant sound) to some persons in surrounding communities. The noise from night bombing in this period would not be louder than noise experienced from current use of ordnance on these ranges by the Army during night hours.
I0098-7	While it may be difficult to meet the night exercise requirements, they can be met or the goals can be rewritten. I support 2.1.5.2 No Action Alternative.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. As explained in Chapter 1, Purpose and Need for the Proposed Actions, Sections 1.2 and 1.3 of the Draft EIS, the decision on which alternatives the Army and Air Force will pursue will be made in light of the Purpose and Need by Army and Air Force representatives following the review of all relevant facts, impact analyses, mitigations, and comments received via the JPARC EIS public participation process.
I0098-8	Airspace Corridors for UAV Access appears to be an attempt by the military to jump the gun on reserving airspace when the FAA hasn't yet released a plan for integrating UAV operations with general aviation and commercial aircraft.	These corridors were proposed as restricted areas in the EIS for required environmental assessment pending any future decisions that are made by the FAA to safely integrate UAV operations into the National Airspace System.
I0098-9	Airspace Corridors for UAV Access appears to be an attempt by the military to jump the gun on reserving airspace when the FAA hasn't yet released a plan for integrating UAV operations with general aviation and commercial aircraft. The proposals are significant in they want to reserve airspace from 1200' AGL to FL 180. This proposal is premature.	Currently the FAA requires a Certificate of Authorization for UAVs to operate in the National Airspace System (NAS). The U.S. Army is fully compliant with FAA requirements for UAV operations. The UAV corridors will be activated by Notices to Airmen (NOTAMs) and once the UAV is clear of the corridor the airspace will be returned to FAA control.
I0098-10	I support 2.1.6.1.3, 2.1.6.2.3, 2.1.6.3.3, 2.1.6.4.3, 2.1.6.5.3, 2.1.6.6.3, 2.1.7.3 No Action.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0098-11	The EIS and appendixes are a hugely long and complex documents. The issues discussed are important.	See response to comment I0006-3.
I0098-12	Alaska should oppose the military trying to tie up large areas of the state both for ground and air training. The answer isn't always "more is better". Once these areas become tied up as MOAs it will be very hard to get the military to release them back to general public use. Live fire impact areas will remain off limits probably for a very long time.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. JPARC is an important and vital component of the national defense strategy of the United States and is a key attribute of Alaska's value to the military in the twenty-first century. There is no other place in the country where the military has the opportunity to conduct state-of-the-art training in diverse terrains without significant encroachment. The Army and Air Force are required by NEPA to make the efforts required to harmonize mission requirements and community needs in order that user conflicts be avoided, minimized, or mitigated to the extent feasible and practicable.

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		Additionally, the proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use.
I0098-13	Unless expansion is opposed, Alaska stands to lose large areas of the state that offer residents and tourists truly unique wilderness experiences both from the ground level and from aerial access.	The effects of proposed activities on remote and protected areas are described in several sections of the Draft EIS, including Sections 3.1.10.3.1/2, 3.2.10.3.1/2, and 3.5.10.3.1.
I0098-14	Unless expansion is opposed, Alaska stands to lose large areas of the state that offer residents and tourists truly unique wilderness experiences both from the ground level and from aerial access.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. In preparing the Final EIS the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century.
I0098-15	The Live Ordnance Delivery expansion should be rejected. Live ordnance training areas are problematic locations for wildland fires started either by ordnance or lightning strikes, The EIS says very little about suppression plans for live fire impact areas beyond the military's coordination with BLM and AFS.	In terms of fire prevention, three primary management actions are used to prevent wildfires. First, a fire danger rating system is used to reduce the likelihood of a fire by limiting military activities. Certain military activities are restricted when thresholds of wildfire risk are reached. Second, wildfire danger is reduced through the removal of accumulated fuels (e.g., prescribed burning and/or construction and maintenance of fire or fuel breaks). Third, an Initial Attack Response Team remains available during military training activities during high and extreme fire danger to provide a rapid initial response to wildfires in the area. These actions are designed to minimize the potential for wildfires from training activities.
I0098-16	Wildland fire smoke in Fairbanks and the interior can be substantial, both esthetically and from the health stand points. There is no discussion in the EIS about this potential problem.	In terms of fire prevention, three primary management actions are used to prevent wildfires. First, a fire danger rating system is used to reduce the likelihood of a fire by limiting military activities. Certain military activities are restricted when thresholds of wildfire risk are reached. Second, wildfire danger is reduced through the removal of accumulated fuels (e.g., prescribed burning and/or construction and maintenance of fire or fuel breaks). Third, an Initial Attack Response Team remains available during military training activities during high and extreme fire danger to provide a rapid initial response to wildfires in the area. These actions are designed to minimize the potential for wildfires from training activities.
I0098-17	Wildland fire smoke in Fairbanks and the interior can be substantial, both esthetically and from the health stand points. There is no discussion in the EIS about this potential problem.	Comment noted. Additional text will be added to the EIS as follows: "There is potential for naturally occurring wildfires in Alaska which can be substantial both esthetically and from a health standpoint. Forest wildfires emit visible pollution in the form of smoke, soot, and ash. Additionally, such

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		fires emit carbon monoxide, nitrogen oxides, and hydrocarbons. Smoke from fires can hurt the eyes, irritate the respiratory system, and worsen chronic heart and lung diseases. Additional information can be found at the Alaska Department of Environmental Conservation’s website: http://dec.alaska.gov/air/smoke_qa.htm ."
I0099-1	Thank you for the chance to comment on the proposed new Paxson MOA and expanded Fox 3 MOA. The proposed new Paxson MOA will take in hunting and fishing areas which have been used for generations by my family and my wife’s family. This area was not used for military training in the past. So the new – low and loud – sounds in the MOA will disturb the wildlife in the area and start unusual behavior in the animals. This is an important calving area for moose, caribou and Dall Sheep. The expanded Fox 3 MOA is over the Nelchina Caribou breeding grounds. That herd has sustained Alaska families for generations – in addition to my family. The Nelchina Caribou herd also provides an excellent sport hunting opportunity for out-of-state military personnel in both MOA areas (which I believe should continue).	The Nelchina caribou herd was identified by several commenters and management agencies as a valued resource for residents of Alaska. The Air Force will consider specific procedures to avoid sensitive areas during critical seasons to limit potential effects to these herds and to both subsistence and sport hunting opportunities. The FEIS and ROD will describe particular avoidance procedures that the Air Force will implement for this proposal.
I0099-2	<p>The proposed new Paxson MOA will take in hunting and fishing areas which have been used for generations by my family and my wife’s family. This area was not used for military training in the past. So the new – low and loud – sounds in the MOA will disturb the wildlife in the area and start unusual behavior in the animals. This is an important calving area for moose, caribou and Dall Sheep.</p> <p>The expanded Fox 3 MOA is over the Nelchina Caribou breeding grounds.</p>	<p>In Section 3.1.8.1, second paragraph, the following will be added just after the Figure 3-5 call-out: "for the Nelchina Caribou Herd." Animal responses to low-level flights have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. Please see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p> <p>The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight-restricted areas for pilot/aircraft safety and wildlife protection.</p>
I0099-3	I don’t believe the US Air Force needs more airspace in the Fox 3 MOA. The flat terrain in the expansion area gives no new training options which do not already exist in other existing MOAs. Having spent time in the 82nd Airborne, I know – and understand – the US military has enough training areas without locking up more airspace or land for training in Alaska. The US Air Force has locked up the Naknek 1 & 2, Stony A & B, Susitna areas for MOAs. All of those MOAs are closer than the proposed Paxson MOA.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska’s airspace. The comment to move new fifth generation fighter training and exercises to other MOAs in JPARC does not, however, meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Sections 1.2 and 1.3.

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	So your reasoning of needing closer aircraft training areas to Elmendorf is not justifiable. And you're moving all fighter aircraft out of Fairbanks, remember?	
I0099-4	While the US Air Force provides notifications and warnings about flying in MOAs, US Air Force pilots do not feel constrained by designated and published boundaries, routes, altitudes, or times. This observation and statement is from my flying and outdoor recreation experience within the Susitna, Copper, and Tanana basins.	<p>Aside from the MOAs, Air Force flight training may also be conducted within the Military Training Routes and the low-altitude tactical navigation area described in the Final EIS Section 3.1.1 and Appendix D. Please contact the 11th Air Force Airspace Management Office or the JBER or Eielson AFB Public Affairs Office regarding any flight activities you may observe and question outside of those approved training areas.</p> <p>Eielson Public Affairs (907) 377-2116 354fw.pa.publicaffairs@us.af.mil</p> <p>JBER Public Affairs (907) 552-8151 pateam@elmendorf.af.mil</p>
I0099-5	I love and believe in our military, but the military is our spoiled child – gimme, gimme, gimme. As parents (or taxpayers and owners of public lands) we have to say no to baseless “gimme’s”. I say that knowing whatever Alaska residents say, nothing will change what the military is planning to do. Thank for the opportunity to comment anyway.	Thank you for your comment. These comments indicate issues that are outside the purview of this EIS, either because they describe current operations or because they describe broader Department of Defense policy decisions. For further assistance with the issue please contact your local base Public Affairs Office or Alaskan Command Public Affairs at (907) 552-2341.
I0099-6	I will read further and try to find a designated corridor within the new Paxson MOA which would allow Alaska pilots unrestricted transit between Glennallen and Delta within the new Paxson MOA.	As noted in Appendix K (Mitigations, BMPs and SOPs), the need for any additional visual flight rule (VFR) corridors would be considered to minimize impacts on general aviation in the affected areas. Please contact the Eleventh Air Force Airspace Management Office on any questions you may have in this regard.
I0100-1	The "reality" of your military world is so completely out of sync with the natural world that -- if I could be King for a day -- I would shut down your whole shooting match -- forever. Humankind has been trying to negotiate conflicts with your methods for thousands of years. It ain't working. This endless escalation of human aggression -- always more, bigger, stronger, faster -- is totally nutso -- undesirable -- unsustainable. You will succeed in extinguishing Homo sapiens. We've got to find a better way. Like compulsory service in the Peace Corps.	Thank you for your comment. These comments indicate issues that are outside of the purview of this EIS either because they describe current operations or because they describe broader Department of Defense policy decisions. For further assistance with the issue please contact your local base Public Affairs Office or Alaskan Command Public Affairs at (907) 552-2341.
I0100-2	But for now, since I'm unlikely to be King for a day, I say NO -- to expanding Fox 3, NO -- to the Paxson addition. NO -- to flying below	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>5000'.</p> <p>I say YES -- to requiring you to fund independent studies of impacts, of your operations on wildlife -- especially in live ordinance areas.</p> <p>I say YES -- to prohibiting public access on military lands/roads using motor vehicles.</p>	
I0100-3	<p>I say YES -- to requiring you to fund independent studies of impacts of your operations on wildlife -- especially in live ordinance areas.</p> <p>I say YES -- to prohibiting public access on military lands/roads using motor vehicles.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
I0100-4	<p>I must complement the thoroughness of your presentation in Talkeetna. But the vast volume of information was presented with such unrelenting intensity as to feel like an assault --. Like a steamroller comin' through. It was overwhelming. The number of camouflaged military men in the small space was intimidating as well. One on one, good guys. But as a group, out of touch with their effect on people & life outside the military.</p>	<p>Public hearings were held in accordance with the process outlined in 32 Code of Federal Regulations (CFR) Part 989 (Appendix C). Alaska Command's (ALCOM's) intent in having military personnel present at the public hearings was twofold: (1) to have personnel that are directly involved and impacted by the JPARC proposals available to answer public questions and inquiries and (2) to have the personnel that are directly involved and impacted by the JPARC proposals hear public concerns firsthand. ALCOM's goal was to provide the best venues available in each community to have the public hearings and provide an atmosphere of ease and comfort for the public to provide their comments and input into the JPARC National Environmental Policy Act (NEPA) process.</p>
I0101-1	<p>Greetings,</p> <p>I attended the last meeting held at the Menard Complex in Wasilla. I have some comments regarding the project as it pertains to the vicinity of Lake Louise (including Susitna and Tyone). Everyone is aware of the growing uses in the close vicinity of the lakes in this area and also the much increased use of the surrounding lands for miles in all directions.</p> <p>1) I saw the military proposed alternative that moved the southern</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	boundary of the Fox 3 (MOA) expansion. In addition to that boundary move, I believe this boundary line should again be moved more northerly to totally avoid the entire lakes system. Whether you draw a line across the area from east to west or create a square or block area to remove the area all around all the lakes in the southeast part of the training area makes no difference. Let us not also forget about the lakes to the east of Lake Louise, i.e., Crosswind, Ewan, Fish and other small lakes in the immediate vicinity. It would be easy to remove the southeast block of this training area –again, my point is to have the military operations avoid the entire lakes system.	actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
I0101-2	2) The meeting brought forward comments regarding an Over Flight Avoidance Area. If, for some reason, the project area is not totally removed to avoid the entire lakes system, then this Over Flight Avoidance Area should be put in place due to impacts regarding noise, land use and flight safety. For this, training flights above ground level should be a minimum of 4000 feet.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
I0101-3	3) The next comment is for the military's proposed flight level of 500 AGL over the lakes area. This is not acceptable. At no time should the AGL be lowered to 500 feet over the entire lakes system. The noise created by the training at this low level is a huge disturbance itself to both the human population and game. This does not even include the projects proposed increase of a higher noise level from 35 to 50dB. This higher noise request is not acceptable for the entire lakes system.	The Air Force is considering and will implement feasible procedures to limit noise impacts on residents of the lakes area (Lake Louise, Susitna, and Tyone). This may include spatial avoidance and seasonal restrictions on overflight of these populated areas.
I0101-4	I do have another comment. I believe there should be minimum 3000 AGL along all the road corridors in all the training areas. This corridor should be a minimum of one (1) mile wide – with special attention given to the Denali Highway and Richardson Highway.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
I0102-1	As someone who recreates in the Talkeetna mountains and Denali Highway area for quiet wilderness experiences, I am opposed to a 500 foot AGL of aircraft flight in the FOX 3 MOA.....I have experienced an overflight like this in a remote valley, and it is the antithesis of a wilderness experience. Changing the minimum AGL flight level to 3,000 feet could be acceptable.	The effects of the Fox 3 MOA expansion and new Paxon MOA proposal on quiet and remote areas is described in Sections 3.1.10.3.1 and 3.1.10.3.2 of this EIS. The Air Force is considering and will implement feasible procedures to limit disruption to popular recreation areas and specially designated areas (such as State and National Wild and Scenic Rivers, parks, and wilderness areas) where quiet surroundings are valued. This may include spatial avoidance and seasonal restrictions on overflight of these populated areas.
I0102-2	To increase the minimum flight level from 5,000 feet AGL to 500 feet AGL over this huge area is unreasonable. There are many other people who use the area for many purposes which are in conflict with such low-flying, high-speed aircraft.	The effects of the Fox 3 and new Paxon MOA proposal on people and the many uses of the underlying area are described in Sections 3.1.10.3.1 and 3.1.10.3.2 of the EIS. The Air Force is considering and will implement feasible procedures to limit disruption to multiple uses (recreation, hunting, subsistence uses, residential, tourism and commerce) and specially designated areas (such as State and National Wild and Scenic Rivers, parks, and wilderness areas). This may include spatial avoidance and seasonal restrictions on overflight of some areas with particular concerns and resource values.
I0102-3	The Draft EIS for the JPARC Modernization and Enhancement does not consider the effects of low-flying (500 feet AGL) aircraft on wildlife. As a human being, I could quickly determine that the terror of a low-level flight over a ridge just ahead of me was not actually dangerous, just terrifying and heart-stopping when it's completely unexpected. How do calving moose and caribou react? What are the effects of these flights on all kinds of wildlife? The fact that the draft EIS does not consider the impacts on wildlife in these many thousands of square miles of habitat is unacceptable.	Section 3.1.8.3 in the DEIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 feet AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies reviewed included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. Other DEIS sections also consider the effects of low-level aircraft overflight on wildlife (e.g., Night Joint Training). The authors understand that wildlife may have different reactions than humans to the same stimulus and rely on the scientific literature that has systematically reviewed specific wildlife species responses to overflight. Please also see Appendix E for a review of research on effects, primarily from aircraft overflights, on wildlife species. The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection.
I0103-1	As I understand it, the plan is to close Eielson Air force base any move all aircraft to Elmendorf. While cost reduction is an admirable effort, Is this a wise move from a	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's military training facilities. The location of the F-16 Aggressor Squadron within Alaska is not connected, however, to the JPARC proposals. The Air

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<p>strategic standpoint?</p> <p>Consider all military A/C based at one location when an Earthquake hits and renders the runways inoperable and unable to launch.</p> <p>I remember the damage suffered by Anchorage from an earthquake. Do we really want to trust to fate and put all our "Eggs" in one basket ?</p>	<p>Force restructuring action to move the F-16 Aggressor Squadron from Eielson AFB to JBER is not included in the JPARC Modernization and Enhancement EIS. This move is a completely separate NEPA action and a separate NEPA document will be prepared to address the impacts of the restructuring program. The F-16 proposed relocation is also not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. The details of the proposed F-16 relocation and military training, including Major Flying Exercises such RED FLAG-Alaska, will be worked out in the coming months. The majority of the JPARC proposals that involve Eielson AFB are Army proposals and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft.</p>
I0104-1	<p>I am writing to you with my comments regarding the JPARC-EIS. I live in the area that you propose expanding for air space training called Fox 3 MOA and work in the same area as a health care provider.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0104-2	<p>I have huge concerns about the the overflight altitude being changed from minimum 5,000 feet above ground level (AGL) to minimum 500 feet AGL. The impact of noise on wildlife and human populations is very concerning. Not only will the noise affect where my family, friends and community members live, but also the huge number of tourists who come to our area to enjoy the peace and tranquility of rural remote areas of Alaska. My family and I hike and camp regularly in Denali State Park. Fox 3 MOA threatens these "public" lands and would make it impossible for the myself, my family and the public to enjoy time there.</p>	<p>The effects of the Fox 3 and new Paxon MOA proposal on communities and wildlife in the underlying area are described in Sections 3.1.10.3.1 and 3.1.10.3.2 of the EIS. The Air Force is considering and will implement feasible procedures to limit disruption to multiple uses (recreation, hunting, subsistence uses, residential, tourism and commerce) and specially designated areas (such as State and National Wild and Scenic Rivers, parks, and wilderness areas). This may include spatial avoidance and seasonal restrictions on overflight of some areas with particular concerns and resource values. There are no national parks underlying the proposal airspace.</p>
I0104-3	<p>The EIS does not sufficiently address the impact that the noise level would have on resident wildlife, the animals, birds, and fish. They will be impacted. There are suggestions in EIS to avoid lambing and calving areas and to study bald and golden eagle nesting areas, but these barely touch the vast number of other wildlife populations. If noise over a certain decibel level is a known stressor for humans, even with our ability to intellectually understand it, it follows that the same noise level will create significant stress for wildlife.</p>	<p>Section 3.1.8.3 in the EIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 feet AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor, and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. Other EIS sections also consider the effects of low-level aircraft overflight on wildlife (e.g., Section 3.5.8.3, Night Joint Training). The authors understand that wildlife may have different reactions than humans to the same stimulus and rely on the scientific literature that has systematically reviewed specific wildlife species' responses to overflight.</p> <p>The U.S. Air Force publishes a handbook for pilots that specifies where</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection.</p> <p>Please also see Appendix E (Noise) for a review of research on effects, primarily from aircraft overflights, on wildlife species, where additional fish research was added in response to comments.</p>
I0104-4	<p>I am in favor of the NO ACTION alternative for Fox 3, which would leave the areas at status quo. I could agree to an expansion of the area if flying was set at NO LOWER THAN 3,000 ft but it is my understanding that all other alternatives were withdrawn that left the minimum altitude at a higher level.</p> <p>Five hundred feet is too low.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.</p>
I0105-1	<p>I would like to keep access to the established trails open for public use. These established trails are Historic and recreational trails that are used for recreational camping and hunting. Examples of the trails are the Bonnfield trail and the Donnelly-Washburn trail.</p>	<p>The Air Force proposal to expand restricted airspace west of Delta Junction does not include any development or ordnance use on the land beneath the new area. Any trails under the new airspace would only be closed during the periods of activation for safety reasons. Once the proposed activity ceases, the new section of the restricted area would be reopened to recreational users via the Army Recreational Tracking System (USARTRAK) already in use.</p>
I0106-1	<p>Thank you for considering my comments regarding the JPARC- EIS.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0106-2	<p>1. I agree that the Air Force could be allowed to expand the range of area they can carry out training</p>	<p>Sections 3.1.10.3.1 of the DEIS acknowledges that noise associated with low-level overflight could lessen recreational experiences for some persons. Sections 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation such as seasonal avoidance areas; expanding the existing Delta National Wild and Scenic River and Gulkana National Wild River to include all portions within the new MOA boundaries; and avoiding overflight of popular hunting areas, campgrounds, and trails between June 27 and July 11. These areas including Brushkana Creek campground, Tangle Lakes campground, Paxson Lake campground, Clearwater Wayside, One Mile Creek/Wolverine Mountain, Tangle Lakes trail, Gulkana River raft trail, Castner Glacier trail Sourdough campground, Lake Louise State Recreation Area, Crosswind Lake, and Matanuska Valley</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		Moose Range. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0106-3	2. The Air Force should NOT be allowed to lower the altitude AGL for their operations.	The proposed Alternative E configuration and reserved use of the proposed Paxon MOA altitudes below 14,000 feet MSL for the six annual major flying exercises (MFEs) would reduce potential impacts on other airspace uses. The Air Force acknowledges that this would not fully alleviate your concerns over the use of those lower altitudes when other general aviation aircraft are operating within these areas. Newer (fifth) generation fighter aircraft must train at those lower altitudes, which are not sufficiently available in the existing training airspace. The extent to which that would occur would be limited to what is necessary to successfully meet those mission requirements. The EIS provides daily average estimates for those operations and includes existing and proposed mitigation measures that would be used to the greatest extent possible to help minimize impacts and ensure the safe, compatible use of this airspace by all concerned.
I0106-4	3. Fox 3 needs noise mitigation proposals. I believe the minimum altitude of 5000 feet AGL should be maintained for Fox 1, 2, and 3 in order to address biological, recreation, land use and subsistence problems caused by noise disturbance.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
I0106-5	4. Only 2 weeks a year for human recreational users? Why are hunters more important than the many humans who seek quiet recreation on our public lands?	The impacts to recreation from each proposal and proposed mitigation measures are discussed in Chapter 3 for each of the proposed actions.
I0106-6	5. Funding is needed to pay for wildlife studies to provide baseline data of current wildlife populations and behaviors.	Mitigation identified in the document for three of the definitive projects (Section 3.1.8.4 for the Fox/Paxon MOA, Section 3.2.8.4 for Realistic Live Ordnance Delivery, and Section 3.3.8.4 for Battle Area Complex Restricted Area Expansion) states, "Continue to monitor effects of military training including overflights on select wildlife species (especially herd animals, waterfowl, and raptors) and fisheries during critical seasons such as breeding, young-rearing, and migration. Use knowledge to develop and implement strategies to minimize disturbance to priority wildlife in existing and new

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>SUAs and restricted airspace. This would help natural resources and range managers to coordinate training schedules that minimize impacts on wildlife populations.” Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p> <p>Animal responses to low-level flights have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. Please see Appendix E for a review of research on effects, primarily from aircraft overflights, to wildlife species.</p>
I0107-1	<p>there is no reason at all to "modernize" this range. i believe this is an attempt to kill even more trees and wildlife. it would be better if you stayed on your own old turf, not look into new ones to destroy. there is too much impact from this. these training exercises should be done over afghanistan. stop destroying america.</p> <p>this comment is for the public record.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0108-1	<p>I believe the land should be left open to off road vehicles, and the trails keep open to off road vehicles</p>	<p>Thank you for your comment. There are no actions in the JPARC EIS that would change the current management policies governing off-road vehicle use on military or nonmilitary lands. For the Realistic Live Ordnance Delivery proposal, some areas and trails on military land may be less available for off-road public access and use during times when hazardous training is underway. Also, two new small temporary impact areas on Donnelly Training Area West may be identified as off-limits for off-road use. Similarly, access to some areas and trails within surface danger zones on state lands would be closed to off-road access during periods when hazardous training activities activate the use of new special use areas on state land. At other times, off-road use would remain unaffected.</p>
I0109-1	<p>No action alternative</p> <p>I live in this area and do not want defense maneuvers in the air at low elevations where all life will be impacted. Remain at the current levels</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0109-2	<p>I support a “NO ACTION” alternative</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0110-1	I have been a resident of Cantwell for 30+ years. As the pilot of a small aircraft I am greatly concerned about the proposed lowering of the Fox3 MOA to 500 feet and the increased traffic in the area from the diversion of Stony sortie missions to the Fox 3 MOA. A prime recreation area would be negatively impacted! The Fox 3 MOA encompasses prime recreational and wilderness area. There are only a few road systems in Alaska where private individuals have access to wilderness areas.	Chapter 3.1.1 of this EIS addresses the increase in traffic in the proposed new airspace. From Tables 3-1 and 3-4, the average daily sortie count increases 16 percent (from 19 to 22 per day) for routine training days. Impacts from the proposed action are covered thoroughly in the referenced chapter. The U.S. military has a great record of environmental stewardship in Alaska. There are mitigations being considered that alleviate impacts on certain areas of the proposed airspace. The need for low-altitude flight to accomplish training includes areas large enough for maneuvering and tactical deception utilizing terrain. It is not feasible to declare every cabin, animal, lake, and recreation area as "noise-sensitive" for the purpose of avoiding over flight. Any remaining areas would be too small and unusable for the stated purpose. The Air Force will attempt to avoid or minimize low-level flight where the most significant adverse impacts exist if the training can still be accomplished.
I0110-2	<p>The Fox 3 MOA overlies an area accessed by the Denali Highway as well as the Parks and Richardson Highways. The area is utilized by recreationalists, the tourist industry and hunters and fishermen.</p> <p>Recreation:</p> <p>Hikers -- the general public and the NOLS (National Outdoor Leadership School). The NOLS organization has six or more groups of 10-15 students hiking through various parts of the area through the early summer to the late fall season. Their emphasis is teaching leadership through participating in a wilderness experience.</p> <p>Tourism -- Bus tours over the Denali Highway during the summer season.</p> <p>Fishing -- Fishing along the Denali Highway and the lakes in the area which are accessed by road, ATV or airplane.</p> <p>Hunting -- Because of its access, the area is heavily hunted.</p>	Section 3.1.10.1 of the EIS acknowledges that the Fox 3 MOA overlies areas used for recreational activities, including camping, hunting, trapping, and fishing. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0110-3	I am greatly concerned about the proposed lowering of the Fox3 MOA to 500 feet and the increased traffic in the area from the diversion of Stony sortie missions to the Fox 3 MOA....	Section 3.1.8.3 in the EIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 feet AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor, and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Wildlife:</p> <p>Caribou, moose, bears, fox, lynx -- startled by more sonic booms-- the sound reverberates off the mountains when you're in a low valley -- I know it startles me every time.</p>	<p>calving/lambing seasons and in winter. Please see Appendix E (Noise) for a review of research on effects, primarily from aircraft overflights, on wildlife species. Sonic booms are also addressed in the document and Appendix E. As stated in the EIS Section 3.1.2, supersonic aircraft operations are permitted in the existing Fox 3 MOA/ATCAA down to 5,000 feet AGL or 12,000 feet MSL, whichever is higher. Overpressures from sonic booms for a variety of military jet aircraft in Mach 1.2 level flight at 10,000 feet AGL range from 4.4 to 5.7 pounds per square foot (psf) for the F-16 and F-22, respectively (see Table 3-6, Sonic Boom Peak Overpressures for Aircraft at Mach 1.2 Level Flight). Near the centers of Fox 3 MOA/ATCAA and the Paxon MOA/ATCAA, sonic booms would increase from about 4.6 to 5.2 per day on average.</p> <p>The U.S. Air Force publishes a handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Dall sheep lambing and migratory bird concentration areas are included in the flight restricted areas for pilot/aircraft safety (e.g., to avoid bird strikes) and wildlife protection. To reduce potential for disturbance under new airspace areas, the following measure was included in the EIS's Fox/Paxon MOA Section 3.1.8.4 (Mitigations): "Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information."</p>
I0110-4	<p>Birds -- many nesting swans on the numerous pothole lakes -- are disturbed by low-flying aircraft and also represent a collision hazard as do the eagles (I generally encounter an eagle on every flight).</p>	<p>Animal responses to low-level flights have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor, and wildlife seem to habituate to non-harmful stimuli over time. Many studies have included raptors and waterfowl. Please see Appendix E (Noise) for a review of research on effects, primarily from aircraft overflights, on wildlife species.</p> <p>Given the potential for loss or injury to aircrews and aircraft as a result of a bird-aircraft strike, extensive efforts are made by the military to avoid areas with high concentrations of birds (also described in the Safety discussion in Section 3.1.3.3, under Mitigations in Section 3.1.8.4, and Appendix G, Biological). The U.S. Air Force publishes a handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Migratory bird concentration areas are included in the flight restricted areas for pilot/aircraft safety (e.g., to avoid bird strikes) and wildlife protection. To reduce potential for disturbance under new airspace areas, the</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		following measure was included in the EIS's Fox/Paxon Section 3.1.8.4 (Mitigations): "Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information."
I0110-5	Birds -- many nesting swans on the numerous pothole lakes -- are disturbed by low-flying aircraft and also represent a collision hazard as do the eagles (I generally encounter an eagle on every flight).	The FEIS Flight Safety and Biological Resources sections for each airspace proposal address the different bird/wildlife species in the affected regions and the potential flight safety risks of a bird/wildlife-aircraft strike. As noted in these discussions, both the Air Force and the Army have implemented bird/wildlife-aircraft strike hazard (BASH) programs to help monitor and increase pilot awareness of those areas/altitudes where such hazards may exist. The 11th Air Force Airspace Handbook lists noise-/flight-sensitive areas, including bird migratory locations, where pilots are instructed to avoid by stated vertical and lateral parameters.
I0110-6	Environmental impact: Increase of emissions -- (246,313 tons CO2/yr plus the increased tonnage of chaff) -- that's significant!!	With respect to the increases in carbon dioxide (CO2) emissions, on February 18, 2010, the Council on Environmental Quality (CEQ) released its Draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions (CEQ 2010), but did not establish a significance threshold for CO2/greenhouse gas emissions. The draft guidance suggests that proposed actions that would be reasonably anticipated to emit 25,000 metric tons or more per year of carbon dioxide equivalent (CO2e) should be evaluated by quantitative and qualitative assessments. This is not a threshold of significance but a minimum level that would require consideration in NEPA documentation. The purpose of quantitative analysis of CO2e emissions in this EIS is for its potential usefulness in making reasoned choices among alternatives. With respect to impacts from chaff use, according to a Navy Research Laboratory study, "Environmental Effects of RF Chaff," virtually all radio frequency chaff is 10 to 100 times larger than particulate matter with a diameter of 10 microns (PM10) or 2.5 microns (PM2.5). The air quality impacts of chaff were evaluated by the Air Force in "Environmental Effects of Self-Protection Chaff and Flares." The study concluded that most chaff fibers maintain their integrity after ejection. Although some fibers may fracture during ejection, it appears that this fracturing does not release particulate matter. Consequently, the use of chaff under the proposed action would not result in any substantial air quality impacts.
I0110-7	GENERAL AVIATION WOULD BE GREATLY RESTRICTED IF THE	The concerns expressed over the proposed Fox 3 MOA expansion and Paxon MOA were considered when planning this proposal. While the Alternative E

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>500-FOOT FLOOR WERE ESTABLISHED!</p> <p>a. It is often too turbulent to fly below 500 feet in a small aircraft.</p> <p>b. There is no guarantee that military aircraft will remain above the 500-foot floor.</p> <p>(1) They have no warning system to alert them from straying beyond vertical parameter.</p> <p>(2) In simulated battle exercises it will be difficult to maintain situational awareness. The reaction time in these high-speed maneuvers would delay recovery.</p> <p>(3) The altitude restrictions of the existing boundaries are violated (based on personal observations and experiences of other local pilots) so there is considerable doubt that the 500-foot floor would be observed.</p> <p>c. There is more general aviation activity in the Fox 3 MOA area than is indicated by Flight Service statistics. Local pilots generally file flight plans with friends or company personnel.</p>	<p>configuration would avoid some higher use areas flown by civil aircraft, it is understood that this would not fully alleviate concerns with the lower altitudes proposed under any alternative. The areas and altitudes proposed for this expansion are essential in meeting combat training requirements for advanced aircraft capabilities and adversary tactics that were not yet a factor when the current Alaska training airspace was established 15 years ago. The Draft EIS includes discussion regarding possible increased flight risks when and where both military and civil aviation aircraft may be operating within the same area. For that reason, the existing and proposed mitigation measures addressed in the EIS Airspace Management and Flight Safety discussions and Appendix K would be used to the reasonable and practicable extent possible to help ensure the safe, compatible use of this airspace by all concerned. Those military aircraft observed operating at lower altitudes outside the boundaries of the existing MOAs may be conducting training flights along the charted Military Training Routes and within the low-altitude tactical navigation area (uncharted) described in the EIS Section 3.1.1 and Appendix D (Airspace). If you have any questions regarding how and where military aircraft currently operate, please contact the JBER or Eielson AFB Public Affairs Office, and they will direct you to the appropriate contact for answering your questions.</p> <p>Eielson Public Affairs (907) 377-2116 354fw.pa.publicaffairs@us.af.mil</p> <p>JBER Public Affairs (907) 552-8151 pateam@elmendorf.af.mil</p>
<p>I0110-8</p>	<p>No alternative listed</p> <p>When the initial proposal was released there was an option not to include the 500-foot floor. Although many general aviation pilots objected to the lower floor, this option was deleted. Now the only option is to "check and see if the airspace is active" and avoid it. That is like saying, "I'm in your backyard so don't come out of the house".</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Three alternatives were presented during the scoping process that were determined to not provide the lateral and vertical airspace structure required to fully achieve the stated objectives for expanding the current training airspace environment for the Fox 3 MOA Expansion and New Paxon MOA Addition proposal. Therefore, these alternatives, as noted in JPARC DEIS Section 2.1.1.3, Alternatives Considered But Not Carried Forward, were not carried forward. As indicated previously, Alternative E was added and analyzed as a more practicable and viable alternative for achieving the purpose and need required for this proposal.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
I0110-9	There are only a limited number of days in the summer and fall to fly. That is what keeps us going through the winter so if the weather's good I'm going flying and I hope I don't run into a fast-flying aircraft that I don't have time to avoid. I do support the military but surely there are some more remote areas where there would be less impact.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The statement expressed in the comment, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Sections 1.2 and 1.3.
I0111-1	please do not allow low fly area over tyone,susitna or lake louise,alaska area as having ben brought up in northern new york state 30 miles north of now abanded griffis afb i have personally witnessed the sound of low flying aircraft and no respect of people or animals living in the area. i am 63 & remember this very well also have a cabin in this area of lake louise.alaska	The Air Force is considering and will implement feasible procedures to limit disruption to residents of the lakes area (Lake Louise, Susitna, and Tyone). This may include spatial avoidance and seasonal restrictions on overflight of these populated areas.
I0112-1	support military training in Alaska. However, the proposed UAV corridors (and the proposed corridors to R-2211 in particular) create an undue burden on general and commercial aviation and create a negative impact on the human environment. When active, these corridors combined with the existing restricted airspace will negatively affect all civilian air traffic southeast bound from Fairbanks. General aviation traffic will either have to take circuitous detour around the restricted airspace, leading to increased time and costs for GA pilots, or fly below 1200 feet AGL. Funneling southeast bound general aviation traffic below 1200 feet AGL will create significant safety hazards. In addition, the proposed corridors along with the proposed MOA expansions will negatively affect commercial IFR traffic. I respectfully request that greater consideration be given to the impacts of the his proposed expansion on civilian aviation in Alaska.	As noted in the EIS Section 2.1.6, the FAA, DoD, and other agencies continue to collaborate on those near-, mid-, and long-term solutions for integrating UAV operations and supporting ground elements into the National Airspace System while ensuring they do not present any flight risks to other airspace users. Pending FAA decisions on how this can be done and further evaluation by the Alaska FAA Regional Office on the JPARC corridor proposals, it is imperative that the military proceed with identifying and evaluating those corridor options that would be required to support Army UAV missions. For that reason, a restricted area designation was assessed for these proposals as the most restrictive option each may have on other airspace uses. Pending the outcome of any decisions to be made on these corridors, the Army would schedule and use only those corridors/altitude layers required to support individual UAV mission needs to minimize impacts on other airspace uses.
I0113-1	The Federal government doesn't need 75% of Alaska for their use. It is a state, and belongs to the residents of Alaska and should be controlled by them. Not the military. Not BLM, and not the Park Service.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
I0113-2	The Federal government doesn't need 75% of Alaska for their use. It is a state, and belongs to the residents of Alaska and should be controlled by them. Not the military. Not BLM, and not the Park Service.	Your comment is noted. None of the proposals in the JPARC EIS involve acquiring land. The military is seeking to share the use of public (State and Federal) land and air assets to provide quality training for the U.S. military as an important national public purpose.
I0114-1	I will suggest not putting GA aircraft in such a tight corner around the delta area. Corridors for free movement must be allowed in order for incursions into restricted airspace and MOAs to be minimal. Please keep GA in mind when these changes are implemented.	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.
I0115-1	My comments still stand from my last entry. Thank you, Mark A. Bartlett [deleted for privacy]	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0116-1	I am an old us army aviator, 7 years active duty, 3 of those years at Ft. ww and have witnessed many unnessesary uses in the proposed areas...	While most public attention is on the charted MOAs and Restricted Areas where most flight training activities occur, you may have witnessed some aircraft types that must conduct lower-altitude training along Military Training Routes and the low-altitude tactical navigation area located within those regional areas where the new airspace is proposed. These training areas are described in the EIS Section 3.1.1 (Airspace Management) and shown in Appendix D (Airspace). Please contact the appropriate Air Force or Army installation Public Affairs office on any questions you may have on military flight activities, and you will be directed to the appropriate contacts for addressing your concerns. Eielson Public Affairs (907) 377-2116 354fw.pa.publicaffairs@us.af.mil JBER Public Affairs (907) 552-8151 pateam@elmendorf.af.mil USARAK Public Affairs (907) 384-1542 usarak.pao@us.army.mil
I0116-2	I am an old us army aviator, 7 years active duty, 3 of those years at Ft. ww and have witnessed many unnessesary uses in the proposed areas, I have tried to discuss this with all levels of command and ignored time and time again so why would I think you have any real concerns now, this is just another BS smokescreen to look good to some. We'll see if anyone will discuss any of this with me, I doubt anyone will.	In order for the environmental process to work for everyone, participation and communication are required. Detailed comments that address specific impacts you are concerned about can lead to compromises or mitigations that avoid or lessen them. The Alaskan Military Airspace Info website

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		(www.jber.af.mil/11af/alaskaairspaceinfo) provides information and schedules that will heighten the public awareness of Air Force operations. The Air Force maintains a hotline for complaints about noise or suspected violations of flight rules. Please contact 800-JET NOISE (538-6647) with as much detail as possible so we may research the incident fully. In the Fairbanks area you may also call Eielson Air Force Base Public Affairs at (907) 377-2116.
I0117-1	The EIS states that the MOA must have a floor of 500 feet AGL and at the same time says the airspace should minimize the interruption of commercial and general aviation traffic. This does not make sense. I am deeply opposed to the MOA having a floor of 500 feet AGL. It is virtually impossible to have a ceiling of 500 feet and still be safe for low flying general aviation traffic. Especially in this area where there is high small fixed wing traffic use for hunting and recreation. There are bound to be people killed even if there are scheduled use times.	The need for those lower altitudes is driven by advanced aircraft capabilities and adversary tactics that cannot be met within the limitations of the current training airspace environment. The Air Force acknowledges that training activities at those lower altitudes may adversely affect those pilots who are accustomed to operating at those altitudes without the presence of any military aircraft. The Air Force is also concerned over the challenges that shared use of this expanded airspace may present and is hopeful that reasonable solutions can be considered by all concerned through existing and proposed measures to help minimize interruptions to commercial and general aviation air traffic, to the greatest extent possible.
I0117-2	The military doesn't even adhere to the 5,000 foot ceiling now, as I have experienced low flying aircraft while recreating in the Tangle Lakes area. It ruins my day.	You may have observed aircraft operating at approved lower altitudes along the Military Training Routes or within the low-altitude tactical navigation area in this region that are addressed in the EIS Section 3.1.1 and Appendix D (Airspace). Please contact the Eielson AFB or JBER Public Affairs Office, who can direct you to the appropriate contacts for any questions you may have on observed military flights below 5,000 feet. Eielson Public Affairs (907) 377-2116 354fw.pa.publicaffairs@us.af.mil JBER Public Affairs (907) 552-8151 pateam@elmendorf.af.mil
I0117-3	The EIS states that the MOA must have a floor of 500 feet AGLThis kind of flight is not only dangerous to humans but also the wildlife - migrating swans, ducks, other birds, caribou, moose, small animals. It will displace and confuse them plus change migrating patterns that are detrimental to their survival.	Section 3.1.8.3 in the EIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 feet AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor, and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and waterfowl. Please see Appendix E (Noise) for a

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>review of research on effects, primarily from aircraft overflights, on wildlife species.</p> <p>Given the potential for loss or injury to aircrews and aircraft as a result of a bird-aircraft strike, extensive efforts are made by the military to avoid areas with high concentrations of birds (also described in the Safety discussion in Section 3.1.3.3, under Mitigations in Section 3.1.8.4, and Appendix G, Biological). The U.S. Air Force publishes a handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Dall sheep lambing and migratory bird concentration areas are included in the flight restricted areas for pilot/aircraft safety (e.g., to avoid bird strikes) and wildlife protection. To reduce potential for disturbance under new airspace areas, the following measure was included in the EIS's Fox 3/Paxon MOAs Section 3.1.8.4 (Mitigations): "Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information."</p>
I0117-4	<p>To me the area between Paxon and Cantwell is sacred and should be treated as such. It has a majestic beauty, peace, quiet and solitude that is hard to find in our human impacted world. I go there to hunt, berry pick, canoe and enjoy the quiet, solitude, and beauty. Please do not destroy it by impacting it with low flying aircraft.</p>	<p>Thank you for your comment. The Air Force will incorporate reasonable and feasible mitigations to reduce noise in popular and highly valued remote areas to the extent feasible. Selected mitigations will be included in the Final EIS and Record of Decision (ROD).</p>
I0117-5	<p>In one of the meetings the information was that the 500' level has never been implemented in a real war situation but that they want to practice it now because maybe in the future they might use it. I don't think this is justification to practice a 500' ceiling and jeopardize the lives of other people and wildlife.</p>	<p>The comment that "the 500-foot level has never been implemented in a real war" was misinterpreted from the public meeting. The statement made at those meetings referred to a nonexisting "floor" in a real war; a pilot will fly as low as possible to avoid detection. The military imposes floors in the Military Operations Areas (MOAs) because we share those airspaces in our country during peacetime.</p> <p>A 500-foot above ground level (AGL) floor in the Fox 3 and Paxon MOAs does place military aircraft in the same airspace as nonparticipating aircraft. Just as the Air Force currently shares low airspace in MOAs near Delta Junction, the new airspace will be made safe for all aircraft with a robust Special Use Airspace Information System (SUAIS) and maximum participation from pilots. This communications network allows a range control operator to inform pilots of the status of military airspace as well as the location of other nearby aircraft. The current SUAIS system would require significant infrastructure additions to cover the new airspace</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		adequately.
I0118-1	The military has enough training areas world-wide. Our family is firmly against any further JPARC Modernization and Enhancement.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0119-1	Thank you for this opportunity to comment on the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Environmental Impact Statement. The area that I am most familiar with is the Fox 3 MOA (Military Operating Area) which extends from the southern side of the Alaska Range between the Parks and Richardson Highways south across the Denali Highway to the northern part of the Talkeetna Mountains. I have backpacked in remote parts of the Talkeetna Mountains for many years. Currently the military practices aircraft maneuvers between 5,000 feet above ground level (AGL) to 18,000' above mean sea level in this area. The only alternative that I find acceptable is the No Action alternative. I am totally against Alternative A for the Fox 3 and Paxon MOA's. The area is too large and the minimum altitude of 500 feet is much too low. Alternative E makes the Fox 3 MOA smaller, but it is still too big and the minimum flight altitude is also 500 feet. I am not in favor of Alternative E. The only way Alternative E could be acceptable is if the minimum altitude is raised to 5,000 feet. The noise created by aircraft flying as low as 500 AGL over this huge area will adversely affect many backcountry users. There are mountaineers climbing in the eastern Alaska Range, many types of recreation takes place along the Richardson and Denali Highways, there are many cabin owners in the Lake Louise area, backpackers hike in the Talkeetna Mountains and hunters and fishers are throughout the entire area. It is becoming increasingly more difficult to find quiet places to recreate.	Section 3.1.10.3.1 of the EIS acknowledges that noise associated with low-level overflight could lessen recreational experiences for some persons. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation, such as seasonal avoidance areas; expanding the existing Delta National Wild and Scenic River and Gulkana National Wild River to include all portions within the new MOA boundaries; and avoiding overflight of popular hunting areas, campgrounds, and trails between June 27 and July 11. These areas include Brushkana Creek campground, Tangle Lakes campground, Paxson Lake campground, Clearwater Wayside, One Mile Creek/Wolverine Mountain, Tangle Lakes trail, Gulkana River Raft trail, Castner Glacier trail, Sourdough campground, Lake Louise State Recreation Area, Crosswind Lake, and Matanuska Valley Moose Range. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0119-2	Hearing fighters practicing overhead diminishes wilderness values considerably.	The Air Force recognizes that remote and pristine areas are highly valued in Alaska, and lack of sound is a key attribute of these areas.
I0119-3	I am concerned that low level military aircraft practicing in the region will adversely affect the wildlife. There are Dall sheeplambing in both the Alaska Range and Talkeetna Mountains and caribou calving in the northern Talkeetna Mountains (often in the region of the Oshetna River valley) in the spring, birds nesting including Trumpeter swans and other animals including moose in the region.	Section 3.1.8.3 in the EIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 feet AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor, and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and waterfowl. Please see Appendix E (Noise) for a review of research on effects, primarily from aircraft overflights, on wildlife species.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>The U.S. Air Force publishes a handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Dall sheep lambing and migratory bird concentration areas are included in the flight restricted areas for pilot/aircraft safety (e.g., to avoid bird strikes) and wildlife protection. To reduce potential for disturbance under new airspace areas, the following measure was included in the EIS's Fox 3/Paxon MOAs Section 3.1.8.4 (Mitigations): "Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information."</p>
I0119-4	<p>There are numerous general aviation and air taxi flights throughout the proposed expansion of Fox 3 and Paxon MOA's. Suddenly meeting high speed, low level military planes is both disconcerting and dangerous for these pilots and their passengers. I believe that low level military training flights will be very unsafe.</p>	<p>The concerns expressed over the proposed potential effects of the Fox 3 MOA/Paxon MOA on general aviation, air taxi, and other flights were considered when planning the proposal alternatives. While the Alternative E configuration would avoid some higher use areas commonly flown by these aircraft, it is understood that this would not fully alleviate concerns over lower level military flights that would occur under any alternative. The areas and altitudes proposed for this expansion are essential in meeting combat training requirements for advanced aircraft capabilities and adversary tactics that were not yet a factor when the current Alaska training airspace was established 15 years ago. The Air Force is also concerned over the safety of both military and civil aviation operations within the same airspace environment and would consider all existing and proposed mitigation measures noted in the EIS Airspace Management and Flight Safety discussions and Appendix K to help ensure the safe, compatible use of this airspace by all concerned.</p>
I0119-5	<p>I am totally against Alternative A and E of expanding the Fox 3 MOA and lowering the flight level from 5,000 feet AGL to 500 feet AGL. This size of MOA with such low flight levels would be very disruptive to the activities the public already enjoys in the area and could have detrimental effects to the regions wildlife.</p>	<p>Sections 3.1.10.3.1 of the EIS acknowledges that noise associated with low-level overflight could lessen recreational experiences for some persons. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation, such as seasonal avoidance areas; expanding the existing Delta National Wild and Scenic River and Gulkana National Wild River to include all portions within the new MOA boundaries; and avoiding overflight of popular hunting areas, campgrounds, and trails between June 27 and July 11. These areas include Brushkana Creek campground, Tangle Lakes campground, Paxson Lake campground, Clearwater Wayside, One Mile Creek/Wolverine Mountain, Tangle Lakes trail, Gulkana River Raft trail, Castner Glacier trail, Sourdough campground, Lake Louise State Recreation Area, Crosswind Lake, and Matanuska Valley</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		Moose Range. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0119-6	I am totally against Alternative A and E of expanding the Fox 3 MOA and lowering the flight level from 5,000 feet AGL to 500 feet AGL. This size of MOA with such low flight levels would be very disruptive to the activities the public already enjoys in the area and could have detrimental effects to the regions wildlife.	<p>Section 3.1.8.3 in the EIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 feet AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor, and wildlife seem to habituate to non-harmful stimuli over time. Please see Appendix E (Noise) for a review of research on noise effects, primarily from aircraft overflights, on wildlife species. The Recreation sections (in each Land Use section in Chapter 3) provide analysis of potential effects to the public use of lands.</p> <p>The U.S. Air Force publishes a handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Dall sheep lambing and migratory bird concentration areas are included in the flight restricted areas for pilot/aircraft safety (e.g., to avoid bird strikes) and wildlife protection. To reduce potential for disturbance under new airspace areas, the following measure was included in the EIS's Fox 3/Paxon MOAs Section 3.1.8.4 (Mitigations): "Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information."</p>
I0119-7	I believe the military can come up with creative ways to train in the existing Fox 3 MOA at the existing 5,000 feet AGL to 18,000 feet above mean sea level. It is not acceptable for the military to state that the "No Action" alternative is not satisfactory.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. As explained in Chapter 1, Purpose and Need for the Proposed Actions, Sections 1.2 and 1.3 of the Draft EIS, the decision on which alternatives the Army and Air Force will pursue will be made in light of the Purpose and Need by Army and Air Force representatives following the review of all relevant facts, impact analyses, mitigations, and comments received via the JPARC EIS public participation process.
I0120-1	How does this effect the availability of access to local resident hunters and fisherman?	The Land Use sections of the EIS (3.1.10, 3.2.10, etc.) describe the effect of the proposed actions on the availability of access to local recreational hunters and fisherman. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
I0120-2	What are the environmental impacts expected from the detonation of munitions and training?	Hazardous chemicals are released to the environment as a result of detonating munitions. Such releases can affect water quality, which in turn can cause adverse biological impacts. In addition, training activities can result in

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>incidental spills of petroleum products and hazardous materials, degradation of permafrost, and erosion-induced siltation of water bodies. These impacts are addressed in the Physical Resources, Water Resources, Hazardous Materials, and Biological Resources sections of all proposed actions involving live fire and/or ground disturbance: Realistic Live Ordnance Delivery (Section 3.2), Battle Area Complex Restricted Area (Section 3.3), Expand Restricted Area R-2205 (Section 3.4), Night Joint Training (Section 3.5), Enhanced Access to Ground Maneuver Space (Section 3.7), Tanana Flats Training Area Roadway Access (Section 3.8), Joint Air-Ground Integration Complex (Section 3.9), Intermediate Staging Bases (Section 3.10), and Missile Live Fire for AIM—9 and AIM-120 in the Gulf of Alaska (Section 3.11). More detail on the types of hazardous substances will be added to the Water Resources and Hazardous Materials sections.</p>
I0120-3	<p>What are the environmental impacts expected from the detonation of munitions and training?</p>	<p>Hazardous chemicals are released to the environment as a result of detonating munitions. Such releases can affect water quality, which in turn can cause adverse biological impacts. In addition, training activities can result in incidental spills of petroleum products and hazardous materials, degradation of permafrost, and erosion-induced siltation of water bodies. These impacts are addressed in the Physical Resources, Water Resources, Hazardous Materials, and Biological Resources sections of all proposed actions involving live fire and/or ground disturbance: Realistic Live Ordnance Delivery (Section 3.2), Battle Area Complex Restricted Area (Section 3.3), Expand Restricted Area R-2205 (Section 3.4), Night Joint Training (Section 3.5), Enhanced Access to Ground Maneuver Space (Section 3.7), Tanana Flats Training Area Roadway Access (Section 3.8), Joint Air-Ground Integration Complex (Section 3.9), Intermediate Staging Bases (Section 3.10), and Missile Live Fire for AIM—9 and AIM-120 in the Gulf of Alaska (Section 3.11). More detail on the types of hazardous substances will be added to the Water Resources and Hazardous Materials sections.</p>
I0120-4	<p>What are the environmental impacts expected from the detonation of munitions and training?</p>	<p>Hazardous chemicals are released to the environment as a result of detonating munitions. Such releases can affect water quality, which in turn can cause adverse biological impacts. In addition, training activities can result in incidental spills of petroleum products and hazardous materials, degradation of permafrost, and erosion-induced siltation of water bodies. These impacts are addressed in the Physical Resources, Water Resources, Hazardous Materials, and Biological Resources sections of all proposed actions involving live fire and/or ground disturbance: Realistic Live Ordnance</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		Delivery (Section 3.2), Battle Area Complex Restricted Area (Section 3.3), Expand Restricted Area R-2205 (Section 3.4), Night Joint Training (Section 3.5), Enhanced Access to Ground Maneuver Space (Section 3.7), Tanana Flats Training Area Roadway Access (Section 3.8), Joint Air-Ground Integration Complex (Section 3.9), Intermediate Staging Bases (Section 3.10), and Missile Live Fire for AIM—9 and AIM-120 in the Gulf of Alaska (Section 3.11). More detail on the types of hazardous substances will be added to the Water Resources and Hazardous Materials sections.
I0121-1	I live in the Susitna strategic air corridor. My main concern is safety for myself and my land. The planes fly so low they rattle the dishes in my cupboards! Jet do refueling maneuvers RIGHT over our hay fields!	The Air Force is also concerned over the flight safety of all military and civil aircraft operations that may occur within any existing or proposed training airspace environment. EIS descriptions and discussions of the Fox 3 and Paxon MOA proposals provide some perspective on the projected average use of this expanded airspace and typical use of lower altitudes by the different aircraft types. Because the safe, mutual use of the proposed expansion and lower altitudes would be of utmost importance, please be assured that the Air Force would seek every means possible to promote flight safety within this airspace. This includes continued/expanded use of advisories services, Midair-Collision Avoidance program initiatives, and other operational/safety measures discussed in the EIS Airspace Management and Flight Safety discussions along with consideration of the proposed mitigations (EIS Appendix K) to help ensure the safe, compatible use of this active airspace by all concerned.
I0121-2	There are many acres of undeveloped , uninhabited land in this Susitna Strategic air corridor, WHY use our 90 ac of cleared fields??? A pilot friend took me up to show me why, it is a great landmark , easy to find and meet each other but....come on there are many other spots just as easy to find without family or fortune at risk.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources. The comment to move existing Army and Air Force training areas to other Federal lands or remote locations in Alaska, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Sections 1.2 and 1.3.
I0121-3	I do not know specifics on all these proposed actions...How could I find out details of realistic Live ordnance,UAV access,missile live fire in Gulf of Alaska NO WAY!!! People live and work there. Many food animals live there. Go doink around in some other GUIf!	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0122-1	Our previous comments have gone unheeded and the the probable danger has been disregarded in the EIS. We should not have to comment again now for the same things we said in our previous comments the first go around, and I feel many that commented the first time may not again this time and their	Public and agency input does make a difference. Thank you for your input. The National Environmental Policy Act requires Federal government agencies to consider public input during preparation of the Draft EIS. The purpose of the input obtained during the scoping process is to assist the EIS

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	previous comments will not be counted.	preparers in identifying and addressing the issues that are important to the public. The Federal agency then has agency discretion as to whether or not or how to modify proposed actions and alternatives. The Draft EIS addresses the potential environmental impacts from the alternatives proposed once they have been more clearly defined. In the Final EIS, the government must not only consider public and agency input, but also must respond to substantive input in the Final EIS and before making final decisions. ALCOM, the U.S. Army, and the U.S. Air Force have considered Draft EIS comments in this Final EIS preparation.
I0122-2	I am certain that safety would be severely compromised if high speed fighter jets were turned loose to train in the same airspace that we routinely fly with small, slow and hard to see planes for game counts and captures, predator control, and recreational hunting and fishing. The chances of a mid-air collision would be unacceptable.	The Air Force is also concerned over the flight safety of all military and civil aircraft operations that may occur within any existing or proposed training airspace environment. EIS descriptions and discussions of the Fox 3 and Paxon MOA proposals provide some perspective on the projected average use of this expanded airspace and typical use of lower altitudes by the different aircraft types. Because the safe, mutual use of the proposed expansion and lower altitudes would be of utmost importance, please be assured that the Air Force would seek every means possible to promote flight safety within this airspace. This includes continued/expanded use of advisories services, Midair-Collision Avoidance program initiatives, and other operational/safety measures discussed in the EIS Airspace Management and Flight Safety discussions along with consideration of proposed mitigations (EIS Appendix K) to help ensure the safe, compatible use of this active airspace by all concerned.
I0122-3	I am opposing lowering of the floor of the expanded Fox 3 MOA and new Paxson MOA to 500 feet from 5000 feet. I am also opposing the expansion of these areas, especially if the floor is lowered. I have flown many thousands of hours at lower levels and lower speeds in small planes for the past 40 years in this area for business and recreation and continue to do so. There are many others that fly more and some less than I do.	As noted in the response to your other comment, the Air Force is also concerned over the flight safety of all military and civil aircraft operations that may occur within any existing or proposed training airspace environment. EIS descriptions and discussions of the Fox 3 and Paxon MOA proposals provide some perspective on the projected average use of this expanded airspace and typical use of lower altitudes by the different aircraft types. Because the safe, mutual use of the proposed expansion and lower altitudes would be of utmost importance, please be assured that the Air Force would seek every means possible to promote flight safety within this airspace. This includes continued/expanded use of advisories services, Midair-Collision Avoidance program initiatives, and other operational/safety measures discussed in the EIS Airspace Management and Flight Safety discussions along with consideration of proposed mitigations (EIS Appendix K) to help ensure the safe, compatible use of this active airspace by all

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		concerned.
I0123-1	My personal opinion is this is a land grab. The airspace in use already is larger than the state of Florida. Larger than New England. If the needs cannot be met within this HUGE airspace, something is wrong with airspace management. There is no battle area larger than the airspace currently in use.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use. A number of the proposals request expanded and additional Military Operations Area (MOA) or airspace for restricted areas in order to meet the purpose and need expressed in Chapter 1, Purpose and Need for the Proposed Actions.
I0123-2	The proposed plans would have a major impact on general aviation within the interior.	The impacts that each airspace proposal may have on general and commercial aviation in the region are addressed in the EIS Airspace Management and Flight Safety sections. Mitigations to be considered for these impacts are noted in those discussions and Appendix K (Mitigations, BMPs, and SOPs). Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
I0123-3	Also, the USAF command has shown that their word is no good. Red Flag was promised not to conflict with hunting season. Beginning in 2010 it conflicts, when asked why or if the dates could be changed, the answer was because of other restrictions and no the dates could not be changed. If no concerned is shown for this issue, how can you be believed on other issues?	The Record of Decision of 1997 for the Alaska Military Operations Areas EIS, paragraph 4.1 states, "The Air Force will conduct no MFEs (i.e., RED FLAG) in the months of September, December, and January in order to minimize potential adverse impacts to sport and subsistence hunting and other late season recreation and aviation activities." This restriction has been complied with continually.
I0123-4	Red Flag was promised not to conflict with hunting season. Beginning in 2010 it conflicts, when asked why or if the dates could be changed, the answer was because of other restrictions and no the dates could not be changed. If no concerned is shown for this issue, how can you be believed on other issues?	The Record of Decision of 1997 for the Alaska Military Operations Areas EIS, paragraph 4.1 states, "The Air Force will conduct no MFEs (i.e., RED FLAG) in the months of September, December, and January in order to minimize potential adverse impacts to sport and subsistence hunting and other late season recreation and aviation activities." This restriction has been complied with continually.
I0124-1	"Freedom is not Free" however if the costs of Freedom disenfranchises the rights of the Free...then Freedom is lost.	The Air Force recognizes that there will potentially be some impacts to people in the affected region of influence under the proposed actions. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
I0124-2	The proposed low level F-16/22 interception flights will have adverse effects on the resident sheep and caribou populations in the Talkeetna Mountains, as well as avian populations. The research has already been done by Alaska Department of Fish and Game, ADF&G, in pass MOA studies.	The continuation of mitigation measures (such as seasonal flight floor restrictions over lambing and calving areas) based on these past documents are included in the EIS (Appendix G, Biological Resources) with the intention to adapt the language to apply to specific JPARC actions subsequent

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		to internal review. In addition, to reduce potential for disturbance under new airspace areas, the following measure was included in the EIS's Fox 3/Paxon MOAs Section 3.1.8.4 (Mitigations): "Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information." Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0124-3	My freedom to fly these mountains in search of game is what Freedom means to me!!!!	The Air Force recognizes that there will potentially be some land use, access, and recreation impacts to the population in the affected region of influence under the proposed actions. Section 3.1.10.3 addresses the potential environmental consequences to land use, access, and recreation. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
I0124-4	ADF&G data shows that this area is contains some of the most heavily use areas by Alaskan Hunters, so many others go to these mountains to experience their Freedom also.	Section 3.1.10.1 of the EIS acknowledges that the Fox 3 MOA overlies areas used for recreational activities, GMUs 13A, 13B, 13C,13E, 14A (small portion), 14B (small portion), 20A (small portion), and 20D. Figure 3-11 shows the hunter use days in the JPARC region of influence. As stated in Section 3.1.10.1, over 90 percent of hunter success in GMUs 13, 14, and 20D occurs between mid-August and late September, with another short surge from the end of October to early November. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0124-5	Please Do Not Destroy My Freedom!	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
I0125-1	I doubt that you fear the wake turbulence of my C170B and it is unlikely that I will startle you by getting too close for comfort. You probably have me spotted or targeted on radar and a variety of other instruments before I know you are in the area. You are also travelling 2 to 3 times as fast. I would guess you could fly through me and leave a faint red mist and a shower of aluminum with scarcely a bump. My day will not end so well. Perhaps this sounds a bit melodramatic, but it illustrates a point that I believe is accurate. I do not believe DOD is an advocate for GA in Alaska. I do believe that DOD operations increase the risk of GA accidents in the vicinity of Anchorage and the Mat Su Borough. I oppose the JPARC expansion and do not want to see fast and heavy aircraft operating at low levels outside the	Your concerns on the JPARC expansion are noted and have been addressed in the Final EIS analyses. Flight safety and the potential for a midair collision between any aircraft types operating within the same airspace environment are always a major concern, regardless of the size, airspeed, and ownership (military or civilian) of each aircraft. Additionally, military pilots will use radar systems, see and avoid, traffic advisories, and any other available means to maintain a safe operating distance from nonparticipating aircraft operating within all areas in which training activities are conducted. Those aircraft pilots may not always be aware that their presence has already been detected and flight courses/altitudes adjusted as necessary to avoid any close encounters. Such safety practices are standard for military pilots in any

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	current MOAs.	training airspace environment that would include the JPARC airspace proposals.
I0125-2	I was also disappointed to hear that the attitude of the DOD pilots is that it is not inappropriate to mix up C17s and C130s with general aviation (GA) traffic at low levels as long as we are listening to your position reports on the proper frequency.	The potential for a midair collision between any aircraft type operating within the same airspace environment is always a major concern, regardless of the aircraft mix (i.e., size, airspeed, and onboard equipment capabilities) and ownership (military or civilian). Additionally, military pilots will use radar systems, see and avoid, traffic advisories, and any other available means to maintain a safe operating distance from all nonparticipating aircraft within the training airspace. Such practices will always be a critical aspect of a military pilot's flight activities in the current training airspace and any new airspace that may result from the JPARC proposals.
I0126-1	No to expanding the MOA's. The military has enough space now. This is a airspace grab. I am a 30 year Air Guard veteran.	Training and airspace needs change over time as aircraft capabilities, weapons systems, and adversary tactics advance. The purpose, need, and potential impacts of each airspace proposal are well-documented and assessed in the EIS along with those mitigations that would be considered to minimize those impacts.
I0127-1	The photo I am sending is one of the few that I have. This plane had just barely cleared the house. I am standing in front of my two story house, on my lawn. This perspective looks like he is high, but in fact had been very low. Sadly the camera perspective pushes the image away. This plane is one of the six that came through.	It appears that the C-17 aircraft in the noted photo may have been conducting training operations within the low-altitude tactical navigation (LATN) training area discussed in the EIS Airspace Management Section 3.1.1 and shown in Appendix D (Airspace). This area consists of a large rectangular expanse of airspace encompassing much of the JPARC airspace and is used mostly by C-17 and C-130 aircraft for nonhazardous, low-level training. These aircraft are limited to 500 feet AGL and above and airspeeds of 250 knots (288 statute miles per hour) while operating within this LATN and are precluded from flying over the same points more than once per day. (It is difficult to determine at what altitude the aircraft in the photo may be.) Aircraft are required to avoid airfields, towns, noise-sensitive areas, and wilderness areas by prescribed vertical and/or horizontal distances.
I0127-2	I am responding to your e mail because I am very disturbed about the consequences of JPARC restricting this areas' air space. The last two weeks we experienced your, "Red Flag" exercise in this area. It was unbelievable the amount of sonic booms we incurred. One was executed under 5000 feet.	Please continue to contact the Eielson AFB or JBER Public Affairs Office with any such questions and concerns you may have on military aircraft operations in your area. Military flight training activities are conducted within the approved Military Operations Areas (MOAs), Restricted Areas, Military Training Routes, and the low-altitude tactical navigation training area described and depicted in the EIS Airspace Management and Use discussions (Section 3.1.1) and Appendix D, Airspace. The Air Force will take appropriate actions any time it is confirmed that a military aircraft conducted training activities, including supersonic flight, outside of those designated areas and altitudes approved for those operations. The same

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>would hold true for any future training airspace that may be implemented as a result of the JPARC airspace proposals.</p> <p>Eielson Public Affairs (907) 377-2116 354fw.pa.publicaffairs@us.af.mil</p> <p>JBER Public Affairs (907) 552-8151 pateam@elmendorf.af.mil</p>
I0127-3	Calling the Air Force number in Fairbanks has had no response to complain or express our concerns.	The Air Force maintains a hotline for complaints about noise or suspected violations of flight rules. Please contact 800-JET NOISE (538-6647) with as much detail as possible so we may research the incident fully. In the Fairbanks area you may also call Eielson Air Force Base Public Affairs at (907) 377-2116. As long as you leave contact information, you will be contacted after the research has been done on the details you provide.
I0127-4	I had called FAA to express my concern with the C170's. They were flying too close to my house, and on the last day of your exercise, it had barely missed my house. I did get pictures and I was very shook up. My neighbors are higher in elevation than I am. They (airplanes) had to take evasive actions to miss their houses, but were out of room by the time he got to my house. Had his landing gear been down, I would not be writing this e mail. He was flying carelessly and in a reckless manner. I am in a residential neighborhood, and the pilots can see that. If this is what we are in store for when you restrict the air space for training, you will have a detrimental effect and impact on this area. This will have been the second time my house has been a near miss. I fear for a third.	<p>The Air Force makes great efforts to educate the public on what type of activity to expect in the different airspaces in Alaska. Flight at 300 feet above ground level (AGL) can look like the aircraft are right on the tree tops. The FAA and Air Force rules require 500 feet of clearance from any person, structure, or vessel; please note that this is less than two football fields. Crews are highly skilled and trained to operate at low altitude safely.</p> <p>Knowing what type and where to expect aircraft operations will lessen the impact on many people. The Alaskan Military Airspace Info website (www.jber.af.mil/11af/alaskaairspaceinfo) provides information and schedules that will heighten the public awareness of Air Force operations. The Air Force maintains a hotline for complaints about noise or suspected violations of flight rules. Please contact 800-JET NOISE (538-6647) with as much detail as possible so we may research the incident fully. In the Fairbanks area you may also call Eielson Air Force Base Public Affairs at (907) 377-2116.</p>
I0127-5	During training, these pilots do not take care of who they will be disturbing, or if sonic booms are way too loud and in need of having ear protection on, if on land.	<p>Aircrews should be flying within existing training airspace and in accordance with all existing rules and regulations. If aircraft are observed operating outside of rules and regulations, feel free to contact the Eielson AFB Public Affairs Office to file a complaint.</p> <p>Under the proposed action, supersonic flight would continue to be allowed</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		<p>only at altitudes above 5,000 feet above ground level (AGL) or 12,000 feet above mean sea level (MSL), whichever is higher. Under the proposal to expand Fox 3 MOA and establish Paxon MOA, the area in which supersonic flight could be conducted at these altitudes would be increased. Sonic boom frequency and intensity would be generally comparable to intensities and frequencies experienced beneath existing airspace units that permit supersonic operations.</p> <p>The risk of hearing loss associated with proposed training operations would be low. With regard to the likelihood of noise-induced hearing loss, the duration of sound is as important as its level. Beneath training airspace, the duration of intense noise events is typically short. High noise levels from low-altitude flight are, of course, a concern and have been specifically studied.</p> <p>Nixon (1993) measured changes in human hearing from noise representative of low-flying aircraft on Military Training Routes (MTRs). The potential effects of aircraft flying along MTRs are of particular concern as the maximum overflight noise levels can exceed 115 decibels (dB), with a rapid increase in noise level exceeding 30 dB per second. In that study, participants were first subjected to four overflight noise exposures at A-weighted levels of 115 dB to 130 dB. One-half of the subjects showed no change in hearing levels, one-fourth had a temporary 5-dB increase in sensitivity, and one-fourth had a temporary 5-dB decrease in sensitivity. In the next phase, participants were subjected to up to eight successive overflights, separated by 90-second intervals, at a maximum level of 130 dB until a temporary shift in hearing was observed. The temporary hearing threshold shift showed a decrease in sensitivity of up to 10 dB.</p> <p>Ising (1999) measured temporary threshold shifts of 115 test subjects between 18 and 50 years old after laboratory exposure to military low-altitude flight (MLAF) noise. The results indicate that repeated exposure to MLAF noise with maximum noise levels greater than 114 dB may have the potential to cause permanent noise-induced hearing loss, especially if the noise level increases rapidly.</p> <p>The most pertinent result was that of Nixon, who showed no ill effects from a sequence of four successive exposures up to 130 dB but hearing damage risk at twice that exposure. Ising replicated the result that hearing damage risk is</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>associated with repeated exposure to this type of noise event. In the proposed action, exposure to single events at this level will be rare, and exposure to multiple events comparable to (or even approaching) those in Nixon’s study will not occur. The primary adverse effect will be surprise or startle, as stated in this EIS.</p> <p>Eielson Public Affairs (907) 377-2116 354fw.pa.publicaffairs@us.af.mil</p> <p>JBER Public Affairs (907) 552-8151 pateam@elmendorf.af.mil</p>
I0127-6	<p>If my house was almost hit, how close will you be to the pipeline and the pilot cannot divert an obstacle? They are putting themselves, as well as innocent civilians in danger with these training missions. I repeat,,it is reckless endangerment with the tactics they use. I am forwarding this as well as the pictures to Senator Murkowski, and anyone else who will listen. I do not want to see any of your pilots crash,,and I do not want to be in their line of sight if such a tragedy should occur.</p>	<p>Your comments and concerns are noted, as no one wants to see any aircraft mishaps under any circumstances. The public may not fully understand to what great lengths the military goes to make flight safety such a top priority for its flight training operations. Pilots are well-trained in all flight safety measures and precautions that must be taken to prevent any type of mishap, whether it be a collision with another aircraft or ground obstacles, or other conditions that would put anyone’s life at risk, including the pilot’s. All pilots are trained not to take any risks that would endanger themselves or others. Please continue to contact the appropriate installation Public Affairs Office to report any conditions that may be putting you or others in jeopardy.</p> <p>Eielson Public Affairs (907) 377-2116 354fw.pa.publicaffairs@us.af.mil</p> <p>JBER Public Affairs (907) 552-8151 pateam@elmendorf.af.mil</p>
I0128-1	<p>Please register this letter to be an indication of strong support for the draft JPARC Modernization and Enhancement Environmental Impact Statement.</p> <p>I am privileged to encourage the Department of Defense to utilize Alaska’s assets needed to train America’s fighting forces. Alaska offers the geography, the space, the global location, and the isolation to effectively and efficiently train for combat in near real-world situations.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>As a participant in the MOA expansion in the mid-nineties, I am aware of the many concerns and promises made during this expansion process. While occasional conflicts have occurred, one can only proclaim the past effort a resounding success. I am confident our military and civilian leaders will make every effort, in this necessary new expansion, to maintain mission joint readiness while keeping safety as the utmost consideration and local impact to the absolute minimum.</p> <p>Thank you for the opportunity to provide input and please advise if I may assist further.</p>	
I0129-1	<p>To the person who will ultimately make the final decision on this.</p> <p>Regarding the JPARC. I am totally against any expansion. You do not need it.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0129-2	<p>first of all the reality of fighting in the environment you train in is NIL. the enemy would die just trying to access area's like that, be consumed by mosquito's and black flies, maybe fall in a crevasse.</p> <p>the second reason is that as you remove airspace, you remove freedom to travel around our state and the continental 48 states... would you as a military enlisted person, who is supposedly trying to protect OUR freedom, and receives his/her pay from the hardworking people of the US. Would you want to be responsible of taking away more freedom from the Men and Women of this country than you are giving. Think about what you are doing very hard before you make these decisions. No more whittling away at our freedom.</p>	<p>Thank you for your comment. These comments indicate issues that are outside the purview of this EIS, either because they describe current operations or because they describe broader Department of Defense policy decisions. For further assistance with the issue please contact your local base Public Affairs Office or Alaskan Command Public Affairs at (907) 552-2341.</p>
I0130-1	<p>I do not support any use of State of Alaska land or air space.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0130-2	<p>The U.S. Federal government has control of 60% of land in Alaska. No more land or space put under your control.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use. A number of the proposals request expanded and additional Military Operations Area (MOA)</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		or airspace for restricted areas in order to meet the purpose and need expressed in Chapter 1, Purpose and Need for the Proposed Actions.
I0130-3	I can not hunt fish trap on most Federal lands now. I will not give you more. My solution to you is for the Federal government to give back control of Fish and Game to the State of Alaska. Then give us all the land we were entitled to in the State Hood Act.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0130-4	Use your own Federal land. You claim ownership of 60% Alaska.	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska’s resources. The comment to move existing Army and Air Force training areas to other Federal lands or remote locations in Alaska, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Sections 1.2 and 1.3.</p> <p>Additionally, The proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use.</p>
I0130-5	I used to Hunt, Fish, Trap on most land in Alaska freely. Now the military and Federals all say no to use. Unless I’m willing to tell them how long I’ll be on the land, obtain Federal permits, agree to give up all my rights as a free citizen. Taking of Fish, Game, Fur can not be done except for those chosen few you endorse.	<p>The Alaska Department of Fish and Game (ADFG) administers the State’s Game Management Units (GMUs) and regulates all activities—e.g., hunting seasons, bag limits, weapons restrictions, accessibility—for those GMUs. Detailed information on the hunting regulations and restrictions within each GMU is included in Appendix I (Land Use). Current regulations and restrictions can be found on the ADFG website: http://www.adfg.alaska.gov/index.cfm?adfg=huntingmaps.gmuinfo. All Federal and State hunting laws apply within military lands that are open for hunting. All recreational users on designated military land must sign in to the USARTRAK system before proceeding to their intended fishing or hunting area.</p>
I0130-6	Once you take the land we will never get it back again.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use. A number of the proposals request expanded and additional Military Operations Area (MOA) or airspace for restricted areas in order to meet the purpose and need

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		expressed in Chapter 1, Purpose and Need for the Proposed Actions.
I0130-7	In the years past I have been harrassed by military operations during hunting season on State lands. I live a subsistence life style but its not a Federal subsistence life style. Its a State of Alaska subsistence life style.	The EIS describes potential impacts to subsistence activities (Federal and State) in each proposed action's Subsistence discussion (Sections 3.1.13, 3.2.13, etc.). Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
I0130-8	The State of Alaska has all its citizens given equal access to land and resources. You Federals give access to only those who you personally choose. Our founding fathers had the right idea. You new fellows messed it up. Better get out a copy of the constitution and read it over. I'd suggest more than once.	Department of Defense Directive 4715.3, Environmental Conservation Program, May 3, 1996, states, "...Those [Department of Defense] lands shall be made available to the public for educational or recreational use of natural and cultural resources when such access is compatible with military mission activities, ecosystem sustainability, and with other considerations such as security, safety, and fiscal soundness. Opportunities for such access shall be equitably and impartially allocated." Fort Wainwright strives to maintain an interactive relationship with local communities by providing as many opportunities for public access to all citizens, regardless of military affiliation, as allowed by current military training, military security, safety and environmental conditions. Traditionally, there have been ample opportunities for the public to participate in recreational activities on Fort Wainwright lands. In maintaining a liberal policy of public access, Fort Wainwright relies on a responsible public to adhere to installation policies designed to promote physical security, minimize safety hazards, and protect natural and cultural resources.
I0131-1	As local Fairbanks pilots and considering the recent moves of our F16s from Eielson to ANC this proposal for more airspace is way out of line. We oppose this airspace grab and can't begin to understand why you want to remove personel and increase military airspace use. Please abandon your requests. Thank you	The F-16 aggressor squadron proposed relocation from Eielson AFB to Joint Base Elmendorf-Richardson is not connected to the proposals for airspace adjustments contained in the JPARC EIS. The airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska based F-22 fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower-altitude airspace to reflect the types of combat in which fifth-generation F-22 fighters would be engaged. The F-22s have the capability to initiate combat at greater distances than fourth-generation fighters, such as the F-16, so fourth-generation fighters must apply diverse tactics that require airspace expansion in distance and altitude. The F-22s must train to combat all such threats regardless of where the aggressor aircraft are based. The location of the F-16 aggressor squadron within Alaska is not a connected action to the JPARC proposals. The majority of the JPARC proposals that involve Eielson AFB are Army proposals, and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft. The details

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>of the proposed F-16 relocation and training , including major flying exercises (MFEs) such as RED FLAG–Alaska, will be worked out in the coming months. An environmental analysis will be prepared to address the environmental consequences of the proposed F-16 relocation within Alaska.</p>
<p>I0131-2</p>	<p>As local Fairbanks pilots and considering the recent moves of our F16s from Eielson to ANC this proposal for more airspace is way out of line. We oppose this airspace grab and can't begin to understand why you want to remove personel and increase military airspace use. Please abandon your requests. Thank you</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The location of the F-16 Aggressor Squadron within Alaska is not connected to the JPARC proposals. The Air Force restructuring action to move the F-16 Aggressor Squadron from Eielson AFB to JBER is not included in the JPARC Modernization and Enhancement EIS. This move is a completely separate NEPA action and a separate NEPA document will be prepared to address the impacts of the restructuring program. The F-16 proposed relocation is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. The details of the proposed F-16 relocation and military training, including Major Flying Exercises such RED FLAG-Alaska, will be worked out in the coming months. The majority of the JPARC proposals that involve Eielson AFB are Army proposals and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft. Additionally, military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. General aviation is particularly important in Alaska as a means of commerce, subsistence, recreation and emergency transportation. In preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent reasonable and practicable.</p>
<p>I0132-1</p>	<p>Fox 3 MOA Expansion: Recommend the No Action Alternative. All other alternatives will result in further loss of access to and use of State lands for recreation and subsistence, more restrictions governing the use of land, and no viable method for communicating the closures of land effectively to stake holders.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use. A number of the proposals request expanded and additional military operations areas (MOA) or airspace for restricted areas in order to meet the purpose and need expressed in Chapter 1, Purpose and Need for the Proposed Actions. Additionally, military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. In preparing the Final EIS, the Army and Air Force will make every effort to harmonize mission requirements and community needs to avoid user conflicts or</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		mitigate conflicts to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0132-2	Realistic Live Ordinance Delivery: Recommend the No Action Alternative. The selection of any other alternatives that expand area will result in loss of Non DoD-owned/managed airspace-restricting pilots from flying this popular corridor. The loss of this airspace in particularly the Lake Louise area would be devastating to both recreational and commercial pilots, as the Lake Louise area is one of the States most popular year-round recreational areas. Limited road access makes flying in by small planes the only viable option for access year-round.	The need to control non-DoD-owned/managed lands by nonparticipants was a key consideration while examining the restricted area alternatives for meeting realistic live ordnance delivery requirements. The alternatives for this proposal considered that additional airspace necessary for this mission activity would be required only when the flight exercises are taking place, not all of the time. The Air Force and Army are striving to avoid, minimize, or mitigate any need to control land areas that are not currently government-owned and would otherwise be an impact on other aviation and land uses within the affected region. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0132-3	Lastly, consideration must be given to the continually declining populations of wildlife in the area. Caribou and moose are two wildlife populations that would be significantly impacted by Live Ordinance training and the losses as a result of this training on formerly State-Owned lands cannot be accurately assessed.	As stated in the Biological Resources impacts section for Realistic Live Ordinance Delivery RLOD (Section 3.2.8.3), ordnance aimed at new targets would be inert and used in target areas only. New target sites would be approximately 1 to 2 acres in extent and would be located within existing ordnance impact areas in DTA and TFTA. For north-south run-in headings, however, targets would be located within DTA-West, but outside of existing ordnance impact areas. Use of live ordnance would be confined to existing impact areas where the use of live ordnance is currently authorized. The siting criteria listed under the Biological Resources Section 3.2.8.4 (Mitigations) also assure that no valuable wildlife habitat will be used for targets, to minimize potential effects to the local wildlife.
I0132-4	Night Joint Training: Recommend Alternative A. Unmanned Aerial Vehicle Access: Recommend Alternative B.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0133-1	As a member of AOPA, The Alaska Airmen's Association, and the Fairbanks General Aviation Association. I would direct you to these organizations, well thought out responses to the proposal.	Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.
I0133-2	My own comment is just what you don't want to hear. There should be no more Airspace or land given up by the residents of the state of Alaska for military Training. If you need it, try to get it in the lower 48. See how that	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	works for you? Enough!	consideration of all comments provided during the public comment period of the Draft EIS.
I0134-1	<p>I am writing to express my opposition to more restricted airspace in the Delta Junction area, and along the routes to Fairbanks and Anchorage. I can and do work with the MOAs, but restricted airspace is already too much. More will only make recreation, work, and safe, expeditious travel so much harder for rural Alaskans. Below, I am including a conversation I had this week with the XO of the Predator UAS company that supports us here in Afghanistan. If you will read it, you will see what an experienced Army helicopter pilot thinks after reading about the proposed expansions in Alaska. Finally, I have a farm in Big Delta, my family is still there, and I am a bush pilot that is looking forward to coming home to the Interior. Previously I have worked in the Ground-based Midcourse Defense program at Fort Greely, and hope to be assigned there again. I fly my Cessna 170B in support of our farming, more quickly transporting my family around Alaska, on some TDYs, and recreationally for sightseeing, camping, fishing, hunting, etc. I hope that you will reduce your desired dependence on restricted airspace in the air corridors of Interior Alaska, especially over the Delta Junction area.</p> <p>CONVERSATION -----Original Message----- From: Tappen, Paul MAJ MIL USA USFOR-A Sent: Saturday, June 30, 2012 6:18 PM To: Earwood, Philip T CW2 TF Odin Company XO Subject: (U) Thanks for the Tour UNCLASSIFIED Chief!</p> <p>Below is a story about the proposed additional restricted airspace in Alaska, esp. in the Delta Junction area (my home). Read it and see how much you recognize. Thanks for the tour, photos and answers. I had a great time and my sons were pretty excited by the pictures, esp. the two boys in the Air Force. When I become the USFOR-A CJ2X in Oct, I plan on calling you guys. And if you need help w/anything here in Kabul, just call.</p> <p>Thanks, MAJ Bill Tappen NKC BSG XO [deleted for privacy]</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. JPARC is an important and vital component of the national defense strategy of the United States and is a key attribute of Alaska's value to the military in the twenty-first century. The Army and Air Force are required by NEPA to make the efforts required to harmonize mission requirements and community needs in order that user conflicts be avoided, minimized, or mitigated to the extent feasible and practicable. Additionally, military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. General aviation is particularly important in Alaska as a means of commerce, subsistence, recreation and emergency transportation. In preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century. There is no other place in America where the military has the opportunity to conduct state-of-the-art training in such diverse terrain and large areas required by fifth generation aircraft.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>AOPA seeks changes to large military airspace proposal in Alaska By Dan Namowitz Share on google_plusoneShare on twitterShare on emailShare on printMore Sharing Services1.AOPA is urging the Department of Defense to work with the aviation community to solve access and routing problems posed for general aviation by a revised special-use airspace plan for the Joint Alaska Pacific Range Complex (JPARC). Members may comment on the plan by July 9. In formal comments filed June 26, on the plan’s draft environmental impact statement, AOPA called for solutions to numerous concerns pilots have raised about proposed new uses, boundaries, and altitudes of the complex of land, sea, and air training areas that support military exercises in Alaska—known as the JPARC plan. The association opposed various parts of the plan and urged “utmost caution” in modifying other portions of the airspace, depended on by a \$3.5 billion state aviation industry, and providing access that “enables many small communities to exist.” “This range is already the largest military airspace complex in the country,” said Melissa McCaffrey, AOPA senior government analyst for air traffic. “Pilots should examine how the proposed changes would affect their ability to fly.” AOPA objected to a proposed significant expansion and lowering of the floor of a military operations area (MOA) in an area “frequently used by general aviation pilots and air taxi operators” to conduct air tours, support businesses, and provide access to recreational areas. Expansion of the Fox MOA should be minimized to avoid raising the risk of midair collisions near population centers including Anchorage, Fairbanks, and the Matanuska-Susitna (Mat-Su) Borough, AOPA said. Also, any expansion should be accompanied by increased coverage by the special-use airspace information service, which provides pilots with information about MOA use. AOPA expressed concern about lack of assurances that funding for program infrastructure would remain sufficient. Although existing T-routes and the instrument approaches provided by the Wide Area Augmentation System have increased IFR access, such gains could be “seriously degraded” by expanded MOAs, AOPA said, requesting in the formal comments that expansions be deferred until real-time IFR access through active MOAs can be effected. Another concern was the proposal to establish restricted airspace over the Battle Area Complex, near Delta Junction where winds and variable weather and the need to access a mountain pass already limit pilots’ navigational options. Proposed restricted corridors for the sole purpose of unmanned aerial vehicle operations—which the FAA has customarily rejected—“would clearly interfere with the safe</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>and efficient access between Fairbanks, the Richardson Highway Corridor and the Alaska Range,” AOPA said. The association has been calling for development of a reliable sense-and-avoid capability for UAVs, rather than creation of segregated airspace for their development. AOPA said the JPARC proposal provides an opportunity to study the Stony, Naknek, Susitna, and Galena MOAs “to determine if they are still required to meet modern training needs.” The results of the evaluation should be included in the environmental impact statement and made available for public comment. Members may comment on the proposal online, by email, or by mail to ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506. Please share your comments with AOPA.</p> <p>----- Response of XO of the Predator UAS company to Commenter: -----</p> <p>MAJ Tappen,</p> <p>It was a nice tour to hold. Thanks for the pictures. I love seeing the ones from Alaska, although it makes me feel homesick all over again! The article you forwarded was pretty interesting. It seems to me like we military have plenty of airspace without adding more to the Alaskan sectionals. What’s more, we don’t exclusively use the military airspace anyway. We can go wherever we want! One of the perks of flying in AK, to be sure. I would think more restricted/special use airspace is unneeded. Range control should be able to help coordinate altitudes for UAS when in operation and allow the flyers to be professional in their occupation. As long as the UAS use the current MOAs, range control could easily coordinate with other military users letting them know there is a UAV in the sky.</p> <p>Most Respectfully, PHILIP T. EARWOOD CW2, AV Executive Officer Aggressor 05 A/306 MI BN - TF ODIN [deleted for privacy] END OF CONVERSATION</p>	
I0134-2	<p>I am writing to express my opposition to more restricted airspace in the Delta Junction area, and along the routes to Fairbanks and Anchorage. I can and do work with the MOAs, but restricted airspace is already too much. More will only make recreation, work, and safe, expeditious travel so much harder for rural Alaskans. Below, I am including a conversation I had this week with</p>	<p>The Air Force and Army proponents for the respective JPARC proposals will be pursuing those mitigation measures noted in the EIS Appendix K (Mitigations, BMPs, and SOPs) and other viable options as the FAA examines the preferred airspace alternatives to determine how each could be implemented without adversely impacting other airspace uses. The UAV</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>the XO of the Predator UAS company that supports us here in Afghanistan. If you will read it, you will see what an experienced Army helicopter pilot thinks after reading about the proposed expansions in Alaska. Finally, I have a farm in Big Delta, my family is still there, and I am a bush pilot that is looking forward to coming home to the Interior. Previously I have worked in the Ground-based Midcourse Defense program at Fort Greely, and hope to be assigned there again. I fly my Cessna 170B in support of our farming, more quickly transporting my family around Alaska, on some TDYs, and recreationally for sightseeing, camping, fishing, hunting, etc. I hope that you will reduce your desired dependence on restricted airspace in the air corridors of Interior Alaska, especially over the Delta Junction area.</p> <p>CONVERSATION</p> <p>-----Original Message----- From: Tappen, Paul MAJ MIL USA USFOR-A Sent: Saturday, June 30, 2012 6:18 PM To: Earwood, Philip T CW2 TF Odin Company XO Subject: (U) Thanks for the Tour UNCLASSIFIED Chief!</p> <p>Below is a story about the proposed additional restricted airspace in Alaska, esp. in the Delta Junction area (my home). Read it and see how much you recognize. Thanks for the tour, photos and answers. I had a great time and my sons were pretty excited by the pictures, esp. the two boys in the Air Force. When I become the USFOR-A CJ2X in Oct, I plan on calling you guys. And if you need help w/anything here in Kabul, just call.</p> <p>Thanks, MAJ Bill Tappen NKC BSG XO [deleted for privacy]</p> <p>AOPA seeks changes to large military airspace proposal in Alaska By Dan Namowitz Share on google_plusoneShare on twitterShare on emailShare on printMore Sharing Services1.AOPA is urging the Department of Defense to work with the aviation community to solve access and routing problems posed for general aviation by a revised special-use airspace plan for the Joint Alaska Pacific Range Complex (JPARC). Members may comment on the plan by July 9. In formal comments filed June 26, on the plan's draft</p>	<p>corridors will be of particular interest as the FAA and DoD continue to explore, on a national level, how unmanned aircraft operations can be safely and effectively integrated into the National Airspace System. Pending future decisions on this integration, UAV operations can only be conducted in a restricted area or airspace approved through a Certificate of Authorization. The Alaska FAA Regional office will be examining if and how the Army's proposed UAV corridors can best be established to support required mission activities without creating any significant impacts on VFR and IFR air traffic flows and air traffic control capabilities.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>environmental impact statement, AOPA called for solutions to numerous concerns pilots have raised about proposed new uses, boundaries, and altitudes of the complex of land, sea, and air training areas that support military exercises in Alaska—known as the JPARC plan. The association opposed various parts of the plan and urged “utmost caution” in modifying other portions of the airspace, depended on by a \$3.5 billion state aviation industry, and providing access that “enables many small communities to exist.” “This range is already the largest military airspace complex in the country,” said Melissa McCaffrey, AOPA senior government analyst for air traffic. “Pilots should examine how the proposed changes would affect their ability to fly.” AOPA objected to a proposed significant expansion and lowering of the floor of a military operations area (MOA) in an area “frequently used by general aviation pilots and air taxi operators” to conduct air tours, support businesses, and provide access to recreational areas. Expansion of the Fox MOA should be minimized to avoid raising the risk of midair collisions near population centers including Anchorage, Fairbanks, and the Matanuska-Susitna (Mat-Su) Borough, AOPA said. Also, any expansion should be accompanied by increased coverage by the special-use airspace information service, which provides pilots with information about MOA use. AOPA expressed concern about lack of assurances that funding for program infrastructure would remain sufficient. Although existing T-routes and the instrument approaches provided by the Wide Area Augmentation System have increased IFR access, such gains could be “seriously degraded” by expanded MOAs, AOPA said, requesting in the formal comments that expansions be deferred until real-time IFR access through active MOAs can be effected. Another concern was the proposal to establish restricted airspace over the Battle Area Complex, near Delta Junction where winds and variable weather and the need to access a mountain pass already limit pilots’ navigational options. Proposed restricted corridors for the sole purpose of unmanned aerial vehicle operations—which the FAA has customarily rejected—“would clearly interfere with the safe and efficient access between Fairbanks, the Richardson Highway Corridor and the Alaska Range,” AOPA said. The association has been calling for development of a reliable sense-and-avoid capability for UAVs, rather than creation of segregated airspace for their development. AOPA said the JPARC proposal provides an opportunity to study the Stony, Naknek, Susitna, and Galena MOAs “to determine if they are still required to meet modern training needs.” The results of the evaluation should be included in</p>	

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	<p>the environmental impact statement and made available for public comment. Members may comment on the proposal online, by email, or by mail to ALCOM Public Affairs, 9480 Pease Avenue, Suite 120, JBER, AK 99506. Please share your comments with AOPA.</p> <p>----- Response of XO of the Predator UAS company to Commenter: -----</p> <p>MAJ Tappen,</p> <p>It was a nice tour to hold. Thanks for the pictures. I love seeing the ones from Alaska, although it makes me feel homesick all over again! The article you forwarded was pretty interesting. It seems to me like we military have plenty of airspace without adding more to the Alaskan sectionals. What's more, we don't exclusively use the military airspace anyway. We can go wherever we want! One of the perks of flying in AK, to be sure. I would think more restricted/special use airspace is unneeded. Range control should be able to help coordinate altitudes for UAS when in operation and allow the flyers to be professional in their occupation. As long as the UAS use the current MOAs, range control could easily coordinate with other military users letting them know there is a UAV in the sky.</p>	
I0134-3	<p>I am writing to express my opposition to more restricted airspace in the Delta Junction area, and along the routes to Fairbanks and Anchorage. I can and do work with the MOAs, but restricted airspace is already too much. More will only make recreation, work, and safe, expeditious travel so much harder for rural Alaskans.</p> <p>...</p> <p>Finally, I have a farm in Big Delta, my family is still there, and I am a bush pilot that is looking forward to coming home to the Interior. Previously I have worked in the Ground-based Midcourse Defense program at Fort Greely, and hope to be assigned there again. I fly my Cessna 170B in support of our farming, more quickly transporting my family around Alaska, on some TDYs, and recreationally for sightseeing, camping, fishing, hunting, etc. I hope that you will reduce your desired dependence on restricted airspace in the air corridors of Interior Alaska, especially over the Delta Junction area.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. General aviation is particularly important in Alaska as a means of commerce, subsistence, recreation, and emergency transportation. In preparing the Final EIS, the Army and Air Force will make every effort to harmonize mission requirements and community needs to avoid user conflicts or mitigate conflicts to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century. There is no other place in America where the military has the opportunity to conduct state-of-the-art training in such diverse terrain and large areas as required by fifth-generation aircraft. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.</p>
I0135-1	<p>I am still very concerned with the proposal to use Fish and Game management area #13 as a place for your exercises!! This area is vital for</p>	<p>Section 3.1.8.3 in the EIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Caribou calving and migration as well as an area of large moose population. Low flying aircraft in certain areas at certain times can change the calving production, and also migration routes!!</p>	<p>500 feet AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor, and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. All known calving, lambing, and important bird areas within the JPARC project area were taken into consideration during the effects analyses. Also, see Appendix E (Noise) for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p> <p>The U.S. Air Force publishes a handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection. To reduce potential for disturbance under new airspace areas, the following measure was included in the EIS's Fox 3/Paxon MOAs Section 3.1.8.4 (Mitigations): "Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information."</p>
<p>I0135-2</p>	<p>Use of live fire ordinance will close those areas off for personal use by Alaska citizens. Building roads and facilities in this area will close off more of the area.</p>	<p>Section 3.2.10.3 in this EIS acknowledges that the proposed military training schedule for the Realistic Live Ordnance Delivery proposal would limit access for commercial or personal purposes to some extent, but only when hazardous operations are taking place. This could constrain the use of the land for some potential or intended productive purposes and the availability for recreational uses to some degree. Most homes in this area are used seasonally or intermittently on weekends. Access to these remote homes may be impacted when flight activities for this proposal are taking place. This proposal does not involve construction of roads or facilities on nonmilitary land. The Air Force is considering measures to reduce impacts of closures, such as limiting their duration and frequency, reducing the size of the closed areas, and providing advance notification of training schedules. Additionally, the Air Force and Army would need to obtain an expanded Special Use Designation from the Alaska Department of Natural Resources (ADNR).</p>
<p>I0135-3</p>	<p>There are plenty of areas that are not used as extensively for fishing, hunting, recreation as Game management area #13!!!!</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The comment to move existing Army and Air Force training areas to other Federal lands or remote areas in Alaska, however, does not meet the purpose and need stated in the EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas as described in Chapter 1, Purpose and Need for the Proposed Actions, Sections 1.2 and 1.3</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		of the EIS. Additionally, mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
I0135-4	Please find a area that meets your criteria and does not ruin the land for the animals and humans!!!!!! Your proposal is completely wrong for this area!!!!!!!	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0136-1	I think extending the MOA area and dropping its lower limit to 500' AGL is absolutely crazy . The talkeetna mountains are heavily trafficed by private aircraft and with these proposed extentions, a very dangerous situation is being set up. Alaska is a huge state and it would make far more sense to have low level military training done far away from populated areas.	The EIS Chapters 1 and 2 explain the purpose and need for the expanded airspace and lower altitudes and the factors that were considered in determining where this proposed airspace could most effectively be located so as to meet training needs while minimizing adverse effects on other airspace uses. The concerns expressed about the potential impacts of this proposal will be considered when the mitigation measures discussed in the EIS Appendix K (Mitigations, BMPs, and SOPs) and other options are considered for minimizing any impacts. The FAA will also be considering such concerns while examining how the airspace proposals may be implemented without significantly impacting visual flight rules (VFR) and instrument flight rules (IFR) operations and air traffic control system capabilities. Please be assured that efforts will be made to provide for the safe and compatible use of the shared airspace by all concerned.
I0136-2	In addition, the idea of taking fighters out of Eilson and basing them at JBER is a decision obviously made by people who missed history class. Putting all of the top cover in northern U.S. at one base is a bad decision. Ask them if they have ever heard of what happened at Pearl harbor in 1941.	<p>The F-16 aggressor squadron's proposed relocation from Eielson AFB to Joint Base Elmendorf-Richardson is not connected to the proposals for airspace adjustments contained in the JPARC EIS. Therefore ALCOM cannot directly address your comment in this EIS.</p> <p>ALCOM can clarify that the airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower-altitude airspace to reflect the types of combat in which fifth-generation F-22 fighters would be engaged. The F-22s have the capability to initiate combat at greater distances than fourth-generation fighters, such as the F-16, so fourth-generation fighters must apply diverse tactics that require airspace expansion in distance and altitude. The F-22s must train to combat all such threats regardless of where the aggressor aircraft are based.</p> <p>The location of the F-16 aggressor squadron within Alaska is not a connected</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>action to the JPARC proposals. The majority of the JPARC proposals that involve Eielson AFB are Army proposals, and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft. The details of the proposed F-16 relocation and training , including major flying exercises (MFEs) such as RED FLAG–Alaska, will be worked out in the coming months. An environmental analysis will be prepared to address the environmental consequences of the proposed F-16 relocation within Alaska.</p>
I0137-1	<p>I am opposed to ANY expansion of training areas in Alaska. I am constantly amazed, when I hear on the one hand (around red flag times) about how the training areas in Alaska are the largest and best available to the US and many of its training partners, and on the other hand (when the DOD wants yet more), whining about how the DOD can't do the training it wants to do because of limited training space. You can't have it both ways, at least mere mortals can't. I reiterate the same comments I made in the first time around.</p> <p>1. DOD controls enough land and air space in Alaska. 2. DOD has no respect for the land, air, or water it controls. 3. DOD has a proven track record of befouling the land, air, and water it controls despite promises to not do so. NO ADDITIONAL SPACE IN ALASKA UNDER DOD CONTROL!</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force units based within the State of Alaska face an exceptional challenge to meet compelling and increasingly urgent needs borne out of fighting wars. In an era of persistent combat operations, the Army and Air Force need to continue to generate new technologies, learn from battlefield experiences, update tactics, and train intensively to face a committed and agile enemy. Each of these challenges drives the purpose and the need for modernization and enhancements to the range and airspace infrastructure that replicate the modern battlefield for training and testing in Alaska. Additionally, the Army and the Air Force are required by Federal and State of Alaska public statutes to comply with applicable regulations to protect, conserve, and preserve the environment and prevent and remediate pollution on lands within their jurisdiction.</p>
I0137-2	<p>I am opposed to ANY expansion of training areas in Alaska. I am constantly amazed, when I hear on the one hand (around red flag times) about how the training areas in Alaska are the largest and best available to the US and many of its training partners, and on the other hand (when the DOD wants yet more), whining about how the DOD can't do the training it wants to do because of limited training space. You can't have it both ways, at least mere mortals can't. I reiterate the same comments I made in the first time around.</p> <p>1. DOD controls enough land and air space in Alaska. 2. DOD has no respect for the land, air, or water it controls. 3. DOD has a proven track record of befouling the land, air, and water it controls despite promises to not do so. NO ADDITIONAL SPACE IN ALASKA UNDER DOD CONTROL!</p>	<p>The purpose of the JPARC proposed actions is to modernize and enhance JPARC in Alaska and to best support the military exercises in and near Alaska. JPARC modernizations and enhancements would enable realistic joint training and testing to support emerging technologies, respond to recent battlefield experiences, and train with tactics and new weapons systems to meet combat and national security needs.</p> <p>The JPARC EIS has evaluated the potential environmental impacts for the proposed actions and is in the process of identifying modifications and mitigations that avoid or reduce those impacts. Alaskan Command's goal for the overall EIS is to maximize the training opportunities in JPARC while considering the impacts to the environment. With continued cooperation and communication the future shape of JPARC will be a win-win.</p>
I0138-1	<p>The proposed JPARC Range increase shows a blatant disregard for the lifestyle and safety of the Alaskan people. Mixing high speed jet traffic with known civilian VFR corridors is irresponsible and bordering on criminal negligence. The proposed Fox 3 MOA Expansion covers homes, businesses and known VFR traffic routes and to lower the floor to 500 feet is a extreme</p>	<p>The Air Force is aware of the aviation activities that are most prevalent within the region where the Fox 3 and Paxon MOAs are proposed and took those into account when planning this airspace proposal and developing the mitigation measures noted in the EIS Section 3.1.1 (Airspace Management and Use) and Appendix K (Mitigations, BMPs, and SOPs). The Alternative</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	safety hazard. The proposed Paxton MOA down to 500 feet is again in the only VFR corridor between Gulkana and Fairbanks. Mixing high speed jet traffic with known civilian VFR corridors is irresponsible and bordering on criminal negligence.	E proposal was added as a result of scoping comments to help avoid the higher use areas. While the Air Force realizes this does not completely alleviate everyone's concerns, they would continue to seek those viable options that would permit safe, mutual use without creating significant impacts on the general aviation community. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0138-2	The proposed Battle Area Complex Restricted Area is going against a signed agreement with the Big Delta that it would not be expanded.	There is nothing in USARAK-MOA-029 which prohibits or limits the expansion of the Battle Area Complex (BAX), land or air. The MOA merely requires the Army execute the correct NEPA action to accomplish any further effort and cannot use the NEPA action to which the MOA refers to, to add any additional effort.
I0138-3	This also is the only VFR corridor for civilian air traffic and to make it more restrictive is putting these pilots in harms way. The UVA corridors and use do not currently meet the FAA requirement to "See and avoid". UAV Corridors near a major city, is again irresponsible.	As noted in the EIS Section 2.1.6, the FAA, DoD, and other agencies continue to collaborate on those near-, mid-, and long-term solutions for integrating UAV operations and supporting ground elements into the National Airspace System while ensuring they do not present any flight risks to other airspace users. Pending overall decisions on how this can be done and the Alaska FAA Regional office study on the corridor proposals, it was imperative that the Army proceed with identifying and evaluating those corridor options that would be required to support their UAV missions. Restricted area designations were assessed for the proposals as the most restrictive option each may have on other airspace uses in the area. The Army would consider the mitigation measures in the EIS Appendix K and other viable options in collaboration with the FAA and other stakeholders to determine how each corridor could best be established to meet both military and civil aviation needs.
I0138-4	Build an airstrip in the already Restricted Areas and fly them in that area.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0139-1	This is to support the NO ACTION ALTERNATIVE. JPARC has not made a case for expansion of MOA's and Above Ground Level (AGL) dimensions. . . For many reasons, I support the NO ACTION ALTERNATIVE, NO REDUCTION IN FLIGHT ALTITUDE LEVELS, NO INCREASES IN ORDNANCE AND TRAINING AREAS.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
I0139-2	I also support the Matanuska Susitna Borough Assembly Resolution 12-076 that passed unanimously 6/28/12. It is an excellent resolution that expresses	Please see the responses to the comments from the Matanuska-Susitna Borough under comment identification number G0020; from the Lake Louise

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	many of my comments on the draft EIS. I also support the concerns of the Lake Louise Community Non-profit Corporation and the comments of the Talkeetna Community Council, Inc.	Community Non-profit Corporation under comment identification number N0020; and from the Talkeetna Community Council, Inc. under comment identification number N0047.
I0139-3	Other concerns that were not dealt with adequately in the draft EIS are: • The introduction of hazardous substances and the creation of hazardous waste sites in the MOA areas. The military leaves hazardous waste sites wherever its presence is felt. The clean-up is a long time in the future with public funds being used. Can we afford this?	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force are required by Federal and State of Alaska public statutes to comply with applicable regulations to protect, conserve, and preserve the environment and prevent and remediate pollution on lands within their jurisdiction.
I0139-4	• Air pollution from the increased flights and the pollution from the chaff used must be considered more fully.	<p>Air quality impacts from increased flights associated with the definitive actions were adequately assessed in Chapter 3 of this EIS. For the programmatic actions, additional analyses will be completed in future NEPA documents to fully assess the air pollution impacts from those actions.</p> <p>With respect to impacts from chaff use, according to a Navy Research Laboratory Study, Environmental Effects of RF Chaff, virtually all radio frequency chaff is 10 to 100 times larger than particulate matter 10 microns or less in diameter (PM10) and particulate matter 2.5 microns or less in diameter (PM2.5). The air quality impacts of chaff were evaluated by the Air Force in Environmental Effects of Self-Protection Chaff and Flares. The study concluded that most chaff fibers maintain their integrity after ejection. Although some fibers may fracture during ejection, it appears that this fracturing does not release particulate matter. Consequently, the use of chaff under the proposed action would not result in any substantial air quality impacts.</p>
I0139-5	Low altitudes to 500 feet AGL combined with supersonic flights are not compatible with civilian quality of life and will cause negative impacts to wildlife. This will impact recreationists, hunters, subsistence resource users, berry pickers, ATV travelers along the Richardson and Denali Highways, cabin owners in the Lake Louise area, and backpackers in the Talkeetna Mountains and near the Denali Highway, and hunters, fishers, and trappers throughout the expanded MOA areas.	Section 3.1.10.3.1 of the EIS acknowledges that noise and low-level overflight could affect wildlife and land use, including recreation. Sections 3.1.10.4 (Land Use) and 3.1.8.4 (Biological Resources) list mitigation measures that could be implemented to reduce the impacts to wildlife and land use, such as seasonal avoidance areas; no major flying exercises (MFEs) during January, September, December and June 27 to July 11; and coordinating the schedule of MFEs with local communities in advance. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0139-6	Low altitudes to 500 feet AGL combined with supersonic flights are not compatible with civilian quality of life and will cause negative impacts to wildlife. This will impact recreationists, hunters, subsistence resource users,	The Air Force recognizes that there will potentially be some impacts to the population in the affected region of influence under the proposed actions. Some persons may experience diminished quality of life. Appendix E

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	berry pickers, ATV travelers along the Richardson and Denali Highways, cabin owners in the Lake Louise area, and backpackers in the Talkeetna Mountains and near the Denali Highway, and hunters, fishers, and trappers throughout the expanded MOA areas.	(Noise) of the EIS provides several indicators of noise level, which can be used to predict quality of life. Estimates of the percentage of the population that would be highly annoyed by noise, for example, are one indicator of a decreased quality of life. Quality of life is a subjective term and is highly dependent on various factors that are subject to bias and arbitrariness. Therefore, impacts to quality of life are subjective experiences and not all residents and/or visitors may feel their quality of life or experience would be severely impacted. Common factors for how people define their quality of life include: wealth, employment, health, recreation, leisure time, access, safety, wildlife, climate, and the surrounding natural environment. These and additional factors are addressed under separate resource areas (i.e., airspace management and use, noise, biological resources, land use and recreation, socioeconomics, safety, air quality, subsistence, etc.) in the EIS so that the significance of each action on each resource area considers both context and intensity as required under the National Environmental Policy Act (NEPA).
I0139-7	Increase in military accidents and military and civilian aircraft collision accidents were not considered along with the creation of new access roads to get to the crash sites. When the F-22 crashed in the winter of 2011, a whole new access road was built which will be there forever.	A key consideration of the JPARC airspace proposals would be ensuring flight safety for all users of this shared airspace and taking all actions necessary to not increase any potential for aircraft mishaps. Emergency response capabilities would be provided for any mishap in the proposed new airspace as now exists in the current airspace environment. Emergency access to a crash site is a necessity for all aircraft accidents and not just limited to those involving military aircraft.
I0139-8	Increase in military accidents and military and civilian aircraft collision accidents were not considered along with the creation of new access roads to get to the crash sites. When the F-22 crashed in the winter of 2011, a whole new access road was built which will be there forever.	As noted for the Flight Safety response to this same comment, a key consideration of the JPARC airspace proposals would be ensuring flight safety for all users of this shared airspace and taking all actions necessary to not increase any potential for aircraft mishaps. This includes the manner in which the military's use of this airspace would be scheduled and managed to help minimize this potential.
I0139-9	Increase in military accidents and military and civilian aircraft collision accidents were not considered along with the creation of new access roads to get to the crash sites. When the F-22 crashed in the winter of 2011, a whole new access road was built which will be there forever.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
I0139-10	Air pollution from the increased flights and the pollution from the chaff used must be considered more fully.	As indicated on page 3-37, Section 3.1.7.3.1, there would not be an increase in chaff and flare use within the overall airspace. Rather, this use would be redistributed over a larger expanse of airspace. The Air Force would encourage and facilitate the continued study of chaff alternatives (e.g., biodegradable chaff) to reduce hazardous waste-related impacts on soils, water, air, and biological resources within and underlying the Military

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		Operations Areas (MOAs), such that no significant adverse impacts would occur.
I0139-11	Low altitudes to 500 feet AGL combined with supersonic flights are not compatible with civilian quality of life and will cause negative impacts to wildlife. This will impact recreationists, hunters, subsistence resource users, berry pickers, ATV travelers along the Richardson and Denali Highways, cabin owners in the Lake Louise area, and backpackers in the Talkeetna Mountains and near the Denali Highway, and hunters, fishers, and trappers throughout the expanded MOA areas. For many reasons, I support the NO ACTION ALTERNATIVE, NO REDUCTION IN FLIGHT ALTITUDE LEVELS, NO INCREASES IN ORDNANCE AND TRAINING AREAS.	Potential impacts to subsistence resource users are addressed for each proposed action in Sections 3.X.13 (where X is the specific section number of a proposed action). Where potentially adverse impacts are identified and the military has the ability to minimize these identified impacts to the extent possible, mitigation measures are proposed in Section 3.X.13.4. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
I0139-12	Low altitudes to 500 feet AGL combined with supersonic flights are not compatible with civilian quality of life and will cause negative impacts to wildlife. This will impact recreationists, hunters, subsistence resource users, berry pickers, ATV travelers along the Richardson and Denali Highways, cabin owners in the Lake Louise area, and backpackers in the Talkeetna Mountains and near the Denali Highway, and hunters, fishers, and trappers throughout the expanded MOA areas. For many reasons, I support the NO ACTION ALTERNATIVE, NO REDUCTION IN FLIGHT ALTITUDE LEVELS, NO INCREASES IN ORDNANCE AND TRAINING AREAS.	<p>Section 3.1.8.3 in the DEIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 feet AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor, and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. All known calving, lambing, and important bird areas within the JPARC project area were taken into consideration during effects analyses. Other EIS sections also consider the effects of low-level aircraft overflight on wildlife (e.g., Section 3.5, Night Joint Training). The authors understand that wildlife may have different reactions than humans to the same stimulus and rely on the scientific literature that has systematically reviewed specific wildlife species' responses to overflight.</p> <p>Supersonic flight and sonic booms are also addressed in the document. As stated in the EIS Section 3.1.2, supersonic aircraft operations are permitted in the existing Fox 3 MOA/ATCAA down to 5,000 feet AGL or 12,000 feet MSL, whichever is higher. Overpressures from sonic booms for a variety of military jet aircraft in Mach 1.2 level flight at 10,000 feet AGL range from 4.4 to 5.7 pounds per square foot (psf) for F-16 and F-22, respectively (Table 3-6). Near the centers of Fox 3 MOA/ATCAA and the Paxon MOA/ATCAA, sonic booms would increase from about 4.6 to 5.2 per day on average.</p> <p>The U.S. Air Force publishes a handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>flight restricted areas for pilot/aircraft safety and wildlife protection. To reduce potential for disturbance under new airspace areas, the following measure was included in the EIS’s Fox 3/Paxon MOAs Section 3.1.8.4 (Mitigations): “Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information.” Also, see Appendix E (Noise) for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p> <p>Please see the discussions for Subsistence (Sections 3.X.13), Land Use – Recreation (Sections 3.X.10), and Noise (Section 3.X.2) for more details on the remainder of your comment.</p>
I0140-1	<p>I am a USAF veteran, an Alaskan resident for the past 37 years and a private pilot and single engine aircraft owner for 30 of those years. It is commonplace for Alaskans to state that small aircraft, both commercial and private are the life blood of Alaska. The proposed regulations seeking to add to the military use airspace will in my opinion severely and negatively impact civilian aviation throughout our state. These effects will be felt in every sector including Fish and Game surveys, mail delivery, passenger transportation and commercial enterprise such as fuel delivery. My greatest concern, however is the burden of unsafe flying conditions that will be generated by the 500 foot ceiling imposed in much of the area under consideration. This leaves pilots of small aircraft very little margin for safety in the situation of high winds, adverse turbulence or other unforeseen weather events that are commonly encountered throughout Alaska but are particularly prevalent in the Alaska Range. For example, I have experienced two incidents flying through Windy Pass where I encountered severe un-forecast turbulence and had to climb to 10,000 ft to get to safety. In another incident I encountered such strong headwinds in Windy Pass and another time above Black Rapids that my 94 mph Arctic Tern was actually traveling backwards. One again my only recourse was to climb. None of these alternatives would have been available if the proposed new rules are put in place! My understanding of the proposed expansion is that the existing and well established routes of flight between Fairbanks and Anchorage and Fairbanks and Delta/Tok/Tanacross will be restricted in ways that will compromise air safety. This is, in my opinion unacceptable and will impose an unprecedented burden on the general aviation users in Alaska. As a supporter of the USAF I am embarrassed that the branch of service that</p>	<p>The concerns expressed over the JPARC airspace proposals were key considerations in the planning of these proposals and the mitigation measures and other viable options being pursued to provide for the safe and compatible use of Alaska’s airspace. The Air Force and Army will be working with the FAA and key stakeholders during the FAA’s formal review of each proposal to determine if and how each preferred alternative in the Final EIS can be implemented in a safe and effective manner without adversely affecting VFR and IFR air traffic and the FAA’s air traffic control system capabilities. These collaborative efforts will consider such concerns over those higher use areas/passes where adverse weather or other factors may require a course or altitude change to avoid unsafe conditions.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	brought me to Alaska would embark on such a reckless and draconian action!	
I0141-1	This is a highly traveled area by general aviation pilots. Using this area for training by the military is bound to cause an accident with a small airplane and I think it is irresponsible to think otherwise. Alaska is a large state with many unpopulated areas that the military can use for their training and I strongly request they look at those unpopulated areas for their training.	The FEIS Chapters 1 and 2 explain the purpose and need for the expanded airspace and lower altitudes and the factors that were considered in determining where this proposed airspace could most effectively be located so as to meet training needs while minimizing adverse effects on other airspace uses. The concerns expressed about the potential impacts of this proposal will be considered when the mitigation measures discussed in the FEIS Appendix K and other options are considered for minimizing any impacts. The FAA will also be considering such concerns while examining how the airspace proposals may be implemented without significantly impacting VFR and IFR operations and Air Traffic Control system capabilities. Please be assured that all efforts will be made to provide for the safe and compatible use of the shared airspace by all concerned.
I0141-2	This is a highly traveled area by general aviation pilots. Using this area for training by the military is bound to cause an accident with a small airplane and I think it is irresponsible to think otherwise. Alaska is a large state with many unpopulated areas that the military can use for their training and I strongly request they look at those unpopulated areas for their training.	See comment response I0141-1.
I0141-3	This is a highly traveled area by general aviation pilots. Using this area for training by the military is bound to cause an accident with a small airplane and I think it is irresponsible to think otherwise. Alaska is a large state with many unpopulated areas that the military can use for their training and I strongly request they look at those unpopulated areas for their training.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources. The comment to move existing Army and Air Force training areas to other Federal lands or remote areas in Alaska, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Sections 1.2 and 1.3.
I0142-1	I am not in favor of the proposed actions. I am in favor of a professional & well-trained military, but the cost to Alaskans through the impacts - real & possible - convince me that Alaska is not the optimum choice for this proposed expansion. As a Native Alaskan, Ninilchik Native Association shareholder, Cook Inlet Region, Inc. shareholder & Kenaitze Indian Tribe member, my heritage is in Alaska and I speak from the heart. Furthermore, access to Alaska by nations to the West/Southwest, is much easier than access to, Oklahoma, for example. Should a 'situation' arise, this huge military training area would become a prime target & would be more vulnerable than one otherwise situated. Any proposal which puts our country & our military in a more vulnerable position than necessary, is not a good	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources. The statement expressed in the comment, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Sections 1.2 and 1.3.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	proposal.	
I0142-2	I am not in favor of the proposed actions. I am in favor of a professional & well-trained military, but the cost to Alaskans through the impacts - real & possible - convince me that Alaska is not the optimum choice for this proposed expansion. As a Native Alaskan, Ninilchik Native Association shareholder, Cook Inlet Region, Inc. shareholder & Kenaitze Indian Tribe member, my heritage is in Alaska and I speak from the heart. Furthermore, access to Alaska by nations to the West/Southwest, is much easier than access to, Oklahoma, for example. Should a 'situation' arise, this huge military training area would become a prime target & would be more vulnerable than one otherwise situated. Any proposal which puts our country & our military in a more vulnerable position than necessary, is not a good proposal.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.
I0143-1	As a former USAF single-seat fast-mover I am intimately familiar with what is required to train our pilots. As a current commercial pilot flying in and around Alaska, in aircraft whose performance limitations make all weather and high altitude flying impossible, I see the proposed airspace restrictions a threat to the safety of flight. I am adamantly opposed to the proposed airspace restrictions.	The flight safety concerns were an important consideration in the planning and development of the JPARC airspace proposals. Advanced aircraft capabilities, weapons systems, and adversary tactics have created a demand for a greater airspace training environment that cannot be met in the existing Military Operations Area (MOA) structure. The EIS Chapters 1 and 2 explain the purpose and need for these proposals and those factors that were considered for siting the proposed areas. Pending the FAA's study of the preferred actions, the Air Force will pursue those means noted in the EIS proposed mitigations (Appendix K) and other options for achieving the safe, compatible use of this shared airspace.
I0143-2	As a former USAF single-seat fast-mover I am intimately familiar with what is required to train our pilots. As a current commercial pilot flying in and around Alaska, in aircraft whose performance limitations make all weather and high altitude flying impossible, I see the proposed airspace restrictions a threat to the safety of flight. I am adamantly opposed to the proposed airspace restrictions.	As noted for the flight safety response to the comment, the need for the proposed expanded airspace and the lower altitudes is based on the new training requirements that account for advanced aircraft capabilities, weapons systems, and adversary tactics. Pending the FAA's study of the preferred alternatives, the Air Force will pursue those means noted in the FEIS proposed mitigations (Appendix K) and other options for implementing these proposals in a manner that will provide for the safe, compatible use of this shared airspace.
I0144-1	As a long time Alaskan and winter and summer visitor of the Tanana Flats and Alaska Range, I am highly concerned about increasing the restricted areas in the Interior of Alaska. As a private pilot the plan to confine the routes to corridors increases risks and reduces safety. The new Paxon MOA is of great concern.	The JPARC airspace proposals considered the current use of the affected areas by visual flight rules (VFR) and instrument flight rules (IFR) aircraft and how each proposal could be most effectively configured to accommodate training needs while not creating adverse operational or flight safety risks on other airspace uses. The EIS Airspace Management and Safety discussions and the Appendix K mitigations address those existing and proposed measures that would further enhance flight safety in the proposed new

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>airspace. Flight safety will be a high priority during the FAA’s study of the preferred airspace alternatives and decisions on how each may be implemented without significantly impacting VFR/IFR air traffic flows, airport operations, and Air Traffic Control system capabilities. The Army and Air Force will be working with the FAA and key stakeholders throughout the FAA review processes to pursue those mitigation measures and other viable options that would provide for the safe, compatible use of the shared airspace by all concerned.</p>
I0144-2	<p>With the reductions of Air Force activity in the Interior other than periodic Red flag exercises should not justify the increase in the changes proposed. There are little to no permanent Air Force fighters or bombers stationed in interior Alaska. The 'Fighter Wing' is not a real fighter unit, only an exercise unit. Units from outside Alaska should seek training areas in the Lower 48 and not encroach on and reduce our State’s available resources. Or better yet do the flying over the National Parks (Denali & Wrangell St Ellias) for the "Training"</p>	<p>The JPARC EIS does not address any change in overall level of activity or number of personnel at any of the bases in Alaska. Current aircraft stationed at Eielson AFB include the F-16 aggressors of the 353rd Combat Training Squadron and the KC135 tankers flown by the Alaska Air National Guard. These units are no less permanent than any other in the country. While not an immediately deployable unit, the Aggressor Squadron referred to in the comment is just as important to aircrew training as the airspace itself. The Eielson AFB aircraft fly daily as the Red Force that local, out-of-state, or other service units train against. America stands strong in the world as one nation and one military force, not 50 separate state militias as the comment alludes to. National parks and wilderness areas are, by definition, noise-sensitive areas. The FAA requests pilots fly at or above 2,000 feet above ground level (AGL) in these areas. Altitudes above 1,000 feet AGL will not satisfy the need for low-level training. The Fox 3 MOA expansion and new Paxon MOA are the most suitable areas for low-level training with proximity to both Air Force bases.</p>
I0145-1	<p>First let me say, I am in full support of the military and our need for them and their need to train. I know what it takes to stay proficient and recognize the need for special airspace for the military to do this. It is my understanding that the last time the military increased the airspace for training, it was stated "We will never need any more than this." Well that was several years ago and here you are back asking for more. If we give up all our liberty’s and all our rights, then of what use is this country. You have enough airspace and "We the People" say the rest is ours, as well as what we allow you to use when we are not needing to use what we have already allowed you access to.</p>	<p>Thank you for your comment on the JPARC Draft Environmental Impact Statement (EIS). This comment is duly noted. The Army and the Air Force share your concerns about Alaska’s resources. In preparing the Final EIS the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. Once the Army and Air Force select the preferred alternatives for each proposal, specific measures will be developed in order to avoid, minimize, and, in some cases, fully mitigate adverse impacts to the environment, natural resources, and public communities to the extent feasible and practicable. Such measures are required in accordance with the implementation regulations the Army and Air Force were required to adopt in the National Environmental Policy Act</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		(NEPA) of 1969, as amended (42 United States Code [U.S.C.] 4321 et seq.) and the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500–1508.
I0146-1	The training areas in Alaska are already the largest in the US. The claim is that they are also the best in the US. Why does the DOD claim to need more? I am opposed to any and all of the proposed expansions. Yes, Alaska is the Last Frontier, but it will not stay that way if the DOD is allowed to continually control more and more land and air space. The DOD has already proven that it has no respect for the land, air and water it already controls. For example, no firefighting is done on land where unexploded bombs exist...land where animals do still exist, and where unsuspecting children have been maimed and killed. Respectful landowners clean up their mess! The current proposed actions affect too many people who live in and enjoy Alaska.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force units based within the State of Alaska face an exceptional challenge to meet compelling and increasingly urgent needs borne out of fighting wars. In an era of persistent combat operations, the Army and Air Force need to continue to generate new technologies, learn from battlefield experiences, update tactics, and train intensively to face a committed and agile enemy. Each of these challenges drives the purpose and the need for modernization and enhancements to the range and airspace infrastructure that replicate the modern battlefield for training and testing in Alaska. Additionally, the proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use. Lastly, The Army and the Air Force are required by Federal and State of Alaska public statutes to comply with applicable regulations to protect, conserve, and preserve the environment and prevent and remediate pollution on lands within their jurisdiction.
I0146-2	The proposals will limit access to private pilots, hunters and other recreational users.	The Land Use sections of each proposed action addressed in this EIS (Sections 3.1.through 3.12) describe the effect of the proposed actions on the availability of access to private pilots, hunters and other recreational users. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
I0146-3	The proposals will limit access to private pilots, hunters and other recreational users.	The Army and Air Force will consider mitigations and other viable options that can be considered in conjunction with the FAA study of the airspace proposals that would minimize any adverse effects to aircraft flight activities on which hunters, recreationists, surveyors, and other interests rely. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
I0146-4	The noise alone will affect numerous residential areas -- I still remember how our house shook with each explosion during the Fall Stryker training exercises at Ft. Wainwright (or Eielson AFB). The explosions continued well past 2am.	The military will continue to adhere to its good neighbor policy of executing its training events to the greatest extent between the hours of 0600 and 2200. Other times will be publicized by notices in various public conveyances such as television, radio, internet, and newspapers. The Army remains steadfast in

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		being a good neighbor by honoring its quiet hours to the greatest extent possible. There will be times when deployment schedules demand that the Army give notice of exception and execute training beyond the desired "quiet times."
I0146-5	From the list of resource areas, it looks like it's well known who and what will be affected by the expansions. Please recognize that more harm than good will come out of allowing the DOD to continue with this plan. NO to #1 NO to #2 NO to #3 NO to #4 NO to #5 NO to #6 NO to #7 NO to #8 NO to #9 NO to #10 NO to #11 NO to #12	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0147-1	IFR routes should be made available between FAI VORTAC and ORT during all airspace activity. The loss of these routes a few years ago has resulted in aircraft operators conducting an increased number of VFR flights across this route. It has also resulted in hundreds of Air Carrier aircraft being rerouted into the already busy ANC-FAI arrival flow and suffering increased expenses associated with the longer routing. This has also caused rerouted traffic to conflict with exercise tankers that depart EIL with ENN as their first enroute fix. Increasing VFR traffic is a net safety reduction, IFR aircraft are in continuous communication with ATC and fly at known altitudes and speeds. VFR aircraft have no communication requirement and may be operating on random routes at any VFR altitude. There should be two altitudes available for unpressurized aircraft and two above FL180 so high performance aircraft can operate safely within positive controlled airspace. ATCAAs should be published on IFR High charts to allow flight crews a chance to understand their alternatives.	The concerns noted in your comments are within the realm of what the FAA would be examining in their review of each airspace proposal to determine impacts on VFR and IFR air traffic flows and their Air Traffic Control system capabilities. The FAA will be working with the Air Force and Army proponents to consider if and how these proposals can be implemented so as to minimize impacts on both aircraft operations and their own capabilities for managing this airspace in the most safe and efficient manner possible.
I0147-2	IFR routes should be made available between FAI VORTAC and ORT during all airspace activity. The loss of these routes a few years ago has resulted in aircraft operators conducting an increased number of VFR flights across this route. It has also resulted in hundreds of Air Carrier aircraft being rerouted into the already busy ANC-FAI arrival flow and suffering increased expenses associated with the longer routing. This has also caused rerouted traffic to conflict with exercise tankers that depart EIL with ENN as their first enroute fix. Increasing VFR traffic is a net safety reduction, IFR aircraft are in continuous communication with ATC and fly at known altitudes and speeds. VFR aircraft have no communication requirement and may be operating on random routes at any VFR altitude. There should be two altitudes available for unpressurized aircraft and two above FL180 so high performance aircraft can operate safely within positive controlled airspace.	As noted for the airspace response to the comment, the FAA will be examining the preferred airspace proposals and working with the Air Force and Army proponents to determine if and how each can be established and managed in a safe and efficient manner for all air traffic.

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	ATCAAs should be published on IFR High charts to allow flight crews a chance to understand their alternatives.	
I0148-1	Comments in regards to the expansion of the R-2202 restricted areas across the Little Delta River: These areas are all have long histories of recreational use for Alaskan sporting activities by both individuals and guiding services.	Section 3.2.10.3 of the EIS acknowledges that indirect effects of changes in civilian ground and air access would affect access to areas south of the proposal area, including Little Delta River and associated recreational uses. Pilots may circumnavigate the restricted airspace, with some inconvenience, but ground access would be substantially impeded, reducing the ability to use these popular areas for recreation, fishing, and hunting. Section 3.2.10.4 of the EIS includes mitigation measures that could reduce these impacts including suspending operations during January, September, and December and between June 27 and July 11, in order to allow access for public use and recreation during these popular seasons. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
I0148-2	Comments in regards to the expansion of the R-2202 restricted areas across the Little Delta River: ...Expansion of these areas would block essential SAFE flight corridors for many small aircraft users transitioning through the region.	The alternative for the proposed R-2202 restricted area expansion considered only that additional restricted airspace required to support the Realistic Live Ordnance Deliveries while minimizing any adverse intrusion on airspace and land uses within the affected region. As noted for all comments on the JPARC airspace proposals, the preferred alternatives will be formally examined by the FAA in collaboration with the Air Force or Army proponents to determine if and how each could be implemented in a safe, efficient manner without adversely affecting all aviation and FAA air traffic control operations.
I0148-3	The R areas have already taken away many quality recreational areas within reasonable distance from the Fairbanks area. By further deleting these long standing public use areas the military will create an unnecessary division with many local community members all for the name of "land control".	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use. A number of the proposals request expanded and additional military operational airspace or airspace for restricted areas in order to meet the purpose and need expressed in Chapter 1, Purpose and Need for the Proposed Actions.
I0148-4	Are these expansion REALLY necessary to complete the mission? Or is this just a matter of expanding an empire at the cost of the subjects that pay the taxes that support the empire. The bottom line should be the greatest availability of resources with the least impact on the greatest number of citizens.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force units based within the State of Alaska face an exceptional challenge to meet compelling and increasingly urgent needs borne out of fighting wars. In an era of persistent combat operations, the Army and Air Force need to continue to generate new technologies, learn from battlefield experiences, update tactics, and train intensively to face a committed and agile enemy. Each of these challenges drives the purpose and

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		the need for modernization and enhancements to the range and airspace infrastructure that replicate the modern battlefield for training and testing in Alaska. Additionally, in preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible.
I0149-1	Most of these extensions conflict directly with heavily used airspace. My son and I just flew through one of these proposed areas yesterday. Lowering the floor in the MatSu area to 500' forces us to fly too low to get to some of the most scenic areas of Alaska and increases congestion therefore reducing safety. Further, increasing route lengths by cutting off access to so much airspace will make some trips impossible for those of us with limited range. Do you propose that only more expensive planes with longer ranges should be allowed to fly now, or that we should go over-gross by carrying more fuel? Either way, it will cost Alaskans more money to travel. I thought the point of having a military force was to protect citizens, not put them in danger, which these proposals do? Alaska has always been very supportive of the military here, but I can easily see how that could change if you start trying to grab all of our airspace and put us in danger. I am however, very supportive of UAVs. I would support proposals to use UAVs in a number of areas for a number of purposes.	While the Fox 3 and Paxon MOA airspace proposals overlie portions of the Matanuska-Susitna area, the Alternative E configuration described in the FEIS was added as a result of public and agency scoping comments to avoid much of the higher traffic areas you and others may be most concerned about. This, coupled with limiting use of the lower Paxon MOA altitudes (below 14,000 feet MSL) to major flying exercises during those six annual, two-week periods they are conducted, would help minimize impacts on civil aviation flights through this area. Use of the lower altitudes in both the proposed Fox 3 MOA expansion and new Paxon MOA would be limited to the extent required to fulfill essential mission training needs while minimizing any need a general aviation pilot may consider for diverting flights around this airspace. Pending the FAA's study of the preferred actions, the Air Force will pursue those means noted in the FEIS proposed mitigations (Appendix K) and other options for achieving the safe, compatible use of this shared airspace.
I0149-2	Most of these extensions conflict directly with heavily used airspace. My son and I just flew through one of these proposed areas yesterday. Lowering the floor in the MatSu area to 500' forces us to fly too low to get to some of the most scenic areas of Alaska and increases congestion therefore reducing safety. Further, increasing route lengths by cutting off access to so much airspace will make some trips impossible for those of us with limited range. Do you propose that only more expensive planes with longer ranges should be allowed to fly now, or that we should go over-gross by carrying more fuel? Either way, it will cost Alaskans more money to travel. I thought the point of having a military force was to protect citizens, not put them in danger, which these proposals do? Alaska has always been very supportive of the military here, but I can easily see how that could change if you start trying to grab all of our airspace and put us in danger. I am however, very supportive of UAVs. I would support proposals to use UAVs in a number of areas for a number of purposes.	As noted for the Airspace response to this comment, Alternative E's Fox 3 MOA/Paxon MOA configuration described in the EIS would avoid much of the higher traffic areas you and others may be most concerned about in the Matanuska-Susitna area. This, coupled with limiting use of the lower MOA altitudes to the extent required to fulfill essential mission training needs, would minimize any need a general aviation pilot may consider for delaying or diverting their flights. Flight safety is of utmost importance to the military and be assured the proposed mitigations noted in the Final EIS's Appendix K and other options would be considered to help ensure the safety of all concerned while sharing this airspace.
I0149-3	Most of these extensions conflict directly with heavily used airspace. My son	Potential economic impacts associated with changes in civilian aviation are

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>and I just flew through one of these proposed areas yesterday. Lowering the floor in the MatSu area to 500' forces us to fly too low to get to some of the most scenic areas of Alaska and increases congestion therefore reducing safety. Further, increasing route lengths by cutting off access to so much airspace will make some trips impossible for those of us with limited range. Do you propose that only more expensive planes with longer ranges should be allowed to fly now, or that we should go over-gross by carrying more fuel? Either way, it will cost Alaskans more money to travel. I thought the point of having a military force was to protect citizens, not put them in danger, which these proposals do? Alaska has always been very supportive of the military here, but I can easily see how that could change if you start trying to grab all of our airspace and put us in danger. I am however, very supportive of UAVs. I would support proposals to use UAVs in a number of areas for a number of purposes.</p>	<p>addressed in Section 3.1.12.3.1. The FAA and Air Force would address any impacts and mitigation measures to be taken before implementation of any airspace proposals. This would include advanced coordination between military scheduling agencies and the Air Force, to avoid those time periods and altitudes that are most problematic for the air traffic control system.</p>
IO150-1	<p>I am disappointed to learn of recent plans by the USAF with respect to Alaskan airspace. The rugged airspace and meteorological challenges in Alaska tends to funnel all users into fairly narrow and predictable patterns. Restricting access to locations critical to transportation and commerce comes at a tremendous cost financially with a corresponding adverse impact to aviation safety (in the area with the greatest challenge with respect to aviation safety in the country). This despite being assured by the USAF five years ago not to be concerned about airspace requirements encroaching upon VFR corridors or low altitude IFR traffic connecting Alaska and Canada. Furthermore, opening up UAV airspace where "see and avoid" is the rule of the day and many of the user aircraft are not equipped with transponders and surveillance radar is not available (below 3,000') is quite frankly unconscionable. I have personally been advised by the USAF that operations such as C17s doing uncharted low level training is OK because "practice airdrops at Ft Rich are necessary since the troops don't get to maintain their currency in the sandbox. You need to be watchful and stay out of their (C17s) way." There is no other place in the country where military aircraft develop "in house" training routes that are not published, not NOTAMed, or otherwise disseminated. I can't believe this practice occurs at Maguire or Travis, but in Alaska you develop in the ready room low level routes between Wasilla and Ft Rich transiting some of the most heavily utilized airspace in the world with large jets doing 250kts (which means overtake of on average 150kts) because it is inconvenient to fly an hour to train? Many of the general aviation aircraft based in the MatSu/Anchorage area are not</p>	<p>The concerns about the JPARC proposals were considered while developing these actions, and they were certainly key considerations in the mitigation measures and other viable options being pursued to help ensure the safe and compatible use of Alaska's airspace. The Air Force and Army will be working with key stakeholders during the FAA's formal review of each proposal to determine if and how each preferred alternative can be implemented in a safe, efficient manner without adversely affecting VFR/IFR air traffic and the FAA's air traffic control system capabilities. This collaborative effort will consider such concerns as you expressed over those higher use areas/passes where adverse weather or other factors may limit pilot options for transiting through those areas. The areas where C-17s were observed conducting training operations are likely part of the low-altitude tactical navigation (LATN) area discussed in the EIS Section 3.1.1 and depicted in Appendix D (Airspace). Uncharted, approved LATN areas are established at various locations across the United States where cargo and other slower speed aircraft typically train.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>transponder equipped (not required), not ADS-B equipped, and no window out the back to see if a C-17 is bearing down on them. A squadron Ops Officer told me "too bad, they should have transponders so we can see them on our system." I am a huge supporter of the military and have a fair appreciation of the competing interests you face. I was a tactical aviator for most my 27 years of service. However, I can't help but think this steamroller missed much of the "risk assessment" process required by military aviation doctrine. Alaska is a huge place, why are you demanding the General Aviation community (part 91/135) assume the significant cost and risk associated with this plan?</p>	
I0150-2	<p>I am disappointed to learn of recent plans by the USAF with respect to Alaskan airspace. The rugged airspace and meteorological challenges in Alaska tends to funnel all users into fairly narrow and predictable patterns. Restricting access to locations critical to transportation and commerce comes at a tremendous cost financially with a corresponding adverse impact to aviation safety (in the area with the greatest challenge with respect to aviation safety in the country). This despite being assured by the USAF five years ago not to be concerned about airspace requirements encroaching upon VFR corridors or low altitude IFR traffic connecting Alaska and Canada. Furthermore, opening up UAV airspace where "see and avoid" is the rule of the day and many of the user aircraft are not equipped with transponders and surveillance radar is not available (below 3,000') is quite frankly unconscionable. I have personally been advised by the USAF that operations such as C17s doing uncharted low level training is OK because "practice airdrops at Ft Rich are necessary since the troops don't get to maintain their currency in the sandbox. You need to be watchful and stay out of their (C17s) way." There is no other place in the country where military aircraft develop "in house" training routes that are not published, not NOTAMed, or otherwise disseminated . I can't believe this practice occurs at Maguire or Travis, but in Alaska you develop in the ready room low level routes between Wasilla and Ft Rich transiting some of the most heavily utilized airspace in the world with large jets doing 250kts (which means overtake of on average 150kts) because it is inconvenient to fly an hour to train? Many of the general aviation aircraft based in the MatSu/Anchorage area are not transponder equipped (not required), not ADS-B equipped, and no window out the back to see if a C-17 is bearing down on them. A squadron Ops Officer told me "too bad, they should have transponders so we can see them on our system." I am a huge supporter of the military and have a fair</p>	<p>As discussed in EIS Section 3.1.12.3.1 (Socioeconomics), potential economic impacts associated with the proposed action include additional operating costs (primarily related to increased fuel use from rerouting and economic impacts related to delays or access). The total economic impacts to commercial or civil aviation being delayed or diverted to any extent around the proposed airspace (when active) are difficult to quantify due to the many factors to be considered in estimating such impacts (aircraft type, weight, number of engines, air traffic conditions, time/distance, etc.). However, based on concerns expressed during the public scoping comment period, due to the importance of aviation in Alaska's economy (as noted in section B.12), any additional costs, delays, or access restrictions would likely be perceived by persons affected as a significant impact. Thus, the FAA and the Air Force would address such concerns further through consultation/interaction with appropriate agencies and organizations to discuss their issues and concerns. Additionally, mitigation measures to offset adverse socioeconomic impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>appreciation of the competing interests you face. I was a tactical aviator for most my 27 years of service. However, I can't help but think this steamroller missed much of the "risk assessment" process required by military aviation doctrine. Alaska is a huge place, why are you demanding the General Aviation community (part 91/135) assume the significant cost and risk associated with this plan?</p>	
I0150-5	<p>I am disappointed to learn of recent plans by the USAF with respect to Alaskan airspace. The rugged airspace and meteorological challenges in Alaska tends to funnel all users into fairly narrow and predictable patterns. Restricting access to locations critical to transportation and commerce comes at a tremendous cost financially with a corresponding adverse impact to aviation safety (in the area with the greatest challenge with respect to aviation safety in the country). This despite being assured by the USAF five years ago not to be concerned about airspace requirements encroaching upon VFR corridors or low altitude IFR traffic connecting Alaska and Canada. Furthermore, opening up UAV airspace where "see and avoid" is the rule of the day and many of the user aircraft are not equipped with transponders and surveillance radar is not available (below 3,000') is quite frankly unconscionable. I have personally been advised by the USAF that operations such as C17s doing uncharted low level training is OK because "practice airdrops at Ft Rich are necessary since the troops don't get to maintain their currency in the sandbox. You need to be watchful and stay out of their (C17s) way." There is no other place in the country where military aircraft develop "in house" training routes that are not published, not NOTAMed, or otherwise disseminated. I can't believe this practice occurs at Maguire or Travis, but in Alaska you develop in the ready room low level routes between Wasilla and Ft Rich transiting some of the most heavily utilized airspace in the world with large jets doing 250kts (which means overtake of on average 150kts) because it is inconvenient to fly an hour to train? Many of the general aviation aircraft based in the MatSu/Anchorage area are not transponder equipped (not required), not ADS-B equipped, and no window out the back to see if a C-17 is bearing down on them. A squadron Ops Officer told me "too bad, they should have transponders so we can see them on our system." I am a huge supporter of the military and have a fair appreciation of the competing interests you face. I was a tactical aviator for most my 27 years of service. However, I can't help but think this steamroller missed much of the "risk assessment" process required by military aviation doctrine. Alaska is a huge place, why are you demanding the General</p>	<p>The comment is vague about which proposals appear to impact the VFR corridors and IFR traffic. The low Paxon MOA would restrict low-altitude IFR traffic only for two short periods per day during major flying exercises (MFEs) (less than 60 days per year). These periods will be published 30 days in advance so the general aviation pilot can plan accordingly.</p> <p>UAV corridors are considered in this EIS since the corridors to fly between runways and usable airspace do not exist and the FAA has not published rules on their use outside of restricted airspace. When the FAA issues new rules for UAV flight, DoD will have a way forward and the analysis in this EIS will have laid the necessary groundwork.</p> <p>There are no proposals in this EIS concerned with low-level flight and airdrops in the Matanuska-Susitna/Anchorage area. However, current operations do fly low over the valley en route to the drop zones in R-2203 on Joint Base Elmendorf-Richardson. The Alaskan Military Airspace Info website (www.jber.af.mil/11af/alaskaairspaceinfo) provides information and schedules that will heighten the public awareness of current Air Force operations (see the link C-17/C-130 Low Level Routes on the webpage).</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	Aviation community (part 91/135) assume the significant cost and risk associated with this plan?	
I0151-1	The military should not take additional civilian airspace. It is unnecessary and puts all parties in greater jeopardy.	Military operations must be conducted in harmony with the needs of other uses and users of Alaska’s lands and airspace. General aviation is particularly important in Alaska as a means of commerce, subsistence, recreation and emergency transportation. In preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska’s value to the military in the twenty-first century. There is no other place in America where the military has the opportunity to conduct state-of-the-art training in such diverse terrain and large areas required by fifth generation aircraft.
I0151-2	The military should not take additional civilian airspace. It is unnecessary and puts all parties in greater jeopardy.	The FEIS Chapters 1 and 2 explain the purpose and need for the airspace proposals and those factors that were considered in determining where this proposed airspace could most effectively be located to meet training needs while minimizing adverse effects on other airspace uses. Concerns expressed about the potential for impact on civilian aviation uses will be considered with the FEIS Appendix K proposed mitigations and other options for minimizing any impacts. The FAA will also be considering such concerns while examining if and how the airspace proposals may be implemented without significantly impacting VFR and IFR operations and Air Traffic Control system capabilities. The Army and Air Force will make efforts to avoid, minimize, and mitigate adverse impacts to provide for the safe and compatible use of the shared airspace by all concerned.
I0152-1	*The proposed Fox 3 MOA additions extend laterally and vertically in to an area of Alaska highly used by the general public for business and recreation, due to its close proximity to major population centers of the MatSu Valley, Anchorage and Fairbanks. Lowering the ceiling to 500ft increases the probability of mid-air collisions for commercial pilots conducting tour activities and general aviation pilots engaging in hunting, mining, recreation or other activities. * The low-altitude portion of the proposed Paxson MOA includes a major VFR route connecting northern Alaska with the south central and eastern regions of the state. Other portions of this proposed MOA are used for mining and recreation. Confining VFR traffic to corridors through this area concentrates traffic, potentially creating an unsafe condition for civil aviation. This area is not conducive for a low altitude	The proposed Fox 3 MOA/Paxon MOA Alternative E configuration and reserved use of the lower Paxon MOA altitudes (below 14,000 feet MSL) for up to six annual, two-week major flying exercises (MFEs) would reduce potential impacts on many recreational areas. However, it is acknowledged this would not fully alleviate concerns over the use of those lower altitudes when other general aviation aircraft are operating within these areas. As noted previously, newer (fifth) generation fighters and other supporting aircraft must train at lower altitudes not currently available in the existing training airspace. The extent to which those lower altitudes would be flown by these aircraft would be limited to that necessary to successfully meet those low-level training objectives. The EIS provides daily average estimates for those operations and includes existing and proposed mitigation measures that

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>MOA. * Under current FAA rules, active MOAs block access by IFR aircraft, other than emergency and lifeguard flights. This lack of access limits economic viability and reduces safety to pilots and the public in the communities that our underneath or near this airspace. Establishing MOAs that block IFR airways is directly counter to the work done by the FAA in recent years to increase IFR access with GPS approaches and airways. No new MOAs should be approved that block IFR airways until the FAA and military have developed procedures to allow IFR access to civil aircraft. * The military constructed the Battle Area Complex south east of Delta Junction knowing that this area is important to civil aviation to access Isabel Pass. No restricted airspace should be established over this complex. * Restricted areas west of Delta (2202 and 2211) already limit access between Delta, Fairbanks and the Richardson Highway corridor. We oppose alternatives that completely connect these existing restricted areas, and further block access for mining, hunting and recreation. * Allowing Unmanned Aerial Vehicles (UAV's) to transit between Ft. Wainwright, Eielson and Ft. Greely and the restricted areas where they conduct training limits access, potentially creating a safety hazard for civil aircraft operating to and from Fairbanks, Delta and the Richardson Highway corridor. No segregated airspace should be established in these areas.</p>	<p>would be used to the greatest extent possible to help minimize impacts and ensure the safe, compatible use of this airspace environment by all concerned. The FAA must evaluate the preferred alternative for each proposed airspace, to include the UAV corridors, Battle Area Complex, and other proposed restricted areas noted, to determine if and how each can be established and managed so as to not adversely affect IFR/VFR air traffic and air traffic control system capabilities.</p>
I0152-2	<p>*The proposed Fox 3 MOA additions extend laterally and vertically in to an area of Alaska highly used by the general public for business and recreation, due to its close proximity to major population centers of the MatSu Valley, Anchorage and Fairbanks. Lowering the ceiling to 500ft increases the probability of mid-air collisions for commercial pilots conducting tour activities and general aviation pilots engaging in hunting, mining, recreation or other activities. * The low-altitude portion of the proposed Paxson MOA includes a major VFR route connecting northern Alaska with the south central and eastern regions of the state. Other portions of this proposed MOA are used for mining and recreation. Confining VFR traffic to corridors through this area concentrates traffic, potentially creating an unsafe condition for civil aviation. This area is not conducive for a low altitude MOA. * Under current FAA rules, active MOAs block access by IFR aircraft, other than emergency and lifeguard flights. This lack of access limits economic viability and reduces safety to pilots and the public in the communities that our underneath or near this airspace. Establishing MOAs that block IFR airways is directly counter to the work done by the FAA in recent years to increase IFR access with GPS approaches and airways. No</p>	<p>Flight safety within all existing and proposed airspaces is of utmost concern to the military, and the current safety practices coupled with the proposed mitigations (Final EIS, Appendix K) and other options would be pursued to help ensure the safe, compatible use of this airspace. The measures noted in the Airspace response to your comments, to include the FAA evaluation of the proposed airspace actions, are driven by how the airspace proposals can be implemented in manner that would provide for the safety of all concerned. Safety mitigations include seeking funds for enhancing the Special Use Airspace Information Service, expanding other advisory services, considering additional VFR corridors and avoidance areas, and other such initiatives that would inform the public of the scheduled and real-time MOA uses and help protect all aircraft sharing the use of this airspace.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>new MOAs should be approved that block IFR airways until the FAA and military have developed procedures to allow IFR access to civil aircraft. * The military constructed the Battle Area Complex south east of Delta Junction knowing that this area is important to civil aviation to access Isabel Pass. No restricted airspace should be established over this complex. * Restricted areas west of Delta (2202 and 2211) already limit access between Delta, Fairbanks and the Richardson Highway corridor. We oppose alternatives that completely connect these existing restricted areas, and further block access for mining, hunting and recreation. * Allowing Unmanned Aerial Vehicles (UAV's) to transit between Ft. Wainwright, Eielson and Ft. Greely and the restricted areas where they conduct training limits access, potentially creating a safety hazard for civil aircraft operating to and from Fairbanks, Delta and the Richardson Highway corridor. No segregated airspace should be established in these areas.</p>	
I0152-3	<p>*The proposed Fox 3 MOA additions extend laterally and vertically in to an area of Alaska highly used by the general public for business and recreation, due to its close proximity to major population centers of the MatSu Valley, Anchorage and Fairbanks. Lowering the ceiling to 500ft increases the probability of mid-air collisions for commercial pilots conducting tour activities and general aviation pilots engaging in hunting, mining, recreation or other activities. * The low-altitude portion of the proposed Paxson MOA includes a major VFR route connecting northern Alaska with the south central and eastern regions of the state. Other portions of this proposed MOA are used for mining and recreation. Confining VFR traffic to corridors through this area concentrates traffic, potentially creating an unsafe condition for civil aviation. This area is not conducive for a low altitude MOA. * Under current FAA rules, active MOAs block access by IFR aircraft, other than emergency and lifeguard flights. This lack of access limits economic viability and reduces safety to pilots and the public in the communities that our underneath or near this airspace. Establishing MOAs that block IFR airways is directly counter to the work done by the FAA in recent years to increase IFR access with GPS approaches and airways. No new MOAs should be approved that block IFR airways until the FAA and military have developed procedures to allow IFR access to civil aircraft. * The military constructed the Battle Area Complex south east of Delta Junction knowing that this area is important to civil aviation to access Isabel Pass. No restricted airspace should be established over this complex. * Restricted areas west of Delta (2202 and 2211) already limit access between</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	Delta, Fairbanks and the Richardson Highway corridor. We oppose alternatives that completely connect these existing restricted areas, and further block access for mining, hunting and recreation. * Allowing Unmanned Aerial Vehicles (UAV's) to transit between Ft. Wainwright, Eielson and Ft. Greely and the restricted areas where they conduct training limits access, potentially creating a safety hazard for civil aircraft operating to and from Fairbanks, Delta and the Richardson Highway corridor. No segregated airspace should be established in these areas.	
I0152-4	The recently proposed relocation of the F-16's from Eielson AFB to JBER appears to have a direct impact on the airspace and airports in Anchorage and the Mat Su Valley. This needs to be quantified and addressed as part of the cumulative impact of the Draft EIS.	<p>The F-16 aggressor squadron's proposed relocation from Eielson AFB to Joint Base Elmendorf-Richardson is not connected to the proposals for airspace adjustments contained in the JPARC EIS. The airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower-altitude airspace to reflect the types of combat in which fifth-generation F-22 fighters would be engaged. The F-22s have the capability to initiate combat at greater distances than fourth-generation fighters, such as the F-16, so fourth-generation fighters must apply diverse tactics that require airspace expansion in distance and altitude. The F-22s must train to combat all such threats regardless of where the aggressor aircraft are based.</p> <p>The location of the F-16 aggressor squadron within Alaska is not a connected action to the JPARC proposals. The majority of the JPARC proposals that involve Eielson AFB are Army proposals, and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft. The details of the proposed F-16 relocation and training, including major flying exercises such as RED FLAG-Alaska, will be worked out in the coming months. An environmental analysis will be prepared to address the environmental consequences of the proposed F-16 relocation within Alaska.</p>
I0152-6	Existing MOAs including Susitna, Stony, Naknek and Galena, are not addressed. They should be studied to see if they fit the purpose and need of the JPARC mission.	The major flying exercises (MFEs) flown in Alaska typically base aircraft at both Air Force bases requiring an airspace that is close to both. The Fox 3 MOA is less than 80 nautical miles (NM) from both bases versus much greater distances for all the MOAs mentioned in the comment. Additionally there are no restricted areas with target ranges anywhere near the four western Military Operations Areas (MOAs), making them unsuitable for MFEs.
I0153-1	I am a 20 year USAF aviator who spent 2 of those years flying in AK and now live here to enjoy all this state has to offer including a robust aviation culture. I am an ardent supporter of the military as well as the general	Realistic training with new tactics and weapon systems allows fewer assets to cover larger areas. Concurrent with the requirement to cover larger areas is the need to reduce inefficient training activities such as transiting to and from

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>aviation community. I fully understand the need for adequate training airspace. Having attended one of the public presentations concerning the JPARC EIS I must admit I had many unanswered questions that I felt should have been addressed. How is the current airspace inadequate? Is it too small, too far away or otherwise unsuitable? If it is not going to support the future training needs, will it be removed from military use? If existing airspace isn't useful it shouldn't be kept for military use and should be returned to the NAS. Restricting IFR traffic into and out of FAI should not be pursued. Attempting to make the argument that the training airspace needs to be near the control complex is silly while the air war Afghanistan can be controlled from the US. UAS integration into the NAS remains a challenge. See and avoid is not practical and there does not appear to be a plan that will make "sense and avoid" a reality. All in all, JPARC looks like a great greenfield concept that DOD is attempting to impose on a brownfield without taking into account the negative impacts to the existing uses. Offering to pursue funding or study possible mitigation appears to be paying lip service to the existing users. I think there are viable solutions and am disappointed that something more tangible has not been developed.</p>	<p>Military Operations Areas (MOAs). Realistic training must be efficient to achieve readiness within real-world resources constraints. The Air Force currently conducts low-level training in the Yukon MOAs during major flying exercises (MFEs) and for daily training. The distance to that airspace from Joint Base Elmendorf-Richardson is three times the distance to enter the proposed Fox 3 MOA. The significant difference corresponds to valuable time and fuel being wasted, a lack of efficiency that makes the current airspace inadequate.</p> <p>Air Force Instruction 13-201 requires periodic reviews of Special Use Airspace (SUA) utilization such that underutilized SUA should be returned to the National Airspace System (NAS) and removed from aeronautical charts. This review of airspace is separate from the JPARC EIS and occurs annually.</p> <p>None of the proposals in the JPARC EIS inhibit IFR traffic into Fairbanks International Airport (FAI). The two-dimensional illustration of unmanned aerial vehicle (UAV) corridors (Figure 2-10) should be viewed alongside Figure 2-11 to understand the nature of the altitude blocks that would be utilized. Only a few thousand feet at a time would be activated while the UAV climbed or descended through the new airspace. Other users, including IFR aircraft, would not be blocked from any direction, to or from FAI.</p> <p>At the draft stage of this EIS, the language used to introduce possible mitigations is understandably soft and noncommittal. The JPARC teams continue to comb through hundreds of comments while the experts and leadership consider various methods of reducing or avoiding impacts from the proposals. Decisions will be made going forward and financial commitments secured such that the language in the Final EIS will change to binding and obligatory with respect to actions needed.</p>
I0153-2	<p>I am a 20 year USAF aviator who spent 2 of those years flying in AK and now live here to enjoy all this state has to offer including a robust aviation culture. I am an ardent supporter of the military as well as the general aviation community. I fully understand the need for adequate training airspace. Having attended one of the public presentations concerning the JPARC EIS I must admit I had many unanswered questions that I felt should have been addressed. How is the current airspace inadequate? Is it too small, too far away or otherwise unsuitable? If it is not going to support the future training needs, will it be removed from military use? If existing airspace isn't</p>	<p>The EIS Chapters 1 and 2 explain the purpose and need for the airspace proposals and the siting criteria that were taken into consideration in developing these proposals. The Alaska airspace in which you and other Air Force aviators trained will no longer be sufficient to successfully employ advanced aircraft capabilities and weapons systems against changing combat adversary tactics. Expanding the existing MOA airspace to accommodate these training needs was considered more effective and energy-efficient than eliminating this airspace and moving training activities to more remote areas. Pending the FAA's further study of each preferred airspace proposal</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>useful it shouldn't be kept for military use and should be returned to the NAS. Restricting IFR traffic into and out of FAI should not be pursued. Attempting to make the argument that the training airspace needs to be near the control complex is silly while the air war Afghanistan can be controlled from the US. UAS integration into the NAS remains a challenge. See and avoid is not practical and there does not appear to be a plan that will make "sense and avoid" a reality. All in all, JPARC looks like a great greenfield concept that DOD is attempting to impose on a brownfield without taking into account the negative impacts to the existing uses. Offering to pursue funding or study possible mitigation appears to be paying lip service to the existing users. I think there are viable solutions and am disappointed that something more tangible has not been developed.</p>	<p>alternative, the existing and proposed mitigations noted in the Final EIS's Appendix K and other viable options will be considered, as necessary, to minimize such adverse impacts referenced in the comment.</p>
I0153-4	<p>I am a 20 year USAF aviator who spent 2 of those years flying in AK and now live here to enjoy all this state has to offer including a robust aviation culture. I am an ardent supporter of the military as well as the general aviation community. I fully understand the need for adequate training airspace. Having attended one of the public presentations concerning the JPARC EIS I must admit I had many unanswered questions that I felt should have been addressed. How is the current airspace inadequate? Is it too small, too far away or otherwise unsuitable? If it is not going to support the future training needs, will it be removed from military use? If existing airspace isn't useful it shouldn't be kept for military use and should be returned to the NAS. Restricting IFR traffic into and out of FAI should not be pursued. Attempting to make the argument that the training airspace needs to be near the control complex is silly while the air war Afghanistan can be controlled from the US. UAS integration into the NAS remains a challenge. See and avoid is not practical and there does not appear to be a plan that will make "sense and avoid" a reality. All in all, JPARC looks like a great greenfield concept that DOD is attempting to impose on a brownfield without taking into account the negative impacts to the existing uses. Offering to pursue funding or study possible mitigation appears to be paying lip service to the existing users. I think there are viable solutions and am disappointed that something more tangible has not been developed.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force units based within the State of Alaska face an exceptional challenge to meet compelling and increasingly urgent needs borne out of fighting wars. In an era of persistent combat operations, the Army and Air Force need to continue to generate new technologies, learn from battlefield experiences, update tactics, and train intensively to face a committed and agile enemy. Each of these challenges drives the purpose and the need for modernization and enhancements to the range and airspace infrastructure that replicate the modern battlefield for training and testing in Alaska. In preparing the Final EIS the Army and Air Force will make every effort to harmonize mission requirements and community needs so that user conflicts may be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century. The modernization and enhancement of JPARC provides the Army and Air Force a unique opportunity to conduct state-of-the-art training in such diverse terrain and large airspace areas to meet the national security requirements of the United States in the twenty-first century.</p>
I0154-1	<p>While most of us welcome the military in Alaska and don't mind sharing the air with military aircraft, the proposed expansion of the MOA and possible expansion of activity beyond established flight routes around Anchorage is disturbing. Civilian aircraft must have room to operate, especially in Mvfr conditions and any change to current MOAs and flight rights could prove</p>	<p>The Air Force appreciates the support given to the military forces in Alaska and wants to maintain that confidence as we try to safely and effectively integrate essential future training needs into Alaska's airspace environment. The EIS Chapters 1 and 2 explain the purpose and need for the airspace proposals and the factors that were considered in determining where this</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	dangerous. Please reconsider your plans and give serious consideration to the needs of Alaskan general aviation.	proposed airspace could most effectively be located so as to meet training needs while minimizing adverse effects on other airspace uses. Concerns expressed about the potential for impact on civilian aviation uses will be considered with the Final EIS’s proposed mitigations (Appendix K) and other options for minimizing any impacts. The FAA will also be considering such concerns while examining if and how the airspace proposals may be implemented without significantly impacting VFR and IFR operations and air traffic control system capabilities. The Army and Air Force will make efforts to avoid, minimize, and mitigate adverse impacts to provide for the safe and compatible use of the shared airspace by all concerned.
I0154-2	While most of us welcome the military in Alaska and don’t mind sharing the air with military aircraft, the proposed expansion of the MOA and possible expansion of activity beyond established flight routes around Anchorage is disturbing. Civilian aircraft must have room to operate, especially in Mvfr conditions and any change to current MOAs and flight rights could prove dangerous. Please reconsider your plans and give serious consideration to the needs of Alaskan general aviation.	As noted in the airspace response to the comment, the Air Force appreciates the support given to the military forces in Alaska and wants to maintain that confidence as we explore means for safely and effectively integrating essential future training needs into Alaska’s airspace environment. Flight safety is of utmost importance to the military in the conduct of all flight activities; the mitigations proposed in the FEIS Appendix K (Mitigations, BMPs, and SOPs) and other options would be considered to ensure the safe shared use of this training airspace by all concerned. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
I0155-1	Numerous flights Fairbanks vor direct Gulkana then direct Valdez or Cordova or Mc Carthy over 35 years have convinced me the ability to pick up a IFR clearence enroute (or file IFR) must be there!! Without that you will be endangering many flights trying to maintain VFR in rapidly changing weather over the Alaska Range. I know that a clearence is not available in a MOA. You will be causing accidents and fatalities. Do your MOA stuff further north in less busy Airspace.	The FEIS Chapters 1 and 2 explain the purpose and need for the airspace proposals and the siting criteria that were considered in developing each proposal. Pending the FAA’s further study of each proposal’s preferred alternative, the existing and proposed mitigations noted in the FEIS Appendix K (Mitigations, BMPs, and SOPs) and other viable options will be considered, as necessary, to minimize such adverse impacts referenced in the comment. The proposed mitigations include pursuing funding to enhance communications and advisory services within the proposed airspace to better inform the public of scheduled and real-time MOA uses for use in planning/conducting flights through this airspace.
I0155-2	Numerous flights Fairbanks vor direct Gulkana then direct Valdez or Cordova or Mc Carthy over 35 years have convinced me the ability to pick up a IFR clearence enroute (or file IFR) must be there!! Without that you will be endangering many flights trying to maintain VFR in rapidly changing weather over the Alaska Range. I know that a clearence is not available in a MOA. You will be causing accidents and fatalities. Do your MOA stuff further north in less busy Airspace.	Flight safety within all existing and proposed airspaces is of utmost importance to the military; and those current safety practices coupled with the FEIS proposed mitigations and other options would be pursued to help ensure the safe, compatible use of this airspace. The measures noted in the airspace response to the comment include the FAA evaluation of the proposed airspace actions and are driven by how the airspace proposals can be implemented in a manner that would provide for safety of all concerned.

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
I0155-3	<p>Numerous flights Fairbanks vor direct Gulkana then direct Valdez or Cordova or Mc Carthy over 35 years have convinced me the ability to pick up a IFR clearence enroute (or file IFR) must be there!! Without that you will be endangering many flights trying to maintain VFR in rapidly changing weather over the Alaska Range. I know that a clearence is not available in a MOA. You will be causing accidents and fatalities. Do your MOA stuff further north in less busy Airspace.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. JPARC is an important and vital component of the national defense strategy of the United States and is a key attribute of Alaska's value to the military in the twenty-first century. There is no other place in the country where the military has the opportunity to conduct state-of-the-art training in diverse terrains without significant encroachment. The Army and Air Force are required by NEPA to make the efforts required to harmonize mission requirements and community needs in order that user conflicts be avoided, minimized, or mitigated to the extent feasible and practicable.</p>
I0156-1	<p>As a military, general aviation, and commercial pilot who has resided in Alaska and flown throughout the state since 1968, I feel qualified to comment on the proposed alteration and expansion of JPARC military training areas. As a retired military pilot with many years and thousands of hours flying C-130s in a tactical airlift role, I understand and acknowledge the need for effective training areas for military aircrew. Some realistic conditions can never be replicated by simulators, and Alaska offers unique geographic and topographic venues that cannot be duplicated elsewhere. As a private and commercial pilot with much experience in Part 91, 121, and 135 operations, I also understand the impact created by MOAs and other Special Use Airspace. These areas can impose significant challenges for pilots and operators seeking efficiency and safety in their flight operations. As an aviation safety professional with experience as both an Air Force Safety Officer and Program Manager for the Medallion Foundation, I am quite concerned that the JPARC proposal would expand the "reach" of designated military training areas to the detriment of the civilian aviation community, both commercial and private. Moreover, it would impinge on aviation safety as civilian aviators would be pressed into operating with much more restriction, especially in key corridors such as along the Richardson Highway. Given the challenges of Alaska's often harsh weather and terrain, additional constraints imposed by artificial vertical and horizontal boundaries associated with MOAs and Restricted Areas create real threats to safe flying. While there may be a valid need for tactical training areas for new generation aircraft in both high and low altitude environments, the size and scope of those reservations must be kept to a minimum. They must be located to maximize de-confliction with other airspace users and, to the maximum extent practicable, have designated corridors or "floors" that permit safe transit by civilian aviators.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Such concerns were used in considering those siting criteria that would most safely, efficiently, and effectively satisfy the need for each proposed airspace action. The Alternative E Fox 3/Paxon MOA configuration took into account public and FAA concerns by reducing that "reach" that could adversely affect the civilian aviation community in those higher traffic areas. Pending the FAA's further study of each proposal's preferred alternative, the existing and proposed mitigations noted in the FEIS Appendix K and other viable options would be considered, as necessary, to minimize the concerns expressed in the comment.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
I0156-2	<p>As a military, general aviation, and commercial pilot who has resided in Alaska and flown throughout the state since 1968, I feel qualified to comment on the proposed alteration and expansion of JPARC military training areas. As a retired military pilot with many years and thousands of hours flying C-130s in a tactical airlift role, I understand and acknowledge the need for effective training areas for military aircrew. Some realistic conditions can never be replicated by simulators, and Alaska offers unique geographic and topographic venues that cannot be duplicated elsewhere. As a private and commercial pilot with much experience in Part 91, 121, and 135 operations, I also understand the impact created by MOAs and other Special Use Airspace. These areas can impose significant challenges for pilots and operators seeking efficiency and safety in their flight operations. As an aviation safety professional with experience as both an Air Force Safety Officer and Program Manager for the Medallion Foundation, I am quite concerned that the JPARC proposal would expand the “reach” of designated military training areas to the detriment of the civilian aviation community, both commercial and private. Moreover, it would impinge on aviation safety as civilian aviators would be pressed into operating with much more restriction, especially in key corridors such as along the Richardson Highway. Given the challenges of Alaska’s often harsh weather and terrain, additional constraints imposed by artificial vertical and horizontal boundaries associated with MOAs and Restricted Areas create real threats to safe flying. While there may be a valid need for tactical training areas for new generation aircraft in both high and low altitude environments, the size and scope of those reservations must be kept to a minimum. They must be located to maximize de-confliction with other airspace users and, to the maximum extent practicable, have designated corridors or “floors” that permit safe transit by civilian aviators.</p>	<p>Flight safety within all existing and proposed airspace is of utmost concern to the military, and the current safety practices coupled with the Final EIS proposed mitigations (Appendix K) and other viable options would be pursued to the extent possible to maintain a safe operating environment for all concerned. The planning of these proposals and mitigations, as well as the impending FAA study of each preferred airspace action, are driven by how these actions could be implemented and managed in a manner that would provide for the safety of both military and civilian users of this airspace.</p>
I0156-3	<p>As a military, general aviation, and commercial pilot who has resided in Alaska and flown throughout the state since 1968, I feel qualified to comment on the proposed alteration and expansion of JPARC military training areas. As a retired military pilot with many years and thousands of hours flying C-130s in a tactical airlift role, I understand and acknowledge the need for effective training areas for military aircrew. Some realistic conditions can never be replicated by simulators, and Alaska offers unique geographic and topographic venues that cannot be duplicated elsewhere. As a private and commercial pilot with much experience in Part 91, 121, and 135 operations, I also understand the impact created by MOAs and other</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force units based within the State of Alaska face an exceptional challenge to meet compelling and increasingly urgent needs borne out of fighting wars. In an era of persistent combat operations, the Army and Air Force need to continue to generate new technologies, learn from battlefield experiences, update tactics, and train intensively to face a committed and agile enemy. Each of these challenges drives the purpose and the need for modernization and enhancements to the range and airspace infrastructure that replicates the modern battlefield for training and testing in Alaska. Additionally, in preparing the Final EIS the Army and Air Force will</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Special Use Airspace. These areas can impose significant challenges for pilots and operators seeking efficiency and safety in their flight operations. As an aviation safety professional with experience as both an Air Force Safety Officer and Program Manager for the Medallion Foundation, I am quite concerned that the JPARC proposal would expand the “reach” of designated military training areas to the detriment of the civilian aviation community, both commercial and private. Moreover, it would impinge on aviation safety as civilian aviators would be pressed into operating with much more restriction, especially in key corridors such as along the Richardson Highway. Given the challenges of Alaska’s often harsh weather and terrain, additional constraints imposed by artificial vertical and horizontal boundaries associated with MOAs and Restricted Areas create real threats to safe flying. While there may be a valid need for tactical training areas for new generation aircraft in both high and low altitude environments, the size and scope of those reservations must be kept to a minimum. They must be located to maximize de-confliction with other airspace users and, to the maximum extent practicable, have designated corridors or “floors” that permit safe transit by civilian aviators.</p>	<p>make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska’s value to the military in the twenty-first century.</p>
I0157-1	<p>My comments are pertaining to the State land in Proposal 2, Realistic Live Ordnance Delivery Area, proposed restricted area. I do not support any restriction to access to State lands and or closing of State land to Alaskans to further training of our valued Armed Forces. Alaska has very well written and interruption though the Alaskan Supreme Court a Constitution.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0157-2	<p>The Alaskan Constitution Article 8, the Natural Resource article grants Alaskans many protections and guarantees. Sections 1-4, and 13, 14, and 16 point out my concerns and you should be aware of them.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0157-3	<p>I also don’t believe the EIS addressed the economical and recreational value of the possible 305,000 acres of State land that could have access restrictions levied on it.</p>	<p>The Air Force recognizes that there is potential for economic impacts to local and regional businesses from limited access associated with the Realistic Live Ordnance Delivery (RLOD) proposed actions. The potential loss of income due to delays or rerouting are difficult to quantify due to the many factors to be considered in such estimates. However, based on concerns expressed during the public scoping and Draft EIS review periods, impacts to socioeconomic resources under the RLOD proposal are anticipated to be potentially significant without the use of adequate mitigations. Mitigations proposed include advanced notifications of when ground access would be restricted and scheduling training around popular hunting seasons and times.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		Mitigations could potentially lessen the likelihood of impacts on some residential users and associated economic impacts. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process. Additionally, the Air Force and Army must obtain an expanded Special Use Designation from the Alaska Department of Natural Resources (ADNR) for this proposal.
I0157-4	This area is highly valued and used by many Alaskans to gather their wild food resources on annual bases.	Section 3.2.13 of the EIS acknowledges that the area potentially affected by the Realistic Live Ordnance Delivery proposed action is important for subsistence activities. Potential impacts to these activities are evaluated in the same section. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
I0157-5	Even though the EIS made note of State or private airstrips, it did not consider the many Super Cub type airstrips that are used.(these are not noted on any maps, but they exist)	The EIS noted those public and private airstrips identified on aeronautical charts and other resources along with others noted in scoping comments that may be affected by the different airspace proposals. It is understood that there are many other uncharted private airstrips in Alaska that could also be affected in some manner. These airstrips and their associated aircraft operations may also benefit from those mitigations and other viable options that would be considered to minimize adverse effects on other airport/airstrips and aviation activities discussed in the EIS Airspace Management sections and Appendix K (Mitigations).
I0157-6	...The same is true of many traditional hunt camps.	The Air Force recognizes that there is potential for economic impacts to local and regional businesses from limited access associated with the Realistic Live Ordnance Delivery (RLOD) proposed actions. The potential loss of income due to delays or rerouting are difficult to quantify due to the many factors to be considered in such estimates. However, based on concerns expressed during the public scoping and Draft EIS review periods, impacts to socioeconomic resources under the RLOD proposal are anticipated to be potentially significant without the use of adequate mitigations. Mitigations proposed include advanced notifications of when ground access would be restricted and scheduling training around popular hunting seasons and times. Mitigations could potentially lessen the likelihood of impacts on some residential users and associated economic impacts. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process. Additionally, the Air Force and Army must obtain an expanded Special Use

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		Designation from the Alaska Department of Natural Resources (ADNR) for this proposal.
I0157-7	I did not see in the EIS the possible loss of income from all the guides that are registered to provide guided hunts for this area. With only a minimum of 2 week notice for exercises, how does one book guided hunts, and fulfill contracts with clients if they cannot be in the field?	The Air Force recognizes that there is potential for economic impacts to local and regional businesses from limited access associated with the Realistic Live Ordnance Delivery (RLOD) proposed actions. The potential loss of income due to delays or rerouting are difficult to quantify due to the many factors to be considered in such estimates. However, based on concerns expressed during the public scoping and Draft EIS review periods, impacts to socioeconomic resources under the RLOD proposal are anticipated to be potentially significant without the use of adequate mitigations. Mitigations proposed include advanced notifications of when ground access would be restricted and scheduling training around popular hunting seasons and times. Mitigations could potentially lessen the likelihood of impacts on some residential users and associated economic impacts. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process. Additionally, the Air Force and Army must obtain an expanded Special Use Designation from the Alaska Department of Natural Resources (ADNR) for this proposal.
I0157-8	What about air transporters. How will the anticipated 90 to 150 days use by the military effect their businesses? The same could be asked of the miners. Trapper in this area will also be economically affected. If trappers are restricted from being in the area the result could be loss of reasonable opportunity to harvest furbearers, loss of furbearers being in the trap to long, furbearers having to be in traps long than what is reasonably expected. Maintaining a trap line has social, moral and ethical components to it also.	The Air Force recognizes that there is potential for economic impacts to local and regional businesses from limited access associated with the Realistic Live Ordnance Delivery (RLOD) proposed actions. The potential loss of income due to delays or rerouting is difficult to quantify due to the many factors to be considered in such estimates. However, based on concerns expressed during the public scoping and Draft EIS review periods, impacts to socioeconomic resources under the RLOD proposal are anticipated to be potentially significant without the use of adequate mitigations. Mitigations proposed include advanced notifications of when ground access would be restricted and scheduling training around popular hunting seasons and times. Mitigations could potentially lessen the likelihood of impacts on some residential users and associated economic impacts. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process. Additionally, the Air Force and Army must obtain an expanded Special Use Designation from the Alaska Department of Natural Resources (ADNR) for this proposal.
I0157-9	Note: Trapping season is November – April. Even though this is not a State designated Subsistence area (by definition) many Alaskans use it as such, they treat the wild food they gather as a necessity for life. The 305,000 acres	Section 3.2.13.3 of the EIS acknowledges that activities and restrictions as a result of the Realistic Live Ordnance Delivery proposed action could be perceived as an impact for harvesting subsistence resources. Suggested

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>and predicted 90 to 150 days of use by the military would have a great impact on those who rely on those resources. Moose in this area are managed under State intensive Management (IM) practices. This means “high levels of human harvest” restricting this area at any time during September-November would impact the IM plan. Sheep, caribou, bears are not designated as IM, but many Alaskans do pursue them as a valuable wild food source and some consider them as somewhat of a trophy. The taking of sheep and caribou happens August through September. Black bears have a “no closed” season but the majority of the bears are harvested during the months of June and August and September. Grizzly bears are harvest in the months May and April, and the gain in September till they go into the den sometime mid to late October. So it is very hard for me to see how Alaskan could co-exist with this current proposal on State land, and not impact us greatly.</p>	<p>mitigations to minimize these potential impacts are described in Section 3.2.13.4. Section 3.2.10 (Land Use) addresses hunting or trapping activities that are not managed as subsistence activities. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0157-10	<p>To put in some sort of perspective Alaska only has control of 33% of land within the State. You the Federal Government have the rest.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0157-11	<p>NOTES: I find it somewhat odd that the U.S. Military’s EIS on aircraft noise has little effect on game population and their movements. Also that aircraft noise does not affect the values of a person’s wilderness experience. Yet the National Park Service, Bureau of Land Management, National Petroleum Reserve-Alaska, National Wildlife Refuge and the National Forest and Conservation Areas all say and have made policies or regulations or are in the process of doing so, to make restrictions on aircraft use with in their jurisdictions. Who is correct about aircraft noise, and how it affects game and wilderness values? Is the State of Alaska and the JPARC EIS correct, or are all the other Federal Agency correct?</p>	<p>This EIS recognizes the potential for aircraft overflights to trigger behavioral reactions in animals. Based on the findings of the analysis, population-level effects or abandonment of natural range would not be expected as a result of intermittent overflight noise. This EIS also acknowledges that a person’s wilderness experience can be negatively affected by aircraft overflights. These potential impacts are unfortunate side effects of realistic combat training, which includes some training at low altitudes and/or at night. This EIS recognizes that adverse impacts could occur and, as such, studies conducted by other agencies are not contradicted. The Department of Defense will consider all practicable measures to mitigate potential impacts of combat training to include establishment of avoidance areas in particularly noise-sensitive areas.</p> <p>Low-altitude and night training operations are part of realistic combat training. The Department of Defense recognizes that the potential for impacts exists and tries to minimize impacts to the extent practicable while still achieving training objectives.</p> <p>In accordance with the requirements of the National Environmental Policy</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		Act and Council on Environmental Quality (CEQ) regulations, the Army and Air Force must conduct coordination with other government agencies. As part of the coordination process, other agencies have an opportunity to raise concerns about impacts associated with the proposed action, and these concerns are considered as part of the decisionmaking process when considering to undertake applicable mitigations to minimize or reduce potential adverse noise impacts. The Army and Air Force comply with the restrictions in all cases where the restrictions are applicable to their operations. Mitigation measures to offset adverse noise impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0157-12	RECOMMENDATION: Is to not allow any live ordnance release over State controlled land that would restrict access to those lands.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0158-1	<p>I am a retired professional archeologist with considerable experience in Alaska. This is a long and detailed DEIS and incorporates a great deal of information; unfortunately it is not particularly good regarding the treatment of cultural resources. This probably is directly due to the fact that the lead cultural resource writer is unknown to any archeologist in Alaska and has, obviously, little personal knowledge of our archeology. Some more specific comments follow:</p> <p>3.1 FOX 3 MOA EXPANSION AND NEW PAXON MOA (DEFINITIVE)</p> <p>1. "No new construction would be associated with this action." But construction access for the trailers is ground disturbing and, therefore, potentially destructive of archeological sites.</p> <p>2. only the "records of the National Register of Historic Places (National Register) and National Historic Landmarks (NHL)." Is not adequate; there are a large number of un-registered sites within this large expanse of Alaska.</p> <p>3, "Archaeological sites under existing training airspace include Native burial grounds, village and settlement sites, and historic mining sites" No one knows where the "burial grounds" are or even if there are any; the same for "village and settlement sites". This is an example of the lack of</p>	<p>3.1(1). The section of the Draft EIS that stated there would be "construction access for the trailers" will be revised, as there will be no construction associated with the proposal. As stated in Section 3.1.9.3.1 of this EIS, NHPA Section 106 Consultation with the Alaska State Historic Preservation Officer (AK SHPO) has been completed, and the AK SHPO agreed with the findings of "no adverse effects." Also, this EIS states that "In the event that previously unrecorded or unevaluated cultural resources are encountered, the Air Force would manage these resources in accordance with the NHPA and other Federal and State laws, Air Force and DoD regulations and instructions, and DoD American Indian and Alaska Native policy."</p> <p>3.1(2). The level of effort to identify historic properties in the airspace for impacts analysis is in accordance with 36 CFR 800.4(b)(1).</p> <p>3.1(3). See response to comment 1 for Section 3.1.</p> <p>3.1(4). See response to comment 10 for Section 3.1.</p> <p>3.1(5). The remainder of the paragraph further states that "there are scattered remote residences."</p> <p>3.1(6). In response to another comment, the text of EIS Section 3.1.9.1 has been revised to read "Alaska Native tribes in the proposed Paxon MOA and</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>knowledge of Alaska Native settlement patterns.</p> <p>4. The lack of registered properties is directly related to the lack of military activity and recognition of the sites within their jurisdiction. There may (probably are) many such eligible properties.</p> <p>5. “There are no Alaska Native tribes within this area” but the “tribes” did not have prescribed territories and there was considerable use of this area for hunting and trading.</p> <p>6. “Impacts on traditional resources under airspace can include the noise and visual effects of aircraft overflights on rituals and ceremonies” This is nonsense. There are no rituals and ceremonies in these areas, except, perhaps, in the villages. Again, a complete lack of knowledge about the Alaskan situation.</p> <p>7. “Scientific studies of the effects of noise and vibration on historic properties have considered potential impacts on historic buildings, prehistoric structures, archaeological cave/shelter sites, and rock art.” There have been no such studies in Alaska; in addition, there are no “cave/shelter sites” or “rock art” in the area considered. This is an unnecessary comment and is plain stupid.</p> <p>8. “The potential for traditional resources in the area was identified using ,,,” consulted agencies, plans, maps, and staff.” This did not include any knowledgeable persons of professional stature. The agencies, etc. are not sufficient to establish the potential of cultural resources.</p> <p>9. Aircraft noise—a common factor in this DEIS—is ridiculous when applied to archeological remains and almost so when directed at other historic properties.</p> <p>10. “Consultation with potentially affected Alaska Native tribes...” is laughable. There has certainly been no meaningful such consultation.</p> <p>11. However, overall, I agree there will probably be “no significant impacts”; more likely—NO impacts of any sort from this particular action, except for the potential trailer construction.</p>	<p>Fox 3 MOA expansion area include the Cheesh-Na Tribe (formerly the Native Village of Chistochina), Native Village of Gakona, the Knik Tribe, and the Native Village of Tyonek, as well as scattered residences.” The commenter also notes in Comment 5 that “there was considerable use of this area...” The analysis takes into account the possibility that Alaska Native rituals and/or ceremonies could be conducted anywhere, and it would be presumptuous for any agency to declare that “there are no rituals and ceremonies in these areas.”</p> <p>3.1(7). Scientific studies of the effects of noise and vibration on historic properties have to do with properties of physics, and results of studies of potential effects conducted outside the state of Alaska would also apply to Alaska.</p> <p>3.1(8). Comment noted.</p> <p>3.1(9). Comment noted.</p> <p>3.1(10). This EIS also documents government-to-government consultations conducted with Federally recognized Alaska Native tribes (see EIS Appendix A, Section A.4).</p> <p>3.1(11). As stated in Section 3.1.9.3.1 of this EIS, NHPA Section 106 Consultation with the AK SHPO has been completed, and the AK SHPO agreed with the findings of “no adverse effects.”</p> <p>3.2(1). EIS Section 3.2.9.3.1 acknowledges that the locations of the new target areas have not been surveyed for archaeological resources and states that “Although the specific locations of the target areas have not yet been determined, before they are established, the Air Force would comply with NHPA Section 106, including identifying historic properties. The specific target sites and impact areas would be established where no cultural resources are located.”</p> <p>3.2(2). This editing error will be corrected to properly read “flaked stone.”</p> <p>3.2(3). Comment noted.</p> <p>3.2(4). Comment noted.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>3.2 REALISTIC LIVE ORDNANCE DELIVERY (DEFINITIVE)</p> <p>1. Tanana Flats Training Area: 134 sites have not been evaluated. The land area in northeast DTA in TA 544 and in southwest DTA in TA 533 for the two proposed new target areas has not been surveyed for archaeological resources.</p> <p>2. line 31. No such term as “flakestone” in Alaskan archeology</p> <p>3. “Archaeological sites under training airspace include Native burial grounds, village and settlement sites,...” and historic mining sites” Considering the lack of investigation by any military agency, this is not true. It may be, but considering Native settlement patterns, it is unlikely that any village and/or settlement sites are in the ROI(except for short lived hunting camps). “Burial grounds” are, to begin with, a complete misunderstanding of Native burial practices, as well as completely unknown as to locations.</p> <p>4. Noise—again</p> <p>5. “ALCOM has completed government-to-government consultation with potentially affected Federally recognized tribes, regarding their concerns about potential impacts on Tribal rights,..” This has not been properly pursued; a letter was simply sent out; no real consultation was completed.</p> <p>3.3 BATTLE AREA COMPLEX RESTRICTED AREA (DEFINITIVE)</p> <p>1. Helicopter training” implies the use of ground cleared spaces—usually by bulldozer—destroying any potential cultural sites. “70 percent of the USARAK helicopter operations” The helicopter pad at the Oklahoma range destroyed what was certainly a Register-eligible archeological site. Similar pads at Clear Creek Buttes involve archeological sites.</p> <p>2. I have been on the ground within BAX and there are a number of archeological sites that have not been fully evaluated.</p> <p>3. “Archaeological sites under training airspace include native burial grounds, village and settlement sites, and historic mining sites” and “include structures relating to gold mining, trapping, or the railroad” Within the BAX area, none of this is true, except, maybe, for trapping and gold prospecting.</p>	<p>3.2(5). See response to comment 10 for Section 3.1.</p> <p>3.3(1). Comment noted.</p> <p>3.3(2). Comment noted.</p> <p>3.3(3). Comment noted.</p> <p>3.3(4). Potential impacts to historic properties from the proposed action will be limited to the expanded footprint of the BAX, as discussed in EIS Section 3.3.9.3.1.</p> <p>3.3(5). According to the National Register Information System database, the property is located in the Delta vicinity.</p> <p>3.3(6). See response to comment 10 for Section 3.1.</p> <p>3.3(7). Pursuant to NEPA and 36 CFR 800, ALCOM has consulted with the public by providing multiple opportunities to comment on the proposed actions in this EIS and provide input. This process is documented in EIS Appendix A.</p> <p>3.4(1). The statement in the opening paragraph of Section 3.4 is the correct statement. The proposal deals with acquiring new Restricted Area airspace to enable the use of Army aviation to take part in training activities in R-2205 that they cannot do now. Training activities on the ground are not part of the proposal. This EIS will be revised to remove the incorrect text from Section 3.4.7.3.1.</p> <p>3.4(2). EIS Section 3.4.9.3.1 states that “In compliance with Section 106 of 17 the NHPA, the Army is consulting with the Alaska SHPO and potentially affected Alaska Native tribes, ANCSA corporations, and tribal government entities to identify historic properties that may be affected, including TCPs, and anticipates concurrence with their finding of no historic properties adversely affected prior to finalizing the EIS and signing the ROD.”</p> <p>3.4(3). Comment noted.</p> <p>3.4(4). Comment noted.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Again, a total lack of knowledge.</p> <p>4. “One hundred-thirty sites are located within the original boundaries of the BAX SDZ (not all sites are eligible for the National Register).” Because they haven’t been evaluated.</p> <p>5. “Rapids Roadhouse, also known as Black Rapids Roadhouse, in Delta,” It is NOT in Delta.</p> <p>6. “ALCOM has completed government-to-government consultation with potentially affected Federally recognized tribes, regarding their concerns about potential impacts on Tribal rights, Tribal resources or Indian land under the proposed new restricted area.” Not in any meaningful way. Several Native leaders and others visited the excavation of a site within the BAX area, indicating a more than superficial interest.</p> <p>7. “Army is consulting with the Alaska SHPO and potentially affected Alaska Native tribes, ANCSA corporations, and tribal government entities” but not knowledgeable cultural resource specialists within the State.</p> <p>3.4 EXPAND RESTRICTED AREA R-2205, INCLUDING THE DIGITAL MULTI-PURPOSE TRAINING RANGE (DEFINITIVE)</p> <p>1. “this action...involves no ground-disturbing construction.” But it also says “other than surficial ground disturbance associated with ground maneuvers of vehicles,” It is exactly this vehicular traffic that is potentially destructive to shallow deposits of archeological value.</p> <p>2. It is interesting that some of the oldest and most productive archeological sites in interior Alaska are located immediately adjacent to YTA (Broken Mammoth, Mead, and Swan Point sites). This should make YTA much more sensitive to cultural resource possibilities than is presently the case.</p> <p>3. Statements regarding noise impacts and Native consultation have been commented upon (and condemned) previously. Programmatic Actions “Prior to implementation of any element of this proposed action, the Army would comply with NHPA Section 106, including identification of historic properties, and assessment and resolution of adverse effects” As long as this is done, there is no present need for comment. The “obsession” with noise</p>	<p>3.4(5). Comment noted.</p> <p>3.4(H). The source cited for the content of Table H-2 was inadvertently omitted from the references. This EIS will be revised to include it.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>impacts on cultural resources is stupid.</p> <p>Appendix H. Cultural Resources The list of references(N=2)) is laughable. I can only assume that this Appendix has not been finished.</p>	
I0159-1	<p>"No Place Else in America" provides the infrastructure and key resources that are available in Alaska. It is among the reasons I support the continued use renewal and enhancement of our training location and resources. I especially am pleased to learn of the interest in upgrade and priority of technology and cyber component training. I will look forward to the new alignment and utilization of Alaska as a primary training location in the Pacific.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.</p>
I0160-1	<p>I recognize you are here to protect us, and need the practice. You already have far more than enough room in our great State of Alaska. Please don't Federalize even more. Years ago I was flying ANC to FAI, came over a ridge before the flats headed north into FAI, and found myself head on with an A10. I jinked to the right, and found myself head on with another A10. If you grab more airspace you will be causing that sort of incident to happen even more between us civilians or civilian on military. By the time you kill a few civilians, you will have lost quite a bit of goodwill you now enjoy in our great State. Your airspace grab is just not worth even one civilian life. Years ago I also watched F4's scorch the tundra, and caribou tails, out in the Naknek MOA. You can still do that with the space you have!</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources. The statement expressed in the comment, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Sections 1.2 and 1.3. Additionally, in preparing the Final EIS the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts may be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century.</p>
I0160-2	<p>I recognize you are here to protect us, and need the practice. You already have far more than enough room in our great State of Alaska. Please don't Federalize even more. Years ago I was flying ANC to FAI, came over a ridge before the flats headed north into FAI, and found myself head on with an A10. I jinked to the right, and found myself head on with another A10. If you grab more airspace you will be causing that sort of incident to happen even more between us civilians or civilian on military. By the time you kill a few civilians, you will have lost quite a bit of goodwill you now enjoy in our great State. Your airspace grab is just not worth even one civilian life. Years ago I also watched F4's scorch the tundra, and caribou tails, out in the Naknek MOA. You can still do that with the space you have!</p>	<p>The concerns you and others have expressed over the potential flight safety risks of the proposed airspace actions are also of utmost concern to the military. The safety measures currently used in the existing airspace, to include military training routes where the A-10s encounter may have occurred, coupled with the proposed mitigations (Appendix K) and other viable options would be pursued to the extent possible to help ensure the safe, compatible use of the proposed airspace. Flight safety will also be a key factor in the FAA's evaluation of the preferred alternatives when determining if and how each action can be implemented and managed so as not to adversely affect the safety of flight and air traffic control operations in this region.</p>
I0161-1	<p>I am against the use of the Air Space around the Paxson area, due to the affects it will cause in the Hunting and recreational use of this area.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. In preparing the Final FEIS, the Army and Air Force will make every effort to harmonize mission requirements and community needs to avoid user conflicts or mitigate conflicts to the maximum extent feasible.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>Once the Army and Air Force select the preferred alternatives for each proposal, specific measures will be developed in order to avoid, minimize, and, in some cases, fully mitigate adverse impacts to the environment, natural resources, and public communities to the extent feasible and practicable. Such measures are required in accordance with the implementation regulations that the Army and Air Force were required to develop to adopt the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code 4321 et seq.) and the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations 1500–1508).</p>
I0161-2	<p>As a side note: Last fall, 2 Air Force jets, along with another Air force cargo plane were flying well below 500ft above ground level, and moved the moose that were in the area that I was hunting in. details, I'm sure can be verified by the Air Force, it was Labor Day week in the West Fork of the MaCleam River.</p>	<p>Any questions on such sightings should be directed to the Eielson AFB or Joint Base Elmendorf-Richardson contacts that are publicized for such questions/concerns on military aircraft operations. These aircraft may have been operating along one of the charted Military Training Routes (MTRs) discussed in EIS Section 3.1.1 and depicted in Appendix D (Airspace) where altitudes down to 100 feet above ground level (AGL) are permitted. Use of these training routes and the low-altitude tactical navigation (LATN) area also described Section 3.1.1 and Appendix D are used relatively infrequently compared to the Military Operations Areas (MOAs) and Restricted Areas. It is not expected that use of the MTRs and LATN area would change with the JPARC airspace proposals.</p> <p>Eielson Public Affairs (907) 377-2116 354fw.pa.publicaffairs@us.af.mil</p> <p>JBER Public Affairs (907) 552-8151 pateam@elmendorf.af.mil</p>
I0162-1	<p>JPARCS is not good for the MatSu valley. There is already a lot of air traffic in the entire region. The triangle between Anchorage, Fairbanks and Tok is a very busy place for low-level general aviation. The additional low level maneuvering can only increase the risks and when the speeds are factored in, the multiplied chances for a mid-air are increased by a tremendous amount.</p>	<p>The Air Force evaluated reasonable and practicable alternatives when making decisions on the proposed airspace action relative to the siting criteria that would most safely, effectively, and efficiently meet essential flight training needs for both JBER and Eielson based aircraft. The many civilian aviation activities that are most prevalent throughout the proposed airspace, to include the Matanuska-Susitna valley and triangular area noted in the comment, were also acknowledged during this planning process. For that reason, the Fox 3 MOA/Paxon MOA Alternative E proposal was added after the initial scoping process to help reduce the area potentially affected by the other proposals.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		This alternative, coupled with the existing and proposed mitigations addressed in the Final EIS Airspace Management and Use analyses and Appendix K would be pursued along with other viable options to further minimize any impacts on the civilian aviation community. Military representatives will be collaborating with the FAA during their formal study of each airspace proposal and other stakeholders to find solutions that would best serve the safe, compatible use of this airspace while avoiding any flight safety risks or potential for midair collisions.
I0162-2	If these areas are closed for low-level hi-speed military training the negative impact on local use will be substantial.	The proposed MOAs would not be closed while military training is in progress, but it is acknowledged that some VFR pilots may elect to avoid this airspace during the timeframes that these MOAs are in use. As noted in a previous response to these comments, the mitigation measures addressed in the EIS (Appendix K) and other viable options would be pursued to ensure the safe, compatible use of this airspace by both military and civilian aircraft. Pending FAA decisions on how the proposed airspace may be implemented in a safe, efficient manner, military representatives will work with the FAA and other stakeholders to seek solutions that would best serve both military and non-military needs within this airspace.
I0162-3	However, there are other options for the military training area. Areas where the local air transport for training, commuting, recreational flying, hunting, fishing and myriad other uses of the airspace are not nearly as busy or widespread.	Reasonable and practicable alternatives were evaluated by the Air Force when making decisions on the proposed airspace action relative the siting criteria that would most effectively and efficiently meet essential flight training needs for both Joint Base Elmendorf-Richardson and Eielson AFB-based aircraft. The many civilian aviation activities that are most prevalent within this area were taken into account when considering the existing and proposed mitigation measures in the Final EIS (Appendix K) for minimizing any impacts on those activities. Military representatives will work with all concerned to find solutions that would best serve all military and civil aviation interests.
I0162-4	The local wildlife will also undoubtedly be affected in a negative way by the noise and low-level activity of military training.	Section 3.1.8.3 in the EIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 feet AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor, and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. All known calving, lambing, and important bird areas within the JPARC project area were taken into consideration during effects analyses. The U.S. Air Force publishes a handbook for pilots that specifies where

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection. To reduce potential for disturbance under new airspace areas, the following measure was included in the EIS's Fox 3 /Paxon MOAs Section 3.1.8.4 (Mitigations): "Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information." Also, see Appendix E (Noise) for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.
I0162-5	Please reconsider this proposal and relocate the training area to a less densely populated area. The safety and livelihoods of too many Alaskans and tourists to our beautiful region will be adversely affected by the current proposal.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources. The comment to move existing Army and Air Force training areas to other Federal lands or remote areas in Alaska, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Sections 1.2 and 1.3.
I0163-1	My family and I strongly oppose the taking of our recreational lands on the highway system for Military training for aircraft . The Federal Government already has control of vast amounts of lands in Alaska and will not let the public use a big percentage of it. I am not against the military but, let the public have some land to play on too	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use. A number of the proposals request expanded and additional Military Operations Area (MOA) or airspace for restricted areas in order to meet the purpose and need expressed in Chapter 1, Purpose and Need for the Proposed Actions.
I0164-1	This letter concerns the proposed Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA as analyzed in the Joint Pacific Alaska Range Complex Modernization and Enhancement Environmental Impact Statement (JPARC EIS). With regard to these areas, I support the no action alternative. The proposed actions will negatively impact many residents of Alaska, including but not limited those living in rural communities in the area. The subsistence impact analysis is seriously flawed and consequently the EIS fails to accurately describe or assess the impact that the proposed actions will have on residents of many rural communities that rely on resources in the Fox 3 MOA (including the proposed expansion) and the proposed Paxon MOA.	Please see responses to comments G0013-1, G0013-2, and G0013-3.
I0164-2	Another reason to reconsider the expansion of the Fox 3 MOA and creation	Chapters 1 and 2 of this EIS describe the purpose and need for the Fox 3 and

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>of the Paxon MOA is the ongoing problems with F-22s, which account for a significant number of the proposed flights. Safety issues with these planes need to be resolved before plans are made for expanding their use in military training exercises.</p>	<p>Paxon MOAs airspace proposals in meeting future training requirements for all aircraft types under both routine training and major flying exercise scenarios. Any safety concerns that may exist with any aircraft type as you have noted for the F-22 would not affect nor negate the purpose and need for expanding this airspace to meet all future aircraft training mission needs.</p>
<p>I0164-3</p>	<p>This letter concerns the proposed Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA as analyzed in the Joint Pacific Alaska Range Complex Modernization and Enhancement Environmental Impact Statement (JPARC EIS). With regard to these areas, I support the no action alternative. The proposed actions will negatively impact many residents of Alaska, including but not limited those living in rural communities in the area. The subsistence impact analysis is seriously flawed and consequently the EIS fails to accurately describe or assess the impact that the proposed actions will have on residents of many rural communities that rely on resources in the Fox 3 MOA (including the proposed expansion) and the proposed Paxon MOA. The mitigation measures proposed for the action alternatives are inadequate and would need to be enhanced if you move forward with an action alternative.</p> <p>...</p> <p>In the event that an action alternative is selected, the mitigation measures for the proposed expanded Fox 3 and new Paxon MOA need to be expanded beyond those listed in the EIS in order to lessen the significant impacts that these alternatives will have on subsistence activities and resources.</p> <p>The proposed period for no military flights is not adequate. Short seasons and unpredictable availability of resources in accessible areas mean that it is not realistic to ask local residents to schedule their subsistence activities at times when military activities are not occurring. Instead, military activities need to be scheduled at times that do not conflict with subsistence activities in order to avoid a significant impact on subsistence. Berry picking is an important activity that occurs within late July and August, while moose and caribou seasons in Unit 13 also start in early August. March is another important time for hunting caribou for local residents. There should be no military flying exercises during August, September, and March. In addition, in May, June, July and October, the minimum flight level should be 5,000 AGL to avoid conflicts with general aviation aircraft and subsistence activities during the summer recreation and fall hunting seasons. These restrictions should apply to all branches of the military because it doesn't</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>matter to the wildlife who is flying the plane.</p> <p>Holding a few community meetings is not adequate to monitor the impact of the proposed activities on subsistence. Another round of comprehensive community harvest assessments should be done approximately five years out, with funding from the federal agencies involved in JPARC, and compared to the information that is currently being collected. Funding should also be provided for surveys to monitor the impacts to wildlife resources. This monitoring could be done in cooperation with federally recognized tribes and other Alaska Native organizations.</p> <p>The list of communities notified about and consulted with regarding the proposed activities should be expanded to include all those with a positive customary and traditional use determination through the Federal Subsistence Program for moose, caribou, or both, in Game Management Unit 13 and any other GMUs that overlap with the MOAs. For those communities with federally recognized tribal governments, the consultation should occur on a government to government basis.</p>	
I0164-4	<p>This letter concerns the proposed Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA as analyzed in the Joint Pacific Alaska Range Complex Modernization and Enhancement Environmental Impact Statement (JPARC EIS). With regard to these areas, I support the no action alternative. The proposed actions will negatively impact many residents of Alaska, including but not limited those living in rural communities in the area. The subsistence impact analysis is seriously flawed and consequently the EIS fails to accurately describe or assess the impact that the proposed actions will have on residents of many rural communities that rely on resources in the Fox 3 MOA (including the proposed expansion) and the proposed Paxon MOA.</p> <p>...</p> <p>The list of communities notified about and consulted with regarding the proposed activities should be expanded to include all those with a positive customary and traditional use determination through the Federal Subsistence Program for moose, caribou, or both, in Game Management Unit 13 and any other GMUs that overlap with the MOAs. For those communities with federally recognized tribal governments, the consultation should occur on a government to government basis.</p>	<p>All tribes in and around GMU 13 and several dozen beyond that were offered consultation, and subsequent meetings were government-to-government.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
I0164-5	<p>This letter concerns the proposed Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA as analyzed in the Joint Pacific Alaska Range Complex Modernization and Enhancement Environmental Impact Statement (JPARC EIS). With regard to these areas, I support the no action alternative. The proposed actions will negatively impact many residents of Alaska, including but not limited those living in rural communities in the area. The subsistence impact analysis is seriously flawed and consequently the EIS fails to accurately describe or assess the impact that the proposed actions will have on residents of many rural communities that rely on resources in the Fox 3 MOA (including the proposed expansion) and the proposed Paxon MOA. The mitigation measures proposed for the action alternatives are inadequate and would need to be enhanced if you move forward with an action alternative.</p> <p>...</p> <p>The subsistence analysis for the Fox 3 MOA Expansion and New Paxon MOA is seriously flawed in three substantive areas and should be thoroughly revised before any decision is made to move forward with an action alternative.</p>	<p>Please see responses to comments G0013-1, G0013-2, and G0013-3.</p>
I0164-6	<p>First, limiting the subsistence analysis to eight communities within 20 miles of the MOAs does not accurately represent patterns of resource use and distribution in the Nelchina Basin/Copper Basin area. Many communities beyond those addressed in the analysis rely on resources in the impacted areas and consequently will be negatively impacted by the proposed actions. Resources are spread across the local landscape, and we go to where the resources are. Sometimes that means driving more than 20 miles. For example, I live in Copper Center, one of the rural communities excluded from the analysis, and I pick blueberries every year in the proposed Paxon MOA. I do so because I haven't found a good blueberry patch closer to home. Several of my friends similarly live in communities not included in the analysis, such as Tazlina and Kenny Lake, but hunt caribou in the impact area. Instead of the handful of communities included in the current analysis, the analysis should be expanded to all those communities with a positive customary and traditional use determination (C&T) for moose, caribou or both on lands within Game Management Unit 13 (and any other GMUs that fall within the Fox and Paxon MOAs) under the Federal Subsistence Program. In contrast to the seemingly arbitrary 20 nautical mile rule, customary and traditional use determinations are based on an analysis of all</p>	<p>Please see the response to comment G0013-1.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	available data regarding patterns of resource use. In what follows, the phrase “potentially affected rural communities” refers to the communities that have C&T for moose or caribou in the MOAs.	
I0164-8	Third, limiting the communities with high dependence on subsistence to only those with majority Alaska Native populations is problematic and fails to recognize the importance of subsistence to other local residents. While it is appropriate for predominately Alaska Native communities to fall in the “high dependence” category, there are other rural communities in the area that should also be classified as such. Once up-to-date information is obtained regarding the harvest and use of subsistence resources (as described in the previous paragraph), this question should be revisited for all the potentially affected rural communities. Communities where more than about 80 percent of the households report using subsistence resources should be classified as high dependence regardless of the community’s composition.	Please see response to comment G0013-3.
I0164-9	<p>In the event that an action alternative is selected, the mitigation measures for the proposed expanded Fox 3 and new Paxon MOA need to be expanded beyond those listed in the EIS in order to lessen the significant impacts that these alternatives will have on subsistence activities and resources.</p> <p>The proposed period for no military flights is not adequate. Short seasons and unpredictable availability of resources in accessible areas mean that it is not realistic to ask local residents to schedule their subsistence activities at times when military activities are not occurring. Instead, military activities need to be scheduled at times that do not conflict with subsistence activities in order to avoid a significant impact on subsistence. Berry picking is an important activity that occurs within late July and August, while moose and caribou seasons in Unit 13 also start in early August. March is another important time for hunting caribou for local residents. There should be no military flying exercises during August, September, and March. In addition, in May, June, July and October, the minimum flight level should be 5,000 AGL to avoid conflicts with general aviation aircraft and subsistence activities during the summer recreation and fall hunting seasons. These restrictions should apply to all branches of the military because it doesn’t matter to the wildlife who is flying the plane.</p>	<p>Revisions in the Final EIS include changes addressing concerns or additional information provided in this comment. The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
I0164-10	Holding a few community meetings is not adequate to monitor the impact of the proposed activities on subsistence. Another round of comprehensive community harvest assessments should be done approximately five years	The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>out, with funding from the federal agencies involved in JPARC, and compared to the information that is currently being collected. Funding should also be provided for surveys to monitor the impacts to wildlife resources. This monitoring could be done in cooperation with federally recognized tribes and other Alaska Native organizations.</p> <p>The list of communities notified about and consulted with regarding the proposed activities should be expanded to include all those with a positive customary and traditional use determination through the Federal Subsistence Program for moose, caribou, or both, in Game Management Unit 13 and any other GMUs that overlap with the MOAs. For those communities with federally recognized tribal governments, the consultation should occur on a government to government basis.</p>	<p>recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
I0165-1	<p>I very strongly feel that you should NOT extend these MOA's into area's that have road access. There is very limited road access in Alaska. You propose to incringe upon public domain that is used by many citizens for hunting,fishing, snowmachine activity, trapping, mining and other recreational activity. There already exists, thousands of square miles of MOA's that are under utilized. These areas (Stony, Galena, Naknek) have no road access, and are far more suitable for your requirments with significantly less impact on the general populace. As a professional pilot, a recreational pilot and a long time Alaskan, I STRONGLY OBJECT TO THIS PROPOSITION! I know many people in this state, and thus far know of NOT ONE that approves.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force units based within the State of Alaska face an exceptional challenge to meet compelling and increasingly urgent needs borne out of fighting wars. In an era of persistent combat operations, the Army and Air Force need to continue to generate new technologies, learn from battlefield experiences, update tactics, and train intensively to face a committed and agile enemy. Each of these challenges drives the purpose and the need for modernization and enhancements to the range and airspace infrastructure that replicate the modern battlefield for training and testing in Alaska. In preparing the Final EIS, the Army and Air Force will make every effort to harmonize mission requirements and community needs to avoid or mitigate user conflicts to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0165-2	<p>I very strongly feel that you should NOT extend these MOA's into area's that have road access. There is very limited road access in Alaska. You propose to incringe upon public domain that is used by many citizens for hunting,fishing, snowmachine activity, trapping, mining and other recreational activity. There already exists, thousands of square miles of MOA's that are under utilized. These areas (Stony, Galena, Naknek) have no road access, and are far more suitable for your requirments with significantly less impact on the general populace. As a professional pilot, a recreational pilot and a long time Alaskan, I STRONGLY OBJECT TO THIS</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources. The comment to move existing Army and Air Force training areas to other Federal lands or remote areas in Alaska, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Sections 1.2 and 1.3. Additionally, JPARC is an important and vital component of the national defense strategy of the United States and is a key attribute of Alaska's value to the military in the twenty-first century. The</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	PROPOSITION! I know many people in this state, and thus far know of NOT ONE that approves.	Army and Air Force are required by NEPA to make the efforts necessary to harmonize mission requirements and community needs in order that user conflicts be avoided, minimized, or mitigated to the extent feasible and practicable.
I0166-1	The thinking of the USAF leadership for the JPARC proposal is nonsensical. The USAF does not need the expansion under this proposal OR to gain any approval that would force non-military and non-emergency aircraft to a maximum 500' AGL restriction throughout said expansion area. The State of Alaska has dire dependency upon civil aviation, both IFR and VFR, throughout the entire state. The State of Alaska, aviation-wise, is about the civil AND the military side. It is not just about the USAF side. The USAF must compromise on this proposal to an alternative that is acceptable to Alaska civil aviation including the AOPA and Alaska Airmen's Association.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. General aviation is particularly important in Alaska as a means of commerce, subsistence, recreation and emergency transportation. In preparing the Final EIS the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century.
I0166-2	The State of Alaska has dire dependency upon civil aviation, both IFR and VFR, throughout the entire state. The State of Alaska, aviation-wise, is about the civil AND the military side. It is not just about the USAF side. The USAF must compromise on this proposal to an alternative that is acceptable to Alaska civil aviation including the AOPA and Alaska Airmen's Association.	The Air Force understands this dire dependency on civil aviation within the State, which was certainly taken into account when developing the JPARC airspace proposals and those proposed mitigations that would help minimize potential impacts on this aviation community. The FAA study of the preferred airspace alternatives will determine if and how each may be safely implemented and effectively managed without having an unacceptable impact on air traffic flows and Air Traffic Control system capabilities. The Air Force will continue to work with the FAA, Aircraft Owners and Pilots Association, Alaska Airmen's Association, and other key stakeholders to seek those reasonable alternatives that would most safely and efficiently serve both military and civil aviation airspace needs.
I0166-3	The USAF does not need the expansion under this proposal OR to gain any approval that would force non-military and non-emergency aircraft to a maximum 500' AGL restriction throughout said expansion area. The State of Alaska has dire dependency upon civil aviation, both IFR and VFR, throughout the entire state. The State of Alaska, aviation-wise, is about the civil AND the military side. It is not just about the USAF side. The USAF must compromise on this proposal to an alternative that is acceptable to Alaska civil aviation including the AOPA and Alaska Airmen's Association.	Chapters 1 and 2 of this EIS describe the purpose and need for the expanded airspace and lower altitudes that are not intended to force nonparticipating aircraft to operate outside of or below the proposed airspace. Each JPARC airspace proposal considered the high civil aviation uses of this airspace and those mitigations that will be pursued to minimize any adverse impacts. The FAA study of the preferred airspace alternatives will examine if and how each can be accommodated safely and efficiently without having an unacceptable impact on air traffic flows and Air Traffic Control system capabilities. The Air Force will continue to work with the FAA, Aircraft Owners and Pilots Association, Alaska Airmen's Association, and other key stakeholders to seek those viable alternatives that would meet both civil and military needs while providing for the safe and compatible use of the proposed airspace by all interests.

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
I0167-1	<p>The lowering of the MOA floor to 500ft in an area where there is heavy use of general aviation is a big hazard. If there was a continued radio channel like around FAI this would help but not eliminate it because not all small planes have radios. Restrictions around Delta and Isabel Pass are already a problem in poorer weather. Farther restrictions would effectively close the pass most of the time. Allowing UAVs in the crowded airspace around FAI before the FAA comes up with rules of operation and see and be seen is a midair waiting to happen. Please hold off on this till the rules are set or move it all to the Delta controlled area.</p>	<p>The military is sensitive to the safety concerns you expressed over the lowered MOA floors, radio communication gaps, and airspace restrictions around the Isabel Pass and proposed UAV corridors. They are also aware of how airspace restrictions, poor weather conditions, terrain variations, and other factors may affect those flight routes and altitudes traditionally flown by general aviation pilots. For those reasons and the high priority the military places on flight safety, those existing and proposed mitigation measures discussed in the EIS Airspace Management and Flight Safety analyses and Appendix K would be pursued to help ensure the safe, compatible use of the proposed airspace. Pending the FAA's study of these proposals and determination as to how each could be implemented without impacting flight safety, air traffic flows, and Air Traffic Control capabilities, the Air Force and Army will work with the FAA and key stakeholders to seek any other reasonable options that would best serve all user needs in a safe, efficient manner. Airspace actions can only be implemented once the FAA has ensured all rules, regulations, and other considerations governing airspace management and both aircraft and UAV operations are fully met.</p>
I0168-1	<p>The proposed expansion of the Fox 3 MOA intrudes both laterally and vertically in to an area of Alaska highly used by the general public. Expanding a MOA to within 30 miles of Alaska's fastest growing populace is precarious. The Mat-Su Valley is home to over 230 landing areas and to over 2,000 of Alaska's general aviation pilots. The Lake Louise recreation area is one of the most frequented destinations for all Alaskan's who enjoy hunting, fishing, hiking, boating but most importantly for the quiet and pristine outdoor experience. Military aircraft traveling in excess of 500kts and/or 500' would not only endanger civil aviation traffic but destroy Alaska's quintessence. The same argument applies to the Paxson MOA Low Altitude proposal. This area is a major VFR route connecting northern Alaska with the south central and eastern regions of the state. Variable weather in this area eliminates the discussion of corridors that would create congested, unsafe situations for aviation traffic. MOA's today prohibit IFR access by civilian aircraft during exercises. This not only affects the economic viability of communities with and outside of these areas but history shows it has been difficult even obtaining access during emergency situations. This results in an even bigger concern: the loss of safety for VFR operators who are being encouraged to use low-level civil corridors. If larger, IFR capable aircraft are forced to use the VFR corridor during these exercises, this puts these larger, faster aircraft on the same flight path as our</p>	<p>All options were explored by the Air Force and Army proponents in their airspace proposals relative to the siting criteria that would most safely, effectively, and efficiently meet both military and civilian aviation needs. It was recognized that the proposed airspace overlaps areas frequently used by VFR and IFR air traffic; therefore, the military will work closely with all concerned during the FAA's formal study of each proposal to seek all viable options that would provide for the safe, compatible use of this airspace. The potential effects of the Fox 3 MOA/Paxon MOA proposal on the areas you noted were considered among other scoping comments with the added Alternative E proposal, which reduced the areas potentially affected by the initial original Alternative A proposal. Pending FAA and DoD decisions on how UAV operations can be safely and efficiently integrated into the National Airspace System, the military must identify and evaluate the options that would best support UAV mission requirements. Restricted area corridors were assessed as the most restrictive option each could have on other airspace uses. These corridors, along with the restricted areas proposed for the expanded R-2205, expanded R-2202, and the Battle Area Complex, will be further evaluated by the FAA to determine if and how each could be established without adversely affecting VFR and IFR air traffic flows through these areas. The potential effects that adverse weather conditions and other factors may have on higher use VFR and IFR routes will be considered in the</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>smaller general aviation aircraft at low altitude, which is a loss of safety for all civil operators. We oppose any additional airspace that hinders IFR traffic and the negatively impacts our communities. Five years ago the Alaska Airmen participated in an EIS process that resulted in the building of the Battle Area Complex south of Delta Junction. One of the concerns at the time was the possibility of restricted air space over the complex. We were assured that this would never be a requirement. Our position has not changed even though the military’s planned use of airborne weapons release has changed. We oppose restricted airspace over an area where weather, terrain, and mountain passes creates a challenging and potentially unsafe situation. The proposals to establish more restricted airspace for live ordinance delivery further impacts the Fairbanks, Delta Junction areas and north even more. Again, the areas affected are accessed by Alaskans utilizing these areas for mining, hunting and recreation. Existing restricted areas already have a negative impact to civilian communities. We understand Unmanned Aerial Vehicles are the future and that the military would like to integrate these into their training. Corridors allowing UAV’s to access training areas is an enormous safety concern. Currently the National Airspace System does not have a mechanism that allows UAV’s to harmoniously fly and communicate in the same airspace as civil aircraft. Until true sense and avoid capability is defined and developed we need to side with safety and oppose these corridors as proposed. Alaska already has one of the largest areas of airspace in the world secured for training. The Alaska Airmen’s Association supports our military and understands the need for training; however we are concerned for other users of this airspace. Through the scoping and public meetings it was explained that the military needed such low altitudes and expanded areas in order to train for existing and future threats to the 5th generation fighters and to train with new weapons systems. It was also stated that this redesign was based on saving transient time and fuel to reach the training areas. While not part of this proposal, we ask the military to look at all Alaska airspace they currently hold and release airspace that is not being effectively utilized. We also question the reasoning and claims for the proposed F-16 move to JBER as they seem to contradict the motives of the JPARC redesign. We do know that improved and consistent communication that includes real-time information for pilots sharing this airspace needs to occur. Implementing a statewide Special Use Airspace Information Systems (SUAIS) as well as improving the existing service are essential to operating an airspace complex of this size. Radio coverage and communication</p>	<p>FAA studies. The military agrees with the need to expand its communications capabilities and will pursue funding to enhance coverage in those areas where communications is lacking so as to better inform the public of the scheduled and real-time airspace uses. The support and assistance of all aviation interests are requested to help achieve solutions that will best serve the mutual interests and needs of all concerned. Also, be advised that the F-16 relocation is not associated in any manner with the JPARC proposals and will be examined separately through other NEPA processes.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	remains unreliable in the eastern areas of the current complex. Beside improvements to the current program, we would like alternatives to be explored for communicating the status of the MOA's improving access in the ranges for civil aircraft when not in use. We ask that the floor of current and proposed airspace be determined based on communication coverage for SUAIS.	
I0168-3	The Lake Louise recreation area is one of the most frequented destinations for all Alaskan's who enjoy hunting, fishing, hiking, boating but most importantly for the quiet and pristine outdoor experience. Military aircraft traveling in excess of 500kts and/or 500' would not only endanger civil aviation traffic but destroy Alaska's quintessence. The same argument applies to the Paxson MOA Low Altitude proposal. This area is a major VFR route connecting northern Alaska with the south central and eastern regions of the state.	<p>Section 3.1.10.3.1 of the EIS acknowledges that Lake Louise State Recreation Area is located under the Fox 3 MOA and new Paxson MOA proposal area for Alternative A. A description of this special use area is provided in Appendix I (Land Use, Public Access, and Recreation). The referenced section also acknowledges that the Lake Louise area is popular for tourism, vacationing, and outdoor sports such as hunting and fishing.</p> <p>Section 3.1.10.3.1 of the EIS also acknowledges that noise associated with low-level and supersonic overflight could lessen recreational experiences for some persons. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation, such as seasonal avoidance areas and avoiding overflight of popular hunting areas, campgrounds, and trails between June 27 and July 11, including the Lake Louise State Recreation Area.</p> <p>Section 3.1.10.3 of the EIS acknowledges that the expansion of the Fox 3 MOA and the establishment of the Paxson MOA would result in indirect effects on civilian air access to areas below or in the vicinity of the project area. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts, including coordinating the schedule of major flying exercises (MFEs) with local communities in advance. In addition, Section 3.1.1.4 (Airspace) lists mitigation measures that could be implemented to reduce the impacts, such as use of the Special Use Airspace Information Service (SUAIS) and establishing or expanding existing VFR flyway corridors as necessary to provide VFR aircraft transit through areas that may be affected by high density military flight activities within/near the proposed airspace. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0168-4	We oppose any additional airspace that hinders IFR traffic and the negatively impacts our communities. Five years ago the Alaska Airmen participated in an EIS process that resulted in the building of the Battle Area Complex south	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force units based within the State of Alaska face an exceptional challenge to meet compelling and increasingly urgent

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>of Delta Junction. One of the concerns at the time was the possibility of restricted air space over the complex. We were assured that this would never be a requirement. Our position has not changed even though the military’s planned use of airborne weapons release has changed. We oppose restricted airspace over an area where weather, terrain, and mountain passes creates a challenging and potentially unsafe situation. The proposals to establish more restricted airspace for live ordinance delivery further impacts the Fairbanks, Delta Junction areas and north even more. Again, the areas affected are accessed by Alaskans utilizing these areas for mining, hunting and recreation. Existing restricted areas already have a negative impact to civilian communities. We understand Unmanned Aerial Vehicles are the future and that the military would like to integrate these into their training.</p>	<p>needs borne out of fighting wars. In an era of persistent combat operations, the Army and Air Force need to continue to generate new technologies, learn from battlefield experiences, update tactics, and train intensively to face a committed and agile enemy. Each of these challenges drives the purpose and the need for modernization and enhancements to the range and airspace infrastructure that replicate the modern battlefield for training and testing in Alaska. In preparing the Final EIS, the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent reasonable and practicable. JPARC is a key attribute of Alaska’s value to the military in the twenty-first century. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0168-5	<p>Through the scoping and public meetings it was explained that the military needed such low altitudes and expanded areas in order to train for existing and future threats to the 5th generation fighters and to train with new weapons systems. It was also stated that this redesign was based on saving transient time and fuel to reach the training areas. While not part of this proposal, we ask the military to look at all Alaska airspace they currently hold and release airspace that is not being effectively utilized.</p>	<p>Air Force Instruction 13-201 requires periodic reviews of Special Use Airspace (SUA) utilization such that underutilized SUA should be returned to the National Airspace System (NAS) and removed from aeronautical charts. This review of airspace is separate from the JPARC EIS and occurs annually.</p>
I0168-6	<p>We also question the reasoning and claims for the proposed F-16 move to JBER as they seem to contradict the motives of the JPARC redesign.</p>	<p>The F-16 aggressor squadron’s proposed relocation from Eielson AFB to Joint Base Elmendorf-Richardson is not connected to the proposals for airspace adjustments contained in the JPARC EIS. The airspace requirements described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower-altitude airspace to reflect the types of combat in which fifth-generation F-22 fighters would be engaged. The F-22s have the capability to initiate combat at greater distances than fourth-generation fighters, such as the F-16, so fourth-generation fighters must apply diverse tactics that require airspace expansion in distance and altitude. The F-22s must train to combat all such threats regardless of where the aggressor aircraft are based.</p> <p>The location of the F-16 aggressor squadron within Alaska is not a connected action to the JPARC proposals. The majority of the JPARC proposals that involve Eielson AFB are Army proposals, and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft. The details of the proposed F-16 relocation and training, including major flying exercises</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		(MFEs) such as RED FLAG–Alaska, will be worked out in the coming months. An environmental analysis will be prepared to address the environmental consequences of the proposed F-16 relocation within Alaska.
I0169-1	<p>I have lived in Alaska for 16 years, based primarily out of the Susitna Valley and the Fairbanks area. I am for ABSOLUTELY NO ACTION on ALL of these proposals. We do not need to enhance and modernize the military; if anything, we need to decrease the current military activity which is already too extreme. With a faltering economy, huge national debt, and dwindling resources (e.g. oil) we cannot support the excessive, expensive behavior of the U.S. military. Alaskans need to protect this last frontier we have from further bombardment of excess military activity. Alaska has a special place in Americans’ hearts as a last vestige of wilderness, wildlife, and a wild spirit that has gone extinct in the rest of the nation. Alaska is a last vestige of remote wilderness. Wilderness includes air and sound space. Further expansion of military activity does not support the wilderness spirit.. The United States military is a cancer that is rapidly sickening our nation, not to mention many other nations such as Iraq and Afghanistan. The military exists only for itself and the mega-corporations that make and sell the weapons, planes, helicopters, tanks, drones, and all the other equipment. It has failed to look out for the American people, to serve as a protector from other potentially aggressive nations. Instead, the U.S. military is beating its chest at the rest of the world and stirring up aggression and further threatening the peace of our own nation, not to mention the peace of the world. Where is this so called advanced weaponry getting us besides making complete fools out of ourselves.</p> <p>...</p> <p>There’s already plenty of technology. The U.S. military should use what it has already wasted taxpayers’ money on and not act like a spoiled rich kid having to have the latest newest toy. We can save resources and money by just sticking with what we have. What other countries have this kind of technology? Iraq and Afghanistan sure don’t but our technology sure didn’t just win the war. Those countries, and the terrorists, use creativity to hold their own against us. As all of the long drawn out wars of the 20th and 21st century have proven (e.g. Vietnam, Iraq, and Afghanistan) more modern enhanced technology never allowed this nation to go in and get the mission accomplished in a short time. With our supreme technology we’ve just made complete fools out of ourselves. What’s missing from this EIS is the effect</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force recognizes there will potentially be some impacts to the population and the natural environment in the affected region of influence of the proposed actions. The Army and Air Force will continue to consult and coordinate with appropriate government agencies and other organizations to discuss their issues and concerns to develop mitigations to avoid or minimize potential adverse impacts. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>modernization and the military, in general, have on the spirit of Alaska. This is extremely important. Our airspace should not just be a free for all. You can't have wilderness and so called wild and free rivers on the ground and not include the airspace. Fighter jets flying over the wilderness can completely ruin a person's experience on the ground and affect their sanity. I know from first hand experience being right under the flight path for all fighter jets leaving Eielson. We're down on the ground just living a peaceful life while the aggressive military is training to provoke other nations. Our peace is affected in two ways. In the long-term from other countries disgruntled by our cocky country and, immediately, from all the noise. The noise from these jets is excruciating. The stress is intense; it strains relationships. Our quality of life is diminished. We need to promote peace, not war. Peace is cheaper than war. Alaskans gave the military an inch during World War II when it was rightly justified for defense. But they've taken it miles ever since and turned this state into an aggressive, offensive training grounds. The growth of the military in Alaska along with resource extraction industries, which the military heavily depends upon, has led to a lower quality community in Fairbanks. The so called economic growth that has resulted also resulted in a decrease of local shops and a huge increase in Box Store counterculture. Most old timers will tell you, and many short timers as well, that this place just isn't what it used to be. There's also too much hunting pressure coming from the military who don't even need the meat and there's too many stories of unethical military hunting behavior. Expansion of the military in general will result in a further expansion of lower valued people and community. The people who came to Alaska to live a simpler way of life away from the stifling congestion and development of the lower '48 are an important part of Alaska's history and culture even though they may be in the minority. Wilderness and subsistence is an important part of this culture. With the death of wilderness comes the death of a lot of people's spirits. MOAS do not equal wilderness. What little bit of uncluttered, minimally encroached environment that this state has left should be left intact for the benefit of future generations. This includes air and sound space. In these days of ridiculous national debt there is no better time to reduce military technology. Stop giving money to the big multinational corporations making the military technology. Stop using up all of our oil and metals (the extraction of which results in further loss of wilderness) to keep making more modern and enhanced military technology. The military is one of the number one consumers of natural resources such as oil. At the rate</p>	

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>we're going we will run out of these resources soon enough. Let's stop now, halt the modernizations, quiet Alaska's air space, let the caribou feed in peace, let the people who came to Alaska for wilderness and subsistence opportunities carry on their peaceful activities, and those who peacefully existed here already for thousands of years continue to do so. Please, absolutely NO ACTION on all proposals.</p>	
I0169-2	<p>I have lived in Alaska for 16 years, based primarily out of the Susitna Valley and the Fairbanks area. I am for ABSOLUTELY NO ACTION on ALL of these proposals. We do not need to enhance and modernize the military; if anything, we need to decrease the current military activity which is already too extreme. With a faltering economy, huge national debt, and dwindling resources (e.g. oil) we cannot support the excessive, expensive behavior of the U.S. military. Alaskans need to protect this last frontier we have from further bombardment of excess military activity. Alaska has a special place in Americans' hearts as a last vestige of wilderness, wildlife, and a wild spirit that has gone extinct in the rest of the nation. Alaska is a last vestige of remote wilderness. Wilderness includes air and sound space. Further expansion of military activity does not support the wilderness spirit.. The United States military is a cancer that is rapidly sickening our nation, not to mention many other nations such as Iraq and Afghanistan. The military exists only for itself and the mega-corporations that make and sell the weapons, planes, helicopters, tanks, drones, and all the other equipment. It has failed to look out for the American people, to serve as a protector from other potentially aggressive nations. Instead, the U.S. military is beating its chest at the rest of the world and stirring up aggression and further threatening the peace of our own nation, not to mention the peace of the world. Where is this so called advanced weaponry getting us besides making complete fools out of ourselves. The U.S. military drags out every mission they set out to accomplish, kill more innocent people than guilty, make us look as bad, if not worse, than the bad guys we're trying to eliminate. It didn't take an F22 and other modern, enhanced technology to find Saddam Hussein or Osama bin Laden. It took intelligent courageous men to find them, sneak up on them and arrest or kill them. If the U.S. military wants to increase training and create stressful scenarios for potential wars, then they should get the men off their butts, tear them away from their computer and radar screens, yank them out of their cockpits and plop them down in the middle of the wilderness living with minimal technology and using their senses and working together to become tough courageous men ready to face</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>the potential challenge of other threatening nations and people. Alaska is a prime place for this kind of training, especially joint training. Groups of army, air force, and navy men on their feet traveling through the wilderness working together to solve problems and find the hidden imaginary enemy in a cold dark canyon or in a cave in the mountains. Most of our real life enemies (e.g. Osama bin Ladin) are on the ground using their brains to elude us, not in an F22 like the role playing Red Flag Alaska games. I propose an alternative not listed here. It would save vast amounts of tax payers money. Park all the F22s, F16s, drones, and other technology, but leave just enough in training for defending our country. Get the men training jointly on their feet, trekking through swamps and up mountains, create scenarios where men learn to sneak up on enemies, teach them diplomacy, how to defend themselves in hand to hand combat, teach them to use their senses rather than rely on technology, teach them to only kill when absolutely necessary. Maybe then they could tell the difference between innocent civilians and the actual bad guys. They can't do it up in the sky screaming along at hundreds of miles an hour. There's already plenty of technology. The U.S. military should use what it has already wasted taxpayers' money on and not act like a spoiled rich kid having to have the latest newest toy. We can save resources and money by just sticking with what we have. What other countries have this kind of technology? Iraq and Afghanistan sure don't but our technology sure didn't just win the war. Those countries, and the terrorists, use creativity to hold their own against us. As all of the long drawn out wars of the 20th and 21st century have proven (e.g. Vietnam, Iraq, and Afghanistan) more modern enhanced technology never allowed this nation to go in and get the mission accomplished in a short time. With our supreme technology we've just made complete fools out of ourselves.</p>	
I0169-4	<p>Alaskans need to protect this last frontier we have from further bombardment of excess military activity. Alaska has a special place in Americans' hearts as a last vestige of wilderness, wildlife, and a wild spirit that has gone extinct in the rest of the nation. Alaska is a last vestige of remote wilderness. Wilderness includes air and sound space. Further expansion of military activity does not support the wilderness spirit.</p> <p>...</p> <p>What's missing from this EIS is the effect modernization and the military, in general, have on the spirit of Alaska. This is extremely important. Our airspace should not just be a free for all. You can't have wilderness and so</p>	<p>Land Use discussions in the EIS (Sections 3.1.10, 3.2.10, etc.) evaluate impacts of the proposed project on land use and recreation. Section 3.1.10 of the EIS acknowledges that quiet and naturalness is an intrinsic part of some recreational experiences. The analysis considers the expected effect of noise on the qualities of recreational areas and user experience based on the sensitivity of the area or use, and on the spectrum of available recreational opportunity. It also considers how changes in public access would affect the spatial and temporal availability of areas used for diverse recreational purposes. Sections 3.1.10 of the EIS acknowledges that noise associated with low-level and supersonic overflight could lessen recreational experiences for some persons. Section 3.1.10.4 lists mitigation measures that could be</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>called wild and free rivers on the ground and not include the airspace. Fighter jets flying over the wilderness can completely ruin a person’s experience on the ground and affect their sanity.</p> <p>...</p> <p>There’s also too much hunting pressure coming from the military who don’t even need the meat and there’s too many stories of unethical military hunting behavior.</p> <p>...</p> <p>Wilderness and subsistence is an important part of this culture. With the death of wilderness comes the death of a lot of people’s spirits. MOAS do not equal wilderness. What little bit of uncluttered, minimally encroached environment that this state has left should be left intact for the benefit of future generations.</p>	<p>implemented to reduce the impacts to recreation, such as seasonal avoidance areas and avoiding overflight of popular hunting areas, campgrounds, and trails between June 27 and July 11. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p> <p>While military personnel may participate in hunting, harvest of game species in Alaska is managed by the Alaska Department of Fish and Game (ADFG), not the military. A license from ADFG is required to participate in hunting and trapping; sport, commercial, and personal use fishing; and sport fish guiding or hunting guiding. Detailed information on the hunting regulations and restrictions within each of the Game Management Units (GMUs) is included in Appendix I (Land Use). In addition, current regulations and restrictions can be found on the ADFG website.</p>
I0169-5	<p>I know from first hand experience being right under the flight path for all fighter jets leaving Eielson. We’re down on the ground just living a peaceful life while the aggressive military is training to provoke other nations. Our peace is affected in two ways. In the long-term from other countries disgruntled by our cocky country and, immediately, from all the noise. The noise from these jets is excruciating. The stress is intense; it strains relationships. Our quality of life is diminished.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Your comment will be incorporated as part of the Final EIS and considered as part of the decision-making process. The Army and the Air Force share your concerns about military flight noise. In preparing the Final EIS, the Army and Air Force will make every effort to harmonize mission requirements and community needs to avoid or mitigate user conflicts to the maximum extent feasible. Once the Army and Air Force select the preferred alternatives for each proposal, specific measures will be developed in order to avoid, minimize, and, in some cases, fully mitigate adverse impacts to the environment, natural resources, and public communities to the extent feasible and practicable. Such measures are required in accordance with the implementation regulations that the Army and Air Force were required to develop to adopt the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code 4321 et seq.) and the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations 1500–1508).</p>
I0169-6	<p>There’s also too much hunting pressure coming from the military who don’t even need the meat and there’s too many stories of unethical military hunting behavior.</p> <p>...</p> <p>Wilderness and subsistence is an important part of this culture. With the death of wilderness comes the death of a lot of people’s spirits. MOAS do</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. In preparing the Final EIS, the Army and Air Force will make every effort to harmonize mission requirements and community needs to avoid or mitigate user conflicts to the maximum extent feasible. Once the Army and Air Force select the preferred alternatives for each proposal, specific measures will be developed in order to avoid, minimize, and, in some</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>not equal wilderness. What little bit of uncluttered, minimally encroached environment that this state has left should be left intact for the benefit of future generations. This includes air and sound space. In these days of ridiculous national debt there is no better time to reduce military technology. Stop giving money to the big multinational corporations making the military technology. Stop using up all of our oil and metals (the extraction of which results in further loss of wilderness) to keep making more modern and enhanced military technology. The military is one of the number one consumers of natural resources such as oil. At the rate we're going we will run out of these resources soon enough. Let's stop now, halt the modernizations, quiet Alaska's air space, let the caribou feed in peace, let the people who came to Alaska for wilderness and subsistence opportunities carry on their peaceful activities, and those who peacefully existed here already for thousands of years continue to do so. Please, absolutely NO ACTION on all proposals.</p>	<p>cases, fully mitigate adverse impacts to the environment, natural resources, and public communities to the extent feasible and practicable. Such measures are required in accordance with the implementation regulations the Army and Air Force were required to develop to adopt the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code 4321 et seq.) and the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations 1500-1508).</p>
I0170-1	<p>Thank you for the opportunity to comment on this DEIS.</p>	<p>Thank you for taking part in the public and agency review process for the JPARC Draft EIS. Your comments will be duly noted and responses provided, as applicable.</p>
I0170-2	<p>The review thus far has failed to effectively describe the impact on the incredible number of users in this extremely popular yearround recreational area.</p>	<p>Section 3.1.10.3 of the EIS identifies Federal and State lands with legislatively designated protection, other lands that are managed for multiple uses, and Game Management Units (GMUs) designated by Alaska Department of Fish and Game (ADFG) in the proposal area. The general recreational uses and opportunities provided in the region are described in Section B.10.3.3 of Appendix B (Definition of the Resources and Regulatory Setting). Federally and State-designated recreation areas and lands within the region of influence for this proposal are listed in Figure 3-10, "Land Status and Special Use Areas in the Fox 3 MOA Expansion and New Paxon MOA Proposal Area." Recreational uses and values of the special use areas are described in Appendix I (Land Use, Public Access, and Recreation).</p> <p>Impacts to recreational uses associated with the Fox 3 MOA expansion and new Paxon MOA is provided in Section 3.1.10.3 of the EIS. Mitigations to minimize these impacts are provided in Section 3.1.10.4. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0170-3	<p>Leaving the Paxson area as is, and leaving the Fox 3 MOA above 5000 ft. is the only viable, realistic, safe option.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the Army and the Air Force will consider the</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		environmental impacts of all of the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0170-4	Saving fuel so that the joint bases can train in the Nelchina-Oshetna-Lake Louise-Gulkana-Paxson-Denali Highway region is absolutely ludicrous and should never have been recognized as a valid rationale for the proposed changes listed in the DEIS.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. Lower fuel consumption and lower energy costs are valid and important factors for the JPARC proposals in this EIS, but are two of many. Chapter 1, Purpose and Need for the Proposed Actions provides all of the requirements and elements that went into the development of the purpose and the need for each of the proposals planned to modernize and enhance future training at JPARC.
I0170-5	The wildlife resources in this area provide valuable subsistence and socioeconomic opportunities to over 10,000 Alaskan hunters and gatherers each year.	Section 3.1.13 acknowledges that the area in the vicinity of the proposed Fox 3 MOA and Paxon MOA is an important area for subsistence activities. Potential impacts to subsistence activities as a result of this proposed action are discussed in Section 3.1.13.3 of the EIS. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0170-6	The wildlife resources in this area provide valuable subsistence and socioeconomic opportunities to over 10,000 Alaskan hunters and gatherers each year.	Recreation and Tourism is recognized as a key industry in the affected socioeconomic environment of the Fox 3 MOA and New Paxon MOA proposed actions in Section 3.1.12.1. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0170-7	The extensive trail system in Game Management Unit 13 is testament to this fact - the EIS must consider this extensive system in order to fully grasp the extent of the summer and fall use.	Section 3.1.10.1 of the EIS provides a list of RS 2477-designated trails within the project area and acknowledges that there are extensive trail networks throughout the area. Impacts to public access resulting from the proposed action are discussed in Section 3.1.10.3. Section 3.1.10.4 proposes mitigation measures that could reduce these impacts. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0170-8	The waterways provide additional summer transportation, as well as snow in winter. The trapping, fishing, and hunting interest in this area is unparalleled in the state, and this area is so popular for the very reason JPARC is interested - it's in the middle of the 2 largest urban areas of the state.	Hunting, trapping, and fishing resources within the project area, including Game Management Unit (GMU 13) are discussed in Section 3.1.10.1 and Appendix I (Land Use). Section 3.1.10.3 evaluates the impacts of this proposal on hunting, fishing, and trapping in the project area. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0170-9	Pilots look down and see trees and water, we all look up and see and hear	Thank you for your comment on the JPARC Draft EIS. This comment is

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	pilots training all year. At this point the existing Fox 3 MOA is compatible with area uses and has no effect on the wildlife resources.	duly noted. Military operations must be conducted in harmony with the needs of other uses and users of Alaska’s lands and airspace. In preparing the Final EIS, the Army and Air Force will make every effort to harmonize mission requirements and community needs to avoid or mitigate user conflicts to the maximum extent feasible. JPARC is a key attribute of Alaska’s value to the military in the twenty-first century.
I0170-10	With a 500ft ceiling, the aerial wildlife monitoring in this area will be seriously impacted, and without the highest quality data, subsistence opportunities will be curtailed for the sake of conservative management. That’s what happens when biologists don’t have the best quality data - subsistence harvest opportunities will be cut drastically. The DEIS failed to acknowledge this.	The Air Force has a history of working with the state wildlife biologists/Alaska Department of Fish and Game and survey pilots to enhance flight safety in the Military Operations Areas (MOAs). The survey flights are conducted under visual flight rules (VFR) and therefore have access to the MOA airspace even while the Air Force is training. Communication via the Special Use Airspace Information Service (SUAIS) will continue ensure the safety of all pilots in the MOAs. Prior planning, when possible, will avoid the simultaneous use of the airspace.
I0170-11	The Nelchina Caribou herd as well as moose in the Nelchina-Copper river basins are managed under the state’s intensive management law, meaning the harvest must be maximized annually for the benefit of Alaskan subsistence hunters. The state has thus far done an excellent job bringing these populations back up to the point where they can sustain the incredible hunting pressure from Anchorage, the valley, and Fairbanks, among others. Expanding the Fox 3 MOA and establishing a Paxon MOA would have detrimental effects on the monitoring as well as the use of these wildlife resources. While monitoring occurs from May - November (daily or weekly depending on the season), hunting occurs throughout August, September, after October 21st, November-March. There is no avoiding the critical management or harvest periods. There are simply too many people reliant on these resources to risk them by bringing in joint military training missions.	Section 3.1.13.3 describes potential impacts to subsistence activities as a result of the proposed Fox 3 MOA and new Paxon MOA, including potential impacts to the wildlife resources and monitoring activities. Proposed mitigations to minimize these potential impacts are discussed in Section 3.1.13.4 of the EIS. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0170-12	Maintaining the safety of our biologists, hunters, and other locals and recreational flyers was sorely missed in the DEIS. You obviously are not aware of all the time periods when people are out there flying in small fixed wing aircraft. First thing in the spring March-April there are considerable numbers of people flying out to their recreational cabins. There are also a number of pilots out pursuing furbearers and wolves in the area, and following tracks from a fixed-wing makes these small planes extra vulnerable to impact and wake turbulence from the large fast flying jet aircraft. From April-May pilots are out tracking bears for later pursuit by hunters as well as for biologists attempting population estimates. In May	The concerns expressed over the accessibility of general aviation aircraft into those airspace areas proposed for military activities are addressed in the FEIS Airspace Management and Use, Land Use, Biology, and other resource areas relative to the potential adverse effects each proposal may have on those aviation activities. As the FAA examines these proposals to determine if and how each could be implemented in a manner that would avoid those effects on IFR and VFR air traffic, the Air Force and Army would pursue those mitigations noted in the FEIS Appendix K and other viable options that could best serve all aviation interests while providing for the safe, shared use of this airspace. Military representatives will be working with the FAA and other

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>moose and caribou are surveyed for parturition (calving), a very important piece of data for sustainable wildlife management. In June and July the Nelchina Caribou Herd must be counted annually - it is extremely weather dependent and usually occurs from 25 June - 10 July. This count entails using 3-5 small fixed wing aircraft covering the eastern Talkeetna mountain foothills counting caribou all day, followed by a composition flight in a small helicopter. Sheep surveys occur throughout June and July, weather dependent. Hunting starts August 1st for federal moose and caribou hunters, and the caribou hunting season runs through the end of March. Trapping ramps up November and runs through February - many are on snowmachine but many use small aircraft. Recreational snowmachine riding ramps up from February-April, during the same time that biologists are flying snow surveys in small aircraft. There simply is no good time for large numbers of jet aircraft to be flying around in this region at 500 ft, period. You will kill somebody, then it will probably happen again. It could be me - I spend a tremendous amount of my time in small aircraft throughout the Nelchina-Copper River basin yearround.</p>	<p>key stakeholders to arrive at the solutions and compromises that would help meet that objective. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0170-13	<p>The actual effects on wildlife are yet to be determined regardless of how many short jet-overflight studies the AK military has funded. The short term overflight studies of caribou and sheep during random periods has no bearing on the reality that the proposed 500ft ceiling in these MOAs will cover the calving grounds of the Nelchina Caribou Herd (the heaviest harvest of any Alaskan caribou herd) and substantial Dall's sheep habitat in the eastern Talkeetna and Chulitna Mountains. Overflights for a week or more during training exercises, especially as jets have gotten larger and louder than all past Alaskan overflight studies, will severely curtail the effectiveness of caribou and sheep to graze and evade predation. Caribou and sheep do not like continuous disturbances, read S. Wolfe's M.S. thesis from UAF per the shift of the Central Arctic Caribou Herd following establishment of Prudhoe Bay. That herd was lucky - they had adjacent areas that they could move to that were of equally high quality. The Nelchina Caribou herd has no adjacent high quality habitat to move to. If JPARC training missions occur over their calving areas at 500', we can be guaranteed the Nelchina Herd will abandon their preferred calving range. The reality is this isn't a short 1-2 week period the military can avoid - caribou remain on their calving range for up to 2 months during summer. When they shift away from this preferred area in the foothills of the Talkeetna mountains, you will see increased mortality on calves just as the Porcupine Herd saw in years they calved adjacent to their</p>	<p>Your example of Prudhoe Bay development included in the comment differs from effects expected from the JPARC occasional overflights in that it includes continuous noise and presence of humans, vehicles and structures remaining in one place. Section 3.1.8.3 in the Draft EIS considers the effects of low-flying (500 feet above ground level [AGL]) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 feet AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. All known calving, lambing, and important bird areas within the JPARC project area were mapped (please see Figures B-11, B-13, and B-14 that cover entire project area, and Figures 3-4 through 3-8 for occurrences of sensitive wildlife species, including caribou, Dall sheep, moose, and trumpeter swans, under the proposed Fox/Paxon MOAs) and have been taken into consideration during effects analysis.</p> <p>The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection. Implementation of the JPARC proposals will include selected refinements to</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>preferred calving grounds in the 10-02 area on the north slope. We have a fantastic management program in place for Nelchina Caribou, having harvested over 50,000 caribou from the herd in the last 25 years. The military will not fare well with the weight of destroying the productivity of the Nelchina Caribou Herd on its shoulders. It is not a matter of if this will happen, it's a matter of when, how soon after the jets start training here. If this is the price to pay for training cost savings, I have severely misjudged our Alaskan military.</p>	<p>existing flight avoidances of sensitive areas in the Record of Decision. Mitigation measures to offset adverse impacts will continue to be reviewed and refined, with agency input when necessary, when the preferred alternative is selected during the Final EIS preparation process. To reduce potential for disturbance under new airspace areas, the following measure was included in the EIS's Fox 3/Paxon MOAs Section 3.1.8.4 (Mitigations): "Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information." Additional overflight restrictions within the proposed Fox/Paxon MOAs area such as those identified in your comment are being considered but have not been finalized at this time.</p> <p>See Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p> <p>Also, please see Recreation (under Sections 3.X.10, Land Use) and Subsistence (under Sections 3.X.13) for hunting-related impacts analyses.</p>
I0170-14	<p>Do the right thing, use Stony River, or develop a different area out west or up north for use for low level mountainous training. This area is already too well developed and sustains a tremendous subsistence and socioeconomic benefit to Alaskans - a lower ceiling in this area is a death sentence to the basin as well as to the first few people that get killed.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS. Additionally, the comment to move existing Army and Air Force training areas to other Federal lands or remote areas in Alaska, however, does not meet the purpose and need of the JPARC EIS. The primary purpose and need is to modernize and enhance existing JPARC training areas in accordance with Chapter 1, Purpose and Need for the Proposed Actions, Sections 1.2 and 1.3 of the Draft EIS.</p>
I0171-1	<p>The no action alternative should be chosen. Do not turn Alaska's landscape, the last surviving continuous wild lands in America into a training ground.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted.</p>
I0171-2	<p>Wild and Scenic Rivers have been already designated and the power to maintain the qualities of wild lands should be adhered to. Recreation, hiking, canoeing, river rafting, hunting, and fishing are why people come (and stay) in Alaska- these resources need to be maintained and foster pride and patriotism in America.</p>	<p>Sections 3.1.10.3 evaluates the impacts to recreational areas including the portions of the Delta National Wild and Scenic River and Gulkana National Wild River within the project area. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation, including expanding the existing Delta National Wild and Scenic River and Gulkana National Wild River to include all portions within the new MOA boundaries. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
I0171-3	<p>There is not enough oversight in these proposed actions to protect the biological, physical, and cultural resources- clean water, wildlife (especially bird populations and migrations), solitude, quiet, open lands that we as Americans are allowed to access without restrictions from the military- that Alaskans value, that I as an Alaskan value. I do not want to give our military a larger blank admission to ruin America's greatest legacy- our land.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. In preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. Once the Army and Air Force select the preferred alternatives for each proposal, specific measures will be developed in order to avoid, minimize, and in some cases fully mitigate adverse impacts to the environment, natural resources, and public communities to the extent feasible and practicable. Such measures are required in accordance with the implementation regulations the Army and Air Force were required to develop to adopt the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] 4321 et seq.) and the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508).</p>
I0172-1	<p>This letter concerns the proposed Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA as analyzed in the Joint Pacific Alaska Range Complex Modernization and Enhancement Environmental Impact Statement (JPARC EIS). With regard to these areas, we support the no action alternative. The proposed actions will negatively affect many Alaskans, rural and urban who use this popular area for subsistence and recreation. We feel that the analyses created for this EIS are both flawed and dated. Much of the data does not really include all of the communities impacted by this area - for example we are subsistence berry pickers and caribou/ moose hunters in the area as are many in our community but it, Copper Center, was not included. We also recreate in the area in the summer, enjoying wildlife watching and camping. Such experiences have been badly disrupted by a passing helicopter, we can only imagine the impact of low flying military aircraft. The subsistence data used is particularly appallingly data given the data used in several similar EIS's that are ongoing in the area (the Suisitna Dam and the Alyeska Gas Pipeline Project). These projects paid for the collection of the data that was missing. It seems that the federal government who holds those other projects to such standards should do no less. Friends of ours as far as Fairbanks and Anchorage are active users of the area as well and it is one of the more popular tourist areas. This aspect was not addressed in the EIS. In the event that an action alternative is selected the mitigation measures for the proposed expanded Fox 3 and new Paxon MOA need to be</p>	<p>Please see responses to comments G0013-1 and G0013-2.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>expanded beyond those listed in the EIS to properly address the impacts to subsistence activities and resources as well as wildlife and recreation and a substantial monitoring program needs to be in place to insure that the mitigation measures are successful. In particular we think it is unreasonable for subsistence activities to be adjusted around flight schedules when they involve uncertain and differentially distributed resources.</p>	
I0172-2	<p>This letter concerns the proposed Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA as analyzed in the Joint Pacific Alaska Range Complex Modernization and Enhancement Environmental Impact Statement (JPARC EIS). With regard to these areas, we support the no action alternative. The proposed actions will negatively affect many Alaskans, rural and urban who use this popular area for subsistence and recreation. We feel that the analyses created for this EIS are both flawed and dated. Much of the data does not really include all of the communities impacted by this area - for example we are subsistence berry pickers and caribou/ moose hunters in the area as are many in our community but it, Copper Center, was not included. We also recreate in the area in the summer, enjoying wildlife watching and camping. Such experiences have been badly disrupted by a passing helicopter, we can only imagine the impact of low flying military aircraft. The subsistence data used is particularly appallingly data given the data used in several similar EIS's that are ongoing in the area (the Susitna Dam and the Alyeska Gas Pipeline Project). These projects paid for the collection of the data that was missing. It seems that the federal government who holds those other projects to such standards should do no less. Friends of ours as far as Fairbanks and Anchorage are active users of the area as well and it is one of the more popular tourist areas. This aspect was not addressed in the EIS. In the event that an action alternative is selected the mitigation measures for the proposed expanded Fox 3 and new Paxon MOA need to be expanded beyond those listed in the EIS to properly address the impacts to subsistence activities and resources as well as wildlife and recreation and a substantial monitoring program needs to be in place to insure that the mitigation measures are successful. In particular we think it is unreasonable for subsistence activities to be adjusted around flight schedules when they involve uncertain and differentially distributed resources.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS. Additional information and cumulative assessment are included for the Susitna Dam project. Also, data from studies undertaken for that project have used in the evaluation and refinement of mitigations for biological resources, particularly for eagles.</p>
I0172-3	<p>This letter concerns the proposed Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA as analyzed in the Joint Pacific Alaska Range Complex Modernization and Enhancement Environmental Impact</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>Statement (JPARC EIS). With regard to these areas, we support the no action alternative. The proposed actions will negatively affect many Alaskans, rural and urban who use this popular area for subsistence and recreation. We feel that the analyses created for this EIS are both flawed and dated. Much of the data does not really include all of the communities impacted by this area - for example we are subsistence berry pickers and caribou/ moose hunters in the area as are many in our community but it, Copper Center, was not included. We also recreate in the area in the summer, enjoying wildlife watching and camping. Such experiences have been badly disrupted by a passing helicopter, we can only imagine the impact of low flying military aircraft. . . . Friends of ours as far as Fairbanks and Anchorage are active users of the area as well and it is one of the more popular tourist areas. This aspect was not addressed in the EIS. In the event that an action alternative is selected the mitigation measures for the proposed expanded Fox 3 and new Paxon MOA need to be expanded beyond those listed in the EIS to properly address the impacts to subsistence activities and resources as well as wildlife and recreation and a substantial monitoring program needs to be in place to insure that the mitigation measures are successful.</p>	<p>recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
<p>I0173-1</p>	<p>The military does not have an effective means in place to mitigate the impacts that their training exercises would have on these lands and the animals and people that depend on them.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p>
<p>I0173-2</p>	<p>Please choose the No Action alternative. There is too much at stake if we open these lands to military training. The benefits do NOT outweigh the potential risks and losses at stake in terms of the value of these lands as natural resources, wildlife habitat, places to enjoy wild and scenic rivers, solitude and freedom.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. JPARC is an important and vital component of the national defense strategy of the United States and is a key attribute of Alaska's value to the military in the twenty-first century. There is no other place in the country where the military has the opportunity to conduct state-of-the-art training in diverse terrains and large training areas. The Army and Air Force are required by NEPA to make the efforts required to harmonize mission requirements and community needs in order that user conflicts be avoided,</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		minimized, or mitigated to the extent feasible and practicable. Additionally, the proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use.
I0174-1	Thank you for the opportunity to comment. I often fly a private single engine seaplane in proximity to various MOAs as I transit from Southeast Alaska to the interior, between Fairbanks and Glennallen, and west of Anchorage to and from a remote cabin on Telaquana Lake. I appreciate the value of the unique training opportunities presented by the wide open space found in Alaska. I also appreciate the positive economic impact of exercises held in these locations. I would ask the planners to consider raising the floor of areas adjacent to transit areas, mineral developments, and common recreation routes, particularly in the summer months. Raising the floor to something like 2000ft AGL would create less congested VFR corridors, reduce the risk of in flight collisions, and retain safe access to covered locations. Thank you.	The Alternative E configuration described in the FEIS was added as a result of public and agency scoping comments to avoid much of the higher-traffic areas that elicited the most concern. This, coupled with limiting use of the lower Paxson MOA altitudes (below 14,000 feet MSL) to major flying exercises during those six annual, two-week periods they are conducted, would help minimize impacts on civil aviation flights through this MOA. Use of the lower altitudes in both the proposed Fox 3 and Paxson MOAs would be limited to the extent required to fulfill essential mission training needs while minimizing any need a general aviation pilot may consider for delaying or diverting flights that would transit this MOA airspace. Pending the FAA's study of the preferred actions, the Air Force will pursue those means noted in the FEIS proposed mitigations (Appendix K) and other options for achieving the safe, compatible use of this shared airspace.
I0175-1	To whom it may concern, I am writing to express that I prefer the no action alternative for the JPARC Modernization and Enhancement EIS.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.
I0175-2	As a resident of the Denali Borough I live, recreate and subsist off of the lands in and adjacent to the proposed JPARC expansion. I am particularly concerned with the Fox MOA and the Paxson MOA proposals. The Bureau of Land Management (BLM) considers the area, included in the Fox and Paxson MOA, "A historic glimpse into the Last Frontier-wilderness in all directions." The BLM also, describes the Tangle Lakes area within the possible Fox MOA expansion, as a place to imagine and appreciate the past, and also a wonderland for outdoor activities. The EIS for the JPARC expansion suggests that the JPARC will not interfere with other agency functions or missions in the lands possibly added in an expansion. I see little in the way of compatibility between a MOA and a Wild and Scenic River, such as the Gulkana River a BLM managed site, even if the sound intrusion will only occur for approximately 60 days.	Section 3.1.10.3 evaluates the impacts to recreational areas including the portions of the Delta National Wild and Scenic River and Gulkana National Wild River within the project area. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation, including expanding the existing Delta National Wild and Scenic River and Gulkana National Wild River to include all portions within the new MOA boundaries; and avoiding overflight of popular hunting areas, campgrounds, and trails (5,000 feet AGL and half-mile lateral distance) during peak use periods between June 27 and July 11 and from mid-August through September and other important hunting seasons determined with ADFG. Locations to avoid include Tangle Lakes. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0175-3	However, in regards to possible wildlife impacts, such as sheep nurseries,	Section 3.1.8.4 (and the other definitive proposals) includes a mitigation

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>caribou calving grounds, migratory bird breeding grounds and stopover sites, there are no monitoring standards or plans in the EIS for assuring that wildlife are not adversely affected by sound intrusions and increased air traffic. By not having critical indicators, such as mortality and reproductive rates, identified in the EIS there is no immediate accountability by JPARC for changes in wildlife populations in the JPARC expansion. Simply stating that JPARC will avoid calving grounds, sheep nurseries, and bird migratory routes, leaves too much room for interpretation and lack of accountability in the end for negative impacts.</p>	<p>measure as follows: "Continue to monitor effects of military training, including overflights on select wildlife species (especially herd animals, waterfowl, and raptors) and fisheries during critical seasons such as breeding, young-rearing, and migration. Use knowledge to develop and implement strategies to minimize disturbance to priority wildlife in existing and new SUAs. This would help natural resources and range managers to coordinate training schedules that minimize impacts on wildlife populations." Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p> <p>Based on a review of recent applicable literature, changes in mortality or reproductive rates are not expected to result from overflights as proposed under the Fox/Paxon MOAs proposal.</p>
I0175-4	<p>Similarly, I have concerns that JPARC has discounted the recreational community and tourism industry that uses the areas in the Fox and Paxson MOA. As stated above, there is little in the way of compatibility in a wildland being considered for heavier military use and destination for outdoor enthusiast, recreational hunters, subsistence users, just to name a few.</p>	<p>Section 3.1.10 evaluates impacts to recreation. Section 3.1.12 of the EIS addresses impacts to socioeconomics, including key industries in the region (natural resources and mining, recreation and tourism, and civilian aviation). Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process. Additionally, military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. In preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century.</p>
I0175-5	<p>While the JPARC EIS considered sound and social impacts from sonic booms and sound intrusions, it picks sound levels based on urban areas and seemingly brushes off social impacts as annoyances. Similar to the disappearance of stars from the night sky in urban areas due to light pollution, the disappearance of a wild landscape is closely behind the night sky. A wild soundscape is a precious resource and one many residents and visitors to the State of Alaska experience and should be able to experience on for years to come.</p>	<p>The EIS recognizes that noise levels in areas affected by the proposed action are extremely low (see Section 3.1.2.1). Although military training noise can be intrusive, it is typically transitory, leaving the soundscape untouched for a large percentage of most days. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0175-6	<p>Additionally third behind, commercial fishing and oil and gas industry, tourism is an economic engine for many of the areas included in the Fox and Paxson MOA, including Tangle Lakes, Gulkana Wild and Scenic River, McClaren River to name a few. The dollars spent in the surrounding</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Recreation and Tourism is recognized in the EIS under Section 3.1.12.1 as a key industry for Alaska and in the particular affected region of the Fox 3 MOA Expansion and New Paxson MOA alternative actions.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	communities and the communities servicing travel to these destinations greatly benefit and rely on this very important renewable resource.	Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0175-7	I appreciate that the military is attempting to create a more energy efficient and realistic training ground through the JPARC expansion in order to meet operational goals and environmental standards. However, the areas identified for heavier training use and other newly added lands are more than just maneuvering grounds. They are wildlands for recreation and rejuvenations a dwindling resource, the world over. The lands proposed for addition to JPARC are important breeding grounds for wildlife, they are peoples homes and subsistence livelihoods.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force units based within the State of Alaska face an exceptional challenge to meet compelling and increasingly urgent needs borne out of fighting wars. In an era of persistent combat operations, the Army and Air Force need to continue to generate new technologies, learn from battlefield experiences, update tactics, and train intensively to face a committed and agile enemy. Each of these challenges drives the purpose and the need for modernization and enhancements to the range and airspace infrastructure that replicate the modern battlefield for training and testing in Alaska. Additionally, The proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use. A number of the proposals request expanded and additional Military Operations Area (MOA) or airspace for restricted areas in order to meet the purpose and need expressed in Chapter 1, Purpose and Need for the Proposed Actions.
I0176-1	I am a general aviation and professional pilot in Alaska for 37 years and I have a son who flies in the military in Alaska and I oppose the expansion of the Fox 3 and Paxon MOA due to safety concerns for mid-air hazards with general aviation users. These areas have high-density general aviation traffic. As a professional airline pilot utilizing Alaska's airspace, I'm extremely concerned about the potential hazards of the UAV corridors near Fairbanks. These corridors have the potential to have a significant safety impact on my job as an airline pilot.	Flight safety is of utmost importance for both military and civilian pilots. The key safety concerns identified for the proposed Fox 3 MOA expansion and new Paxon MOA were also Air Force considerations in the planning of those proposals and the mitigations to be pursued along with other viable options for addressing any potential impacts and flight safety risks. The FAA will be examining each airspace proposal, including the UAV restricted area corridors, to determine if and how the respective Air Force and Army airspace actions can be safely implemented and managed so as not to impact VFR and IFR air traffic.
I0177-1	I and many others have cabins on the Wood River, to get to it I fly from North Pole and skirt around the Blair MOA; I see in the Proposed Action-6 they want to add an Unmanned aircraft training corridor; my question is if this corridor is hot will I have to go around it or under it? If yes to go around it t not under it then I have to fly all the way around Fairbanks and up the Wood River taking more than double/triple the time and fuel. If I can go under it no problem. There are many of us that use this route to get to our cabin and many commercial outfits flying this route to Gold King, mining operations and guided hunting camps. This is a very busy section on a daily	Nonparticipating aircraft would be restricted from transiting through an active unmanned aerial vehicle (UAV) corridor, therefore visual flight rules (VFR) pilots such as yourself would have to either fly around this airspace, operate above or below the active corridor altitude layers, or plan your flight around those scheduled time periods when a corridor would be in use. The FAA would be separating their instrument flight rules (IFR) air traffic from an active corridor as required by their procedures. The Army understands the potential impacts the UAV corridors may have on other airspace uses and would schedule only those corridors/altitude layers required to accomplish

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>basis! The impact on our operations will become very expensive to us and to customers of the commercial folks. Is there a document that explains what the impact to us would be if this passes?</p>	<p>specific UAV mission activities. The scheduled use of these corridors would be disseminated through the Special Use Airspace Information Service and/or other standing means for communicating military airspace uses. Pending FAA and DoD decisions on how UAV operations can be integrated into the National Airspace System, each proposed UAV corridor will be studied by the Alaska FAA Office to determine if and how they may be implemented within the purview of governing rules and regulations so as not to significantly impact civil air traffic flows and Air Traffic System capabilities. The results of this study and the specific mitigations for addressing impacts on nonparticipating aircraft would be included in the Record of Decision for these proposals. The Army would also provide information to the public, as needed, to further explain the use of these corridors and those measures to be taken for minimizing impacts on other airspace uses.</p>
<p>I0178-1</p>	<p>After learning at the public meeting at the Swiss Alaska Inn on May 22, 2012 that you were interested in very specific comments, I would like to add some things to the letter that I submitted that night.</p> <p>The area that would be affected by the changes if JPARC is expanded would be very specific...it would be THE ENTIRE AREA of Fox 3 MOA because caribou, moose, bear, smaller mammals, waterfowl, migratory birds inhabit the entire area. Caribou are migratory, which means that they move around. They move around through the entire area.</p> <p>... this same region is a major hunting, camping, berry picking, and recreational area. It is a huge area for wildlife, especially being a caribou migration/calving area and a moose calving area. Migratory birds (such as Trumpeter swans) pass through the area and have their nesting grounds here. I cannot imagine the damage to waterfowl with jets going over at 500 feet AGL. It would be devastating. Most of the hunters from Mat-Su, Anchorage and Fairbanks use this area to hunt moose and caribou. This would completely disturb this traditional hunting area. Many people who hunt live a subsistence life style.</p> <p>...</p> <p>The following site reviews the results of studies that indicate that military aircraft have adverse affects on wildlife:</p>	<p>Animal responses to low-level flights have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. All known calving, lambing, and important bird areas within the JPARC project area were mapped (please see Figures B-11, B-13, and B-14 that cover entire project area, and Figures 3-4 through 3-8 for occurrences of sensitive wildlife species, including caribou, Dall sheep, moose, and trumpeter swans, under the proposed Fox/Paxon MOAs) and have been taken into consideration during effects analysis.</p> <p>The following mitigation, included for the definitive projects, addresses the need for additional research recommended in the comment. "Continue to monitor effects of military training, including overflights on select wildlife species (especially herd animals, waterfowl, and raptors) and fisheries during critical seasons such as breeding, young-rearing, and migration. Use knowledge to develop and implement strategies to minimize disturbance to priority wildlife in existing and new SUAs. This would help natural resources and range managers to coordinate training schedules that minimize impacts on wildlife populations."</p> <p>Given the potential for loss or injury to aircrews and aircraft as a result of a bird-aircraft strike, extensive efforts are made by the military to avoid areas with high concentrations of birds (also described in the Safety section, under Section 3.5.8.4, Mitigations and Appendix G). The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>http://www.nonoise.org/library/fctsheets/wildlife.htm</p> <p>The result of these studies indicated that the calving of wildlife with this type of noise pollution was adversely affected.</p> <p>...</p> <p>I am a speech/language pathologist and have taken audiology courses. Jets flying over at 500 feet AGL are loud...to the point of damaging hearing. The following link has a table of noise levels starting on page 2:</p> <p>http://www.musicmotion.com/content/mim/pdfs/noise%20and%20hearing.pdf Page 3 indicates that noises of 80 dB or greater are potentially dangerous to hearing. Page 4 indicates that noise not only affects hearing, but other things:</p> <ul style="list-style-type: none"> &#56319;&#56320; Increases blood pressure &#56319;&#56320; Has negative cardiovascular effects such as changing the way the heart beats &#56319;&#56320; Increases breathing rate &#56319;&#56320; Disturbs digestion &#56319;&#56320; Can cause an upset stomach or ulcer &#56319;&#56320; Can negatively impact a developing fetus, perhaps contributing to premature birth &#56319;&#56320; Makes it difficult to sleep, even after the noise stops &#56319;&#56320; Intensifies the effects of factors like drugs, alcohol, aging and carbon monoxide <p>All mammals would be similarly affected (see http://www.nonoise.org/library/fctsheets/wildlife.htm).</p> <p>Before any changes could be made in the FOX MOA, you really need to have baseline data for the current populations of wildlife and their behaviors/patterns (feeding, calving, birthing, raising their young, nesting, migrating, watering, routines, etc.) in order to have data to compare after a change is made...although I don't think you should make any changes in the current FOX MOA. It should remain as it is. ADFG should be included in studies (funded by the military) in order to obtain accurate information about</p>	<p>any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection. To reduce potential for disturbance under new airspace areas, the following measure was included in the EIS's Fox 3/Paxon MOAs Section 3.1.8.4 (Mitigations): "Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information." Additional overflight restrictions within the proposed Fox MOA/Paxon MOA area such as those identified in your comment are being considered but have not been finalized at this time.</p> <p>Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species. Sustained exposure to elevated noise levels such as those cited in the comment would be required to damage hearing of humans or wildlife.</p> <p>The authors understand that wildlife may have different reactions than humans to the same stimulus and rely on the scientific literature that has systematically reviewed specific wildlife species responses to overflight. The authors also recognize that humans in quiet environments may notice sounds at lower levels than they would notice in noisier environments.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>wildlife behavior/habitat.</p> <p>Some friends of mine were hiking off of the Denali Highway this spring and experienced 2 triple sonic booms that made them hit the deck. This is not a pleasant experience when you are hiking in a “quiet” environment, enjoying solitude and wildlife. Recreation in the area of the FOX MOA is ongoing most of the year: fall: hunting and berry picking, photography; winter: snow machining in some areas and hunting (if season allows), caribou are scratching out food and trying to make it...they certainly don’t need any more pressure; spring: snow machining in some areas, snowshoeing, skiing, and photography; summer: hiking, bird watching, biking, camping and photography.</p> <p>According to: http://www.cannon.af.mil/shared/media/document/AFD-110909-039.pdf 3-12, the sound of an F16 at 500 ft. AGL at 500 KIAS is 102 dB (harmful to human hearing...wildlife have more sensitive hearing). A C-130 flying at 220 KIAS makes a sound at 95 dB (also harmful to human hearing...wildlife have more sensitive hearing).</p> <p>According to: http://www.globalsecurity.org/military/library/report/enviro/F22DraftEis/volume1/Mountain_Home_AFB/MH3.pdf page MH3-15, F 22 flying at 500 feet AGL at an airspeed of 520 would generate 114 dB of sound. This, again is damaging to human (and wildlife) hearing. It is not natural and would interfere w/calving and the development of young wildlife and waterfowl/migratory birds.</p> <p>I completely oppose the expansion of JPARC (Fox 3 expansion, the new Paxon MOA, the lowering of the MOA to 500 feet AGL). There should be No Action. It should be left as it is.</p>	
I0178-2	<p>After learning at the public meeting at the Swiss Alaska Inn on May 22, 2012 that you were interested in very specific comments, I would like to add some things to the letter that I submitted that night.</p> <p>...</p> <p>There are countless air taxi operators in the area where this is proposed. Military aircraft flying at 500 feet above ground level would endanger these pilots, their aircrafts, and their passengers. The speed at which military</p>	<p>The FEIS Airspace Management and Use discussions reflect the flight safety and other concerns expressed during the scoping period and other forums of discussion on the EIS. Flight safety is of utmost concern to the military and all viable options would be pursued to maintain a safe operating environment for all military and nonparticipating aircraft sharing use of this airspace. The constant “see-and-avoid” measures used by military pilots to safety avoid other nonparticipating operating within the training airspace, the midair collision avoidance programs promoted by the Air Force, and other such proactive initiatives all serve to provide for the safe, compatible use of the</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>aircraft fly would be a lethal combination with slow flying Super Cubs, 185's, Beavers, and Otters. The November 16, 2010 F-22 Raptor crash is an example of things gone wrong. With more low flying high speed aircraft in the area with slow flying aircraft, the odds are even greater for accidents.</p>	<p>existing airspace. Those initiatives would be used and expanded as needed for the expanded airspace proposed for future military operations.</p>
I0178-3	<p>After learning at the public meeting at the Swiss Alaska Inn on May 22, 2012 that you were interested in very specific comments, I would like to add some things to the letter that I submitted that night.</p> <p>...</p> <p>The area that would be affected by the changes if JPARC is expanded would be very specific...it would be THE ENTIRE AREA of Fox 3 MOA because caribou, moose, bear, smaller mammals, waterfowl, migratory birds inhabit the entire area. . . . this same region is a major hunting, camping, berry picking, and recreational area. . . .</p> <p>Most of the hunters from Mat-Su, Anchorage and Fairbanks use this area to hunt moose and caribou. This would completely disturb this traditional hunting area. Many people who hunt live a subsistence life style. This would infringe upon the rights of Alaskans. Peace, solitude, and quiet are things that Alaskans treasure. It is why we live here.</p> <p>...</p> <p>Some friends of mine were hiking off of the Denali Highway this spring and experienced 2 triple sonic booms that made them hit the deck. This is not a pleasant experience when you are hiking in a "quiet" environment, enjoying solitude and wildlife. Recreation in the area of the FOX MOA is ongoing most of the year: fall: hunting and berry picking, photography; winter: snow machining in some areas and hunting (if season allows), caribou are scratching out food and trying to make it...they certainly don't need any more pressure; spring: snow machining in some areas, snowshoeing, skiing, and photography; summer: hiking, bird watching, biking, camping and photography.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Section 3.1.10.3.1 of the EIS identifies the recreational uses within the project area. Section 3.1.10.3.1 of the DEIS acknowledges that noise associated with low-level and supersonic overflight could lessen recreational experiences for some persons. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process. Additionally, military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. In preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century.</p>
I0178-4	<p>After learning at the public meeting at the Swiss Alaska Inn on May 22, 2012 that you were interested in very specific comments, I would like to add some things to the letter that I submitted that night.</p>	<p>Section 3.1.13 of the EIS acknowledges that the subsistence lifestyle is important to many Alaskans. Potential impacts to subsistence activities beneath the proposed Fox 3 MOA are evaluated in Section 3.1.13.3 and proposed mitigations to minimize these potential impacts are discussed in</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>...</p> <p>The area that would be affected by the changes if JPARC is expanded would be very specific...it would be THE ENTIRE AREA of Fox 3 MOA because caribou, moose, bear, smaller mammals, waterfowl, migratory birds inhabit the entire area. . . . this same region is a major hunting, camping, berry picking, and recreational area. . . .</p> <p>Most of the hunters from Mat-Su, Anchorage and Fairbanks use this area to hunt moose and caribou. This would completely disturb this traditional hunting area. Many people who hunt live a subsistence life style. This would infringe upon the rights of Alaskans. Peace, solitude, and quiet are things that Alaskans treasure. It is why we live here.</p>	<p>Section 3.1.13.4 of the EIS. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0178-5	<p>After learning at the public meeting at the Swiss Alaska Inn on May 22, 2012 that you were interested in very specific comments, I would like to add some things to the letter that I submitted that night.</p> <p>...</p> <p>The area that would be affected by the changes if JPARC is expanded would be very specific...it would be THE ENTIRE AREA of Fox 3 MOA because caribou, moose, bear, smaller mammals, waterfowl, migratory birds inhabit the entire area. . . . this same region is a major hunting, camping, berry picking, and recreational area.</p> <p>...</p> <p>This would infringe upon the rights of Alaskans. Peace, solitude, and quiet are things that Alaskans treasure. It is why we live here.</p> <p>...</p> <p>Some friends of mine were hiking off of the Denali Highway this spring and experienced 2 triple sonic booms that made them hit the deck. This is not a pleasant experience when you are hiking in a “quiet” environment, enjoying solitude and wildlife.</p>	<p>The Air Force recognizes that the affected environment of the Fox 3 MOA expansion and new Paxon MOA alternative actions encompasses the entire area of Fox 3 (see Section 3.1.8, Biological Resources and Section 3.1.10, Land Use). The Air Force also recognizes that there will potentially be some noise impacts to the population in the affected region of influence under the proposed actions. Some persons may experience diminished quality of life. Appendix E, Noise, of the EIS provides several indicators of noise level, which can be used to predict quality of life. Estimates of the percentage of the population that would be highly annoyed by noise, for example, are one indicator of a decreased quality of life. Quality of life is a subjective term and is highly dependent on various factors that are subject to bias and arbitrariness. Common factors for how people define their quality of life include wealth, employment, health, recreation, leisure time, access, safety, wildlife, climate, and the surrounding natural environment. These and additional factors are addressed under separate resource areas (i.e., airspace management and use, noise, biological resources, land use and recreation, socioeconomics, safety, air quality, subsistence, etc.) in the EIS so that the significance of each action on each resource area considers both context and intensity as required under NEPA.</p>
I0178-6	<p>After learning at the public meeting at the Swiss Alaska Inn on May 22, 2012 that you were interested in very specific comments, I would like to add some things to the letter that I submitted that night.</p> <p>The area that would be affected by the changes if JPARC is expanded would be very specific...it would be THE ENTIRE AREA of Fox 3 MOA because</p>	<p>Thank you for your thoughtful comment. The Air Force recognizes that noise levels under current conditions can potentially result in adverse impacts to humans and animals and that implementation of the proposed action would increase the severity and/or extent of the impacts. Impacts to human health are discussed in the noise sections of the EIS and further detail is provided in Appendices B and E. Noise impacts on recreation, socioeconomics, and</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>caribou, moose, bear, smaller mammals, waterfowl, migratory birds inhabit the entire area. Caribou are migratory, which means that they move around. They move around through the entire area.</p> <p>...</p> <p>The following site reviews the results of studies that indicate that military aircraft have adverse affects on wildlife:</p> <p>http://www.nonoise.org/library/fctsheets/wildlife.htm</p> <p>The result of these studies indicated that the calving of wildlife with this type of noise pollution was adversely affected.</p> <p>I am a speech/language pathologist and have taken audiology courses. Jets flying over at 500 feet AGL are loud...to the point of damaging hearing. The following link has a table of noise levels starting on page 2: http://www.musicmotion.com/content/mim/pdfs/noise%20and%20hearing.pdf Page 3 indicates that noises of 80 dB or greater are potentially dangerous to hearing. Page 4 indicates that noise not only affects hearing, but other things:</p> <ul style="list-style-type: none"> &#56319;&#56320; Increases blood pressure &#56319;&#56320; Has negative cardiovascular effects such as changing the way the heart beats &#56319;&#56320; Increases breathing rate &#56319;&#56320; Disturbs digestion &#56319;&#56320; Can cause an upset stomach or ulcer &#56319;&#56320; Can negatively impact a developing fetus, perhaps contributing to premature birth &#56319;&#56320; Makes it difficult to sleep, even after the noise stops &#56319;&#56320; Intensifies the effects of factors like drugs, alcohol, aging and carbon monoxide <p>All mammals would be similarly affected (see http://www.nonoise.org/library/fctsheets/wildlife.htm).</p> <p>Before any changes could be made in the FOX MOA, you really need to have baseline data for the current populations of wildlife and their</p>	<p>biological resources are discussed in sections dedicated to those resources. Several studies of current species' range/habitat are cited in the Biological Resources section. In accordance with the requirements of the National Environmental Policy Act, mitigations that are practicable are proposed as part of the EIS and would become binding when included as part of the Record of Decision. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>behaviors/patterns (feeding, calving, birthing, raising their young, nesting, migrating, watering, routines, etc.) in order to have data to compare after a change is made...although I don't think you should make any changes in the current FOX MOA. It should remain as it is. ADFG should be included in studies (funded by the military) in order to obtain accurate information about wildlife behavior/habitat.</p> <p>Some friends of mine were hiking off of the Denali Highway this spring and experienced 2 triple sonic booms that made them hit the deck. This is not a pleasant experience when you are hiking in a "quiet" environment, enjoying solitude and wildlife. Recreation in the area of the FOX MOA is ongoing most of the year: fall: hunting and berry picking, photography; winter: snow machining in some areas and hunting (if season allows), caribou are scratching out food and trying to make it...they certainly don't need any more pressure; spring: snow machining in some areas, snowshoeing, skiing, and photography; summer: hiking, bird watching, biking, camping and photography.</p> <p>According to: http://www.cannon.af.mil/shared/media/document/AFD-110909-039.pdf 3-12, the sound of an F16 at 500 ft. AGL at 500 KIAS is 102 dB (harmful to human hearing...wildlife have more sensitive hearing). A C-130 flying at 220 KIAS makes a sound at 95 dB (also harmful to human hearing...wildlife have more sensitive hearing).</p> <p>According to: http://www.globalsecurity.org/military/library/report/enviro/F22DraftEis/volume1/Mountain_Home_AFB/MH3.pdf page MH3-15, F 22 flying at 500 feet AGL at an airspeed of 520 would generate 114 dB of sound. This, again is damaging to human (and wildlife) hearing. It is not natural and would interfere w/calving and the development of young wildlife and waterfowl/migratory birds.</p> <p>I completely oppose the expansion of JPARC (Fox 3 expansion, the new Paxon MOA, the lowering of the MOA to 500 feet AGL). There should be No Action. It should be left as it is.</p>	
I0179-1	I AM FOR THE NO ACTION ALTERNATIVE. I oppose all of the proposed expansion of, and creation of new Military Operation Areas, Training Areas, corridors, access roads, JAGIC and JPADS. The vast existing areas are more than adequate for all training purposes. It has not	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force share your concern about Alaska's resources. The proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>been proven otherwise. The expansion would be a military take-over of huge amounts of our public lands and a hazard to private landowners. These Alaskan public lands provide dozens of uses for thousands of peoples' necessary activities including subsistence, commercial, and recreational uses.</p> <p>...</p> <p>We do not need "more military infrastructure" or a "larger military industrial complex". The present enormous areas now open to the military, both on and off bases, are more than adequate for all training purposes.</p>	<p>land for military use. All land-based military training will take place on existing lands currently withdrawn for military use. A number of the proposals request expanded and additional Military Operations Area (MOA) or airspace for restricted areas in order to meet the purpose and need expressed in Chapter 1, Purpose and Need for the Proposed Actions.</p>
I0179-2	<p>People do not want to be confronted with war games and "live fire" when hunting, fishing, trapping, camping, exploring, and all our other outdoor activities. Certainly 500 feet AGL supersonic flights daily are unacceptable and will have noise impacts outside the boundaries of the MOA's.</p>	<p>Section 3.1.10.3.1 of the DEIS acknowledges that noise associated with low-level and supersonic overflight could lessen recreational experiences for some persons. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts to recreation. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.</p>
I0179-3	<p>Problems with military exercises are as follows:</p> <ul style="list-style-type: none"> • Dumping of aircraft fuel in many flight situations • Danger of live ammo and unexploded ordnance • Unwanted new roads, heli-pads, and airstrips • Litter, human waste, and aircraft chaff • Extremely low flight altitudes <p>In addition, the military has a very poor track record with toxics and abandoned drums of used oil and contaminated fuel.</p>	<p>With respect to aircraft chaff, as indicated on page 3-37, Section 3.1.7.3.1, there would not be an increase in chaff and flare use within the overall airspace. Rather, this use would be redistributed over a larger expanse of airspace. The Air Force would encourage and facilitate the continued study of chaff alternatives (e.g., biodegradable chaff) to reduce hazardous waste-related impacts on soils, water, air, and biological resources within and underlying the MOAs, such that no beneficial or adverse impacts would occur.</p> <p>Hazardous materials/waste management has been addressed within the Hazardous Materials and Waste section for each proposed action. For example, as indicated on page 3-37, Section 3.1.7.3.1, the DoD would manage all hazardous materials/waste in accordance with applicable Air Force, State of Alaska, and Federal regulations, such that no adverse impacts would occur. Similarly, with respect to munitions-related hazardous waste, as indicated on page 3-137, training is subject to EPCRA TRI reporting thresholds, as well as current Federal, State of Alaska, Air Force, and Army regulations, such that the proposed action would result in adverse but not significant impacts.</p>
I0179-4	<p>Problems with military exercises are as follows:</p> <ul style="list-style-type: none"> • Dumping of aircraft fuel in many flight situations 	<p>With respect to unwanted new roads, heli-pads, and airstrips, as indicated on page 3-327, the proposed action would use existing roads where possible. However, as indicated on page 3-328, there is the potential for significant impacts on permafrost from ground maneuver training. The majority of</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
	<ul style="list-style-type: none"> • Danger of live ammo and unexploded ordnance • Unwanted new roads, heli-pads, and airstrips • Litter, human waste, and aircraft chaff • Extremely low flight altitudes <p>In addition, the military has a very poor track record with toxics and abandoned drums of used oil and contaminated fuel.</p>	<p>terrain is off-limits in the warmer months, which would minimize permafrost and soil erosion impacts. As indicated on page 3-329, training activities and roadway/infrastructure construction would adhere to all applicable DoD and Army guidelines for protection of soils, prevention of soil erosion, and prevention of permafrost degradation. Appendix K includes Best Management Practices and Standard Operating Procedures that would apply to the proposed action.</p>
I0179-5	<p>Much of the areas you want to take over are undeveloped or lightly developed country, and it should remain as such. This is essentially a large development project. It would negatively impact wildlife, fish, water quality, homes, cabins and lodges.</p>	<p>Section 3.1.8.3 in the DEIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 feet AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. All known calving, lambing, and important bird areas within the JPARC project area were taken into consideration during effects analysis.</p> <p>As pointed out in Section 3.1.8.3, there would be no ground disturbance proposed as part of the Fox/Paxon MOA alternatives. The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection. To reduce potential for disturbance under new airspace areas, the following new measure was included in text under the Fox/Paxon Section 3.1.8.4, Mitigations: "Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information." Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p>
I0179-6	<p>Much of the areas you want to take over are undeveloped or lightly developed country, and it should remain as such. This is essentially a large development project. It would negatively impact wildlife, fish, water quality, homes, cabins and lodges.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The proposals included in the Draft EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use. A number of the proposals request expanded and additional Military Operations Area (MOA) or airspace for restricted areas in order to meet the purpose and need expressed in Chapter 1, Purpose and Need for the Proposed Actions. Additionally, military operations must be conducted in harmony with the</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		needs of other uses and users of Alaska’s lands and airspace. In preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska’s value to the military in the twenty-first century.
I0179-7	<p>Certainly 500 feet AGL supersonic flights daily are unacceptable and will have noise impacts outside the boundaries of the MOA’s.</p> <p>...</p> <p>The noise of these operations alone would be extremely disturbing to both humans and animals.</p>	Supersonic flights in the proposed or modified airspace units would be limited to altitudes above 5,000 feet above ground level or 12,000 feet above mean sea level, whichever is higher. Sonic booms generated at higher altitudes attenuate to some degree before reaching the ground (see EIS Table 3-6). Sonic booms do currently and would continue to propagate beyond the boundaries of training airspace units in some instances (see Section 3.1.2.3.1). As acknowledged in the EIS, sonic booms and subsonic noise could potentially be disturbing to humans and animals. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.
I0179-8	Your draft EIS needs to consider the proposed Susitna Dam in its cumulative impacts.	<p>The Alaska Airspace Manager for the Air Force has reviewed the documents on your website and has identified an area where your project and the Air Force’s operations may impact one another:</p> <p>If you pursue instrument approaches to your runways for inclement weather operations (IFR), you will require changes to the FAA designated airspace to use them. When the AF is operating in the FOX3 MOA above the airfields, you will not have the necessary IFR access to the instrument approaches. Prior planning is the easiest way to avoid delays and diversions due to active military airspace.</p> <p>Outside of days with low visibility or clouds, we suspect that the majority of your operations would be VFR (visual flight rules), and therefore not require the instrument procedures. During VFR flights, your aircraft would not be restricted from flying in the MOA with the AF aircraft. When we share airspace, the best way to avoid conflicts is through communication which will be enhanced with our Special Use Airspace Information Service (SUAIS). We will provide a radio frequency to talk to our Range Controller on; he is then able to assist with aircraft locations to keep our operations separate. Ensuring your aircraft are transponder equipped (this transmits a signal from the aircraft) will assist the SUAIS as the aircraft are easier to see on radar by</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		<p>the range controller and the fighter aircraft in the area.</p> <p>Finally, your transmission lines are most likely low enough to be no concern to the Air Force operations as 500' is the proposed floor of the new FOX3 MOA.</p> <p>The 11th Air Force chairs an Alaska Civil-Military Aviation Council (ACMAC) which meets twice annually to discuss shared airspace issues and ways to avoid conflicts. Military, Federal Aviation Administration (FAA), Alaska Department of Fish and Game (ADFG), Aircraft Owners and Pilots Association (AOPA), Alaska Airmen and other community groups attend this meeting to enhance the safety of all users of the National Airspace System.</p> <p>Alaska Energy Authority contact information has been added to the list of invitees for the next meeting scheduled tentatively for November 2012.</p> <p>A summary of the information on the Susitna-Watana Hydroelectric project and an analysis of potential cumulative effects have been added to the EIS (see Section 4.8).</p>
I0180-1	As a private pilot using this airspace it would negatively affect my ability to use my airplane for basic transportation. Please reconsider.	The FAA study of each airspace proposal coupled with those measures to be considered by the military proponents to mitigate any impacts are all aimed at serving the safe and mutual needs of all aviation interests in Alaska. This effort includes consideration of a private pilot's need for basic transportation within the affected region.
I0181-1	<p>I am a VFR user of several of these areas and have the following GRAVE concerns for all general aviation users, as noted below by the Alaska Airmen's Association:</p> <ul style="list-style-type: none"> • The proposed Fox 3 MOA additions extend laterally and vertically in to an area of Alaska highly used by the general public for business and recreation, due to its close proximity to major population centers of the MatSu Valley, Anchorage and Fairbanks. Lowering the ceiling to 500ft increases the probability of mid-air collisions for commercial pilots conducting tour activities and general aviation pilots engaging in hunting, mining, recreation or other activities. • The low-altitude portion of the proposed Paxson MOA includes a major VFR route connecting northern Alaska with the south central and eastern regions of the state. Other portions of this proposed MOA are used 	The many concerns that the Alaska Airmen's Association and other aviation interests have expressed over the potential airspace conflicts and flight safety risks associated with the JPARC proposals will be addressed as the Air Force and Army move forward with the further study of these proposals by the FAA. The individual and cumulative effects these proposals could have on Alaska's aviation transportation system were considered during the planning of these proposals pending the NEPA processes and FAA study that would more closely examine the potential adverse effects on air traffic and Air Traffic Control system capabilities. The Air Force and Army will be exploring those mitigation measures and other viable options that would best serve the safe and compatible use of this airspace by all military and civilian interests. Cooperative efforts will be needed to resolve issues with the lower altitudes, VFR corridors, airspace restrictions, UAV corridor designations, and other such concerns that have been identified in the comment.

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>for mining and recreation. Confining VFR traffic to corridors through this area concentrates traffic, potentially creating an unsafe condition for civil aviation. This area is not conducive for a low altitude MOA.</p> <ul style="list-style-type: none"> • Under current FAA rules, active MOAs block access by IFR aircraft, other than emergency and lifeguard flights. This lack of access limits economic viability and reduces safety to pilots and the public in the communities that our underneath or near this airspace. Establishing MOAs that block IFR airways is directly counter to the work done by the FAA in recent years to increase IFR access with GPS approaches and airways. No new MOAs should be approved that block IFR airways until the FAA and military have developed procedures to allow IFR access to civil aircraft. • The military constructed the Battle Area Complex south east of Delta Junction knowing that this area is important to civil aviation to access Isabel Pass. No restricted airspace should be established over this complex. • Restricted areas west of Delta (2202 and 2211) already limit access between Delta, Fairbanks and the Richardson Highway corridor. We oppose alternatives that completely connect these existing restricted areas, and further block access for mining, hunting and recreation. <p>I am entirely in agreement with the above statement.</p> <p>While I support our military and the need to conduct training to remain the world’s unsurpassed air superiority force, this appears to be an excessive appropriation of airspace that is used by many, and I oppose it; this will severely curtail my enjoyment and rightful use of these areas.</p>	
I0181-2	<p>Under current FAA rules, active MOAs block access by IFR aircraft, other than emergency and lifeguard flights. This lack of access limits economic viability and reduces safety to pilots and the public in the communities that our underneath or near this airspace. Establishing MOAs that block IFR airways is directly counter to the work done by the FAA in recent years to increase IFR access with GPS approaches and airways</p>	<p>Section 3.1.1.2, Impact Assessment Methodology, provides a discussion on the FAA Orders which require the FAA to complete an aeronautical study of each JPARC airspace proposal to examine the potential impacts each may have on the safe and efficient use of airspace within the affected region. Such study would include an overview of the current and future airspace structure and needs and determine if and how the JPARC airspace actions could be implemented with minimal impact on IFR and VFR air traffic and air traffic control system capabilities. The FAA would collaborate with the Air Force and Army on their respective proposals to consider those measures noted in the FEIS and other viable options for mitigating any impacts on all airspace uses.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
I0181-3	<p>While I support our military and the need to conduct training to remain the world's unsurpassed air superiority force, this appears to be an excessive appropriation of airspace that is used by many, and I oppose it; this will severely curtail my enjoyment and rightful use of these areas.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. JPARC is an important and vital component of the national defense strategy of the United States and is a key attribute of Alaska's value to the military in the twenty-first century. There is no other place in the country where the military has the opportunity to conduct state-of-the-art training in diverse terrains and large training areas. The Army and Air Force are required by NEPA to make the efforts necessary to harmonize mission requirements and community needs in order that user conflicts be avoided, minimized, or mitigated to the extent feasible and practicable.</p>
I0182-1	<p>I have been a full time resident of the Copper Basin since 1996.</p> <p>I use the Paxon/Tangle Lakes area as a source of subsistence meat and for recreation. All your proposed usage expansions would negatively impact my and most all other users of this area and I am strongly opposed to any of your proposed expansions.</p> <p>All your expansions would very likely have strong negatively impacts on the animals, people (Copper Valley residents and visitors) and businesses that depend on this area.</p> <p>...</p> <p>Also brought up at this same presentation: one of the principle benefits of any of the expansions is convenience and fuel savings, the expansion area being equidistant and between two air force bases. The aggressor team can fly from one base, the defender team from the other and meet in the middle, over our high quality subsistence hunting and recreating area. Your convenience is not a good enough reason to offset the harm you will do to me and so many of us.</p> <p>The users your activities force out of the expansion areas will not go away, they will pile up in other already over-taxed areas in the valley. Many of us resident subsistence users are already having a hard time getting by. Any of your expansions will bring in even more competition for already tight hunting and fishing resources. My reality is, if I don't kill a moose, caribou or bear every year, I don't get to eat meat for the next year. I become an involuntary vegetarian with all the health ramifications that entails. End of story. A lot of us in this valley are in the same boat. Grocery stores are few</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force acknowledge how important subsistence resources and activities are to Alaskans. Potential impacts to subsistence resources and activities from the proposed actions in the EIS are evaluated in Section 3.X.13, where X represents the specific section number of the proposed action. Where potentially adverse impacts are identified, proposed mitigations are provided in Section 3.X.13.4. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process.</p> <p>Additionally, the Army and Air Force units based within the State of Alaska face an exceptional challenge to meet compelling and increasingly urgent needs borne out of fighting wars. In an era of persistent combat operations, the Army and Air Force need to continue to generate new technologies, learn from battlefield experiences, update tactics, and train intensively to face a committed and agile enemy. Each of these challenges drives the purpose and the need for modernization and enhancements to the range and airspace infrastructure that replicate the modern battlefield for training and testing in Alaska. In preparing the Final EIS the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>and far between, cash is hard to come by and if we have to buy our meat, we have to do without something else.</p> <p>You already have a staggering amount of very diverse terrain in which to very adequately do the training you want to do and it sounds like you are not coming anywhere close to using what you already have, yet you want a great deal more. Your main real gain appears to be convenience, a little fuel savings and perhaps a brief respite from the boredom of training on grounds you have trained on before. The very real life cost to the animal and human residents and users of this area is way too great to be justified by your small gain of convenience and fuel savings. Please don't enact any of the proposed expansions.</p>	
I0182-2	<p>I use the Paxon/Tangle Lakes area as a source of subsistence meat and for recreation. All your proposed usage expansions would negatively impact my and most all other users of this area and I am strongly opposed to any of your proposed expansions.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. In preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. Once the Army and Air Force select the preferred alternatives for each proposal, specific measures will be developed in order to avoid, minimize, and in some cases fully mitigate adverse impacts to the environment, natural resources, and public communities to the extent feasible and practicable. Such measures are required in accordance with the implementation regulations the Army and Air Force were required to develop to adopt the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] 4321 et seq.) and the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508.</p>
I0182-3	<p>All your expansions would very likely have strong negatively impacts on the animals, people (Copper Valley residents and visitors) and businesses that depend on this area.</p>	<p>Animal responses to low-level flights have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. All known calving, lambing, and important bird areas within the JPARC project area were taken into consideration during effects analysis.</p> <p>The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		flight restricted areas for pilot/aircraft safety and wildlife protection. To reduce potential for disturbance under new airspace areas, the following new measure was included in text under the Fox/Paxon Section 3.1.8.4 (Mitigations): “Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information.” Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.
I0182-4	All your expansions would very likely have strong negatively impacts on the animals, people (Copper Valley residents and visitors) and businesses that depend on this area.	Potential environmental consequences to biological resources are addressed in Section 3.1.8.3. Potential environmental consequences to key industries, particularly economic effects to regional business and communities that would be affected by the expansion of the Fox 3 MOA and creation of the Paxon MOA are discussed in Section 3.1.12.3. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternatives are selected during the Final EIS preparation process. Additionally, military operations must be conducted in harmony with the needs of other uses and users of Alaska’s lands and airspace. In preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska’s value to the military in the twenty-first century.
I0182-5	<p>Per information in your presentation at the Caribou Hotel in Glennallen winter 2010, was the fact that, although you already have 65,000 square miles of every type of terrain Alaska has to offer to play in, in which you for some reason can’t find precisely the conditions you want, you want to grab up to another 10-11,000 acres of our state with out relinquishing any of the areas you already have. Are you already fully utilizing all the areas you already have to train in? When will you have enough? I strongly object to this both as an american citizen and as an alaskan.</p> <p>Also brought up at this same presentation: one of the principle benefits of any of the expansions is convenience and fuel savings, the expansion area being equidistant and between two air force bases. The aggressor team can fly from one base, the defender team from the other and meet in the middle, over our high quality subsistence hunting and recreating area. Your convenience is not a good enough reason to offset the harm you will do to</p>	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The proposals included in the EIS to modernize and enhance JPARC do not require a request by the Army or Air Force to acquire new land for military use. All land-based military training will take place on existing lands currently withdrawn for military use. A number of the proposals request expanded and additional Military Operations Area (MOA) or airspace for restricted areas in order to meet the purpose and need expressed in Chapter 1, Purpose and Need for the Proposed Actions. Additionally, in preparing the Final EIS the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts may be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska’s value to the military in the twenty-first century. Lastly, lower fuel consumption and lower energy costs are important factors for the JPARC proposals in this EIS, but are two of many. Chapter 1, Purpose and Need for the Proposed Actions provides all of the requirements and elements that went into the development of the purpose

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>me and so many of us.</p> <p>...</p> <p>You already have a staggering amount of very diverse terrain in which to very adequately do the training you want to do and it sounds like you are not coming anywhere close to using what you already have, yet you want a great deal more. Your main real gain appears to be convenience, a little fuel savings and perhaps a brief respite from the boredom of training on grounds you have trained on before. The very real life cost to the animal and human residents and users of this area is way too great to be justified by your small gain of convenience and fuel savings. Please don't enact any of the proposed expansions.</p>	<p>and the need for each of the proposals planned to modernize and enhance future training at JPARC.</p>
I0183-1	<p>My comments are pertaining to the State land in Proposal 2, Realistic Live Ordnance Delivery Area, proposed restricted area.</p> <p>I do not support any restriction to access to State lands and or closing of State land to Alaskans to further training of our valued Armed Forces.</p> <p>Alaska has very well written and interruption though the Alaskan Supreme Court a Constitution.</p> <p>The Alaskan Constitution Article 8, the Natural Resource article grants Alaskans many protections and guarantees. Sections 1-4, and 13, 14, and 16 point out my concerns and you should be aware of them.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0183-2	<p>I also don't believe the EIS addressed the economical and recreational value of the possible 305,000 acres of State land that could have access restrictions levied on it.</p>	<p>Section 3.1.10.1 of the EIS identifies State special use areas for recreation in the proposal area. The general recreational uses and opportunities provided in the region are described in Appendix B, Definition of the Resources and Regulatory Settings, Section B.10.3.3. Recreational uses and values of the special use areas are described in Appendix I, Land Use, Public Access, and Recreation. Section 3.1.10 evaluates impacts to recreation including within State special use areas. Section 3.1.12 of the EIS addresses impacts to socioeconomics, including key industries in the region (natural resources and mining, recreation and tourism, and civilian aviation). Additionally, the Air Force and Army must obtain an expanded Special Use Designation from the Alaska Department of Natural Resources for this proposal.</p>
I0183-3	<p>This area is highly valued and used by many Alaskans to gather their wild food resources on annual bases.</p>	<p>The Air Force acknowledges how important subsistence resources and activities are to Alaskans. Potential impacts to subsistence resources and activities from Realistic Live Ordnance proposed action and alternatives are</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		evaluated in Section 3.2.13. Proposed mitigations to minimize potentially adverse impacts are provided in Section 3.2.13.4. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0183-4	I also don't believe the EIS addressed the economical and recreational value of the possible 305,000 acres of State land that could have access restrictions levied on it.	The effects of restricted access on non-military land are discussed in Section 3.2.10.3. Approximately 163,630 acres of non-military land underlie the extended R-2202 airspace beyond the boundary of military land. In Section 3.2.10.3.1, the EIS acknowledges that the actions associated with the Realistic Live Ordnance Delivery proposal would result in potentially significant impacts to land use, access, or recreation. Potential mitigations that are under consideration to reduce impacts are identified in Section 3.2.10.4. As stated in Section 3.2.12.3, the potential economic impacts of any commercial or residential user from access restrictions is difficult to quantify based on the many factors to be considered in estimating such impacts and the lack of available data. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0183-5	Even though the EIS made note of State or private airstrips, it did not consider the many Super Cub type airstrips that are used.(these are not noted on any maps, but they exist)	The EIS noted those public and private airstrips identified on aeronautical charts and other resources along with others noted in scoping comments that may be affected by the different airspace proposals. It is understood that there are many other uncharted private airstrips in Alaska that could also be affected in some manner. These airstrips and their associated aircraft operations may also benefit from those mitigations and other viable options that would be considered to minimize adverse effects on other airport/airstrips and aviation activities discussed in the FEIS Airspace Management sections and the Appendix K mitigations.
I0183-6	...The same is true of many traditional hunt camps.	The Air Force acknowledges how important subsistence resources, activities, and traditional hunt camps are to Alaskans. Potential impacts to subsistence resources and activities from Realistic Live Ordnance proposed action and alternatives are evaluated in Section 3.2.13. Proposed mitigations to minimize potentially adverse impacts are provided in Section 3.2.13.4. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0183-7	I did not see in the EIS the possible loss of income from all the guides that are registered to provide guided hunts for this area. With only a minimum of 2 week notice for exercises, how does one book guided hunts, and fulfill contracts with clients if they cannot be in the field? What about air	The Air Force recognizes that there is potential for economic impacts to local and regional businesses from limited access associated with the RLOD proposed actions. The potential loss of income due to delays or re-routing is difficult to quantify due to the many factors to be considered in such

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	transporters. How will the anticipated 90 to 150 days use by the military effect their businesses? The same could be asked of the miners.	estimates. However, based on concerns expressed during the public scoping period, impacts to socioeconomic resources under the RLOD proposal may cause adverse impacts. Mitigations proposed include advanced notifications of when ground access would be restricted and scheduling training around popular hunting seasons and times. Mitigations could potentially lessen the likelihood of impacts on some residential users and associated economic impacts. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0183-8	Trapper in this area will also be economically affected. If trappers are restricted from being in the area the result could be loss of reasonable opportunity to harvest furbearers, loss of furbearers being in the trap to long, furbearers having to be in traps long than what is reasonably expected. Maintaining a trap line has social, moral and ethical components to it also.	See comment response I0183-7.
I0183-9	<p>Note: Trapping season is November – April.</p> <p>Even though this is not a State designated Subsistence area (by definition) many Alaskans use it as such, they treat the wild food they gather as a necessity for life. The 305,000 acres and predicted 90 to 150 days of use by the military would have a great impact on those who rely on those resources. Moose in this area are managed under State intensive Management (IM) practices. This means “high levels of human harvest” restricting this area at any time during September-November would impact the IM plan. Sheep, caribou, bears are not designated as IM, but many Alaskans do pursue them as a valuable wild food source and some consider them as somewhat of a trophy. The taking of sheep and caribou happens August through September. Black bears have a “no closed” season but the majority of the bears are harvested during the months of June and August and September. Grizzly bears are harvest in the months May and April, and the gain in September till they go into the den sometime mid to late October. So it is very hard for me to see how Alaskan could co-exist with this current proposal on State land, and not impact us greatly.</p>	<p>The Air Force acknowledges how important subsistence resources and activities are to Alaskans. Potential impacts to subsistence resources and activities from the Realistic Live Ordnance proposed action and alternatives are evaluated in Section 3.2.13. Where potentially adverse impacts are identified, proposed mitigations are provided in Section 3.2.13.4. Hunting and fishing activities that are not managed under Federal or State subsistence regulations are discussed in Section 3.2.10. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process. Additionally, military operations must be conducted in harmony with the needs of other uses and users of Alaska’s lands and airspace. In preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska’s value to the military in the twenty-first century.</p>
I0183-10	To put in some sort of perspective Alaska only has control of 33% of land within the State. You the Federal Government have the rest.	Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
I0183-11	<p>NOTES: I find it somewhat odd that the U.S. Military's EIS on aircraft noise has little effect on game population and their movements. Also that aircraft noise does not affect the values of a person's wilderness experience. Yet the National Park Service, Bureau of Land Management, National Petroleum Reserve-Alaska, National Wildlife Refuge and the National Forest and Conservation Areas all say and have made policies or regulations or are in the process of doing so, to make restrictions on aircraft use with in their jurisdictions. Who is correct about aircraft noise, and how it affects game and wilderness values? Is the State of Alaska and the JPARC EIS correct, or are all the other Federal Agency correct?</p>	<p>The EIS recognizes the potential for aircraft overflights to trigger behavioral reactions in animals. Based on the findings of the analysis, population-level effects or abandonment of natural range would not be expected as a result of intermittent overflight noise. The EIS also acknowledges that a person's wilderness experience can be negatively affected by aircraft overflights. These potential impacts are an unfortunate side-effect of realistic combat training, which includes some training at low altitudes and/or at night. The EIS recognizes that adverse impacts could occur and, as such, studies conducted by other agencies are not contradicted. The Department of Defense will consider all practicable measures to mitigate potential impacts of combat training to include establishment of avoidance areas in particularly noise-sensitive areas. Low-altitude and night training operations are part of realistic combat training. The Department of Defense recognizes that the potential for impacts exists and tries to minimize impacts to the extent practicable while still achieving training objectives.</p>
I0183-12	<p>RECOMMENDATION: Is to not allow any live ordnance release over State controlled land that would restrict access to those lands. Thank you for allowing me comment.</p>	<p>Thank you for your comment. In accordance with the National Environmental Policy Act, the U.S. Departments of Army and the Air Force will consider the environmental impacts of all the actions proposed, which includes full consideration of all comments provided during the public comment period of the Draft EIS.</p>
I0184-1	<p>We are writing in support of the No Action Alternative. We are opposed to both the expansion of the Fox 3 MOA and lowering the altitude to 500 feet. This is the only alternative that would neither expand Fox 3 MOA nor allow training exercises below 5000 feet.</p> <p>Though many of our concerns would apply to the Paxson MOA as well, we are less familiar with that area. Our family spends a great deal of time in the Matanuska-Susitna Borough where we have three cabins and therefore will focus our comments on the Fox 3 MOA. One of our cabins is south of Denali State Park and west of the Susitna River and is already impacted negatively by the MOA west of the Susitna even though it is not directly under it. The others are located in the southern part of the Talkeetnas, generally in the areas known as Chickaloon and Glacier View. Both of these would be negatively impacted by the expansion of Fox 3 MOA.</p> <p>The reason for having and using these cabins is the opportunity they provide for experiencing Alaska's wilderness—the reason we live in Alaska. One of the most important qualities of that wilderness, increasingly rare in today's</p>	<p>Section 3.1.12.3.1 of the Draft EIS acknowledges that areas not currently overlain by MOAs in which baseline noise levels are extremely low would experience an estimated noise increase which could result in significant impacts. Creating avoidance areas over residential areas as outlined in Section 3.1.3.4 could minimize the degree of impact on residents. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process. Additionally, military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. In preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>world, is natural sounds only. The continual roar of airplanes over Anchorage as I write is very disruptive and unpleasant—and makes the qualities of peace and quiet provided by our cabins all the more important. Among other things we value our cabins for the good night’s sleep we get there.</p>	
<p>I0184-2</p>	<p>Another concern is the impact on wildlife, also one of the important values of the Talkeetna Mountains. We know that ADF&G has already provided information to you regarding the negative impacts to wildlife from the noise of training flights, particularly those at low altitude. We also know that these training flights will sometimes break the sound barrier, impacting the health and well being of both humans and wildlife. One of our cabins is within the range of the Nelchina caribou herd. Being surrounded by caribou, having wolves answer our howls, watching Dall sheep traverse the mountain slopes or raptors soaring above us are among the highlights of our lives. These populations will likely be reduced or displaced by the disruptive noise impacts of military training flights. We share the concerns of the Lake Louise residents/property owners who are not far from us.</p>	<p>Section 3.1.8.3 in the DEIS considers the effects of low-flying (500 feet AGL) aircraft on wildlife in detail. Animal responses to low-level flights as low as 500 feet AGL have been characterized in recent studies (reviewed in Section 3.1.8.3) as minor and wildlife seem to habituate to non-harmful stimuli over time. Studies have included ungulates such as caribou and Dall sheep during calving/lambing seasons and in winter. All known calving, lambing, and important bird areas within the JPARC project area were taken into consideration during effects analysis.</p> <p>Supersonic flight and sonic booms are also addressed in the document. As stated in the DEIS Section 3.1.2, supersonic aircraft operations are permitted in the existing Fox 3 MOA/ATCAA down to 5,000 feet AGL or 12,000 feet MSL, whichever is higher. Overpressures from sonic booms for a variety of military jet aircraft in Mach 1.2 level flight at 10,000 feet AGL range from 4.4 to 5.7 pounds per square foot for F-16 and F-22, respectively (Table 3-6). Near the centers of Fox 3 MOA/ATCAA and the Paxon MOA/ATCAA sonic booms would increase from about 4.6 to 5.2 per day on average. The authors understand that wildlife may have different reactions than humans to the same stimulus and rely on the scientific literature that has systematically reviewed specific wildlife species responses to overflight.</p> <p>The U.S. Air Force publishes a Handbook for pilots that specifies where sensitive areas are located and lists any flight restrictions applied to them. Waterfowl concentration and Dall sheep lambing areas are included in the flight restricted areas for pilot/aircraft safety and wildlife protection. To reduce potential for disturbance under new airspace areas, the following new measure was included in text under the Fox/Paxon Section 3.1.8.4, Mitigations: “Update existing list of noise/flight sensitive areas in 11th Air Force Airspace Handbook to include sensitive resources found under the Fox 3/Paxon MOAs and update as necessary to reflect new information.” Also, see Appendix E for a review of research on noise effects, primarily from aircraft overflights, on wildlife species.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		Solitude is an intrinsic part of the surroundings for many Alaskan residents, particularly in the remote areas underlying the Fox 3 and New Paxon proposal area. Potential impacts to rural residents are described in Section 3.1.10.3.1. The Air Force will review the areas and communities of concern and will incorporate reasonable and feasible avoidance of these locations into the final selected mitigations. These mitigations will be included in the FEIS and ROD.
I0184-3	<p>Other concerns are restrictions on on-the-ground use and air space use by other aircraft. Getting out into Alaska's back country is a major component of many Alaskans lives. Either we already live there or we depend on being able to go there for recreation, hunting, fishing, hiking, mining, climbing, ORV trips, wildlife-viewing, camping, berry picking, connecting with the "real" Alaska, peace, silence, solitude. It's why we live here. Many of us use small planes to get to these places.</p> <p>For many of us, our windows of opportunity to do these things are restricted either by our own schedules or by the seasons. If you were to close some of these areas during someone's particular window of opportunity it may mean not using the area at all. This is a major and unacceptable infringement on our freedom to enjoy living in Alaska. The Talkeetnas have become Alaskans playground and should remain so.</p>	Section 3.1.10.3 of the DEIS acknowledges that the expansion of the Fox 3 MOA and the establishment of the Paxon MOA would result in effects on civilian air access to areas below or in the vicinity of the proposed action. Section 3.1.10.4 lists mitigation measures that could be implemented to reduce the impacts, including coordinating the schedule of MFEs with local communities in advance. In addition, Section 3.1.1.4 (Airspace) lists mitigation measures that could be implemented to reduce the impacts such as use of the SUAIS and establishing or expanding existing VFR flyway corridors as necessary to provide VFR aircraft transit through areas that may be affected by high density military flight activities within/near the proposed airspace. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0184-4	In addition, smaller airlines offering scheduled service to small villages may face long and expensive detours. This will have negative economic impacts on their businesses. As well, there will be negative economic impacts on charter aircraft businesses.	As stated in Section 3.1.12.3.1, potential affects to commercial and general aviation are one of the major concerns associated with the Fox 3 MOA and New Paxon MOA proposal. Impacts to civil aviation are analyzed in Section 3.1.1.3. Economic impacts associated with the changes to commercial and general aviation include additional operating costs associated with avoiding active airspace, and the costs of any expended efforts in tracking the airspace status through available advisory services. Alaska's unique dependence on civil aviation is acknowledged in the EIS and due to the potential economic impacts associated with changes in airspace, the Federal Aviation Administration (FAA) and Air Force would address any impacts and mitigation measures to be taken before implementation of any airspace proposals. This would include advanced coordination between military scheduling agencies and the Air Force, to avoid those time periods and altitudes that are most problematic for the Air Traffic Control system.
I0184-5	One further comment: there is a rumor that this expansion of MOAs is related to the proposal to transfer F16s to Anchorage from the Fairbanks area. If true, the simple solution is to keep the F16s in the Fairbanks area	The F-16 Aggressor Squadron proposed relocation from Eielson AFB to Joint Base Elmendorf-Richardson is not connected to the proposals for airspace adjustments contained in the JPARC Draft EIS. The airspace requirements

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>and select the no action alternative in the JPARC draft EIS. Anchorage does not need or want those F16s here, appreciably adding to our already high urban noise level. Fairbanks does want them because of the jobs they provide there and their training areas are far enough away from urban centers that they are not a problem, as we understand it.</p>	<p>described in the JPARC EIS are driven by the capabilities of Alaska-based F-22 fighters and the tactics they will face from adversaries. Realistic combat scenarios create a need for an extended airspace and lower altitude airspace to reflect the types of combat in which fifth generation F-22 fighters would be engaged. The F-22s have the capability to initiate combat at greater distances than fourth generation fighters such as the F-16, so fourth generation fighters must apply diverse tactics which require airspace expansion in distance and altitude. The F-22s must train to combat all such threats regardless of where the aggressor aircraft are based.</p> <p>The location of the F-16 Aggressor Squadron within Alaska is not a connected action to the JPARC proposals. The majority of the JPARC proposals that involve Eielson AFB are Army proposals and ALCOM does not anticipate those being impacted by the proposed move of the F-16 aircraft. The details of the proposed F-16 relocation and training, including Major Flying Exercises such as RED FLAG-Alaska, will be worked out in the coming months. An environmental analysis will be prepared to address the environmental consequences of the proposed F-16 relocation within Alaska.</p>
<p>I0185-1</p>	<p>I support the No Action Alternative. I am very concerned that the plan vastly increases the area of training operations and that the plan will allow training as low as 500 ft. The expanded training area would greatly impact both the Lake Louise area and the Talkeenta area. Residents, businesses, and property owners in Lake Louise and in Talkeetna oppose the expansion. The increased noise, the increased impact on wildlife, and the increased danger to civilian flyers are significant factors that have not been adequately addressed.</p> <p>...</p> <p>The 500 foot flying limit for F-22s and other military jet flights is unacceptable primarily for safety reasons and secondarily for increased noise. There are a lot of private pilots, flight-service companies, recreational users that access the area. Small planes fly at low altitudes and low speeds. Military jets fly at high speeds and belong at high altitudes. If military pilots need to train to fly jets at high speeds at low altitudes it needs to be done in places where there are no civilian planes in the air and no wildlife on the ground. Low altitude training in the proposed area is an accident waiting to</p>	<p>The Fox 3 and Paxon Alternative E proposal was added in response to scoping and FAA comments over the potential effects the expanded airspace and lower altitudes may have on the higher aviation use areas as noted in the comment. While this configuration does not fully alleviate public concerns with this proposal, the mitigation measures noted in the FEIS Appendix K and other viable options would be pursued by the Air Force to address those concerns. The FAA will be considering such concerns regarding the Fox 3 and Paxon MOA proposal as part of the formal aeronautical study they will be conducting on each JPARC airspace proposal. They will collaborate with the Air Force and other key interests as needed in determining if and how each proposal can most safely and efficiently serve military, civilian, and FAA operational needs.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>happen, and the civilian public should not be put in such jeopardy.</p> <p>The Mat-Su Borough is the fastest growing area of the state in terms of population increase. I am concerned that the Military is considering increases in restricted airspace without consideration of conflicts that might arise if the projected increases in population occur.</p>	
I0185-2	<p>I support the No Action Alternative. I am very concerned that the plan vastly increases the area of training operations and that the plan will allow training as low as 500 ft. The expanded training area would greatly impact both the Lake Louise area and the Talkeetna area. Residents, businesses, and property owners in Lake Louise and in Talkeetna oppose the expansion. The increased noise, the increased impact on wildlife, and the increased danger to civilian flyers are significant factors that have not been adequately addressed.</p> <p>...</p> <p>The 500 foot flying limit for F-22s and other military jet flights is unacceptable primarily for safety reasons and secondarily for increased noise. There are a lot of private pilots, flight-service companies, recreational users that access the area. Small planes fly at low altitudes and low speeds. Military jets fly at high speeds and belong at high altitudes. If military pilots need to train to fly jets at high speeds at low altitudes it needs to be done in places where there are no civilian planes in the air and no wildlife on the ground.</p>	<p>In order to provide the most realistic combat training experience, certain elements of the training must be conducted at low altitudes. However, the majority of jet aircraft training is conducted at altitudes above 5,000 feet above ground level (AGL) (see Appendix D, Table D-3). This pattern is followed in existing airspace units, some of which have floor altitudes of 500 feet AGL.</p> <p>The DoD is aware that nonparticipating aircraft fly in Military Operations Areas (MOAs) while training is underway and have taken steps to minimize risk of midair collisions. Both Joint Base Elmendorf-Richardson and Eielson AFB have implemented midair collision avoidance programs. All pilots practice see-and-avoid, and military pilots also use on-board radar systems to identify and avoid nonparticipating traffic early. The DoD also maintains the Special Use Airspace Information System (SUAIS), which provides pilots with up-to-date information on which SUAs are in use. The DoD has a strong interest in avoiding midair collisions and will continue to take all practicable steps to minimize this risk.</p> <p>Noise impacts are discussed in several sections of the EIS relating to individual resource areas. The Air Force would consider establishing avoidance areas around specific communities or sensitive locations in the Lake Louise and Talkeetna areas as mitigation measures to reduce noise impacts.</p>
I0185-3	<p>I support the No Action Alternative. I am very concerned that the plan vastly increases the area of training operations and that the plan will allow training as low as 500 ft. The expanded training area would greatly impact both the Lake Louise area and the Talkeetna area. Residents, businesses, and property owners in Lake Louise and in Talkeetna oppose the expansion. The increased noise, the increased impact on wildlife, and the increased danger to civilian flyers are significant factors that have not been adequately addressed.</p> <p>I don't think the Military has done sufficient study and research to determine</p>	<p>The concern regarding impacts to Lake Louise has largely been addressed with the added Alternative E that avoids low flying over the area. Talkeetna, on the other hand, is over 30 nautical miles (NM) from the nearest border of the proposed Fox 3 Military Operations Area (MOA) and will most likely not experience any adverse impacts from the new airspace.</p> <p>In response to noise impacts on wildlife, studies referenced in this EIS have shown that low-flying aircraft noise can have significant impacts to caribou calving, lambing, and certain avian nesting areas. Mitigations exist, and will be carried forward, that avoid low flight activity in many of these designated</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>how to mitigate the impacts to wildlife, or, indeed, whether the impacts can be mitigated. Wildlife is important to residents who depend on caribou and moose for sustenance. Wildlife is important to tourism businesses and hunting guide businesses. Wildlife is important for maintaining ecosystems. Wildlife from large mammals to migratory birds would be impacted. What will be the impacts to wildlife from increased noise and how does the military plan to mitigate for them?</p> <p>The 500 foot flying limit for F-22s and other military jet flights is unacceptable primarily for safety reasons and secondarily for increased noise. . . . If military pilots need to train to fly jets at high speeds at low altitudes it needs to be done in places where there are no civilian planes in the air and no wildlife on the ground.</p>	<p>"sensitive" areas within the proposed new airspace boundaries. Additional sensitive areas may be designated as a result of consultation with wildlife and natural resource agencies during the drafting of this EIS.</p> <p>The Air Force also has a bird/wildlife-aircraft strike hazard (BASH) program that places altitude restrictions on specific aircraft during heavy bird activity and in high bird traffic areas (migratory paths).</p> <p>There are impacts to general aviation with the proposed modification to the MOAs. A 500-foot AGL floor in the Fox 3 and Paxon MOAs does place military aircraft in the same airspace as nonparticipating aircraft. Just as the Air Force currently shares low airspace in MOAs near Delta Junction, the new airspace will be made safe for all aircraft with a robust Special Use Airspace Information System (SUAIS) and maximum participation from pilots. This communications network allows a range control operator to inform pilots of the status of military airspace as well as the location of other nearby aircraft. The current SUAIS system would require significant infrastructure additions to cover the new airspace adequately.</p>
I0185-4	<p>I don't think the Military has done sufficient study and research to determine how to mitigate the impacts to wildlife, or, indeed, whether the impacts can be mitigated. Wildlife is important to residents who depend on caribou and moose for sustenance. Wildlife is important to tourism businesses and hunting guide businesses. Wildlife is important for maintaining ecosystems. Wildlife from large mammals to migratory birds would be impacted. What will be the impacts to wildlife from increased noise and how does the military plan to mitigate for them?</p>	<p>Proposed mitigations for potentially adverse impacts to subsistence activities are addressed in Section 3.1.13.4. Other mitigations will be considered by the Air Force based on comments received on the Draft EIS. The final mitigations will be identified in the Record of Decision and specified in a mitigation plan for implementation. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process. Additionally, military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. In preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century.</p>
I0185-5	<p>I don't think the Military has done sufficient study and research to determine how to mitigate the impacts to wildlife, or, indeed, whether the impacts can be mitigated. Wildlife is important to residents who depend on caribou and moose for sustenance. Wildlife is important to tourism businesses and hunting guide businesses. Wildlife is important for maintaining ecosystems. Wildlife from large mammals to migratory birds would be impacted. What</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>will be the impacts to wildlife from increased noise and how does the military plan to mitigate for them?</p>	<p>Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>The proponent is coordinating with other land and resource management agencies to acquire best available data for planning mitigations and avoidance procedures. These will reduce effects of aircraft overflight and noise on sensitive wildlife locations and human activities. The decisionmakers will consider all available information prior to making a decision.</p> <p>The Air Force has used additional information from recent studies and reports to consider effects on wildlife populations and in the formulation of mitigations. Additional information on overflight effects was added to Appendix E, Noise of the Final EIS.</p>
<p>I0186-1</p>	<p>I am a private pilot flying out of Lake Hood Strip in Alaska. Below are my comments regarding the Joint Pacific Alaska Range Complex EIS and how they will affect my flying and other GA pilots.</p> <p>The proposed Fox 3 MOA additions extend laterally and vertically in to an area of Alaska highly used by the general public for business and recreation, due to its close proximity to major population centers of the MatSu Valley, Anchorage and Fairbanks. Lowering the ceiling to 500ft increases the probability of mid-air collisions for commercial pilots conducting tour activities and general aviation pilots engaging in hunting, mining, recreation or other activities.</p> <p>The low-altitude portion of the proposed Paxson MOA includes a major VFR route connecting northern Alaska with the south central and eastern regions of the state. Other portions of this proposed MOA are used for mining and recreation. Confining VFR traffic to corridors through this area concentrates traffic, potentially creating an unsafe condition for civil aviation. This area is not conducive for a low altitude MOA.</p> <p>Under current FAA rules, active MOAs block access by IFR aircraft, other than emergency and lifeguard flights. This lack of access limits economic viability and reduces safety to pilots and the public in the communities that our underneath or near this airspace. Establishing MOAs that block IFR</p>	<p>The JPARC airspace proposals considered all existing Alaska Special Use Airspace with the EIS proposed alternatives being the only viable options that would most effectively and efficiently meet the purpose and need explained in the FEIS Chapters 1 and 2. The concerns expressed about the proposed Fox 3 and new Paxson MOA expansion/lower altitudes and the different restricted area proposed are reflected as potential adverse impacts in the FEIS Airspace Management and Use discussions. FEIS Section 3.1.1.2 describes FAA requirements for an aeronautical study to be conducted on the JPARC airspace proposals where they will examine if and how each could be safely implemented and managed so as to minimize impacts on both VFR and IFR air traffic and their Air Traffic Control system capabilities. This will be done in collaboration with Air Force and Army proponents and other stakeholders, as needed, while exploring those mitigations (FEIS Appendix K) and other viable options for meeting the mutual needs of all concerned. The F-16 relocation is not associated with the JPARC proposals in any manner and will be examined separately through other NEPA processes.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>airways is directly counter to the work done by the FAA in recent years to increase IFR access with GPS approaches and airways. No new MOAs should be approved that block IFR airways until the FAA and military have developed procedures to allow IFR access to civil aircraft.</p> <p>The military constructed the Battle Area Complex south east of Delta Junction knowing that this area is important to civil aviation to access Isabel Pass. No restricted airspace should be established over this complex.</p> <p>Restricted areas west of Delta (2202 and 2211) already limit access between Delta, Fairbanks and the Richardson Highway corridor. We oppose alternatives that completely connect these existing restricted areas, and further block access for mining, hunting and recreation.</p> <p>Allowing Unmanned Aerial Vehicles (UAV's) to transit between Ft. Wainwright, Eielson and Ft. Greely and the restricted areas where they conduct training limits access, potentially creating a safety hazard for civil aircraft operating to and from Fairbanks, Delta and the Richardson Highway corridor. No segregated airspace should be established in these areas.</p> <p>The recently proposed relocation of the F-16's from Eielson AFB to JBER appears to have a direct impact on the airspace and airports in Anchorage and the Mat Su Valley. This needs to be quantified and addressed as part of the cumulative impact of the Draft EIS.</p> <p>Existing MOAs including Susitna, Stony, Naknek and Galena, are not addressed. They should be studied to see if they fit the purpose and need of the JPARC mission.</p> <p>Please address the above concerns to ensure that general aviation safety is not compromised.</p>	
I0186-2	<p>Under current FAA rules, active MOAs block access by IFR aircraft, other than emergency and lifeguard flights. This lack of access limits economic viability and reduces safety to pilots and the public in the communities that our underneath or near this airspace. Establishing MOAs that block IFR airways is directly counter to the work done by the FAA in recent years to increase IFR access with GPS approaches and airways. No new MOAs should be approved that block IFR airways until the FAA and military have developed procedures to allow IFR access to civil aircraft.</p>	<p>No new MOA or restricted area airspace can be established without the FAA's study of the airspace proposals. As discussed in the FEIS Section 3.1.1.2, this study will examine if and how each airspace action can be safely implemented so as not to adversely impact VFR/IFR operations and the FAA's ability to manage their air traffic operations in a safe, efficient manner. The Army and Air Force proponents will be working with the FAA and key stakeholders to find the most reasonable and practicable solutions to help achieve that objective.</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
I0186-3	Restricted areas west of Delta (2202 and 2211) already limit access between Delta, Fairbanks and the Richardson Highway corridor. We oppose alternatives that completely connect these existing restricted areas, and further block access for mining, hunting and recreation.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and the Air Force share your concerns about Alaska's resources. In preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. Once the Army and Air Force select the preferred alternatives for each proposal, specific measures will be developed in order to avoid, minimize, and in some cases fully mitigate adverse impacts to the environment, natural resources, and public communities to the extent feasible and practicable. Such measures are required in accordance with the implementation regulations the Army and Air Force were required to adopt for the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] 4321 et seq.) and the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508.
I0186-4	The recently proposed relocation of the F-16's from Eielson AFB to JBER appears to have a direct impact on the airspace and airports in Anchorage and the Mat Su Valley. This needs to be quantified and addressed as part of the cumulative impact of the Draft EIS.	The location of the F-16 Aggressor Squadron within Alaska is not connected to the JPARC proposals. The Air Force restructuring action to move the F-16 Aggressor Squadron from Eielson AFB to JBER is not included in the JPARC Modernization and Enhancement EIS. This action would undergo a separate environmental impact assessment including the impacts on airspace and airports in Anchorage and the Matanuska-Susitna Valley. Because military planning is dynamic, change in missions and training activities are part of the context for the military installations in the region. This has resulted in decreases and increases in military training activities and personnel historically, and the region will likely experience some of these fluctuations in the future. As these projects are identified, they will undergo appropriate evaluation prior to decisionmaking and implementation.
I0187-1	I am opposed to the addition of the Fox 3 MOA in South Central Alaska. I have flown in Alaska for thirty years as a recreational pilot. The proposed addition affects areas that I have used for recreation for my thirty years of flying. The proposal is unreasonable and burdensome to the general aviation users.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. Military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. General aviation is particularly important in Alaska as a means of commerce, subsistence, recreation and emergency transportation. In preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century. There is no other place in America where the military

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
		has the opportunity to conduct state-of-the-art training in such diverse terrain and large areas required by fifth generation aircraft. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.
I0187-2	I am opposed to the addition of the Fox 3 MOA in South Central Alaska. I have flown in Alaska for thirty years as a recreational pilot. The proposed addition affects areas that I have used for recreation for my thirty years of flying. The proposal is unreasonable and burdensome to the general aviation users.	Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Air Force respects the manner in which general aviation interests rely on the use of this airspace and will seek the appropriate means to permit mutual use of this airspace while minimizing any adverse effects on general aviation flying experiences in this area. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process. Additionally, military operations must be conducted in harmony with the needs of other uses and users of Alaska’s lands and airspace. General aviation is particularly important in Alaska as a means of commerce, subsistence, recreation and emergency transportation. In preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska’s value to the military in the twenty-first century.
I0188-1	page 10-1 line 31... change Cooper to Copper. It’s the Copper Valley.	Thank you for your comment. The text of the EIS will be changed as per your input.
I0189-1	I attended both the Scoping meeting and the Public Hearing for this JPARC-EIS. Both times I felt uneasy and even intimidated by the sheer number of uniformed individuals in the very small Swiss Alaska Inn in Talkeetna. The space was congested, even over-crowded, and I know of several people who did not attend because of the chosen venue. If the purpose is to HEAR from the public, the Hearing should take place in a public space – a school, for instance. Even then, is it really necessary to bring so many military personnel?	Public hearings were held in off-base locations as specified in 32 Code of Federal Regulations (CFR) 989.19(c)(2) and in accordance with the process outlined in Part 989 (Appendix C). The location was selected based upon public participation during scoping meetings. Alaska Command’s (ALCOM’s) intent in having military personnel present at the public hearings was twofold: (1) to have personnel that are directly involved and impacted by the JPARC proposals available to answer public questions and inquiries and (2) to have the personnel that are directly involved and impacted by the JPARC proposals hear public concerns firsthand. ALCOM’s goal was to provide ease and comfort for public input.
I0189-2	I urge you to make No Changes to the Fox3. The only alternatives left in the draft EIS both allow overflights as low as 500 feet AGL. This is simply unacceptable. The minimum level for overflights should remain at 5000’ AGL. Low-flying aircraft are much louder, and at the speed they’re flying, can come over a ridge and be upon hikers/fishermen/wildlife very suddenly	The FEIS Chapter 1 and 2 discussions explain the purpose and need for those lower altitudes that cannot be fully met in the lateral and vertical limitations of the existing MOAs. Pending results of the FAA study of the Fox 3 and Paxon MOA proposals, the Air Force will explore those FEIS mitigations and other viable options for minimizing impacts on other airspace uses within the

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>with their ear-splitting noise. This is not anyone’s idea of a pleasant wilderness experience.</p> <p>In Appendix K, Table K-1, Existing Mitigations, RefID438, it states, “Raise the minimum altitude to 5000 feet AGL for Fox 1&2.” This is to mitigate biological, recreation, land use & subsistence issues. It should be the same for Fox 3 – apply this same mitigation to Fox 3.</p> <p>I understand that the No Action Alternative would require more distant travel for JBER trainees. But what about all the people from Anchorage & the Valley who are looking for “accessible wilderness” and who, if changes were made to lower flights to 500’ AGL, would have to drive much farther to arrive at suitable quiet destinations?</p> <p>The Talkeetna Mountains are a gem of accessible wilderness. People love to recreate there. Businesses in Talkeetna guide trips there; air services drop off/pick up clients. The dangers imposed by military over-flights down to 500’ are too great.</p>	<p>expanded area and lower altitudes. Please note that the Fox 1 and 2 MOA floors are 5,000 feet AGL and 7,000 feet MSL, respectively; therefore, the reference to raising those altitudes in the Appendix K is a misprint.</p> <p>Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0189-3	<p>I urge you to make No Changes to the Fox3. The only alternatives left in the draft EIS both allow overflights as low as 500 feet AGL. This is simply unacceptable. The minimum level for overflights should remain at 5000’ AGL. Low-flying aircraft are much louder, and at the speed they’re flying, can come over a ridge and be upon hikers/fishermen/wildlife very suddenly with their ear-splitting noise. This is not anyone’s idea of a pleasant wilderness experience.</p> <p>Natural (i.e. QUIET) soundscapes are increasingly rare, even in Alaska. There is an innate value to quietude, and we cannot, as a species, afford to lose it.</p> <p>I understand that the No Action Alternative would require more distant travel for JBER trainees. But what about all the people from Anchorage & the Valley who are looking for “accessible wilderness” and who, if changes were made to lower flights to 500’ AGL, would have to drive much farther to arrive at suitable quiet destinations?</p> <p>Last but not least, think of the impacts on wildlife. No adequate study has been done on noise impacts to the health & well-being of wildlife in the Fox 3. Please do not make any changes until studies have been done. Humans</p>	<p>Training at 500 feet AGL over a larger area has been identified as an unmet requirement for efficient and realistic joint military training, and a 500-foot-AGL floor is a component of both Fox 3 MOA/new Paxon MOA action alternatives. However, in accordance with the requirements of the National Environmental Policy Act, the No Action Alternative is also analyzed and is a viable alternative even though it does not meet all training requirements.</p> <p>Potential impacts to recreational users of the areas beneath proposed and modified SUAs are discussed in the sections of the EIS dedicated to land use. The majority of training by fast-moving jet aircraft would occur at relatively high altitudes (see Appendix D, Table D-3). Although individual overflight events by low-flying aircraft could be loud and/or startling, these events would be relatively infrequent.</p> <p>Several studies on the effects of noise on wildlife are cited in the Biological Resources sections of the EIS and in Appendix E, Section E.2.8.2. While noise events may result in short-term behavior reactions in individuals of some species, population-level effects (e.g., reduced fecundity, increased mortality) are not expected to occur.</p>

Table N-5. Government Response to Comments (continued)

Submittal ID	Comments	Responses
	<p>can label, make sense of, or rationalize the noise that bothers them. Not so for birds, animals, even fish. They will be impacted. If noise is a known stressor for humans, it follows that the same noise level will create stress for wildlife.</p>	
<p>I0189-4</p>	<p>I urge you to make No Changes to the Fox3. The only alternatives left in the draft EIS both allow overflights as low as 500 feet AGL. This is simply unacceptable. The minimum level for overflights should remain at 5000' AGL. Low-flying aircraft are much louder, and at the speed they're flying, can come over a ridge and be upon hikers/fishermen/wildlife very suddenly with their ear-splitting noise. This is not anyone's idea of a pleasant wilderness experience.</p> <p>In Appendix K, Table K-1, Existing Mitigations, RefID438, it states, "Raise the minimum altitude to 5000 feet AGL for Fox 1&2." This is to mitigate biological, recreation, land use & subsistence issues. It should be the same for Fox 3 – apply this same mitigation to Fox 3.</p> <p>I understand that the No Action Alternative would require more distant travel for JBER trainees. But what about all the people from Anchorage & the Valley who are looking for "accessible wilderness" and who, if changes were made to lower flights to 500' AGL, would have to drive much farther to arrive at suitable quiet destinations?</p> <p>The Talkeetna Mountains are a gem of accessible wilderness. People love to recreate there. Businesses in Talkeetna guide trips there; air services drop off/pick up clients. The dangers imposed by military over-flights down to 500' are too great.</p>	<p>Thank you for your comment on the JPARC Draft EIS. This comment is duly noted. The Army and Air Force units based within the State of Alaska face an exceptional challenge to meet compelling and increasingly urgent needs borne out of fighting wars. In an era of persistent combat operations, the Army and Air Force need to continue to generate new technologies, learn from battlefield experiences, update tactics, and train intensively to face a committed and agile enemy. Each of these challenges drives the purpose and the need for modernization and enhancements to the range and airspace infrastructure that replicate the modern battlefield for training and testing in Alaska. In preparing the Final EIS the Army and Air Force will make every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century. Mitigation measures to offset adverse impacts on hikers, fishermen, and wildlife will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
<p>I0189-5</p>	<p>In Appendix K, Table K-1, Existing Mitigations, RefID438, it states, "Raise the minimum altitude to 5000 feet AGL for Fox 1&2." This is to mitigate biological, recreation, land use & subsistence issues. It should be the same for Fox 3 – apply this same mitigation to Fox 3.</p>	<p>Section 3.1.13.4 and Appendix K, Table K-2 discusses proposed mitigations to minimize potentially adverse impacts to subsistence resources as a result of the Fox 3 MOA. While maintaining the floor of the Fox 3 MOA at 5,000 feet AGL would not accomplish the Air Force's purpose and need for the project, there are proposed avoidance areas and altitude restrictions over sensitive wildlife areas to reduce potential impacts. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process. Additionally, military operations must be conducted in harmony with the needs of other uses and users of Alaska's lands and airspace. In preparing the Final Environmental Impact Statement (FEIS) the Army and Air Force will make</p>

Table N-5. Government Response to Comments (*continued*)

Submittal ID	Comments	Responses
		every effort to harmonize mission requirements and community needs in order that user conflicts be avoided or mitigated to the maximum extent feasible. JPARC is a key attribute of Alaska's value to the military in the twenty-first century.
I0189-6	<p>I understand that the No Action Alternative would require more distant travel for JBER trainees. But what about all the people from Anchorage & the Valley who are looking for "accessible wilderness" and who, if changes were made to lower flights to 500' AGL, would have to drive much farther to arrive at suitable quiet destinations?</p> <p>In the big picture, the military may save some money, but the fuel would be spent – perhaps even more than was saved – by the public.</p> <p>The Talkeetna Mountains are a gem of accessible wilderness. People love to recreate there. Businesses in Talkeetna guide trips there; air services drop off/pick up clients. The dangers imposed by military over-flights down to 500' are too great.</p>	<p>Section 3.1.12.1 of the Draft EIS acknowledges that recreation and tourism is one of the key industries to Alaska and to the region affected by the Fox 3 MOA expansion and New Paxon MOA alternative actions. Section 3.1.12.3 provides a discussion of the environmental consequences to socioeconomic resources under the proposed actions, including potential economic impacts to regional businesses and communities from changes in access to commercial and general aviation. Additional details regarding potential environmental consequences associated with the Fox 3 MOA expansion and new Paxon MOA alternative actions to airspace management and use and safety are provided in Section 3.1.1.3 and Section 3.1.3.3, respectively. Mitigation measures to offset adverse impacts will continue to be reviewed and refined when the preferred alternative is selected during the Final EIS preparation process.</p>
I0189-7	<p>In Appendix K, Table K-1, Existing Mitigations, RefID438, it states, "Raise the minimum altitude to 5000 feet AGL for Fox 1&2." This is to mitigate biological, recreation, land use & subsistence issues. It should be the same for Fox 3 – apply this same mitigation to Fox 3.</p> <p>The Talkeetna Mountains are a gem of accessible wilderness. People love to recreate there. Businesses in Talkeetna guide trips there; air services drop off/pick up clients. The dangers imposed by military over-flights down to 500' are too great.</p> <p>Last but not least, think of the impacts on wildlife. No adequate study has been done on noise impacts to the health & well-being of wildlife in the Fox 3. Please do not make any changes until studies have been done. Humans can label, make sense of, or rationalize the noise that bothers them. Not so for birds, animals, even fish. They will be impacted. If noise is a known stressor for humans, it follows that the same noise level will create stress for wildlife.</p>	<p>The JPARC proponents have carefully considered a variety of alternatives and several measures to reduce potential impacts from the definitive proposed actions evaluated in this EIS. Many of these are derived from recommendations and concerns expressed in tribal, agency, and public comments on the Draft EIS. The Final EIS identifies the preferred alternatives and includes details of all the final proposed mitigations. The Record of Decision will select alternatives and mitigations that proponents will implement as identified in the Final EIS. Some mitigations expand or adopt prior agreements and existing mitigations developed for previous NEPA actions by the Air Force and Army in Alaska, revised to address the particular impacts and locations of the proposals in this EIS.</p> <p>Additional information on overflight effects was added to Appendix E, Noise.</p>