CHAPTER 9
COMMENTS AND RESPONSES

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CHAPTER 9
COMMENTS AND RESPONSES

9.1 INTRODUCTION

This chapter contains the Army's responses to comments received on the Draft Environmental Impact Statement (EIS) released in 2004 for the construction and operation of a Battle Area Complex (BAX) and a Combined Arms Collective Training Facility (CACTF) within the U.S. Army Training Lands in Alaska. A summary of the public comment process is presented in Section 9.2. An overview of government-to-government consultation is presented in Section 9.3. Comment letters from federal, state and local agencies, Alaska tribal entities, public and special interest groups are reproduced in Section 9.4, as well as verbatim transcripts from the U.S. Army Alaska's (USARAK) government-to-government meetings with Alaska tribal entities and from public comment meetings. The Army's responses to comments are also located in Section 9.4. Publications cited in the responses can be found in Chapter 6, *Bibliography*.

Each response was categorized by topic (Table 9.1.a). Topics were numbered in the order they appeared in the document, with each response having its own topic/number code. In Section 9.5, the responses are indexed by topic (9.5.1) and by commentor (9.5.2). This process resulted in 550 coded responses.

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

Topics	
Air Quality	Noise Management
Airspace	Other
Cold Regions Test Center	Proposed Action and Alternatives
Cultural Resources	Public Access and Recreation
Cumulative Impacts	Purpose and Need
Environmental Justice	Socioeconomics
Fire Management	Soil Resources
Flooding/Floodplains	Subsistence
Groundwater	Threatened and Endangered Species
Human Health and Safety	Vegetation
Infrastructure	Water Resources
Location	Wetlands
Mitigation	Wildlife and Fisheries

9.2 SUMMARY OF THE PUBLIC COMMENT PROCESS

The Notice of Availability (NOA) for the initial Draft EIS was published in the *Federal Register* on November 5, 2004. USARAK announced the public meetings in the *Anchorage Daily News* and *Fairbanks Daily-News Miner*, posted meeting notices on public bulletin boards in Delta Junction, and on the Delta News Web, a community website. Approximately 200 copies of the Draft EIS were sent to people who had expressed interest in the BAX/CACTF projects, or other recent issues related to Army activities in Alaska, and were made available for review at community libraries throughout the project area and at Delta Junction's City Hall. Copies of the draft were also available at Fort Richardson, Fort Wainwright, and Donnelly Training Area Environmental Resource Departments and on the USARAK Conservation Website (http://www.usarak.army.mil/conservation).

The public comment period was initially set for 45 days, or from November 5, 2004 to December 19, 2005. In response to individual requests for continued comment, the public comment period was extended for an additional 20 days and ended on January 8, 2005. Notices of the extension were published in local newspapers. Verbal comments were recorded at public meetings held in Fairbanks and Delta Junction. A public meeting was also held in Anchorage; however, no individuals attended. A total of 58 written comments were received. The comment breakdown included six from federal agencies, seven from state agencies, one representing a local government, two from tribal representatives, 15 from special interest groups, and 27 from individuals.

Public meetings were held in three communities in Alaska: Anchorage (November 23, 2004), Fairbanks (December 1, 2004) and Delta Junction (December 2, 2004). Some individuals chose not to register. Total attendance was highest in Delta Junction. The format included a poster session that described the proposed range projects, alternatives considered, and impacts to the respective resources or issues. Briefings were provided by USARAK officials at 2:00 p.m., 5:00 p.m. and 7:00 p.m. in Delta Junction. Each briefing was followed by a question and answer session.

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

9.3 GOVERNMENT-TO-GOVERNMENT CONSULTATION

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

In accordance with these executive orders and policies, U.S. Army Garrison Alaska (USAG-AK) staff visited four tribal villages and held one government-to-government meeting with federally recognized tribes in Alaska after the release of the Draft EIS. The government-to-government coordination and consultations were held independent of the public coordination process.

Before the meetings, the USAG-AK Native Liaison contacted the tribes via phone, fax and U.S. mail to notify them of the availability of the initial Draft EIS and the meetings. Travel cost reimbursement was provided for tribal members attending the meetings. (Some tribal representatives did not turn in their paperwork early enough to receive invitational travel orders and travel cost reimbursement). The initial Draft EIS packages were mailed to the tribes from Fort Richardson.

During the week of November 15-19, 2004, USAG-AK staff visited Dot Lake Village, Native Village of Tanacross, Northway Village and Native Village of Tetlin. The visits were designed to inform tribes of the initial Draft EIS and to provide information to assist tribes with preparing comments for follow-up meetings. The visits also gave the tribes an opportunity to interact with staff involved in the project.

The government-to-government meeting was designed for USAG-AK staff to collect tribal comments on the initial Draft EIS. The meeting was held at the SpringHill Suites at the Marriott in Fairbanks on December 17, 2004. Representatives from Dot Lake Village, Native Village of Eagle, Healy Lake Village, Northway Village and Native Village of Tanacross were present at the meeting. A general overview of the proposed action and alternatives was presented. Several questions regarding the proposed action were answered, and additional non-project related concerns were noted. All comments were recorded by a court reporter. USAG-AK received two written comments from tribal members prior to the meeting, one written comment from a tribal member following the meeting, and one written comment from Tanana Chiefs Conference, Inc., a special Alaska Native interest group.

9.4 COMMENTS ON THE INITIAL DRAFT EIS AND ARMY RESPONSES

This section contains comments received during the initial Draft EIS comment period and the Army's responses to them. This section is divided into three subsections: Government-to-Government Tribal Meetings, Comments and Army Responses (Section 9.4.1); Government, Agency and Non-Governmental Organizations, Comments and Army Responses (Section 9.4.2); and Public Meetings, Comments and Army Responses (Section 9.4.3). Responses were coded according to the topics listed in Table 9.1.a and presented in alphabetical order by last name or organization within each subsection. Table 9.1.b provides a summary of the number of comments received according to topic and commentor. Publications cited in the responses can be found in Chapter 6, *Bibliography*.

Table 9.1.b Comment Summary by Topic and Commentor.

Topic	Commentor						
	Federal	**State**	**Tribal**	**Local Gov't**	**Special Interest Groups**	**Individuals**	**Total**
Air Quality	1	0	0	0	1	2	**4**
Airspace	0	0	0	0	21	11	**32**
Cold Regions Test Center	7	0	0	0	0	1	**8**
Cultural Resources	0	0	2	1	4	1	**8**
Cumulative Impacts	8	0	0	2	1	9	**20**
Environmental Justice	0	0	0	0	1	0	**1**
Fire Management	8	16	1	11	2	25	**63**
Flooding/Floodplains	9	0	0	8	0	9	**26**
Groundwater	0	0	0	0	0	2	**2**
Human Health and Safety	3	1	2	2	4	18	**30**
Infrastructure	1	0	0	0	0	1	**2**
Location	1	0	0	1	7	36	**45**
Mitigation	3	1	0	2	1	1	**8**
Noise Management	2	0	0	1	2	20	**25**
Other	15	2	13	3	8	11	**56**
Proposed Action and Alternatives	14	3	3	4	22	39	**85**
Public Access and Recreation	6	9	0	0	6	5	**26**
Purpose and Need	2	0	0	0	1	1	**4**
Socioeconomics	1	1	0	0	2	6	**10**
Soil Resources	9	0	0	0	2	1	**12**
Subsistence	1	0	2	0	2	1	**6**
Threatened and Endangered Species	2	0	0	0	0	0	**2**
Vegetation	6	0	0	0	0	1	**7**
Water	3	2	0	0	1	1	**7**
Wetlands	22	0	0	0	1	2	**25**
Wildlife and Fisheries	9	15	2	0	6	4	**36**

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9.4.1 Government to Government Tribal Meetings, Comments and Army Responses

1 CONSTRUCTION AND OPERATION OF
2 BAX/CACTF
3 WITHIN U.S. ARMY TRAINING LANDS IN ALASKA
4
5 GOVERNMENT TO GOVERNMENT MEETING
6
7 PRESENTATION AND COMMENT MEETING
8 REGARDING
9 DRAFT ENVIRONMENTAL IMPACT STATEMENT
10 U.S. ARMY ALASKA, DEPARTMENT OF THE ARMY
12 Held on Friday, December 17, 2004
13 Time: 10:00 a.m. to 2:00 p.m.
14
15 Volume 1 of 1
16 Pages 1 through 90, inclusive
17
18 Meeting Proceedings Held
19 At
20 SpringHill Suites at Marriott
21 Fairbanks, Alaska
22

24 Reported by: Carol A. McCue, RMR

Heartland Court Reporters
25 Fairbanks, Alaska

1 P R O C E E D I N G S
2 (On record, meeting presentation and
3 comment proceedings convened at
4 10:24 a.m., December 17, 2004.)
5 MS. AMANDA SHEARER: I think we'll go ahead
6 and get started this morning.
15 MS. AMANDA SHEARER: So we'll just go around
16 the table here. We can start from this end.
17 MS. ELIZABETH COOK: My name is Elizabeth
18 Cook, I'm the treasure for the Tanana Yukon Historical
19 Society, and my only role here today is to make sure
20 that the room is available and to pay people their
21 lodging per diem and, et cetera.
22 MR. JERRY ISAAC: Jerry Isaac, Tanacross
23 Village Council President.
24 MR. MIKE FIFER: Mike Fifer, Healy Lake
25 Council.

1 MR. RAY SANFORD: Ray Sanford, Tanacross
2 Village Council.
3 MR. GERALD ALBERT: Gerald Albert,

4 Vice-President, Northway.
5 MR. TOM O'BRIEN: Tom O'Brien, DOD Program
6 Manager, Tanana Chiefs Conference.
7 MS. CAROLINE WILLIAMS: Caroline Williams,
8 photographer.
9 MS. AMANDA SHEARER: Amanda Shearer. You know
10 me.
11 MR. TERRY BOONE: Terry Boone, I'm the new
12 Environmental Director, Garrison.
13 MR. RUSSELL SACKETT: Russ Sackett, Cultural
14 Resources Manager.
15 COLONEL DONNA BOLTZ: Donna Boltz, Garrison
16 Commander for Alaska.
17 MR. KEVIN GARDNER: Kevin Gardner,
18 Environmental Planning for Garrison Alaska.
19 THE REPORTER: I'm Carol McCue, the Court
20 Reporter.
21 MS. AMANDA SHEARER:
10 The point of today's meeting, what we would
11 really like to hear, either by written comments or
12 today verbal comments that you have on this project,
13 and what you've learned by looking through the
14 documents.

24 COLONEL DONNA BOLTZ: Okay. Instead of just

25 sending out these documents, as these environmental

1 documents tend to be, that we send it out with
2 information with people who can talk about it and so
3 you can ask questions, and then when we ask for
4 feedback it would be more productive.
8 Was that a helpful process to do that this
9 time? Because, I mean, that is something that is in
10 direct response to feedback that we got from village
11 leaders, starting last spring, I guess.
12 Was that a good way to do business? Could we
13 have done that even better? And I know, Mike, we
14 didn't make it to Healy Lake. I know we got the tabbed
15 copy out there, but I also know we didn't make it.
16 MR. JERRY ISAAC: It was helpful, but there is
17 other issues that remains, remains to be worked on. I
18 feel there's no significant efforts towards actually,
19 you know, actually working together to get these
20 concerns that we've expressed over the last several
21 years.
22 So I think, you know, the floor would be quite
23 open for continued resolution to the problems. I mean,
24 the effort is there, it's just not -- I feel it's not
25 fully fledged and there's a lot of room for more work

Other 01
USAG-AK has been actively engaged in government-to-government activities with Tribes since 2003. USAG-AK is committed to communicating and consulting with Tribes on Army-related concerns.

1 to be done. I think.
7 COLONEL DONNA BOLTZ:
12 And I know we don't do them all at one time
13 and certainly not necessarily at the speed that
14 everyone would hope for, but I hope that as we stay
15 engaged in a dialogue, Chief Isaac, that you feel as
16 though we're starting to move towards a resolution of
17 at least some of the issues along the way. And by
18 engaging and getting feedback and information, that we
19 have better processes all the way around.
20 MR. MIKE FIFER: I myself have not been able
21 to also go through your pamphlet there, but I have a --
22 a draft report of the military's actions that occurred
23 in and around Healy Lake, including the Gerstle Test
24 Site area, and unfortunately, this is the only copy
25 that I have. It's pretty explanatory. There is also

1 interviews with a few members that were in the
2 military.
3 COLONEL DONNA BOLTZ: Okay.
4 MR. MIKE FIFER:
6 But I'd like to submit this
7 also.
12 MR. MIKE FIFER: Because -- and I'd like you
13 to take a look at this also sometime.

14 MR. JERRY ISAAC: Okay.
15 MR. MIKE FIFER: But it's pretty explanatory
16 of the destruction of what military did at my home
17 town, including the destruction of our old village.
18 And -- and also -- and it also states in here
19 that there was actually a tank left in the -- in one of
20 the creeks at Healy Lake. That was removed just a
21 couple years ago.
23 MR. MIKE FIFER: And so yeah. I would like to
24 submit this as -- as defense for ourselves.

1 MR. MIKE FIFER: With your -- you know,
2 towards your environmental impact.
16 MR. MIKE FIFER: Right. And I would like you
17 to take a look at this also.
18 MR. TOM O'BRIEN: Thank you.
21 COLONEL DONNA BOLTZ:

10 So it's really critical and that's why we feel
11 so seriously about getting these projects on the
12 ground, getting them on the ground and getting them in
13 the right place is why we have to have this dialogue.
14 Because we have to site smartly to develop training
15 ranges that support our soldiers, but we have to also
16 take very seriously our responsibility for

17 environmental stewardship, for cultural resources, for
18 relationships with Native Alaskans and communities
19 throughout Alaska. And that's why the public comment
20 period is so important.
21 Our new Commanding General, General Hirai, who
22 I think some people have met now, does not have a
23 preferred alternative. That's different than when an
24 environmental assessment was done on this project.
25 There are four courses of action in the

1 Environmental Impact Statement. One is, of course, no
2 change, that we wouldn't develop the ranges, which, I
3 think you can see, would be a very difficult decision
4 for us now, given our mission. But the other three
5 look at three sites within the Donnelly Training Area.
6 General Hirai has not made a decision on which
7 site is the appropriate site to develop the project on.
8 That's really significant because he is counting on us,
9 and this is a small part of a large team of experts,
10 but I'll say us, to go out and get comment, to do the
11 analysis, and to provide information for
12 decision-making. You have information that we don't
13 have unless you share it. So that's why this dialogue
14 and public comment is so important.

3 MR. KEVIN GARDNER:
5 Colonel Boltz gave you a great introduction.
6 And I guess to start out, here are the three sites that
7 we are considering.
8 Let me just preface it by saying the decision
9 that General Hirai has to make on this is a tough one.
10 I mean, when he truly -- when he says there's no
11 preferred alternative, I'll tell you why.
12 In the Eddy Drop Zone area, there are multiple
13 advantages and disadvantages for training siting the
14 ranges there that you would not find necessarily closer
15 to the Delta River, which is the North Texas Range
16 option.
17 And they both are very different
18 vegetation-wise, topographically and whatnot, from the
19 third alternative, which is the Donnelly Drop Zone,
20 which is further from the community of Delta Junction
21 and the Missile Defense site, which is now Ft. Greely.
22 But that's why it's hard.
23 And the environmental factors that go into
24 this are -- are equally challenging to have to balance.
25 And then throw into the fact -- factor in the training

1 effectiveness of each range, and what we're trying to
2 achieve there, it's a lot for us to sort through.

3 And I applaud General Hirai's decision to say
4 there's no preference on our side until we hear from
5 the tribes, from the public, from the agencies, to get
6 everybody's perspective.
7 And we've wrung this out pretty good, and
8 we're extending the comment period even longer so we
9 can take a hard look at everything that comes in.
10 Because, you know, the Alaska Highway, the Richardson
11 Highway, Jarvis Creek, Delta River, nobody has -- has
12 cornered the market of their sole use of those
13 resources.
14 Stryker convoys coming from Ft. Wainwright to
15 the north or from Ft. Richardson to the south are going
16 to impact the public, the tribes, just as much. The
17 resources that would be affected don't recognize that
18 boundary. They move, fly, swim wherever they want. So
19 that's the challenge we have here.
20 What you have, as Colonel Boltz indicated, an
21 integrated range complex with two distinct
22 subcomponents. The urban part of that we call the
23 CACTF, that's the smaller square that you'll see
24 adjacent to the larger one.
25 The CACTF is the Combined Arms Collective

1 Training Facility, or the urban. That's the small

town. Again, the building to building, street to street fighting.

Nearby is the rural counterpart to that, the Battle Area Complex, or the B-A-X, or BAX as we like to refer to it. The hill to hill, tree to tree fighting.

Each of these ranges have several things in common. They will be outfitted with the latest, you know, state of the art cameras, sensing equipment, to capture in real time what the soldiers are doing right and wrong as they train on those two ranges.

And then somewhere at a kind of a convenient location for both ranges will be a facility such as a building, an after-action review facility. That's where the soldiers, when all is said and done after an exercise, will go and the truth will be told about what you did right and wrong.

So all the faded memories of what happened out on the ground where Kevin has talked himself into thinking, no, I didn't expose myself for no full minute when I was maneuvering from point A to point B, I was good. And then the person that's moderating that will say, well, let's see.

And he will flip on the monitor and we will watch the film and I'll be embarrassed and I'll say,

well, I guess I did mess up. And somebody will say, I told you so, but we all learn from that.

And this is the place we want them learning. We don't want them learning a hard lesson in Iraq or Afghanistan. So that's what they will have.

The large range, the Battle Area Complex, will have a combination of stationary targets, personnel, and vehicles for live fire engagements, they will have moving targets, as well, and then just again, the various challenges presented by the topography.

For example, if you're at Donnelly, the Donnelly Drop Zone site, it's bisected by Jarvis Creek, presented two very distinct challenges, kind of, you know, with perhaps a crossing that would have to be considered for -- for maneuver.

But on the other hand, something that neither of these two sites that are east of the Richardson Highway have, you can find over at the North Texas Range site. And that's this area out here, which is a permanent dudded impact area where you can fire artillery and mortars and things into. You won't be doing that here.

You have restricted airspace that allows you to fly and integrate training with the Air Force more easily, more readily, let's say. We have to do a lot

more planning to do that here.

So again, advantages and disadvantages everywhere. But again, the features that the ranges will have in common will be the marksmanship training that they will have to show that, okay, we can hit what we're aiming at, and it will be a very deliberate pace that they will do that.

They won't fire a live bullet anywhere on these until they've proven that they can walk through it with a dry run with no bullets, maybe blanks, kind of, you know, do that a few times until their trainers are confident that they are good to go. And after several rehearsals, they will lock and load live ammunition and do their training. So it's very safe.

The direction of fire, for example, for the Eddy Drop Zone site will be from north to south. And the opposite here at Donnelly Drop Zone, more from a south -- south to north direction. And then here at North Texas Range, it would be in the direction to the west out into the impact area.

Resource impactwise, I mean, it -- again, it just depends. Generally speaking, we found fewer vegetation soil impacts in the Eddy Drop Zone site than we did in some of the others.

For example, there's a lower incidence of

permafrost, vegetation clearing would not be as -- as significant as you think because we want to leave the terrain looking as natural as possible, and with the existence of the drop zone there, there's already kind of a clearing.

So more work would probably need to be done for the Donnelly site just because of the nature of the number of wetlands that are there because of Jarvis Creek running right through it.

And then North Texas, again, different topography actually because of previous fire history. A lot of this area has burned.

The most controversial issue of this whole project, as far as the community of Delta was concerned, is fire, starting -- the incidence of a wildfire starting somewhere in here where the rounds would be landing over, let's say, the maximum extent that a tracer might ricochet and land and inadvertently start a fire.

MR. MIKE FIFER: Can I ask a question?

MR. KEVIN GARDNER: That isn't something -- yes, sir. Go ahead.

MR. MIKE FIFER: I heard on the news a couple days ago that the Missile Defense system, they did a

Other 02
USAG-AK has followed up with Healy Lake Village regarding Missile Defense System concerns.

25 test fire, and it didn't work.

2 MR. MIKE FIFER: Where did it go?
3 MR. KEVIN GARDNER: I believe that missile was
4 fired from the Kodiak --
5 COLONEL DONNA BOLTZ: That's right.
6 MR. KEVIN GARDNER: -- launch facility. If
7 I'm not mistaken. Not from this one.
8 COLONEL DONNA BOLTZ: I don't know the answers
9 to the question where, where it landed.
17 COLONEL DONNA BOLTZ: Amanda, would you check
18 with your liaison and get back with us on it.
19 MR. JERRY ISAAC: Certainly gives us a full
20 sense of security. I mean, we have got a Missile
21 Defense System that's faulty and -- I don't know.
22 COLONEL DONNA BOLTZ: Well, certainly --
23 MR. MIKE FIFER: I'm actually glad it was down
24 in Kodiak because, you know, I'm 50 miles away from
25 there, and when I heard that it didn't work, I was

1 thinking.
2 MR. KEVIN GARDNER: I saw the same headline
3 and I thought, whoa, what missile? Where did they fire
4 that from? Real quick.
5 And I think when they do any testing from

6 this -- from our site here, I think folks will know
7 about it well in advance, I hope.
8 MR. TOM O'BRIEN: Yeah, Kevin, if I could just
9 ask the body here, you know, with my status as a
10 non-tribe, if it would be okay if I would make some
11 comments. And if that's not acceptable, I certainly
12 would not.
13 MR. MIKE FIFER: I don't have a problem.
16 MR. TOM O'BRIEN: With regards to since you've
17 led toward ammunition used, in the documents, chapter
18 2, page 5, what we have is that basically, you've been
19 very specific with the type of ammunition that's going
20 to be allowed on that facility. And definitely with
21 the -- with Howitzer and canon at 105 and 120
22 millimeter, folks are concerned about that.
23 But basically, that can be changed at the
24 discretion of the range officer. What type of
25 ammunition could be incorporated underneath a change at

1 the discretion of the range officer?
2 MR. KEVIN GARDNER: Well, I would say the list
3 in the document is pretty complete for what we commonly
4 use that's in the Army, the active Army inventory now.
5 What I can't predict, Tom, is munitions under
6 development that might be more effective, more

Proposed Action and Alternatives 01
Bullets fired at the BAX and CACTF do not contain explosives. There would be no possibility of unexploded ordnance (i.e., bullets or warheads) being used at the ranges.

7 environmentally friendly, some of the munitions that
8 might be replacing some of the stuff you see there.
9 But by and large, that big list of bullets,
10 big and small bullets, is what soldiers carry into
11 battle right now, or will fire from mounted machine
12 guns or other weapons systems on the Stryker.
13 I do know that there is -- there has been a
14 lot of work on developing green munitions, as they say,
15 that are going to be better in terms of, you know, as
16 far as its impact on the environment is concerned.
17 But my crystal ball doesn't show me too much
18 more in the way of what the research and development
19 folks have, we'll say 20 years out from now, for
20 lethality and range and so forth.
21 MR. TOM O'BRIEN: That discretionary clause
22 there doesn't mean that live ammunitions like --
23 COLONEL DONNA BOLTZ: No.
24 MR. TOM O'BRIEN: -- in the calibers would
25 ever be brought in?

1 MR. KEVIN GARDNER: The intent, and I'll
2 clarify, again, for these two ranges that are east of
3 the Richardson Highway, the Army has no intention of
4 developing anywhere in here the direction of fire,
5 something like that, which is, again, a permanent

Proposed Action and Alternatives 02
Bullets fired at the BAX and CACTF do not contain explosives. There would be no possibility of unexploded ordnance (i.e., bullets or warheads) being used at the ranges.

6 dudded impact area.
7 By that I mean they fire weapons like
8 artillery or mortars, indirect fire, that upon landing
9 they explode, which is what they are supposed to do.
10 Well, that, you all know, doesn't always
11 happen, and that's why it's a permanent off-limits area
12 because of the danger.
13 Any munitions fired in here that could produce
14 a dud, let's say, take the Stryker combat vehicle, for
15 example, it does have a weapons system, the mobile gun
16 system that fires a 105 millimeter round for destroying
17 bunkers or clearing obstacles or whatever, that's
18 primarily its use, and it provides good cover for the
19 dismounted soldiers. Well, it does explode when it
20 lands. However, the version that would be used here in
21 training would be inert. I mean, it would land with a
22 thud and embed itself somewhere.
23 COLONEL DONNA BOLTZ: All the munitions that
24 he's just talking about will have no secondary
25 explosion. So once they actually leave the tube, I

1 think I've heard George Alexion say it in the best way,
2 kind of a gross way of thinking about it, but it's a
3 hunk of metal that doesn't do anything.
4 MR. TOM O'BRIEN: So a 40 millimeter out of a

5 203 would be --
6 MR. KEVIN GARDNER: Exactly.
7 COLONEL DONNA BOLTZ: Would just hit with a
8 thud.
9 MR. TOM O'BRIEN: Just so you can register
10 impact.
11 COLONEL DONNA BOLTZ: Sure.
12 MR. KEVIN GARDNER: You'll know if you hit or
13 miss the target.
14 MR. TOM O'BRIEN: What about any provisions
15 for gas? Any types of gas? I know that you have them
16 for smoke, you know, for possibly for screening
17 movements or for simulating combat activities.
18 MR. KEVIN GARDNER: Yeah, for obscuring, for
19 the training value as the troops maneuver, certainly
20 that would be in there.
21 We'll have to -- the trainers aren't here, but
22 I know they also have in the inventory something, you
23 know, riot or CS, which is a good simulant to train to
24 see if your mask is nice and tight and you have a good
25 seal for that. That's commonly used in the training.

1 MR. MIKE FIFER: I have asked a similar
2 question in the past, and as you stated, Delta is
3 concerned of forest fire. A few years ago, right by

Proposed Action and Alternatives 03
Riot control agents, or CS, can be used within the BAX or CACTF. However, several physical, environmental, and climatic parameters must be considered prior to use. USARAK Range Regulation 350-2 and Range Control regulate the use of CS during training events.

4 the Gerstle test site, Gerstle River, there was a
5 significant fire. And that was not manned.
6 COLONEL DONNA BOLTZ: No.
7 MR. MIKE FIFER: Because of the gasses that
8 were --
9 MR. KEVIN GARDNER: The uncertainty of what's
10 in there.
11 MR. MIKE FIFER: And that also is in my handy
12 dandy little document.
13 MR. KEVIN GARDNER: Yeah. I bet it takes up a
14 few pages in there.
15 MR. MIKE FIFER: But my question then was, you
16 know, since it was a significant forest fire, once it
17 became airborne, that smoke came right over to our
18 village.
19 And you know, I asked what was the -- you
20 know, if it's too dangerous to put firefighters on it
21 and then it gets airborne and blows right on over to
22 Healy Lake, you know, fortunately, none of us got sick,
23 but there is some -- you know, there has to be some
24 contaminants in that smoke.
25 MR. KEVIN GARDNER: That's good. And I'll

1 tell you the good news on this is regardless of the
2 siting, the command has been working very closely in

Fire Management 01
A Restoration Advisory Board exists through the U.S. Army Corps of Engineers that addresses potential contamination at Gerstle River. Additional information can be obtained from the U.S. Army Corps of Engineers, Alaska District, Public Affairs Office at (907) 753-2520.

terms of fire mitigation planning with the Alaska Fire Service folks from BLM.

We had at the public meetings Tammy DeFries from AFS that spoke and kind of talked about the cooperation that they've been having with our range trainers, you know, and operation folks on planning for the type of response in this area. The equipment that they would have on site. Crews and things like that that they were willing to put in place to make sure that that's not a problem.

The other part is that I'll never say never, but traditionally, it certainly hadn't been a chemical training area that we know about on the scale of a Gerstle River. It's certainly been an active Army military training maneuver area for a long time. So it's sort of, from my experience, you just -- it's like building a building on any of our bases. If you want to find something, well, site your project there and when you start digging, you'll probably find it. But I would say riskwise, much, much lower event of something along the lines of what's in your report here.

The training will occur, it will be noticeable in terms of noise to the community. I mean, you'll

hear, you know, varying degrees of pop, pop, if it's a

smaller caliber weapon, maybe a little louder. It's -- yeah, it's training.

And we are -- our analysis is showing that it's not the level of noise that should be legally annoying. I mean, I can't control what annoys somebody and what doesn't, but in terms of what we tried to do in our noise modeling, we made sure we haven't exceeded any thresholds that EPA has established for noise.

MR. RUSSELL SACKETT: On the east of the Richardson Highway, the archeologists in that project area have really walked every square inch. And east of the highway, they have yet to find any live munitions.

That's not to say that there may not be any there, but in the two seasons the archeologists have been out there, and they report everything they find to the range manager, that they have not found any live munitions yet. It's always been dud -- undudded.

MR. TOM O'BRIEN: Kevin, in regards to the concept. Did you want to go, Mike?

MR. MIKE FIFER: I was just going to say in this catalog, there is found live ammunitions east of there.

MR. RUSSELL SACKETT: In this area?

MR. MIKE FIFER: At Healy Lake and the Gerstle

Other 03
A Restoration Advisory Board exists through the U.S. Army Corps of Engineers that addresses potential contamination at Gerstle River. Additional information can be obtained from the U.S. Army Corps of Engineers, Alaska District, Public Affairs Office at (907) 753-2520.

test site area.

MR. RUSSELL SACKETT: Right. But I meant on the Donnelly Training Area, east of there, there hasn't been anything found. I'm not saying there's nothing there, it's nothing's been encountered over the last two seasons.

MR. TOM O'BRIEN: With the philosophy, you know, going into this comprehensive training for a Stryker, the necessary element for air support and close ground support, how would that be incorporated and would they, then, be firing munitions in specific areas to simulate, you know, that support activity for any -- for any of those three sites that you've outlined? How would you -- how would you keep a handle on that?

MR. KEVIN GARDNER: Well, it's, again, the integration of air support training, no matter where the range is, will always be the call of the commander conducting the training.

If he's deemed, you know, my unit's -- my unit can do just about anything I ask them on the ground, but one of our weaknesses of our unit, whether it's the battalion or the brigade, may be the integration of the Air Force.

So he may pick an exercise to say that's what

Proposed Action and Alternatives 04
An “off-set” method would be used to integrated aircraft into training scenarios where there is no restricted airspace. The method allows close air support assets, artillery, mortars and/or attack helicopters to operate using live ordnance in an adjacent, designated impact area while linking (digitally) to a tactical exercise being conducted at the BAX or CACTF, all in a virtual manner.

1 we are going to hone in on. Regardless of the site
2 selected, they can do that.
3 The planning that would have to go into that
4 on the first part for either of these two sites would
5 have to be much greater detail, for example, than maybe
6 for this site simply because of the existence of some
7 actual military restricted airspace over here.
8 But that doesn't prevent them from training
9 here, it just means our air planners and the ground
10 planners have to schedule and coordinate those things
11 much more in advance so the Notices to Airmen can go
12 out in time because of the popularity of the Richardson
13 and Alaska Highway corridors.
14 But in our talks with FAA, and we're
15 continuing to engage those folks and the civil aviation
16 community on all that, it could be worked out.
17 The aircraft would not be depositing munitions
18 on our, let's say east of the highway ranges. There
19 would be simulated runs, a lot of it may be high level.
20 I think the training values may be simply the staff
21 officers doing the planning.
22 COLONEL DONNA BOLTZ: Coordination.
23 MR. KEVIN GARDNER: Communicating, talking to
24 the aircraft or the Air Force ground controller, and

25 they have fairly complex but proven ways of simulating

1 the delivery of those munitions on the ground without
2 there being a single boom going off.
3 MR. TOM O'BRIEN: So you wouldn't have to have
4 approaches that would come in on any type of strafing
5 scenarios or anything low level over occupied areas and
6 off the training area?
7 MR. KEVIN GARDNER: They have very specific
8 corridors that they would have to plan to fly in and
9 out of to avoid just -- just what you talked about.
12 MR. MIKE FIFER: How would you be training
13 12 months out of the year?
14 MR. KEVIN GARDNER: The training tempo.
15 MR. MIKE FIFER: Would it be a continuous
16 active training facility?
17 MR. KEVIN GARDNER: Depending on the
18 requirements, you know, for national security to deploy
19 troops, and we have two brigades training to get out
20 of -- out of Alaska at the same time. That could
21 happen.
22 COLONEL DONNA BOLTZ: I guess the intent on
23 the range development is to have a range that would be
24 available year around. We are not, obviously, a
25 national training center. Even if we have two brigades

Airspace 01
Aircraft will follow defined corridors to maximize safety for occupied areas during training events.

Proposed Action and Alternatives 05
Certain portions of the range complex would be closed for longer periods than others. The required minimum number of days the range must be available is 106. Actual estimated number of days the range complex

will be used is approximately 238.

here, it's very unlikely that we would use the range 365 days a year.

Then you might anticipate that there would be days in which we would be unable to use it because of problems moving equipment or, you know, a heightened risk of fire.

So we have not -- we are not developing a training center that's a 24-7 training center 365 days a year. And I don't foresee that, you know, in -- certainly in the near future in Alaska.

But I don't want to be disingenuous in any way, Mike. The intent is to look at a range that we would have access to year around. And so when we look at it, the range experts actually take off holidays and weekends, and I think that gives them the numbers in the Draft EIS, right.

MR. KEVIN GARDNER: And specific maintenance days, too.

COLONEL DONNA BOLTZ: And they have maintenance days.

MR. KEVIN GARDNER: They have got to take care of it.

COLONEL DONNA BOLTZ: I think the number that's in the Environmental Impact Statement is 244

25 days.

1 MR. KEVIN GARDNER: Right.
2 COLONEL DONNA BOLTZ: So that already factors
3 out days during which we traditionally do not train, we
4 don't develop a training calendar over.
5 So the idea that it's 24 hours a day, 7 days a
6 week, all year long, that you have the noise, the
7 soldiers moving, the equipment on the roads, it just
8 won't be.
9 MR. KEVIN GARDNER: And those guys take into
10 account kind of start-stop times that are more
11 compatible with when folks get up and go to bed, and
12 things like that.
13 COLONEL DONNA BOLTZ: And they actually have
14 to post those.
15 MR. MIKE FIFER: How many men are in them?
16 COLONEL DONNA BOLTZ: The two brigades that we
17 are talking about each are in excess of about 3500
18 soldiers. But talk about the size of the units that
19 train on each of the ranges because I think that's --
20 you'd never have the whole brigade training on these
21 ranges. So I'll let Kevin address that.
22 MR. MIKE FIFER: Before you get to that, so is
23 there going to be a housing facilities or is there

Proposed Action and Alternatives 06
Each of the two brigades are approximately 3,500 to 3,800 Soldiers.

Human Health and Safety 01
No additional troops would be stationed at Fort Greely or DTA under this proposed action. The number of military vehicles

24 going to be these annoying long convoys going up and
25 down the highway?

1 COLONEL DONNA BOLTZ: There will be vehicle
2 movement. General Hirai has been sensitized over and
3 over again from a number of groups, to include native
4 leaders, of the concern of putting big convoys on the
5 road. It aggravates people that live at Delta
6 Junction, it aggravates people who live in Fairbanks.
7 You know, it aggravates people at all points in
8 between.
9 And he has us now looking with our movement
10 control teams at what is an appropriate size and space
11 between the vehicles so that public traffic would not
12 be obstructed over and over again by convoys. That's
13 something that he has really got and he's taken into
14 account with everything that we are picking up. So I'm
15 glad you mentioned that, quite frankly, Mike.
16 MR. MIKE FIFER: Okay.
17 MR. JERRY ISAAC: Since most of the training
18 is done in Ft. Greely, I believe, why can't they store
19 the equipment there?
20 MR. KEVIN GARDNER: I think that's -- I've
21 heard that idea posed from time to time to say why
22 can't you just have a warehouse full of Strykers or

traveling to DTA for training events would not be expected to increase. Military convoys comprise a fraction of a percent of the existing vehicle load to the Alaska highway system (USARAK 2004a). Thus, roadway impacts are expected to be negligible.

Proposed Action and Alternatives 07
Training at DTA occurs for company and larger-sized units. Smaller unit training will occur at the individual Soldier's home station (either Fort Wainwright or Fort Richardson). As more training occurs at the home station, Soldiers have a greater need for their equipment to be at Fort Wainwright or Fort Richardson.

23 whatever available for our guys or for other Army units
24 that would want to come from the Lower 48, for example,
25 to train at a world class facility like this. That's

1 been mentioned.
2 COLONEL DONNA BOLTZ: And it's mentioned again
3 now because you said it, as a matter of public record.
4 So I think it's good that you raise it.
5 MR. KEVIN GARDNER: Real briefly, Tom, I'm
6 going to answer kind of -- Colonel Boltz asked me to
7 describe the size of the units training. She said we
8 have a brigade of about 3500. And while they may have
9 a month or three weeks to a month blocked out to use
10 facilities, let's just pick on Eddy, for example,
11 you're going to be -- your brigade has a month to train
12 and do what it needs.
13 Well, the Army training facilities on Donnelly
14 Training Area are pretty extensive. There are a series
15 of smaller range complexes for firing your individual
16 weapons, artillery training and whatnot can kind of be
17 going on while a company, for example, from one --
18 let's say one company from one of the battalions in the
19 brigade, and that will be up to maybe 200 soldiers,
20 could be conducting some kind of a training exercise on
21 the Battle Area Complex.

22 Now, the -- another battalion, on the other
23 hand, to integrate the training, you could have up to a
24 battalion worth of soldiers, let's say 800 or so, that
25 could be training -- hey, there he is. Come on in.

1 Good to see you.
2 MR. BEN SAYLOR: Thought I'd drop in for a
3 minute and say hello. I'm busy doing all kinds of
4 other things, but wanted to stop in and say hi.
16 MR. KEVIN GARDNER: Tom, the point I was
17 making was while a company of 200 soldiers are training
18 on the rural facility, you could have one from their
19 sister battalion of 800 or so, could be in the
20 accompanying, the small town, conducting operations
21 there, and then, you know, it's up to the commander's
22 imagination as to how he integrates the two in a
23 tactical scenario. But again, the small town, the
24 CACTF could accommodate a battalion's worth of soldiers
25 in training.

1 COLONEL DONNA BOLTZ: About. About 800
2 soldiers.
3 MR. KEVIN GARDNER: Then about 200 or so from
4 a company team from one of those battalions would train
5 here.

Then that brigade, they would rotate their units over the course of the month to use all the – to get their training done that they need to, whether it's using the BAX or the CACTF or maybe do something other training at Donnelly Training Area.

MR. TOM O'BRIEN: So would -- is this that crawl, walk, run philosophy that you're talking about?

MR. KEVIN GARDNER: Yes.

MR. TOM O'BRIEN: So at any given point you'd have soldiers at different levels of training and ultimately graduating at the highest of your four levels of live fire in the Stryker --

MR. KEVIN GARDNER: And the commanders will tell you, they train to standard, not to time. Although, when there's only a few days left in the training window that they've got the range and they can't get it anymore, they will be honing in on what he wants them to graduate at.

And unfortunately, for the unit, if they don't cut the mustard, the commander will have to make that decision to say I've got to find some more money and time to get back there to keep training my guys until they can do what I want them to do.

MR. TOM O'BRIEN: Sure. So in the training

area, at the height of training, what is the total amount of personnel and vehicles?

MR. KEVIN GARDNER: Again, it -- you could --

MR. TOM O'BRIEN: At your most elaborate scenario.

MR. KEVIN GARDNER: At any one time, I would say you could have at least a battalion there, for sure. Which would be 800 to a thousand troops, with the support folks there. Leaving and on their heels maybe another battalion coming in to do their training.

You may have two of them there at the same time, but again, there won't be as much overlap I think as maybe folks think. There certainly could be once a year a big brigade training exercise where all 3500 of them will be somewhere.

COLONEL DONNA BOLTZ: Because there are other ranges in that area that they take advantage of, so this would allow them to put people on these ranges.

They had a pretty major brigade exercise this summer that moved most of the elements out into the vicinity of Delta Junction, within the Donnelly Training Area.

But to see them actually on these ranges, Kevin's right, about a thousand if you put out a

Proposed Action and Alternatives 08
The largest training event occurring at DTA East, to include use of the BAX and CACTF, could potentially involve a brigade-sized unit of approximately 3,500 Soldiers with approximately 270 Stryker vehicles.

4 battalion, plus the support that they are required to
5 conduct in the exercise of a week to 10 days, about a
6 thousand folks.
7 MR. TOM O'BRIEN: Colonel, what about the
8 important element that's for Stryker success is its
9 securing of drop zones with its assault element. So
10 what about integrating airborne? Is that brought into
11 the scenario here for the level of personnel or would
12 you be actually adding that? In other words, maybe
13 500 men dropped to secure a --
14 MR. KEVIN GARDNER: That's a great question.
15 COLONEL DONNA BOLTZ: We have not talked about
16 using these facilities as drop zones because we have a
17 number of them that we already use and can employ the
18 equipment on within the Donnelly Training Area.
19 I wouldn't exclude it, Tom. And we don't have
20 with us today George Alexion, who is our range expert,
21 so we might have to take some of your questions because
22 I don't want to misspeak. And we do have experts that
23 can address it far better than I.
24 So if we can take that and do some follow-up,
25 that probably would be the best way to do it.

1 MR. KEVIN GARDNER: Yes. Suffice to say, I
2 think integrating that kind of training in a complete

Proposed Action and Alternatives 09
Joint use, including air support, would occur at the BAX/CACTF under the proposed action. Please see Section 2.2.1.2.4 for additional information.

3 combined team effort is certainly not -- certainly in
4 the realm of the very possible.
5 COLONEL DONNA BOLTZ: And even for the range
6 that they have at Ft. Wainwright now, the small MOUT
7 site they have now, they do air-mobile exercises where
8 they bring soldiers on helicopters, they dismount and
9 do the exercise. So it definitely is one of the ways
10 in which we expect they will fight. So it is a way in
11 which we want to train.
12 MR. KEVIN GARDNER: Those airborne guys, they
13 can jump, depending on where the range is, there's a
14 drop zone here, one right there, and they can dismount
15 and move to wherever the facility has been constructed
16 under attack realistic scenario and work at both
17 facilities then.
18 MR. TOM O'BRIEN: One more question, if I
19 might at this point.
20 You know where we are talking about and
21 thinking in terms of our local Stryker Brigade and then
22 elements out of Richardson and this comprehensive
23 package you guys are building as a garrison here, when
24 deployed, it would be in our minds to think, well,
25 shucks, that's not going to be used. A facility such

1 as this, then, is open and up for grabs possibly to

Proposed Action and Alternatives 10
Joint use, including air support, would occur at the BAX/CACTF under the proposed action. Please see Section 2.2.1.2.4 for additional information.

any, I would assume any commanders that would want to utilize that.

COLONEL DONNA BOLTZ: You're absolutely right.

MR. TOM O'BRIEN: And I want to know how many of our allies would ask for that.

COLONEL DONNA BOLTZ: We already anticipate that they will. The Air Force has the Northern Edge exercise now which brings in a number of allies.

It's a smart way to train because we are going to operate not only in the joint environment with other services, but in combined environments with other nations. So definitely something that we would be interested in entertaining, no doubt about it.

MR. TOM O'BRIEN: So it might never be vacant?

COLONEL DONNA BOLTZ: I don't think that's fair to say. I think there will be times in which definitely there's no one on the ranges.

But just because all the soldiers are deployed from Alaska, if you ever had a point where the Stryker Brigade and the Airborne Brigade Combat teams were both deployed at the same time, that doesn't mean that soldiers from other where in the United States or in the world wouldn't come in to use these facilities.

You know, the military looks to get the best

bang out of its buck. If you've got a good training site that can be made available, if we validate that the training is very good, I think that certainly there will be interest, just as we currently are sending soldiers from Alaska down into the Lower 48 to do some training before they deploy to Iraq.

We have the 4-14th Cav moving right now to do training out of the state of Alaska in preparation for their deployment. I mean, that's a smart way to train. It's a smart way to use taxpayers' dollars, quite honestly.

MR. KEVIN GARDNER: You have the Alaska Army Guard that would certainly want to use these facilities and stuff like that.

MR. MIKE FIFER: So if you say you guys want to train the soldiers as close to the climate as in Iraq, why aren't you training down in California or somewhere?

COLONEL DONNA BOLTZ: Yeah, actually, we have had this question a number of times.

MR. MIKE FIFER: Instead of at my back door.

COLONEL DONNA BOLTZ: I guess this is not a cop-out, but I will be very clear in that we don't make -- we at this level don't make a lot of the stationing decisions on where the military ends up

Other 04
USARAK requires a training facility in Alaska that allows military units to conduct live-fire combat training to raise and sustain their war-fighting skills to higher levels to be able to fight anywhere in the world, not just Iraq. These combat skills must be raised to levels required for military units to effectively conduct operations in the current global war on terrorism, to support other world-wide contingency operations, and to be prepared for future global combat operations.

1 throughout the United States.
2 If there are concerns about the military in
3 Alaska, there are lots of ways to address that. But
4 there are training areas available. The two
5 installations that are on Alaska -- that are in Alaska
6 have housed much larger units than they do now.
7 There's a lot of capacity, a lot of training capacity.
8 And in fact, it does get cold in Iraq, not as cold as
9 it does here, certainly. But it -- the training area
10 is available.
11 And I'm not sure that anybody in this room
12 made the decision to station people in Alaska, but it
13 is our responsibility to train them so that they are
14 ready to deploy out of Alaska, Mike.
15 MR. KEVIN GARDNER: And again, the training
16 level frequency there, you've got to build into that
17 maintenance time because we've got to take care of
18 these. And not just the range facilities, but the land
19 in general.
20 You know, we've talked in the past about some
21 of the other environmental programs like our Integrated
22 Training Area Management. That's, you know, ITAM that
23 has components that takes care of the soils and the
24 vegetation, and it goes out in some cases and deems an

25 area, and this area is pretty much into the overused

1 category and we really need to stay away from it and
2 train elsewhere for a year or two or three to allow its
3 recovery, repair. So it's available for future, you
4 know, generations of soldiers to come and train on.
5 That's the mindset Army-wide, not just in
6 Alaska, but our program is award winning and that's
7 kind of the approach. And we're integrated as
8 environmental planners into what those guys do all the
9 time, and they are tracking right with us on all these
10 projects, too, so.
11 MR. TOM O'BRIEN: Kevin, just something that
12 comes to my mind in that where we would assume that the
13 troops that are stationed in Alaska have had
14 opportunity to become, you know, accustomed to Alaska,
15 to Alaska's, you know, climate, its conditions, its
16 resources, and its people, they might have had the
17 opportunity to either have some formal orientation or
18 just through, you know, bumping elbows, meet and
19 interact with Alaska Native people.
20 If we end up with a sizable -- well, I won't
21 use that term. If we end up with other folks training
22 here on short term, and it couldn't be too short a term
23 if they are going through the regiment that's going to

Proposed Action and Alternatives 11
USARAK has implemented an education and awareness program for those applying for hunting and fishing permits on USARAK lands to emphasize the importance of and discourage waste of subsistence resources. An education and awareness program for active duty Soldiers has also been implemented in response to tribal concerns. Safety is also a topic addressed under this program. USAG-AK's Native Liaison will continue to work with Tribes to address this concern.

be required, because they would have to be billeted or bivouacked someplace --

MR. KEVIN GARDNER: Planning.

MR. TOM O'BRIEN: Yeah, for several months, I would imagine, to get this thing going for a one-month training scenario.

Is there discussions at this point about cultural orientation, ecological orientation, so that they come to realize that there are certain ways that we do things here in Alaska and certain things that are meaningful to us and that we -- we respect in those areas?

COLONEL DONNA BOLTZ: I really appreciate that comment because we've done a lot recently, and it kind of gives an opportunity to talk about something that we are doing.

Currently, I don't want to miscommunicate, there are not plans to train soldiers from outside Alaska on the ranges. You asked if there would be the capacity to do so, and certainly there will be, Tom.

MR. TOM O'BRIEN: Sure.

COLONEL DONNA BOLTZ: But we would do for those soldiers the same thing we do for our own new soldiers.

Other 05
Coordination with Alaska Native Tribes to identify areas with special meaning will further enhance cultural awareness efforts with Soldiers.

23 And Amanda, I'm going to give you a chance to
24 talk about your program. And this is another thing
25 that came out of dialogue with tribal leaders. This is

1 something that was asked for by tribal leaders, and it
2 is in direct response to getting the message loud and
3 clear. So I'll turn it over to you, Miss Shearer.
4 MS. AMANDA SHEARER: Okay. Something that
5 we've been working on and finally have gotten to
6 implementing most recently -- I was talking with Gerald
7 about it this morning -- is not only on -- as you may
8 understand, our Army is definitely unified, but also
9 split into the missions side and the garrison side,
10 which is the support side, which we come from the
11 garrison side, but we work very closely and are unified
12 with the missions side.
13 So as you know with our government to
14 government process, we have been working closely with
15 you all as tribes and working that process through the
16 garrison side.
17 Well, there's also been a lot of interest and
18 mostly with our new general, General Hirai, coming on
19 board, but also before that as Colonel Boltz mentioned,
20 in earlier consultations and discussions, we learned
21 the importance of teaching and educating both the

22 civilian and active duty folks that are new to Alaska
23 on some cultural awareness training and also having
24 them understand the importance for the respect for the
25 land and the animals that they need to have while they

1 are here and stationed in Alaska.
2 So what we've been doing recently, what I've
3 been busy implementing, both working with doing it
4 myself down at Ft. Richardson and working with folks up
5 here at Ft. Wainwright to implement is orientation at
6 what we call the Newcomers Brief, which all the new
7 active duty soldiers and folks that come to Alaska --
8 that does not cover civilians, but for active duty,
9 they are required to go through a newcomers'
10 orientation, which includes many different programs,
11 things about the base, about the local area, different
12 programs they can get involved in, child care,
13 et cetera, but we've also put in a section on Alaska
14 Native cultural awareness.
15 So up here at Ft. Wainwright, I've worked
16 closely with our conservation officers that work on the
17 post to discuss the hunting and fishing regulations
18 throughout the state, to also include discussions in
19 there about Alaska Native cultural awareness, and also
20 respect for the land and the animals.

Down at Ft. Richardson, I'm doing that briefing myself, so we've actually been working on getting it get done for a long time and we did just start this week doing that. It's held every two weeks. So once every two weeks.

And also we have information and pamphlets at booths, they are also required to, after a certain amount of the different presentations, they go around to some permanent booths that are set up that hold information for them.

It's just to bring awareness. People from the Lower 48 might not realize at all what a large population of Alaska Natives that we have and how important it is that we respect both the folks and the land while we're here visiting.

COLONEL DONNA BOLTZ: So we would anticipate we would do the same thing if we had training, rotating through for training.

This has really addressed a great need, not only to make people aware, to better educate them and inform them, but to make them sensitive in their recreational activities, it's been raised to us for that reason.

And it's a brand new program, but we have

20 immediately recognized the value of it. We brought it
21 on board gradually, starting out with a kiosk and
22 adding some verbiage, and now we actually have a full
23 training program that happens with newcomers. So I'm
24 glad you asked that.
25 MR. JERRY ISAAC: I have some comments. It's

1 not necessarily to do with the proposed training sites.
2 This is going to be a combination of tribal concerns,
3 personal concerns, as well as national concerns.
4 For several years now, I'm one of them that's
5 been pretty consistent with attending the military
6 relationship meetings, and in the initial phase of our
7 meetings, there were a lot of tribes that were sending
8 representatives. Today there's three. Three tribes.
9 Four with Isaac with the Eagle Village Council.
10 That itself should pretty much indicate to you
11 that there's something wrong. To what extent, I don't
12 know. Oftentimes I get faced with should I go or
13 shouldn't I. I mean, what is it do I want to achieve
14 coming to these meetings.
15 Over the years, all of the tribes expressed
16 concerns, interests, questions, and it's genuine
17 concerns, genuine fears and fears of risks and how
18 better to improve our relationship with the military,

Other 06
Five Tribes were invited by the Army to discuss the BAX/CACTF proposal. Invitations were based on the location of proposed sites and their proximity to Tribes. Please see Section 1.8, *Government to Government Consultation* for more information on consultation activities associated with this project.

Other 07
USAG-AK has been actively engaged in government-to-government activities with Tribes since 2003. USAG-AK is committed to communicating and consulting with Tribes on Army-related concerns.

19 which we never had. There was good intentions in the
20 early phase of this effort.
21 Tom, that was when Jim Simon and, you know,
22 several other, Bob Sadler was involved to some extent,
23 and Steve Howdeshell. We have no less than 20 tribal
24 members and tribal leaders at any one time that were
25 meeting.

1 Today I don't see Stevens Village, I don't see
2 Evansville, I don't see Tanana, I don't see Beaver.
3 There was like an average of 20 separate tribal reps at
4 each meeting. Today there's four.
5 Certainly that should, you know, give you
6 signals as to something is broken down, something is
7 terribly, terribly broken down. And I attribute that
8 to the people that work for you or in direct
9 coordination with you.
10 We've expressed over and over our opposition
11 as to how you're doing the alternate Army procedures.
12 Personally, I'm still against this. We have expressed
13 deep concerns on the Agent Orange. We have expressed
14 our interests in contracting what you got Russell
15 Sackett to be doing on your behalf.
16 We've expressed concerns about doing an actual

17 and an all-encompassing overall assessment of military
18 impacts from Delta to the Canadian border.
19 We've expressed our need for financial
20 assistance to conduct the joint efforts to address
21 these issues time and time again. Repetitiously I've
22 talked about cooperation and coordination with the
23 military interest groups, but nothing significant has
24 happened.
25 You know, we have one source of funding that

1 we, all the tribes, have to fight each other over,
2 NALEMP, $10 million nationwide. It appears to me that
3 when we express concerns, we truly mean them. And we
4 truly would want to see resolutions or actions taken on
5 these comments.
6 But, you know, there again, nothing is done to
7 incorporate the concerns into the plans, and if they
8 are, it's more of a -- more of a token gesture with no
9 solid authoritative enforcement on its behalf into the
10 plan.
11 And you know, for this reason, I came here
12 with, you know, a couple of not demands, but conditions
13 that needs to be met. One is, I propose a time
14 maturity, time release-based agreements and contracts,
15 starting today.

16 COLONEL DONNA BOLTZ: Say that again, Chief
17 Isaac.
18 MR. JERRY ISAAC: I propose a time maturity,
19 time-release based agreements and contracts for the
20 tribes collectively to conduct the assessments that
21 Russell Sackett's groups have been doing on the -- on
22 the AAP, the Army Alternate Procedures.
23 For too long I've heard your agency say, well,
24 I have nothing to do -- your department, I have nothing
25 to do with how contracts are awarded. That is the area

Other 08
This EIS does not have the authority to stipulate contracts with any single entity, be it government, tribal, or private sector.

1 of authority and operations for the Corps of Engineers.
2 And there's this big bureaucracy that covers,
3 and it works pretty good, too. I mean, you can never
4 put your finger on one person and hold them
5 accountable. We need to stop that shit. If we want to
6 meet and -- and actually achieve mutual goals that we
7 set forth, then we need to truly intend and mean it.
8 I don't know if I'm -- I mean, I feel
9 frustrated in that, you know, time and time again,
10 these things that we talk about, this stuff we would
11 like to do with you have always been there. It's
12 always been reiterated. I've reiterated them over the
13 years.
14 It appears to me that this kind of meetings

Other 09
A list of Native Liaisons for DoD agencies within Alaska is available. These individuals may be contacted with your concerns.

15 is -- I mean, you know, I don't want to hurt your
16 feelings, but I got to stay this straightforward, is
17 that it is meant to publish newsletters, to show
18 pictures of where the military is meeting its executive
19 order based obligations to conduct government to
20 government relationship meetings. Well, we meet, but,
21 you know, this guy here, you know, brought out some
22 concerns. What are we going to do? How are we going
23 to answer that, and instead of dodging his concerns,
24 instead of making a concerted effort to
25 bureaucratically avoid dealing with him, what are we

Other 10
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1 going to do?
2 I am not happy with the Agent Orange
3 assessment. I propose that you strongly consider a
4 multi-year contract with the tribes in coordination
5 with its regional nonprofit consortium, TCC, to conduct
6 an independent objective-based assessment from Delta
7 Junction to the Canadian border.
8 We're not going -- I give you my word as a
9 tribal leader that we're not going to use this to
10 stymie or impede military project improvement plans.
11 All we want to do is to feel assured that there is
12 actually no Agent Orange.
13 There are other things along the Alaska

Human Health and Safety 02
These past actions are currently under investigation by the U.S. Army Corps of Engineers. Additional information can be obtained from the U.S. Army Corps of Engineers, Alaska District, Public Affairs Office at (907) 753-2520.

14 Highway, the military impact areas that -- that
15 continues to -- to need attention. I mean, you know,
16 there are a lot of military dumps along the Alaska
17 Highway. I can take you to several of them. Might not
18 be poisonous, but there are military debris since 1942
19 on.
20 There are stuff that are being demolished and
21 then it falls on the radar screen. One is like I
22 mentioned to you in Anchorage, the Pump Station in Tok.
23 The underground piping and these systems needs to be
24 removed and mitigated, you know, and taken care of in a
25 way that lessens impacts on what you do with it in

1 terms of discarding them.
2 So, you know, these are my concerns. I'm just
3 going to, you know, make the statement that, you know,
4 from December to June -- December -- December '04 to
5 June '05, I think within a six-month period, I mean, I
6 don't care if we're so busy, I mean, you certainly have
7 the bureaucratic support, you know, that the tribes
8 don't have.
9 Now, I propose that a significant contract to
10 conduct the cross-cultural awareness, the cultural
11 environmental orientation that Tom mentioned be
12 contracted for with the native groups for the native

Other 11
This EIS does not have the authority to stipulate contracts with any single entity, be it government, tribal, or private sector.

13 groups to conduct these cross-cultural awareness
14 trainings to your incoming soldiers.
15 I also would propose that between December '04
16 and June '05 that there be a multiple year contract for
17 the tribes to work hand in hand to conduct and complete
18 the Army Alternate Procedures. And I also propose that
19 between June '05 to December '05 that there be a
20 contract to redo Agent Orange assessments.
21 Thereafter to be continuous contracts to do
22 certain things in terms of public policy. I also
23 would, you know, include such things as military
24 training or military complex improvements projects to
25 be included in the future, time release, time maturity

1 based agreements and contracts.
2 I know, I'm, you know, barking up the tree. I
3 know nothing significant is going to happen as a result
4 of the comments I make. But I'm willing to, again,
5 expect frustration and dissatisfaction knowing that you
6 will not belly up to the bar and take responsibility
7 for this.
8 However, in spite of all this frustrations,
9 I'd also like to make comments that are national in
10 nature.
11 I don't know how well you feed into the

12 national military policymaking and decision-making, but
13 as an Alaskan, as an American, I have some strong
14 concerns about immigration and naturalization. There
15 are things that needs to be improved in that area.
16 One of the things is I understand to a great
17 degree that you can cross a U.S. border without
18 fingerprints and any kind of identification. I think
19 we need to limit dual citizenship with the United
20 States of America to that, to only be applicable to
21 Native Americans.
22 I have relatives across the border with
23 Canada, I'm sure there's a lot of Native Americans that
24 have relatives across the border with the Canadian
25 citizenship.

1 However, if you have some Lebanese with the
2 name Mohammed claims that his dual citizenship with
3 Lebanon and America, then it becomes very questionable.
4 It so happens I feel that person is a product of
5 immigration, and therefore, is -- that he does not
6 qualify for dual citizenship.
7 This is hard nosed, I know that. But we need
8 to do everything to protect ourselves as a country.
9 I understand that civil rights is bestowed
10 upon -- I don't know how you call these people that

11 have green cards to come over here to live here for a
12 time. As a Native American leader, civil rights as
13 guaranteed by the United States Constitution is
14 applicable only to the U.S. citizens. Anyone else
15 claiming civil rights in America need to go get the
16 hell back to where they come from.
17 The reason I'm saying this is that America is
18 based upon the principles of freedom. We enjoy a great
19 deal of freedom. And that great deal of freedom is
20 abused by the Mohammeds and the Musawis and to conduct
21 underground surveillance without the majority of the
22 people knowing it.
23 If I were in Al Qaida, all I have to do is
24 listen to the news, I can pick up a ton of information
25 on the military efforts, the U.S. Government's efforts,

1 and I can feed that information back to the centralized
2 whatever the hell location or organization they use for
3 planning and come up with a plan of sabotage and things
4 like that.
5 Listen to the news. It's amazing how much
6 information that should be classified is talked about.
7 The military morale problem. Unfortunately,
8 some military personnel in Iraq were exposed to having
9 mistreated Iraqi prisoners. That's unfortunate. We

10 all know war is war. War doesn't conduct itself or is
11 not conducted not doing anything as right as you can
12 all the time.
13 I have very strong -- as an American national,
14 I have very strong feelings about the amount of
15 information that gets disclosed on international TV.
16 We need to start rethinking our principles
17 here. And I'm saying this in hopes that you're a
18 ranking military officer and that you will take these
19 concerns back to the national leadership for them.
20 Maybe they have studied it more than I did, I don't
21 know.
22 Has the American military been launching plans
23 for the second invasion of Normandy? If not, I would
24 strongly suggest that the military start thinking about
25 conducting exercises on how they would adjust their

1 actions for the second Normandy Invasion.
2 Maybe I'm scared, maybe I'm crazy, maybe I
3 just kind of think too much into cloud nine, I don't
4 know. But the European Union is of the gravest concern
5 to me as an American.
6 Before the Iraq invasion, there was three
7 countries that were adamantly against it. France,
8 Germany, and Russia. After that country was run over,

9 it was exposed that this three countries that were the
10 most adamant were owed billions of dollars by Saddam
11 Hussein.
12 And today, the French President Chirac is
13 schmoozing with the Republic of China, the Communist
14 Republic of China. And France is a member of the
15 European Union.
16 So I'm -- I just wanted to express these
17 concerns because it bothers me. And I've got, you
18 know, concerns that directly is critical of the
19 military, local level.
20 Sometimes -- you know, I love my village, I
21 love the place where I was born in, I was born at. You
22 know, I try to find a balanced approach in my feelings,
23 my understanding, my observations.
24 You know, there are things as a result of
25 military training that has happened in my area. All I

1 ask is let's clean it up. We've identified the
2 impacts, let's go and clean it up. I mean, let's work
3 towards that. Let's work towards basically setting out
4 to shut Jerry Isaac up forever. You know.
5 So that is -- that is pretty much my concern
6 and I really appreciate your time you gave me to hear
7 me out. I have to say that before you leave, so I only

Other 12
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Environmental management and cleanup strategies have vastly improved over the years. As part of the BAX/CACTF proposal, the Army will continue to dispose of waste in accordance with established laws and regulations. Please refer to Section 2.2.1.2.2.1, *Safety Precautions* and Chapters 3.2.5 and 4.2.5, *Human Health and Safety* for specific discussions.

8 got hope that you would bring a newness to the way
9 things are done here in Alaska between the tribes and
10 the military. Thanks.
11 COLONEL DONNA BOLTZ: Thank you for your
12 comments. Can I comment on a few of those things or
13 would you rather we just take them for public record?
14 MR. JERRY ISAAC: You can go ahead.
15 COLONEL DONNA BOLTZ: I guess on all your
16 concerns at the national level, I'll speak for myself
17 first because I won't represent anything besides my --
18 myself when I make this comment, but for most of us,
19 and for me personally, I know that how the view of the
20 world has changed since 9/11, and I think that's a lot
21 of what you expressed.
22 Now, on behalf of the Army, I will take the
23 comments that you made as a matter of public record,
24 Chief Isaac, and I certainly can provide them to the
25 chain of command. And you met General Hirai about

1 10 days ago. And I can pass those up, but probably the
2 best way is not count on information going up through a
3 local military chain of command to raise those issues.
4 I would encourage that you as a private
5 citizen, as I would as a private citizen, viewing the
6 world somewhat differently since 9/11, use multiple

7 channels, and that includes our congressional
8 representatives, you know, the media, there are a lot
9 of ways to get those comments up.
10 But I will certainly make sure that they are
11 reflected as a matter of public record in what we did
12 today. And I can extract those and provide them to
13 General Hirai.
14 So that's what I -- I don't want you to leave
15 with a feeling that I have any special connection
16 because I know as you pointed out at one of our
17 meetings earlier, I probably don't represent the
18 seniority you seek in many of these matters, but I do
19 work in the chain of command and I will take the issues
20 forward that way.
21 But I would encourage you, and you do
22 obviously feel very strongly about a lot of these
23 things, but use a lot of venues to raise those issues.
24 I recognize your passion toward all of those.
25 On Agent Orange and the concern about the

1 military dumps along the highway, when we came out this
2 summer, this past summer, we brought with us Colonel
3 Gallagher, Tim Gallagher, who is the commander of the
4 Alaska District.
5 And I know that this is not satisfying, so I'm

6 going to take this on myself before I say it, because
7 we are one Army and you told me that the last time we
8 met, and, you know, it's not okay to switch it up
9 between commanders, but what I can do is take your
10 comments and raise them to Colonel Gallagher again,
11 because, in fact, he does have the experts and the
12 funding for this information.
13 And that was one of the reasons that we
14 brought him this summer. And maybe he needs to come
15 and hear again or make sure that he has the specificity
16 that's required to be able to respond to some of these
17 things. But I know he's very engaged.
18 So I will make sure that they get to Tim
19 Gallagher. And then I can ask him to follow up
20 directly with you, and that might be the best thing to
21 do in that regard.
22 I got your notes on contracting. We also
23 brought contracting representatives this summer, and I
24 think you know that I as a commander don't make
25 personal decisions on contract, but I can go back to

1 our contracting office and raise the issues that you
2 raised specifically.
3 MR. JERRY ISAAC: I think you can influence
4 how the contracts are awarded because of it being -- I

Other 13
This EIS does not have the authority to stipulate contracts with any single entity, be it government, tribal, or private sector.

mean, just because of the fact that the contract is based upon the fact that it is your money. It is USARAK's money.

COLONEL DONNA BOLTZ: It is, but I don't even get to be a part of the contracting process.

MR. JERRY ISAAC: I've -- I've lent myself to a high degree of patience and understanding on that basis, but it hasn't panned out. You know, if I were to give Mike 10 bucks because I don't have time to pick my berries, say, Mike, you pick my berries for me.

COLONEL DONNA BOLTZ: Sure.

MR. JERRY ISAAC: And you know, but I tell him that, well, since it's my money, that if you're -- if you can't do it and you're going to get somebody, make sure it's Ben that picks my berries, then that's a condition that has to be, that Mike has to meet in order for me to give him the 10 bucks.

I mean, there are these things that are legal that you can do. You can make a specific provision that unless these contracts go to these people, that, you know, that you -- I'm sure you self-perform

projects.

You know, they -- they say things, good things that makes you hopeful like, well, we want you to do a

4 capabilities brief.
5 Over the last four or five years, I've
6 expressed concern that I want the contracting officers
7 to go and meet with Ben and tell Ben that here's a list
8 of stuff that a contractor has to have and these are
9 the stuff that they have to do and things like that.
10 Has it happened? No.
11 I mean, the limited knowledge that I've
12 acquired on military contracting is just based upon the
13 School of Hard Knocks. It's a struggle.
14 I mean, people are moving out of our villages
15 because there's just simply nothing there. Our
16 interest is to create some type of economics to attract
17 people to move back and to help the tribe advance
18 itself. And military contract is -- contracting is
19 definitely one of the alternatives.
20 COLONEL DONNA BOLTZ: I realize that. You
21 bet.
22 MR. JERRY ISAAC: One of the options that we
23 can strongly exercise. But I guess -- I don't know. I
24 mean --

1 MR. JERRY ISAAC: -- you factor a great deal
2 into it.
3 MR. MIKE FIFER: Excuse me, Jerry. And

4 Colonel Boltz, I believe when Colonel Gallagher and
5 yourself and your crew came over to Healy Lake, I had
6 asked you guys a question concerning the denial of
7 Agent Orange existing along the Alaska Highway and the
8 corridor to the Canadian border. And my question was,
9 who did the testing. And it was your guy's crew.
10 MR. JERRY ISAAC: These guys.
11 MR. MIKE FIFER: It was you guys that did the
12 testing. And of course, time and time again, the
13 military emphatically denies any other actions.
14 And I requested that there be another test.
15 COLONEL DONNA BOLTZ: Right.
16 MR. MIKE FIFER: And I also requested that the
17 native tribes be along present.
18 COLONEL DONNA BOLTZ: I recall that, Mike.
19 Absolutely. Absolutely.
20 MR. MIKE FIFER: And what has come up of that?
21 And, you know, so that's one point.
23 MR. MIKE FIFER: We haven't heard nothing in
24 regards to my statement, which was, what, six months
25 ago.

2 MR. MIKE FIFER: I would like to be here. I
3 would like to see these tests.
5 MR. MIKE FIFER: And then types of hazard,

Other 14
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6 this is a site assessment from my catalog here, types
7 of hazard, there's an ordnance, and ordnance-related
8 scrap military vehicles debris and possible debris in
9 Healy Lake. Open dumps, 300 plus Jeep motors and
10 vehicles, batteries, drums, construction debris on
11 trails, communication cables and drums scattered in the
12 woods. Military reportedly sprayed roads with
13 chemical.
14 And so it's a proven fact that you guys --
15 excuse me, not you guys, but --
16 COLONEL DONNA BOLTZ: The Army. And I accept
17 that --
18 MR. MIKE FIFER: The Army.
19 COLONEL DONNA BOLTZ: -- we represent the
20 Army, absolutely.
21 MR. MIKE FIFER: So it's pretty much a proven
22 fact that there are chemicals being -- in the past that
23 have been used. And it's -- it's a concern of ours
24 because we eat that meat that -- you know, that the
25 animals eat this vegetation.

1 And I have in the past stated that we have
2 tainted meat. And, you know, we periodically get a
3 moose that's, you know, kind of disformed in one matter
4 or other, and you know, that's right there in Gerstle

Other 15
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5 River is my home. It may be 10 miles down the road or
6 river, but those animals that go out there and eat come
7 on over to my home.
8 COLONEL DONNA BOLTZ: Absolutely.
9 MR. MIKE FIFER: And you know, so. These
10 tests that your agency does by themselves and
11 continuously denies any use of chemicals, we want to be
12 there. I want to be there. Because I believe -- you
13 know, I know there's stuff there. And it needs to be
14 cleaned up.
15 MR. BEN SAYLOR: And we have a lot of things
16 in our freezer that we built up over the last few years
17 that we are going to bring in for testing, you know.
18 And by the results of those tests, you know, maybe it
19 might help push things along as far as, you know,
20 getting some cleanup, you know, moving because, you
21 know, we -- we subsist off the land all the time, we
22 eat wild meat more than we eat store-bought meat.
23 But we do have a lot of specimens that we're
24 going to bring into the university to have testing.
25 And, you know, you guys will be the first to see the

1 results of whatever them tests, the outcomes of those
2 tests are, you know, maybe that will push things along
3 a little bit, I'm hoping.

MR. MIKE FIFER: There's fish, and there's moose meat, there's --

MR. BEN SAYLOR: Ducks. Duck eggs.

MR. MIKE FIFER: Ducks. Waterfowl. Just this -- just this last fall Ben and I was out duck hunting, and was a whole -- one of the bays at Healy Lake, coves, a bunch of fish were just dead floating up in the water. And that is from something that is still there that we didn't put there. And, you know, the DOD did this.

COLONEL DONNA BOLTZ: You're right. It's DOD.

MR. MIKE FIFER: Okay. There's not a FUDS number on here. Why is that?

COLONEL DONNA BOLTZ: You know, Mike, I think you know that the garrison, the Army Garrison doesn't have the FUDS program, Formerly Used Defense Sites. That's a Corps of Engineers program.

Now, again, I realize I represent the whole Army, and I'm not asking you to make a distinction when I sit here, but what I can do is take these concerns to Colonel Gallagher. When he came to Healy Lake, one of the people he brought was his program manager for FUDS.

MR. MIKE FIFER: I wish we had found this out.

COLONEL DONNA BOLTZ: It's not too late,

3 though. I mean, the fact that we had this dialogue, it
4 is not too late.
5 And I've said that I know that we are not
6 going to do things fast enough to satisfy everyone, but
7 if we don't begin to address some of these issues, we
8 will be nowhere.
9 So the fact that you brought this today, and
10 Amanda's got a copy, and we will get a hard copy, it's
11 all helpful.
12 MR. MIKE FIFER: Well, as I've stated in the
13 past, I am -- I am very actively doing my homework --
14 COLONEL DONNA BOLTZ: Absolutely.
15 MR. MIKE FIFER: -- on the military's
16 actions --
17 COLONEL DONNA BOLTZ: Right.
18 MR. MIKE FIFER: -- in and around my home.
19 And I want to get a FUDS number. I am going to
20 continuously fore-seek some kind of satisfaction to me
21 and my people.
22 COLONEL DONNA BOLTZ: Right.
23 MR. MIKE FIFER: And, you know, been's kind of
24 left this in my hands to pursue this.
25 COLONEL DONNA BOLTZ: Okay.

1 MR. MIKE FIFER: So I feel that I'm going in

the right direction.

COLONEL DONNA BOLTZ: Good.

MR. MIKE FIFER: My grandmother that's 83 years old is very happy that I'm fore-seeing -- you know, she's -- she was there present and watched the destruction of her own home. And there's been no ever any apology even, you know. So you ain't heard the last of me.

COLONEL DONNA BOLTZ: I would hope not.

MR. ISAAC JUNEBY: I got a question. I think when Jerry was talking, he touched up on the contracting. I know there are, like Jerry right there, the Tanacross Native Village, it's a proven -- he has a proven record now.

And one of the things -- I've been involved with this for over a year now, since I started coming, after I got elected Chief of Eagle. And one of the things I liked about this getting together that we can help you make those regulations to deal with some of these issues that we have.

COLONEL DONNA BOLTZ: Uh-hum.

MR. ISAAC JUNEBY: And I felt very happy about that because we -- I said it time again, we have never been given a chance to make federal regulations that

are going to imply upon our people. And I think we do have a chance.

Why is it that a lot of Alaska pride for some of the programs that you have -- well, it's probably not even in your department or whoever. Give you an example.

Eagle had a program back in 1955, they had a DEW Line, some -- they have an assembly area in Eagle, instead of going the way they go, they were going to go across country right up through Eagle into Canada to the Beaufort Sea.

COLONEL DONNA BOLTZ: Right.

MR. ISAAC JUNEBY: And we do have the assembly and the debarking and embarking point there.

And now, there was some testing done by, I think, Tanana Chiefs, you know, but we have a tribe from Navajo Nation or some Navajo -- well, they are from Albuquerque.

And I differ with the fact that I -- Mike Utley from the Corps of Engineers was with them, and that was good, but these people don't know a darn thing about Alaska.

COLONEL DONNA BOLTZ: Right.

MR. ISAAC JUNEBY: And I had to go, and I mean, they were -- they were so darn scared that they

wanted a bear guard. You know. And I have to say I -- I could feel that I have to be with them, so I provided a bear guard just because they never been up here.

And I think that these people here knows where these locations or some of these are, and I think it would be better to make a direct contract. Because I -- and I don't -- I follow him because I could feel what he's frustrated about, you know.

COLONEL DONNA BOLTZ: Yeah.

MR. ISAAC JUNEBY: And it's much more than what we can see.

And I -- I think that -- well, one of the, that embarking, debarking, whatever they call that up there in Eagle. That's on my land, right on my native land. That land was in the family for years, and now it's -- it's contaminated. And nobody has made an effort to say, oh, well, we can do some of this.

But on one thing they are saying in the report that there is no high volume of something on the land, and on this next sentence, they say, but it's right here. And it's whatever it is, I traced it down just by that. I'm not a chemist, so I don't understand that.

COLONEL DONNA BOLTZ: Right.

25 MR. ISAAC JUNEBY: And it's pretty bad stuff.

1 It's higher than what a human can.
2 MR. KEVIN GARDNER: The risks.
3 MR. ISAAC JUNEBY: Risks and something like
4 that.
5 So I have to say that, you know, I think that
6 like Jerry say, you know, we have to be involved with
7 this process or else we're going to be out the door.
8 COLONEL DONNA BOLTZ: Right.
9 MR. ISAAC JUNEBY: And I -- when we start
10 dealing with the environmental issues, the -- I think
11 you were here, I think, and I have to stress that our
12 involvement is not only because we know about this,
13 we've been here forever. And we need this. I call it
14 traditional knowledge. And this is what --
15 COLONEL DONNA BOLTZ: It's invaluable.
16 MR. ISAAC JUNEBY: And I said right there if
17 we don't have any of that within this plan, I'm not
18 going to sign it. And I have said that with
19 parentheses because I wouldn't sign it because it
20 doesn't govern me.
21 And that's one of the things I want to make
22 sure that it's in there that our views through the
23 native way of thinking or the native way of life is put

Other 16
USAG-AK's Native Liaison and Cultural Resources Manager will coordinate annual or semi-annual meetings with Tribes regardless of specific projects like the BAX and CACTF to continue the government-to-government consultation process. We always encourage dialog on how USARAK can work more closely with Tribes.

24 in there.
25 Sure, we got -- Jerry knows about these

1 experts and all these things, and I know we can get a
2 lot of good reports from them, but I think that a lot
3 of these has got to be blessed by the Elders and even
4 the Council and even those public meeting process where
5 we say it's okay.
6 You know, if we -- if we see a discrepancy, I
7 think we will have to fix it before we can say oh, it's
8 going to be okay. You know.
9 And I have to be -- I could feel what Jerry's
10 talking about. And you know, I -- I've seen some
11 things in life that at that time were just not the
12 issue of the day at time, so it's just a matter, you
13 know, we didn't know about it.
14 But now that we know it and now that we're
15 coming back with all these hypotheses, saying it may be
16 cause over here by this, it may be cause over here, but
17 they don't know. But I think that's where we have got
18 to take a very precautious look.
19 And since I become a leader in Eagle, I have
20 tried to become aware of everything so I can tell the
21 people that this is what's going on.
22 If it wasn't for me, that old school dump up

there in Eagle, the old school site there, it would never have been cleaned up if I didn't say anything. I sued them to clean it up. And they came and they

cleaned it up. But I hope that we don't have to go that far in order to get things done, that we can do it on a one-to-one basis.

MR. TOM O'BRIEN: I won't take any time if any of the other leaders and other representatives would like to say anything.

COLONEL DONNA BOLTZ: Okay. I apologize.

Thank you all for your time this morning. And for your input, and I know Carol is going to get anything that we missed.

I will give Colonel Gallagher a call this afternoon because a number of your issues are directly related to issues that are Corps of Engineers, I don't handle their money or their people, but I have a direct line to their boss. So I will do that for you.

MR. JERRY ISAAC: You got until June '05. Then that will determine my continued participation in the future meetings.

COLONEL DONNA BOLTZ: Okay.

MR. TOM O'BRIEN: What I would like to say,

Other 17
USAG-AK's Native Liaison and Cultural Resources Manager will coordinate annual or semi-annual meetings with Tribes regardless of specific projects like the BAX and CACTF to continue the government-to-government consultation process. We always encourage dialog on how USARAK can work more closely with Tribes.

19 and understanding that Colonel Boltz has to bolt, it's
20 just a little tongue and cheek there joke.
21 Basically, so much of what I've heard is so
22 much about what I do and the frustrations of my job at
23 TCC.
24 Basically, I think Terry and I were discussing
25 this before the meeting, that when you come together to

1 discuss important things on the table, that are under
2 really a red light to where they are trying to get them
3 passed quickly and want to do them for a real world
4 situation, grievances, credibility issues, trust, all
5 come into play. And that has so much to do with the
6 relationships that have been forged over time.
7 When folks live in a legacy of debris and
8 possible health risks, knowing health risks, in many
9 cases, it's hard for people to say that they want to
10 see more activity.
11 I think one of the problems in my own opinion
12 of what I inherited and how I've evolved in Tanana
13 Chiefs is that we are talking about two different ways
14 of funding here and one of them isn't even being
15 considered.
16 On the one hand, a portion of funding is being
17 allocated and distributed for restoration and cleanup.

Other 18
This EIS does not have the authority to stipulate contracts with any single entity, be it government, tribal, or private sector.

18 And this predominantly comes through the NALEMP
19 program. This is the program that has funded this
20 portion of the office of TCC that I'm working for and
21 that I manage.
22 However, there is a -- in funding, we have to
23 realize that the reality is that there's a "been there,
24 done that" type of thinking from funding sources.
25 Once you engage in a certain activity and it

1 has a time span, then that basically is played out and
2 it is difficult to get funding sources to do that
3 again, or to perpetuate it.
4 So we have a significant amount of folks that
5 have very real world frustrations and grievances having
6 to do with restoration and remediation issues. On the
7 other hand, the tribes are continually assaulted
8 basically with information, complex documents that
9 people are being asked to digest in very short periods
10 of time.
11 Now, I've been looking into the Stryker
12 philosophy and I realize that this is nothing and
13 cannot be nothing new. In fact, the allocations by
14 Congress for just the training ammunitions for
15 something of this are several years old, four to five
16 years old, to where behind doors that we are not aware

Other 19
The Draft EIS was distributed early to the various Tribes involved in the government-to-government consultation process. Tribes were also visited individually by USAG-AK staff members to assist with interpreting the document and to answer questions.

17 of they are talking about the issues that we are
18 confronted with today. Army transformation and this
19 type of thing.
20 Tribes have nothing in place to compete with
21 that type of bureaucracy and resource. And yet,
22 through DOD policy, tribes take advantage of this
23 opportunity to take part in consultation and to give
24 meaningful input, but it is too lopsided. It's
25 inherent in the whole situation.

1 DOD has already been looking at a problem for
2 five years and actively working on it for three, and
3 the people engaged are career professionals.
4 In other words, this is their livelihood.
5 This is what they do for a living. But for the
6 representatives of the tribes, this might be the case
7 in some cases, but it might not be the case in others.
8 And folks have a variety of different things
9 that they need to do and need to interact in, and to
10 take the time to digest a document like this might just
11 be asking too much of people.
12 If there was funding available to take that
13 into account, in other words, funding that provided for
14 offices and villages to interact with the DOD on these
15 type of issues, I don't think that we would -- I think

Other 20
USAG-AK has been able to provide funding for tribal government travel to meetings in urban hubs (Anchorage, Fairbanks, etc.) when staff is unable to travel to individual villages to discuss Army issues.

that we could minimize frustration.

And what Jerry is proposing, I think this is a sensible way to start looking at these things. Points of contact, people that can give hours a week toward digesting the documents, and then come and give the DOD meaningful feedback, clear, concise things. And this can only come through funding. And it can only come through the realization that there has to be funding for that. So where on one hand, in summary, we do have funding for restoration, we also have multiple

frustration with that, but at least there is an avenue that can be pursued.

On the other hand, for addressing activities like this today, to be quite honest, in my office, I'm in breach right now because I really -- I can twist it and shape it in different areas, but in the scopes of work that I'm operating under, I'm kind of outside those being attending this.

They are very specific, they are for a certain task, and I end up with DOD monies for that task. It isn't just encompassing. So you have to finesse the needs and address them as they come.

But at the village level, they are getting nothing for that. They are -- they need -- this needs

15 to be recognized. It's a real need.
16 And I would think that Colonel Boltz would be
17 able, when she reads what we've been talking about,
18 rereads it, and goes over her notes, I hope that she
19 will be able to understand that this type of thing,
20 which will continue because of Army transformation, we
21 are looking at many years and perhaps several decades
22 of intensified military activity in this state, in you
23 gentlemen's homeland.
24 And because of that, we should get in place at
25 this point in time something that provides for that

1 that actually is geared toward that, is funded toward
2 that dialogue, and that interaction. And that's
3 basically what I have to say.
4 MR. JERRY ISAAC: I second that.
6 MR. MIKE FIFER: Third. And I myself, I've
7 got to take off, I have a dentist appointment I've got
8 to go to.

23 MS. AMANDA SHEARER: Can I just address one
24 thing that you brought up? One thing, quickly, because
25 I need to take a break, too.

1 You mentioned about the number of tribes and

you've seen the numbers of tribes showing up diminishing, what we have done for this specific project was narrowed down the group. Like in the transformation meetings earlier of the Stryker Brigade and others, where we had big groups, we had really narrowed down because of the local area of this project, down to five tribes that we've been consulting with on this.

So that would include Tanacross, Healy Lake, Dot Lake, Tetlin, and Northway. So that would be why less tribes showed up to this meeting.

MR. JERRY ISAAC: Well, there's other things that happened, too. Downsized contract between the military and TCC, the stuff that Tom's working on.

There's an inadvertent negative impact in that, in that there's a lot of other villages that have military impacts. Lessons learned. How the military treated the Native Village of Fort Yukon when the Native Village of Fort Yukon objected to buried debris that is tainted with asbestos and stuff.

To me, that's not working cooperative relationship. It's like -- it's like wanting to be married to a woman and making sure the woman has the rights you as a husband have. You know. Is basically

1 what it amounts up to, to me.
2 When I say "cooperation," cooperative
3 relationship, I mean just that. That, you know,
4 there's oftentimes the military interest groups cite
5 fiscal controls, fiscal limitations that keeps them
6 from doing certain things.
7 But I don't know, I mean, they -- I don't know
8 what the military budget was -- was that was proposed
9 for the fiscal year '05, but it's in the billions,
10 hundreds of billions. That includes Corps of
11 Engineers. That includes NALEMP.
12 Certainly to me, to the military, money's no
13 problem. You know, you can piss it out the window and
14 you're certainly going to get your budget refinanced
15 next year. There's going to be a lot of grandstanding
16 and soapbox operas about how wasteful, you know, tax
17 dollars are being used by the military, but nothing's
18 going to become of it.
19 The military will always get -- get its fair
20 share. Not fair share, more, you know, lopsided, more
21 advantageous portion. Money's no problem to the
22 military.
23 I mean, in any case, when you got, you know,
24 $500 billion of a budget per year, you know, I don't
25 know whether you understand numbers, but half a

trillion dollars worth is no small chump change to me, you know.

And if you compare $10 million NALEMP out of 500 billion, Jesus Christ, I mean, like it's less than 1 percent. It's less than a quarter of 1 percent. I mean, it's just -- I don't know.

I mean, you know, all I'm saying is let's be fair. I mean, we've got common interests that we would like to share with you. We -- we want to do what's right. All we're saying is there's impacts there, let's clean it up. I mean, you know, let's not fuss over it.

We're willing to do your studies for you, we are not going to be prejudiced in our conclusive statements. We're going to give you a document that is well rounded and is not only subjective, but it is objective. I mean, you know. Let's put your talk where the money is.

And I'm giving you until June 30th of '05 to see if it materializes. Don't come back give me excuses, well, we tried this but we didn't. June 5, contract is prepared and the document is ready to sign, I'll accept your word.

With that, I'd like to have my cigarette.

(Off record, recess from 12:25 p.m.
to 2:00 p.m.)
(Meeting proceedings adjourned
2:00 p.m., December 17, 2004.)

REPORTER'S CERTIFICATE

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

That I am a Registered Merit Reporter for Heartland Court Reporters and Notary Public for the State of Alaska; that the foregoing proceedings, the Government to Government Presentation and Comment Meeting, taken December 17, 2004, were written by me in computerized machine shorthand and thereafter transcribed under my direction; that the transcript constitutes a full, true and correct record of said proceedings taken on the date and time indicated therein;

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

IN WITNESS WHEREOF, I have hereunto subscribed my hand and affixed my official seal this _____ day of _____, 2004.

20

21 _____

CAROL A. McCUE, RMR

22 Registered Merit Reporter

Heartland Court Reporters

23

24

25 My Commission Expires: February 15, 2006

11/18/2004 13:08 TANACROSS VILLAGE → TCC TOK NO.954 P002

U.S. ARMY GARRISON- ALASKA
BAX/CACTF DRAFT EIS
COMMENT SHEET

NAME: Roselyn Isaac

ADDRESS: Box 76004
Tanacross, AK 99776

REPESENTING: Self X Organization

ORGANIZATION NAME AND ADDRESS:

COMMENT: As a descendent of people who are buried at or near Donnelly Dome, I highly recommend that the military do everything in its power to research where the grave sites are @, location of historic communities and hunting grounds located around Donnelly Dome area. I suggest that the military interview elder family members before they do anything. People like Martha Isaac, Dorothy Paul, Laura Sanford(?) Robert John Emma Northway, etc. Jerry Isaac! so on.
Whatever area selected should not be located on the historical community site or grave site!!
Whatever area selected need to be cleaned up by the military. Do not leave, esp. explosives as during the 1990(?) forest fires + fire fighters could not get into certain areas near Ft. Greely due

Cultural Resources 01
USARAK's Native Liaison and Cultural Resources Manager will coordinate annual or semi-annual meetings with Tribes regardless of specific projects like the BAX and CACTF. We always encourage dialogue on how USARAK can work more closely with Tribes.

Archeological survey work is currently underway. Planning procedures would be in place during both the construction and operation of the BAX and CACTF to identify and protect significant cultural resources. Please see revised Sections 3.2.7 and 4.2.7, *Cultural Resources* for more information regarding your comment.

Human Health and Safety 03
The collection of used bullet casings (spent brass) is neither required nor advisable when training in the field. Bullets fired at the BAX and CACTF do not contain explosives. There would be no possibility of unexploded ordnance (i.e., bullets or warheads) being used at the ranges that would require on-the-ground clearing by certified unexploded ordnance personnel. However, all refuse and unused ammunition would be removed from ranges or training sites.

11/18/2004 13:08 TANACROSS VILLAGE → TCC TOK NO.954 P003

to explosives & whatever contaminants left behind, Military should ALWAYS CLEAN UP THEIR MESS! Safety NEEDS to be TAKEN INTO CONSIDERATION AS THERE IS ALOT of traffic during tourist season. Wildlife safety is another concern as people do hunt in those areas. THERE should be MINIMAL impact to historical sites!

Please add in extra pages, if needed.

You may leave your completed form with representatives during Garrison village visits,
OR
Submit your comments via fax: (907) 384-0283,
OR
Fold this sheet in half and staple, fill in your return address, attach a stamp and mail to the below address.

Return Address:

Place Stamp Here

Amanda Shearer, Native Liaison
U.S. Army Garrison-Alaska
ATTN: APVR-RPW-GS
724 Postal Service Loop #6500
Fort Richardson, AK 99505-6500

Human Health and Safety 04
Convoy procedures and safety measures are stipulated in Department of the Army Regulation 55-2. For further information on expected convoy frequency and mitigation, see revised Section 2.2.1.2.6, *Support Operations, Transition Routes and Deployments*, and Sections 3.2.5 and 4.2.5, *Human Health and Safety* for additional information regarding your comment.

Wildlife and Fisheries 01
USARAK has implemented an education and awareness program for those applying for hunting and fishing permits on USARAK lands to emphasize the importance of, and to discourage the waste of, subsistence resources. An education and awareness program for active duty Soldiers has also been implemented in response to tribal concerns. Safety is also a topic addressed under this program. USAG-AK's Native Liaison will continue to work with Tribes to address this concern.

Dec 02 04 01:52p Delta Office 907-895-2039 p.3
Delta Office 907-895-2039 p.3

U.S. ARMY GARRISON- ALASKA
BAX/CACTF DRAFT EIS
COMMENT SHEET

NAME:

ADDRESS: PO Box 76009, Tanacross, Alaska 99776-6009

REPESENTING: Self _____ Organization x

ORGANIZATION NAME AND ADDRESS: Native Village of Tanacross (Same as above)

COMMENT: First - let me express my appreciation to Col. Boltz and the US Army for taking the time to include our tribe in the Government-To-Government discussions. Our people believe training ranges such as the BAX & CACTF are vital to training our forces for current and future battles. Therefore we fully support the development of these ranges as ourlined in the draft EIS.

I ask only that you give special attention to the following concerns.

1. Preservation or recovery of archaeological sites. Involve our people in this effort. Maybe develop an Athabascan Archaeological Center with recovered artifacts? Please send copies of previous surveys as well as reports from future surveys.

2. Wildlife protection & preservation. As you know, we are a subsistance village. Therefore wildlife is integral to our way of life. Here again use our people to manage the all Flora & Fauna including Fisheries & Cultural resources.

Cultural Resources 02
During both the construction and operation of the BAX and CACTF, planning procedures would be in place to identify and protect significant cultural resources. Please see Sections 3.2.7 and 4.2.7, *Cultural Resources* for more information.

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

USAR-AK sends archaeological methodology reports (prior to the field season) and annual reports that document archaeological survey and evaluation of Army managed lands in Alaska to interested tribes.

Subsistence 01
There are many other areas available for rural residents to participate in subsistence activities around Delta Junction. Therefore, the proposed ranges will not significantly restrict rural Alaskans' access to subsistence resources. Please refer to Sections 3.3.7 and 4.3.7, *Subsistence* for additional information.

Wildlife and Fisheries 02
USAG-AK supports the military mission by protecting and enhancing the training lands upon which the mission is critically dependent. The Army utilizes an ecosystem management approach that has an overriding goal of protecting the properties and functions of natural ecosystems. These ecosystems extend beyond the military installation boundary, so management of natural resources will require more emphasis on partnerships with neighbors.

Dec 02 04 01:52p Delta Office 907-895-2039 p.4
Delta Office 907-895-2039 p.4

3. Provide jobs. This project will create new jobs and/or add new requirements on existing positions elsewhere. I request new jobs in construction, security, O & M of the new facilities as well as the environmental and natural & cultural resources programs be made available to members of the Village of Tanacross.

Please add in extra pages, if needed.

You may leave your completed form with representatives during Garrison village visits,
OR
Submit your comments via fax: (907) 384-0283,
OR
Fold this sheet in half and staple, fill in your return address, attach a stamp and mail to the below address.

Return Address:

Dihthaad Global Services, LLC
PO Box 76049
Tanacross, AK 99776

Amanda Shearer, Native Liaison
U.S. Army Garrison-Alaska
ATTN: APVR-RPW-GS
724 Postal Service Loop #6500
Fort Richardson, AK 99505-6500

37 USA
AK
7004
99776

Other 21
This EIS does not have the authority to stipulate contracts with any single entity, be it government, tribal, or private sector.

FROM : ADI FAX NO. : 9077782311 Jan. 10 2005 10:58AM P1

P. O. Box 516 • Northway, Alaska 99764 • (907) 778-2311 • FAX (907) 778-2220

<<<FACISMILE COVER SHEET>>>

TO: Anna Gonzalez
ATTN: Anna Susanna
FAX#: 907-384-0283

DATE: 01-07-05
#OF PAGES: 2
original in mail: Y X N

FROM:

- ____ Daisy Northway, Tribal Administrator
- ____ Adena Cronk, Education/Employment Tech & TWDS
- ____ Eleanor David, Bookkeeper
- ____ Romania John, Social Service Administrator
- ____ Crystalena Sam, Indian Child Welfare Act
- ____ Wayne Cowart, Water Plant Operator
- ____ Kim Thomas, Truck Driver

TCC STAFF:

- ____ Christine Sam, Community Health Representative
- ____ Sylvia Pitka, Community Health Practitioner
- ____ Jenny Pitka, Community Health Aide
- ____ UTAP, Vacant

FROM:

- ✓ NORTHWAY VILLAGE COUNCIL MEMBERS (GEORGE ABBOTT, V.P.)
- ____ OTHER NAME: ____

<<<COMMENTS>>>

<<<CONFIDENTIALILY NOTICE>>>

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FROM : ADI FAX NO. : 9077782311 Jan. 10 2005 10:58AM P2

ATTN: AMANDA SHEMEK
PH: 907-384-3263
FAX: 907-384-0283

01-07-05

COMMENTS ON ARMY PROJECT:

WITH THE ARMY PROJECT HAPPENING SURROUNDING FT. GREELY, UPPER TANANA EAST OF FT. GREELY HAVE MANY PROBLEMS WITH WHAT HAPPENS ON ARMY TRAINING GROUNDS SINCE THE WATERWAYS COME FROM THE UPPER TANANA AREA. FISH, WATERFOWL AND SO-ON MIGRATES THROUGH UPPER TANANA AND I NEVER HEARD ANYTHING ON EXPLOSIVES OR UNEXPLOSIVE ORDNANCE BEING MENTIONED, ESPECIALLY WITH WATERWAYS NEAR BY.

ANOTHER CONCERN THAT I HAVE AS A TRIBAL COUNCIL LEADER FOR MY VILLAGE (NORTHWAY) IS THAT BACK IN 1942 NORTHWAY WAS STAMPEDED BY THE ARMY WHICH PEOPLE BACK THEN WERE BARRACADED INTO ONE AREA. AND, FOOD WAS SCARCE BECAUSE PEOPLE COULD NOT GO WHERE THERE'S FOOD. 50 YRS. LATER OUR PEOPLE ARE STILL DEALING WITH THE ARMY FOR THE MESS THE MILITARY LEFT BEHIND AND OUR PEOPLE WERE NOT APOLOGIZED FOR WHAT HAPPENED BACK IN 1942. NOW, WE ARE DEALING WITH ARMY GARRISON WITH NO APOLOGY. MILITARY SHOULD BE RESPONSIBLE FOR THEIR ACTIONS NO MATTER WHO THEY ARE.

THANK-YOU
NORTHWAY VILLAGE COUNCIL

Wildlife and Fisheries 03
Bullets fired at the BAX and CACTF do not contain explosives. There would be no possibility of unexploded ordnance (i.e., bullets or warheads) being used at the ranges.

Subsistence 02
There are many other areas available for rural residents to participate in subsistence activities around Delta Junction. Therefore, the proposed ranges will not significantly restrict rural Alaskans' access to subsistence resources. Please refer to Sections 3.3.7 and 4.3.7, *Subsistence* for additional information.

To: ***Kevin Gardner***
Strategic Planning Office
USAGAK

From: ***Tom O'Brien***
DoD Program Manager
Tanana Chiefs Conference

Date: ***January 30, 2005***

Subject:

Comments addressing Draft 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, October 2004

Tanana Chiefs Conference appreciates this opportunity to review and comment on this Draft EIS. The reviewer for the most part, has formulated comments that request some further clarifications of terms and concepts. The overall format and information package submitted for review is retrievable, logically oriented and suitably comprehensive; however, there are some inherent ambiguities. These ambiguities could be construed in many cases to be intentionally drafted, working as illusive caveats, perhaps conceived by the document authors as necessary and thereby allowing contingencies for flexible future interpretation of DoD related actions and procedures. However, these types of "contingencies" often do not allow Tribes or the public a clear understandings for draft review purposes nor does it assure accountability for specific future actions by DoD. This inherent lack of certainties in many areas throughout the document make it difficult for those outside DoD operations to

predict long term DoD motives and actions and therefore, not allow on the part of the reviewer a fully informed knowledge to be incorporated toward formulating a comprehensive draft document evaluation.

Comments pertaining to:

Executive Summary:

Page vi, 3rd paragraph: Reference to types of "munitions not listed in the SOP" (noted here and later, 2-5). This is vague and begs cautionary questions from the reader as to- what specific types of munitions could be authorized by the Range Safety Officer. When considering the infamous history for the neighboring Gerstle River Testing Area, this should be clarified – example; no biological or chemical weapons with the exception of CS gas will be authorized or utilized on these facilities.

Human Health and Safety 05
Bullets fired at the BAX and CACTF do not contain explosives. There would be no possibility of unexploded ordnance (i.e., bullets or warheads) being used at the ranges. Additional information to address your comment on munitions used at the BAX and CACTF can be found in revised Sections 2.2.1.2.2 and 2.2.2.2.2, respectively.

Page vii, 1st paragraph: What are the specific sizes for TUAV crafts? Are there longitudinal studies that discuss the "dependability" of these types of aircraft? Address concerns for air safety and potential for crashes off UASARAK lands, a footnote may help.

Human Health and Safety 06
Direct eye contact of the TUAV by on-the-ground observers must be maintained during training operations. In addition, their use is also coordinated through the FAA. The wingspan of the Shadow UAV, part of the Stryker Brigade Combat Team at USARAK, is 13 feet with a range of 125 kilometers (USARAK 2004a).

Page vii, 3rd paragraph: Reference to the use of smoke, specifically "fog oil smoke", lack of definitions does not allow the reader to know just what this apparatus is. Health concerns regarding potentials for toxic residue should be dealt with in some degree.

Human Health and Safety 07
Information regarding fog oil smoke can be found in revised Section 3.3.1.1.2. Impacts to human health and safety from fog oil smoke use were found to be insignificant (USARAK 2000c).

Page vii, 4th paragraph: This portion (and with the later detailed development in the text) makes me ask- why the pretense to consider nine alternative sites when they could not even remotely address the needs for the proposed facilities? The public could easily assume that the earlier nine considerations, were merely a "smoke screen" to allude to a "good faith" effort to reach alternatives when actually the DTA was the always the target and the only realistic and suitable

Other 22
All Army lands in Alaska were considered for siting of the proposed action. Only three location alternatives remained for further analysis based on their ability to meet range training, design and siting criteria. See Section 2.3.3, *Alternative Viability Analysis* for additional information.

choice.

Page viii, 2nd paragraph: This was an obvious circumstance for anyone reviewing / researching the potentials. This portion further lends itself to implications of – a pretense for choices, when actually only one serious choice was available (DTA) when factoring the philosophies within concepts of transformation and the stryker combat tactics.

Other 23
Thank you for your comment. An additional alternative is being considered in the second draft, locating the BAX and CACTF at different locations.

Issue 2, page xi, 1st paragraph: The term "moderate" is relative and should have some clarification allowing for the reader a firmer understanding.

Soil Resources 01
Please refer to Table 2.o, *Summary of Environmental Consequences by Alternative* for a definition of "moderate".

Issue 3, page xii, 1st paragraph: With regarding munitions residue- is there a projected "saturation point" for accumulated residues overtime? Could this be a problem when considering the potential for a 242 day annual training cycle under the best conditions?

Water Resources 01
Bullets fired at the BAX and CACTF do not contain explosives. Field soil samples at firing points have detected low levels (parts per million) of munitions constituents on the surface, but not at depth in the soils, and not in the groundwater or surface water. Monitoring for munitions constituents is on-going at USARAK and would continue under the proposed action.

Issue 4, page xii, 2nd paragraph: Based on long term studies - have the predominate wind directions been determined for estimating the potential for future fire damage? Who is primarily responsible for fighting fires begun on USARAK training facilities? Who pays the cost?

Fire Management 02
Fire risk assessments have been performed by the Alaska Fire Service for all location alternatives. These assessments take localized weather patterns into account. Additional information can be found in Section 3.2.3.1, *Fire Hazard Assessment*. Fire management on USARAK lands is a joint effort between USASRAK and the Alaska Fire Service. Additional information can be found in Section 3.2.3.2, *Fire Policy*.

Issue 5, page xii, 3rd paragraph : In this portion, a person could get an impression that the potential for "aircraft noise" is down played. During air support training scenarios – will any training combat sorties approach low level off the DTA designated area in the more populated regions?

Noise Management 01
During field events at the BAX and CACTF, an "off-set" training technique would be used to incorporate aircraft via radio or other digital methods. Aircraft would utilize existing restricted airspace and impact areas. Noise levels would not be expected to increase over existing aircraft noise under the proposed action.

Issue 6, page xii, 5th paragraph: The term "moderate" is a relative concept and needs to be specified.

Human Health and Safety 08
Please refer to Section 4.2.6.1.1, *Description of Methodology*, for a definition of "moderate".

Issue 7, page xii, 6th paragraph: Depending on the amount of potential - 242 day training activities (noise and troop movements) I speculate, what moose or bison will "hang around" to take advantage of the "vegetation in successional stages"?

Wildlife and Fisheries 04
Changes have been made to Section 3.2.6.1.1, *Mammals*.

Issue 7, page xiii, 1st paragraph: I would speculate that soldiers while traveling to, and training at DTA will see hunting / fishing potentials (spotting game animals and noting lakes and streams). It would seem reasonable that they would attempt to return to these areas to sport hunt and fish in their off duty time, rather than go to areas they know nothing about. Therefore, I would lean toward a certainty for increased impact potential.

Wildlife and Fisheries 05
No stationing of Soldiers at DTA is proposed under this alternative.

Air Quality, page xiii, 4th paragraph: I have concerns regarding the use of "fog oil", not having any idea of this apparatus / procedure, and the likelihood of uncontrolled wild fires from military training activities as potentials for diminished air quality.

Air Quality 01
Information regarding fog oil smoke can be found in Section 3.3.1.1.2. Impacts to human health and safety from fog oil smoke use are insignificant (USARAK 2000c). Additional information about impacts to air quality from fires has been added to Section 4.2.3.1 and 4.3.1.1.

Wetlands, page xiii, 6th paragraph: Does USACE have total control over determining impacts to wetlands on USARAK lands?

Wetlands 01
The U.S. Army Corps of Engineers, Regulatory Branch reviews permit applications for proposed activities in "waters of the United States" (wetlands). This agency is separate from USARAK.

Socioeconomic, page xiv, 4th paragraph: This portion takes on the form of a "disclaimer", in that it appears to imply potential for local employment, but may limit any potential considerably, due to "skills /abilities" required and in reality could mean for the areas "locals" - little or none.

Socioeconomics 01
Section 4.3.6, *Socioeconomics* has been revised and may provide you with additional information regarding your comment.

Subsistence, page xiv, 5th paragraph: With the idea of specific areas closed within DTA, and "impacts expected to be minor" –just how realistic are the opportunities for subsistence users to actually be able to use "alternative areas" when considering the extent of the extensive training purposed? Will not those areas also have simultaneous training demands or be in a state of fallow? How reliable will future DoD training schedules are to allow for subsistence users their abilities to predict suitable time frames to plan for seasonal land use?

Subsistence 03
Additional areas would remain available for subsistence practices on training areas that are not in use and on nearby non-military land. The USARTRAK system provides updated information on training land closures at DTA. Military training at USARAK, however, does not follow a predictable schedule.

Public Access and Recreation, page xiv, 6th paragraph: Considering "permanent closure" of portions of DTA to the public conflicts with "subsistence", usage as all subsistence users could be regarded as "public". Once again, the implication that the public can use the "remaining portions" of DTA that is not being currently utilized, however this is only when there is not a scheduled training for any of these specific additional portions of landscape. There appears to be no concrete or long term assurances for Tribes or the public when or where portions of DTA will be open for access.

Environmental Justice, page xiv, 7th paragraph: Specific clarification regarding the interchangeability of the terms "Alaska Native Community" and "Minority Community" for the Upper Tanana villages addressed within the document – who qualifies for what and how important are these determinations for these communities? Later reference (page 4-103) – What guidelines determine the additional "five percent" utilized for your determinations?

Public Access and Recreation 01
Military training does not follow a predictable schedule, the required number of days the range must be available is 106. The required minimum number of days the range must be available is 106. Actual estimated number of days the range complex will be used for training is approximately 238. Certain portions of the range complex would be closed for longer periods than others.

Environmental Justice 01
According to the *Environmental Justice Guidance Under the National Environmental Policy Act*, a reference guide published by the Council on Environmental Quality (http://ceq.eh.doe.gov/nepa/regs/ej/justice.pdf), a minority is an "individual(s) who are members of the following population groups: American Indian or Alaskan Native; Asian or Pacific Islander; Black, not of Hispanic origin; or Hispanic." Therefore, Alaska Native communities are also considered minority communities. The term is merely describing a particular type of minority community. In this EIS, when discussion refers to all minority communities, the term "minority community" is used. When discussion refers specifically to Alaska Native minority communities, the term "Alaskan Native community" is used. Text in the Executive Summary and in Environmental Justice sections 3.3.9 and 4.3.9 have been updated to ensure references to "minority" and "Alaska Native" communities are correct.

Guidelines for defining a minority community can also be found in the Council on Environmental Quality document referenced above: "Minority populations should be identified where either: (a) the minority population of the affected area exceeds 50 percent or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis." In the Southeast Fairbanks Census Area, there is no minority population exceeding 50% of the area's total population. Since "meaningfully greater" is not defined in the Council on Environmental Quality guidelines, this EIS uses a conservative estimate that includes all minority communities with populations greater than or equal to 5% of the state-wide average of the minority populations.

Cumulative Impacts, page xv, 2nd paragraph: A further clarification for the ambiguous statement "impacts will be insignificant until major growth or change occur" would help as this is pretty "broad brush".

Cumulative Impacts 01
Additional information is provided in Section 4.3.11, *Cumulative Impacts* to address this comment.

Interim Summary:

It is often the case that individuals or groups when requested to review this form of document, unfortunately do not have the required time to digest the details. Therefore, the Executive Summary and Introductory portions are extremely significant for gaining the specifics of the document. Therefore, it is suggested that in addition to the provided "Acronym List", a page be included defining relative terms specific to the evaluation process, such as; moderate, minor, severe …may be useful. This type of clarity is important at the onset of the document, and can help dispel much potential for subsequent ambiguity. The addition of a table or listing (such as on page 4-64, 4.3.1.2.1) defining terms and rating categories could therefore, be beneficial at the beginning of the document and thereby, aid the harried reader.

Other 24
Unique definitions for impact categories are defined at the beginning of each resource section in Chapter 4, *Environmental Consequences*.

Purpose and Need 01
The *Transformation of U.S. Army Alaska Final EIS* provides much of the information incorporated by reference into this EIS.

Continuing general comments:

Page 1-3, 6th paragraph: This is a suitable place to let the reader know approximately how long DoD planners have been dealing with the transformation / stryker concepts Tribes and the public are at an inherent disadvantage when confronted by DoD proposals, as they have not been privy to prior information or the initial planning strategies. Once confronted, it is reasonable for these (outside DoD sphere) individuals and groups to be resent "introduction" to a four or five year entrenched planning process. Therefore, criticism of DoD can foster and perceptions of a lack of "good faith" efforts on the part of DoD perpetuated.

Proposed Action and Alternatives 12
Additional information has been added to Section 2.2.1.2.5, *Training Day Requirements*.

Page 1-5, 1st paragraph: With regards to "Current training"-here again, Tribes and the public are being requested to review and comment on "possibilities" –

that may or may not be valid considerations for the future. It is very difficult to provide "feedback" when there is no certainty for the actual training and schedules as these are contingent upon the "Commanding General guidelines", which are certainly subject to change when considering future mission priorities and individual rotation of the Commander.

Page 1-7, 5th bulleted category: When discussing "live munitions" it is not clarified if the term "hand grenade" implies to a live offensive or defensive explosive?

Proposed Action and Alternatives 13
The term "hand grenade" refers to both offensive and/or defensive operations.

1.2.4. Range Siting Criteria, page 1-7: These factors as described suggest strongly for the possibility that the earlier nine alternative sites were only a pretense, and not regarded by the DoD as meaningful alternatives for serious considerations for selection for the proposed facilities. The possibility for this circumstance can undermine Tribal and public confidence in the motives of the DoD with implications that a prescribed agenda was already in place and therefore – their feedback is of little consequence, as "minds had already been made up".

Proposed Action and Alternatives 14
All Army lands in Alaska were considered for siting of the proposed action. Only three location alternatives remained for further analysis based on their ability to meet range training, design and siting criteria. See Section 2.3.3, *Alternative Viability Analysis* for additional information.

Page 2-4, 4th paragraph: I would feel that an inclusion of a clarification of "direct fire only" weapons would add reassurance of safety to the minds of both Tribes and the public.

Proposed Action and Alternatives 15
Please see additional information in Section 2.2.1.2.2, *Munitions Training at the BAX*.

Pages 2-4 and 2-5: With the potential for "hand grenades" suggested earlier in the document (but never clarified) will they be used within the BAX?

Proposed Action and Alternatives 16
Units would be allowed to use grenades at the BAX if the actual area being used for training is prepared and bunkers constructed in accordance with USARAK Range Regulation 350-2.

Page 2-4: No specific mention of "bivouac" areas or "troop resting" procedures for small and large scale training scenarios. These could be considerations for additional daily troop travel (barracks) or habitat sustainability issues (field camping).

Proposed Action and Alternatives 17
Please see additional information in Section 2.2.1.2.6, *Support Operations, Transition Routes and Deployments*.

Page 1-7: Perhaps a footnote regarding "fog oil smoke" would help dispel questions of procedure, potential toxins, residues…

Proposed Action and Alternatives 18
Thank you for your comment.

Page 2-9, 2nd paragraph: An inclusion of mention of "direct fire only" would help here. A clarification of the potential for the intentions for live / dud – offensive and defensive hand grenades would help. Also, is there any potential for future indirect 60mm or 81mm mortar training within the BAX or CACTF facilities?

Proposed Action and Alternatives 19
Please see additional information in Section 2.2.2.2.2, *Munitions Training at the CACTF*. Indirect mortar training requires a nearby impact area. The only alternative where this may be possible would be at North Texas Range, which is co-located with an existing dedicated impact area.

Page 3-6: When regarding potentials for soil degradation, reference to Stryker vehicles is predominate. There is, however, a "light weight" tank (not the MGS) on the drawing board to have capabilities similar to the M1AI main battle tank, but significantly lighter to strengthen transformation combat capabilities. If produced, will this lighter weight (air mobile) tank track armored vehicle conduct training exercises within these facilities? If so, has the factoring for potentials for soil degradation from track vehicles been taken this into account?

Soil Resources 02
Any vehicles new to the Army inventory would require separate NEPA analysis prior to their use. Impacts to soil resources take into account all vehicles currently used by the Army in Alaska. Please see Section 4.2.1.1.2, *Impacts Common to All Alternatives* for additional information.

Page 3-16, last paragraph: Once again "grenades" are not defined clearly.

Fire Management 03
Both offensive and defensive grenades would be limited during certain fire danger ratings in accordance with USARAK Range Regulation 350-2.

3.2.4.4.1, page 3-35: Statement implies lower levels per unit, but does not develop scenarios for increased usage of vehicles overall.

Noise Management 02
Noise from Army vehicles is not usually modeled because of the short distance that vehicle noise travels (as compared to heavy weapons noise, for example). Stryker noise would be temporary in nature and would be less than or equal to current vehicle noise at DTA.

3.3.8.2., page 3-99: This is an important area for discussion, as much flexibility and future determinations for land use and access rest solely with the Range Control Office. How much "fore warning" would Tribes and the pubic have regarding these changing land statuses? Would potential non-military subsistence / recreation users have adequate time to plan and outfit for seasonal land uses?

Public Access and Recreation 02, and Subsistence 04:
These categories are general land use classifications whose definitions are not likely to change. The USARTRAK call-in system is typically updated once each week to inform users on which areas are inaccessible due to military training.

Page 4-53, 4th paragraph: Is it realistic to assume that moose will "habituate" with the potential for considerable weapons fire and vehicle and marching troop movements?

Wildlife and Fisheries 06
Thank you for your comment. Please see Section 4.2.6, *Wildlife and Fisheries* for a discussion of potential impacts to moose as a result of the proposed action.

Table 4.2.7.a, page 4-57: Could we assume that a "lower" or "higher" percentage could imply that more or less field work was conducted in that specific area and therefore, higher or lower percentages of sites were located?

Cultural Resources 03
The same level of field investigation was completed for all alternative sites.

4.2.7.3.2, page 4-60, 1st bullet: A clarification of what "where practicable" means would help this completely relative phrase. Also, what process determines "practicability"?

Cultural Resources 04
Section 4.2.7, *Cultural Resources* has been updated to include additional explanation.

Summary:
The document is well done overall and when considering the time factor – remarkable! As noted earlier there are some potentials for ambiguities and additional portions that could unfortunately serve to confirm to a biased reader – a predisposition on the part of DoD for DTA ultimate selection and therefore, a pretense alluding to the possibilities of any one of the earlier proposed nine alternatives as ever being serious considerations for selection.

There is little development if any, that discusses the potentials for BAX and CACTF training facility users to be other than USARAK personnel. The possibility for other U.S. military groups using the facilities is in my opinion high. Also, I would suspect that the facilities will be used to host various allied combat contingents. These factors should be dealt with up front within an exploratory framework as Tribes and the Alaskan public is affected by these intrusions. There should be specific cultural orientations for any personnel, domestic or foreign, regarding Alaska in general, Alaska Native culture and rural communities.

Proposed Action and Alternatives 20
Please see Section 2.2.1.2.1, *Description of Units Using the BAX* for additional information.

Cultural Resources 05
An Alaskan native cultural education and awareness program for active duty Soldiers has been implemented in response to tribal concerns. USAG-AK's Native Liaison will continue to work with Tribes to address this concern.

Will these facilities be useful if the Stryker concept is dropped, or will "new and improved" facilities be needed? Is this a possibility? It is known that the transformation concept with Stryker as a key element has been challenged as a viable alternative at various levels of DoD planning strategy. The concept is problematic in that it stresses "high mobility" and "rapid deployment", but in

Other 25
The Stryker Brigade Combat Team remains a part of the Army's synchronized program of transformation to occur in three phases over a 30 year period. Please see the *Final EIS for Transformation at U.S. Army Alaska* (2004) for additional information. The facilities will be used by both Stryker and non-Stryker units.

fact is still harassed by current air lift capabilities.
In addition the concept of rapid safe troop carriers is nothing new and harkens back to the post WWI era idealism of the mid 1920s –stressing the highly mobile and thought to be capable "armored car". This concept carried to the extreme with Germany during WWII with "lighting war" served them well in the open, but they paid a terrible price when confined in urban warfare such as with 1942 Stalingrad. A person would be hard pressed to convince a veteran British paratrooper who served at Arnhem 1944, regarding the feasibility of linking necessary support armor with established assault elements holding key positions.

With this current and purposed Alaskan military make over, transformation, Tribes and the public can be assured of the needs for future changes and the necessities to address them. The current provisions for addressing changes; such as with this EIS, are tolerable and appreciated, but I am concerned that they are not entirely effective, especially with regards to garnering Tribal participation. It is too late for alternative provisions regarding Tribal / Military interactions for this specific EIS, however, due to the certainty of future needs – we should begin working together to address potentials for enhancing the future process at this time and not later.

Cultural Resources 06
USARAK's Native Liaison and Cultural Resources Manager will coordinate annual or semi-annual meetings with Tribes regardless of specific Army projects. We always encourage dialogue on how USARAK can work more closely with Tribes.

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

DPW: Attention Mr. Gardner

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

FRANK MURKOWSKI, GOVERNOR

610 University Avenue
Fairbanks, AK 99709-3643
PHONE: (907) 451-2180
FAX: (907) 451-5105
http://www.state.ak.us/dec/

File: 141.38.038

November 29, 2004

Donna G. Boltz, Colonel, U.S. Army
Department of the Army
Headquarters, U.S. Army Garrison, Alaska
725 Postal Service Loop #6000
Fort Richardson, AK 99505-6000

Re: Draft Environmental Impact Statement for Construction and Operation of a Battle Area Complex and a Combined Arms Collective Training Facility within U.S. Army Training Lands in Alaska.

Dear Ms. Boltz:

The Alaska Department of Environmental Conservation (ADEC) Contaminated Sites Program received a copy of the *Draft Environmental Impact Statement for Construction and Operation of a Battle Area Complex and a Combined Arms Collective Training Facility within U. S. Army Training Lands in Alaska.* Thank you for the opportunity for the Contaminated Sites Program to comment on this report.

The U.S. Army proposes to construct a combat training facility near Fort Greely,

Delta Junction, Alaska. The alternative locations to construct the facility include: Eddy Drop Zone, Donnelly Drop Zone, or North Texas Range. If contamination is discovered or released at these sites, Alaska state law (18 AAC 75.300-.380) requires responsible parties to notify the ADEC when an oil or hazardous substance discharge or release to the environment occurs and requires site characterization and cleanup (18 AAC 75.325-.380). According to ADEC-Contaminated Site Program records, there are no existing contaminated sites in the Eddy Drop Zone, Donnelly Drop Zone, or North Texas Range.

Human Health and Safety 09
This information has been added to Section 4.2.5, *Human Health and Safety*.

If you have further questions, please do not hesitate to call me at (907) 451-2180 or email emily-youcha@dec.state.ak.us.

Sincerely,
Emily Youcha
Environmental Specialist

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Barta Carrie L MS DPW NEPA COORDINATOR
From: Gardner Kevin R DPW Strategic Planning [kevin.gardner@us.army.mil]
Sent: Tuesday, November 23,2004 4:33 PM
To : 'Steve DuBois '
Cc: Barta Carrie L MS DPW NEPA COORDINATOR
Subject: RE: DEIS Comments

Hi Steve, thanks for the note. We'll use this email and your earlier comments as your submittal. Thanks.

Refer to responses below.

Kevin
-----Original Message-----
From: Steve DuBois
To: kevin.gardner@richardson.army.mil
Sent: 1 1/23/2004 12:49 PM
Subject: DEIS Comments

Hi Kevin, I'm sorry I missed the agency meeting yesterday to review the DEIS for the BAX and CACTF. I was busy flying moose surveys. After the meeting I spoke with Fronty Parker (ADFG Sport Fish) who told me that DPW staff seemed to have a clear understanding of wildlife concerns Pertaining to development of the ranges on Texas Range. Given that assumption, is it necessary that I resubmit comments for the DEIS, or can you refer to the 2 sets of comments I submitted for earlier versions? Thanks.

Steve DuBois
Alaska Dept. Fish and Game
P.O. Box 702, Delta Junction, AK 99737
907-895-4484 ext. 13
steve-dubois@fishgame.state.ak.us

STATE OF ALASKA

FRANK MURKOWSKI, GOVERNOR

DEPARTMENT OF FISH AND GAME

DIVISION OF WILDLIFE CONSERVATION

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July 7, 2004

Mr. Kevin Gardner
Chief of Environmental Planning
730 Quartermaster Road
Ft. Richardson, AK 99504

Dear Mr. Gardner:

Thank you for the opportunity to submit preliminary comments on U.S. Army Alaska's (USARAK) plans to develop new training areas. My comments are based on a scoping meeting I attended on June 17, 2004 with you, Ellen Clark, and Jeff Mason where we discussed USARAK plans for development of

a Battle Area Complex and Combined Arms Collective Training Facility. I was asked to submit preliminary comments on the impacts to wildlife for the 9 sites being investigated for development.

I believe the least impact to wildlife and users would be to develop the proposed ranges in the Tanana Flats, Donnelly West, or Yukon Training Areas. However, I will leave comments on these areas to other ADFG staff because they are in

Alaska Department of Fish and Game (ADFG) Game Management Units 20A

and 20B, and outside of my management authority.

I will comment on the North Texas Range (NTR), Gerstle River Test Area (GRTA), Donnelly Drop Zone, Eddy Drop Zone, and Black Rapids, which are all located within Game Management Unit 20D. Of the above sites, the greatest potential negative impacts to wildlife will be development of the North Texas Range site.

Wildlife and Fisheries 07
This comment was taken into consideration.

Game Management Unit 20D Specific Site Comments:
North Texas Range: The area of the NTR is listed in the USARAK Integrated Natural Resource Management Plan 2002–2006 (Sec. 5.6.4) as a high priority Special Interest Area for the Delta bison herd (DBH). This area is critically important for bison calving and summer range and important to ADFG's overall bison management program.
The DBH is a natural resource of the state that is one of the most sought after hunting opportunities for the public with over 15,000 people applying annually for the hunt. Proper management of DBH movement patterns also has significant impacts on bison depredation to private agricultural lands in the Delta Junction area.
The DBH is also important for wildlife viewing and is a positive economic factor for the Delta Junction community as bison hunters and viewers contribute to the economy by purchasing hotel rooms, gasoline, groceries, and other supplies.

Wildlife and Fisheries 08
Please see revised Sections 3.2.6 and 4.2.6, *Wildlife and Fisheries* for updated information regarding your comment.

Public Access and Recreation 03
Please see revised Sections 3.2.6 and 4.2.6, *Wildlife and Fisheries* for updated information regarding your comment.

Socioeconomics 02
Please see Section 4.2.6, *Wildlife and Fisheries* and Section 4.3.6, *Socioeconomics* for additional information regarding the biological and economic impacts of the Delta bison herd.

Destruction of habitat and high levels of disturbance from military training activities on the proposed NTR will have negative impacts to the DBH's use of this critical calving and summer range resulting in 2 potential ramifications including 1) impacts to herd population dynamics and 2) impacts to bison movement patterns which effect private farmers in Delta Junction agricultural areas. The DBH uses the NTR site from approximately mid-February through late-July or early-August as part of their Delta River precalving, calving, and postcalving range. Disturbance of critical habitat or increased levels of disturbance may negatively impact herd productivity, calf survival, and herd movements by reducing forage availability and quality. Negative impacts to herd productivity will reduce the opportunity for public hunting and viewing and the commensurate economic benefits to Delta Junction. Negative impacts to herd movements will result in potential changes to herd migration patterns

causing the herd to migrate sooner from the NTR area, and ultimately impact private farmers if the DBH spends more time depredating agricultural crops.

These negative impacts will make it much more difficult for ADFG to accomplish DBH management goals and objectives approved by the Alaska Board of Game in the 2000–2005 Delta Bison Management Plan. These goals and objectives were developed with input and approval from USARAK staff.

If the NTR site is selected for development it will be necessary to mitigate the impact on the DBH. Depending on the level of impact, several levels of mitigation exist. If effects on the DBH are relatively small it may be possible to mitigate with habitat development in other areas. The Bureau of Land Management is currently interested in improving bison habitat along portions of the Delta River and these efforts may be expedited with cooperation from USARAK. If effects are larger and significantly reduce herd productivity, resulting in reduced hunting and viewing opportunity for the public, it may be necessary to mitigate by, for example, establishing a different bison herd somewhere in the state to compensate for the lost opportunity with the DBH.

Mitigation 01
Section 4.2.6.2, *Mitigation* has been revised to include this proposal.

The NTR is also important moose calving, rutting, and winter habitat and provides habitat for caribou, grizzly bears, wolves, upland game birds, furbearers, and numerous nongame species.

Wildlife and Fisheries 09
Thank you for your comment. See added information in Section 4.2.6.1.6, *Impacts Attributed to Alternative 4 (North Texas Range)*.

I have also been asked to include comments from ADFG Division of Sport Fish biologist Fronty Parker (Mr. Parker is in the field an unable to submit written comments at this time). Greatest impacts to the state fisheries program will occur at the NTR site. Increased USARAK training in the area will make the numerous stocked lakes along the Meadows and Windy Ridge Roads more inaccessible to the public. It is likely that the state will stop stocking these lakes under this scenario, with a loss of opportunity to the public.

Public Access and Recreation 04
New mitigation has been proposed to address this issue. See added information in Section 4.3.8.2, *Mitigation*.

Gerstle River Test Area: The Gerstle River Test Area (GRTA) is an in-holding within state land that is managed as a special bison management area, the Delta Junction Bison Range (DJBR). ADFG management of the DJBR is directed in the 2000–2005 Delta Bison Management Plan with the primary purpose to reduce bison depredation on nearby private agricultural lands.

Proposed Action and Alternatives 21
This alternative was eliminated from further consideration in the EIS. Please refer to Section 2.3.4, *Conclusion of Viability Analysis* for more information.

ADFG manages bison habitat within an area of the DJBR called the Gerstle Fields that is approximately 1 mile north of the GRTA boundary. The access road into the GRTA crosses DJBR land within approximately 1/4–1/2 mile of the Gerstle Fields. Bison use the Gerstle Fields from approximately late-July through April. Increased military training activity in the GRTA and along the access road would result in increased levels of disturbance for bison in the area, resulting in decreased bison use of the area, which likely would result in increased depredation on private agricultural lands. As with the NTR, it may be necessary for USARAK to develop mitigation if military activity in the GRTA results in increased bison depredation on private agricultural lands.

The GRTA is also important moose habitat and provides habitat for black and grizzly bears, wolves, upland game birds, furbearers, and numerous nongame species.

Eddy Drop Zone: Although the Eddy Drop Zone provides habitat for moose, bear, sharptailed grouse, sandhill cranes, and nongame species there are not significant wildlife issues to be addressed at this site.

Wildlife and Fisheries 10
This comment was taken into consideration.

Donnelly Drop Zone: The Donnelly Drop Zone area provides high quality habitat for moose and is a popular moose hunting area for moose hunters. It also provides habitat for the Macomb caribou herd, sharptailed grouse, and nongame species but there are not significant wildlife issues to be addressed at this site.

Wildlife and Fisheries 11
This comment was taken into consideration.

Black Rapids: The Black Rapids site is in close proximity to Dall sheep habitat. Training activity in the area may reduce Dall sheep use of the adjacent uplands, however, impacts would be minimal.

Proposed Action and Alternatives 22
This alternative was eliminated from further consideration in the EIS. Please refer to Section 2.3.4, *Conclusion of Viability Analysis* for more information.

Thank you again for this opportunity to submit preliminary scoping comments.

Sincerely,

Steve DuBois
Delta Area Wildlife Biologist
Cc: Clark, Ihlenfeldt-McNay, James, Nowlin, Parker

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

OFFICE OF HABITAT MANAGEMENT AND PERMITTING

FRANK H. MURKOWSKI, GOVERNOR

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FAX: (907) 456-3091

December 17,2004

Directorate of Public Works
Attn: APVR-RPW -EV (Gardner)
724 Postal Service Loop #6500
Fort Richardson, AK 99505-6500

Dear Mr. Gardner:

RE: Draft Environmental Impact Statement, Construction and Use of a Battle Area Complex and Combined Arms Collective Training Facility

The Alaska Department of Natural Resources (ADNR), Office of Habitat Management and Permitting (OHMP) has reviewed the above referenced DEIS and has the following general comment:

Section 4.2.2 Surface Water/4.2.2.1 Impacts Common to All Alternatives - This section states that increased frequency and magnitude of disturbance from vehicles crossing streams will lead to bank erosion, widening of the waterway and increased sediment into streams. To minimize these effects in streams that support fish, the OHMP suggests that permanent low-water crossings (i.e., ingress and egress ramps) be constructed at designated vehicular stream crossings.

Water Resources 02
This recommendation has been included as mitigation under the proposed action. See Section 4.2.2.2.2, *Proposed Mitigations*.

In addition, under the authority of Executive Order 107 and the Memorandum of Understanding (signed October 16, 2003) between the ADNR and the Alaska Department of Fish and Game (ADF&G), the OHMP has enclosed comments submitted by Mr. Steve DuBois (ADF&G Wildlife Biologist, Delta) and Mr. Fronty Parker (ADF&G Sport Fish Biologist, Delta).

If you have any questions regarding the above comments, please contact Nancy Ihlenfeldt at 907-459-7287.

Sincerely,

Robert F. McLean, Area Manager
Office of Habitat Management and Permitting
Alaska Department of Natural Resources

Enclosures
ecc: Steve Dubois, ADF&G, Delta
Fronty Parker, ADF&G, Delta
David James, ADF&G, Fairbanks

(note: enclosures from Steve Dubois and Fronty Parker are included below…)

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

DIVISION OF WILDLIFE CONSERVATION

FRANK MURKOWSKI, GOVERNOR

P.O. Box 605
Delta Junction, AK 99737
PHONE: (907) 895-4484
FAX: (907) 895-4833

MEMORANDUM

TO: Nancy Ihlenfeldt, Habitat Biologist, Dept. of Natural Resources, Fairbanks

FROM: Steve DuBois, Wildlife Biologist, Dept. of Fish and Game, Delta Junction

DATE: December 13, 2004

SUBJECT: Comments on Army Draft Environmental Impact Statement

---

Abstract: I concur with the Draft Environmental Statement (DEIS) that development of the North Texas Range area would have the most detrimental consequences for wildlife resources. The DEIS needs more specific discussion and direction about procedures for stopping live fire exercises when wildlife is present on ranges. Bison food plots in the Meadows Road area are not being properly maintained as implied in the DEIS. Development of training facilities at Eddy Drop Zone and North Texas Range will result in significant reduction of access for public use of military land and access to public land for longer periods of time than initially conveyed to the public.

I concur with the findings of the Draft Environment Impact Statement (DEIS) for Construction and Operation of a Battle Area Complex (BAX) and a Combined Arms Collective Training Facility (CACTF) within U.S. Army Training Lands in Alaska, that consequences for wildlife resources will be most severe on the North Texas Range site.

Wildlife and Fisheries 12
Thank you for your comment. Please see Table 2.o, *Summary of Environmental Consequences by Alternative*.

Therefore I continue to rate this site as the lowest priority. I explained this position in earlier correspondence dated July 7, 2004 (see ADFG memorandum dated July 7, 2004 from Steve DuBois (Delta Junction Area Biologist) to Kevin Gardner (Chief of Environmental Planning, Ft. Richardson, Anchorage)). Please refer to that correspondence for a detailed discussion of BAX/CACTF development on the North Texas Range, Eddy Drop Zone, and Donnelly Drop Zone Sites. I also feel that there are consequences to all 3 proposed sites and recommend further evaluation of Donnelly Training Area (DTA) West.

Proposed Action and Alternatives 23
Donnelly Training Area West was eliminated from further analysis in this EIS. Please refer to Section 2.3.3, *Alternative Viability Analysis*.

Specific DEIS comments are as follows:

Page 3-42 (and other pages throughout the DEIS) states that Range Regulation 350-2 says, "all firing will cease when animals are present on the range, regardless of season." Assuming that this regulation refers primarily to ungulates, all 3 sites being considered are in areas of high moose density and depending on the site chosen may also include bison and caribou. I believe it will be very difficult for USARAK to monitor the occurrence of these species without frequent over flights and constant monitoring, particularly considering that the range will be used approximately 242 days per year. In addition, I am not aware of any previous firing exercises ever being stopped on ranges because of the presence of wildlife, although I concede that I am not in a position to routinely be informed of these decisions. Also, because of the size of the ranges and high density of moose present, I believe it would be very difficult to actually move all ungulates off the ranges.

Wildlife and Fisheries 13
Direct fire requiring a direct line of site would be used at the ranges. If any moose and bison are present, they would be visible by those training on the range.

This regulation is discussed further in Sec. 4.2.6.1 (Impacts Common to All Alternatives), and states that aircraft will not be used to move wildlife off the ranges, implying that USARAK personnel will wait for the animals to wander off the ranges on their own. I think it may be

very difficult to conduct training exercises without ungulates being present on the range. I believe it would be appropriate to discuss this issue in more detail in the final EIS giving more detailed explanations of how ungulate presence will be monitored, which species will be monitored, and the action taken when ungulates are present on the range. Section 4.2.6.2.3 Alternative 2 (Eddy Drop Zone) also states that a benefit of range construction on Eddy Drop Zone will result in a long-term benefit to moose and bison by creating early successional vegetation. However, I anticipate that this benefit to moose and bison will attract animals, thus resulting in range closures due to the presence of wildlife, complicating the military training mission.

Wildlife and Fisheries 14
This additional information has been added to Section 4.2.6, *Wildlife and Fisheries.*

Page 3-43 (moose) states that the sustainable moose harvest quota established by the Board of Game for Game Management Unit 20D is 500-700. This is not technically a harvest quota but a harvest goal. Also, there is no current system to reduce the number of harvest permits in this area and there are no moose registration permits hunts in this unit as stated in the DEIS.

Wildlife and Fisheries 15
Changes have been made to Section 3.2.6.1.1, *Mammals* to address this comment.

Page 3-44 (bison) states that the Alaska Department of Fish and Game's (ADFG) bison precalving population objective is 430 bison, however, the actual precalving population objective is 360.

Wildlife and Fisheries 16
Changes have been made to Section 3.2.6.1.1, *Mammals* to address this comment.

This section also states that USARAK created bison food plots along Meadows Road in the 1980s. This statement implies that these food plots are still functioning. However, I believe it would be appropriate to state in the final EIS that the food plots have been poorly maintained by USARAK and several have been incorporated into training and firing points which has severely decreased their benefit to bison. From my observations there has been little effort by USARAK to protect

Wildlife and Fisheries 17
Changes have been made to Section 3.2.6.1.1, *Mammals* and Section 4.2.6.1.6, *Impacts Attributed to Alternative 4 (North Texas Range)* to address this comment.

these sites from habitat degradation during training exercises. This comment also applies to the discussion of bison food plots on page 4-53.

Several sets of bison survey data are given in paragraphs 3 and 4 about the number of bison counted in the North Texas Range site at various times. A qualifier should be added to this data that these surveys were flown by USARAK personnel and did not include a survey of all bison that may have been present, but only those that were seen during a visual search of the area. Groups of bison are commonly located in forest vegetation and are not routinely seen during visual searches. ADFG surveys of the area are based on visual searches plus locating aggregations containing radio-collared bison that may not be readily visible during visual searches. Therefore, any USARAK data should be qualified as resulting in minimum estimates.

Wildlife and Fisheries 18
Changes have been made to Section 3.2.6.1.1, *Mammals* to address this comment.

Page 3-45 (caribou) contains a sentence that is confusing that says the southern portion of DTA east contains mostly caribou from the Macomb Herd, but that many are from the Delta Herd. This statement needs further clarification.

Wildlife and Fisheries 19
Changes have been made to Section 3.2.6.1.1, *Mammals* to address this comment.

This page also states that the harvest quota for the Macomb caribou registration hunt RC835 is 30-50 caribou. That is not the harvest quota for RC835, but rather the harvest objective for the Macomb Herd established by the Alaska Board of Game. The harvest quota varies annually.

Wildlife and Fisheries 20
Changes have been made to Section 3.2.6.1.1, *Mammals* to address this comment.

Page 3-48 states that the presence of peregrine falcons breeding on DTA East is unknown. One peregrine falcon nest site was found and documented by USARAK personnel on DTA East during summer

Wildlife and Fisheries 21
Changes have been made to Section 3.3.5, *Threatened or Endangered Species and Species of Special Concern* to address this comment.

2004 and should be documented in this section.

Page 3-48 states that the BAX location at the southeast corner of the

Eddy Drop Zone site is a popular public moose hunting area. I believe this statement minimizes the actual impact on moose and other hunting by development of this site. If as stated elsewhere, access to this area via the 33-mile Loop Road is closed for 365 days per year, then this will severely reduce hunting opportunity for one of the most popular moose hunting areas in Unit 20D. A year-round closure of the 33-mile Loop Road through the Eddy Drop Zone BAX site will also restrict access to public land to the south that is commonly used for large and small game hunting and other activities.

Public Access and Recreation 05
New mitigation has been proposed to address this issue. Please see revised Section 4.3.8.2, *Mitigation* for additional information.

This section also includes a typographical error in paragraph 3 where the word "only" is repeated.

Other 26
Changes have been made to Section 3.2.6.1.1, *Mammals*.

Page 4-99 states that it will be necessary to have a year-round closure of access to the Eddy Drop Zone ranges via 33-mile Loop Road. This is a significantly longer restriction than was discussed with the public during earlier meeting and constitutes an overall severe impact rather than a moderate impact listed in the DEIS. This will preclude the main public access route to public lands south of DTA East. These public lands are used for hunting, fishing, ATVing, berry picking, camping, and other activities.

Public Access and Recreation 06
New mitigation measures have been proposed to address this issue. Please see Section 4.3.8.2, *Mitigation* for additional information regarding this comment.

This section also states that the public will continue to have access to portions of DTA East with a Recreational Access Permit. However, public access to Ft. Greely to acquire these permits has not been provided. Measures should be taken to make the permits readily obtainable by the public.

Public Access and Recreation 07
Recreational Access Permits (RAPs) are available at the Fort Greely Visitor Center, located at the Front Gate. This facility is accessible to the general public Monday through Friday from 6 a.m. to 8 p.m. In addition, RAPs can be obtained from either Fort Wainwright or Fort Richardson as the RAP is applicable to all three military installations.

Page 4-100 states that it will be necessary to have a year-round closure of access to the North Texas Range site via Meadows Road. This is a significantly longer period of time than was discussed with the public during earlier meeting and constitutes an overall severe impact rather than a moderate impact listed in the DEIS. This will severely restrict the main public access route to lands used for wildlife viewing, hunting, fishing, ATVing, berry picking, camping, and other activities via Meadows Road.

This section also states that the public will continue to have access to portions of DTA East with a Recreational Access Permit. However, access to Ft. Greely to acquire these permits has not been provided for the public. Measures should be taken to make the permits readily obtainable by the public.

Cc: James, Nowlin

Nancy J lhlenfeldt

From: Fronty Parker [fronty-parker@fishgame.state.ak.us]
Sent: Monday, December 13,2004 2:08 PM
To: 'nancy'
Cc: Charles Swanton
Subject: comments on Army draft Environmental Impact Statement

Nancy, I understand you are putting together STATE comments to the ARMY. I've attached my comments to the BAX/CACTF development in Delta. These comments to the Army are due December 20th.

Public Access and Recreation 08
New mitigation measures have been proposed to address this issue. Please see Section 4.3.8.2, *Mitigation* for additional information regarding this comment.

Public Access and Recreation 09
Recreational Access Permits (RAPs) are available at the Fort Greely Visitor Center, located at the Front Gate. This facility is accessible to the general public Monday through Friday from 6 a.m. to 8 p.m. In addition, RAPs can be obtained from either Fort Wainwright or Fort Richardson as the RAP is applicable to all three military installations.

Fronty Parker
ADF&G Sport Fish Division
Delta Junction, AK 99737
(907) ***895* 4632**
frontygarker@fishgame.state.ak.us

If the final decision were to accept alternative 4 (North Texas Range) then ADF&G would discontinue stocking 14 recreational fishing lakes along

Meadows Road. These lakes represent 30% of all lakes stocked by ADF&G in the Upper Tanana River drainage. Pubic access to these lakes must be provided for ADF&G to continue stocking fish. The development of North Texas Study Area expansion and configuration of the facility footprint would exclude public from the lakes for most or all of the year. In the EIS under 4.3.8.2.5 it states these lakes would be permanently closed to outdoor recreation. It would be unfortunate to discontinue these lakes because they are in close proximity to Fort Greely and Delta Junction and are exceptional fishing opportunities. There are no publicly acceptable alternatives to replace these lakes.

Public Access and Recreation 10
New mitigation measures have been proposed to address this issue. Please see Section 4.3.8.2, *Mitigation* for additional information regarding this comment.

These lakes are important recreational opportunities especially to Army, Missile Defense, and construction workers. Because of the increased construction and expansion of the Army's mission, these lakes are absorbing increased demand for recreational fishing. These fishing opportunities are close to military installations and prevent expansion into other already heavily used wild stock and stocked fisheries in the area.

Public Access and Recreation 11
Text has been amended to address this conflict. Please see Section 4.3.8.1.2, *Impacts Common to All Alternatives.*

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES
OFFICE OF PROJECT MANAGEMENT AND PERMITTING
ALASKA COASTAL MANAGEMENT PROGRAM

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November 23, 2004

Directorate of Public Works
730 Quartermaster Road
Fort Richardson, AK 99505-6500
Attn. APVR-RPW-GS (Kevin Gardner)

Re: **ACMP REVIEW NOT REQUIRED**
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

Dear Mr. Gardner:

The Office of Project Management & Permitting (OPMP) has reviewed the Coastal Project Questionnaire and other pertinent information regarding the above referenced project. The location of your proposed project; Donnelly Training Area East, approximately 100 miles southeast of Fairbanks within the Tanana River Valley, is not within the coastal zone boundaries of Alaska. Therefore, a State review for consistency with the Alaska Coastal Management Program (ACMP) is not required.

Water Resources 03
Thank you. Noted.

If any of the proposed activities are relocated to Fort Richardson, one of the alternative sites the U.S. Army Alaska considered and eliminated in its site

evaluation, a consistency review may be required. Portions of Fort Richardson are within the Coastal Zone.

Nothing in this letter may be construed as excusing you from compliance with other statutes, ordinances, or regulations that may affect any proposed work.

Thank you for your cooperation with the ACMP.

Sincerely,

Jim Renkert
Project Review Coordinator

"Develop, Conserve, and Enhance Natural Resources for Present and Future Alaskans."

Enclosure

CC :

Robert McLean, DNR/OHMP
Wayne Dolezal, DFG
Kerry Walsh, DNRMLW
Fran Roche, DEC
Stefanie Ludwig, DNRfSHPO
Christy A. Everett, COE Regulatory Branch

DEPARTMENT OF THE ARMY
U.S. ARMY YUMA PROVING GROUND
COLD REGIONS TEST CENTER
P O BOX 35068
FT. WAINWRIGHT, AK 99703-0068

Received
20 Dec04

CSTE-DTC-YP-CR-CO

16 December 2004

MEMORANDUM FOR Commander, U.S. Army Garrison Alaska, (APVR-GC), 724 Postal Service h o p 6000, Ft. Richardson, AK 99505-6000

SUBJECT: Cold Regions Test Center (CRTC) comments to the Battle Area Complex Environmental Impact Statement (EIS)

1. The Cold Regions Test Center (CRTC), a subordinate element of the Army Test and Evaluation Command (ATEC) has reviewed the *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, Combat Training Facility,* dated October 2004. Overall, we feel that the document provides an excellent review of the impacts associated with the construction of the BAX/CACTF facility. Nonetheless, there are areas of the document that we feel need to be expanded upon or corrected to fully reflect the environmental consequences of the undertaking.

The following comments are provided in regard to specific impacts from the proposed project:

a. Fire Management. One of the most controversial aspects of the project is its impact on fire management. We feel the document lacks a full discussion of impacts to fire management should the No Action Alternative be

Fire Management 04
Additional information has been added to Section 4.2.4.2.2, *Impacts Attributed to Alternative 1 (No Action).*

implemented. Likely management practices at each of the three other alternative sites should be discussed as part of the No-Action Alternative. For example, Eddy Drop Zone is located in a full fire-suppression area. Should the no-action alternative be implemented, fires will continue to be immediately extinguished at this site. Due to funding constraints, USAG-AK and the Bureau of Land Management will not likely invest in wildfire protection measures such as timber thinning, firebreaks, or controlled burns. As a result, fuels from overgrowth will continue to accumulate to dangerous levels. The risk of an ignition source from recreational users, military training, and lightening would remain constant or increase. Without adequate forest management, we believe that the fire risk will grow greater every year until a catastrophic fire occurs, similar to the one in 1999.

In regard to fire management, we noted several other minor issues that should be clarified. CRTC has monitored winds on Texas Range for decades. CRTC data, which is available upon request, indicates that wind speeds on Texas Range are much greater than stated in the document (Section 3.2.3.4.3). The document notes peak wind speeds of 30-40 mph whereas our data shows frequent gusts up to 60-75 mph. We feel these greater wind-speeds significantly raise the fire risk at Texas Range when using flares or tracer rounds.

Fire Management 05
Additional information has been added to Section 3.2.3.4, *Fuels Management*.

We feel the discussion of fire management in the cumulative impacts section needs to be expanded. Both CRTC and Missile Defense have constructed sizeable projects to the South of Fort Greely. These developments have resulted in the construction of numerous new roads and fence lines which effectively serve as firebreaks. Furthermore, expansion at Fort Greely has resulted in additional staffing for the fire department and emergency response personnel as well as the procurement of new equipment. The Fort Greely fire department, through an inter-service support agreement with USAG-AK, would be called upon to protect structures at the BAX/CACTF should a fire

Cumulative Impacts 02
Additional information has been added to Section 4.3.11, *Cumulative Impacts*.

be started. We feel that this expansion of protective services would help to contain a fire, preventing a catastrophic incident such as occurred in 1999.

.b. CRTC Infrastructure and Mission The CRTC has six primary mission impact concerns with situating the proposed BAX and CACTF on North Texas Range. We feel that current usage of Texas Range by CRTC should be detailed in the document. Furthermore, the negative impacts on our operations in regard to the North Texas Range alternative should also be presented.

Cold Regions Test Center 01
Additional information has been added to Section 2.4.3.3, *North Texas Range Alternative*. A new section addressing CRTC activities has been added. Please see new information in Section 3.3.10.7, *Military Testing Facilities*.

Issue #l. The BAX would block Meadows Road, the only practical access road to Texas Range.

Problem: CRTC requires unrestrained access to it facilities and primary use ranges on Texas and Washington Range. The Texas Maintenance facility is used on a daily basis and testing is performed on Texas and Washington Ranges in excess of 100 days a year. Including test site preparation, these ranges are in use 150 - 200 days a year. Windy Ridge Road is not a viable option due to safety (CRTC rolled a Stryker there in 2003), frequent blockages from drifting snow, distance, prohibition of driving tracked vehicles on the Richardson Highway, and the need to cross private property to reach the road.

Location 01
Please see newly added information in Section 4.3.10, *Infrastructure*.

Mitigation: The Texas BAX option would have to include a bypass road on the backside of the facility to support both use of the BAX and CRTC's movement to Texas and Washington Ranges. Any such road must be capable of handling routine traffic, the movement of heavy armored vehicles, and untested experimental vehicles. As such, it should have a grade of 3% or less, support a speed limit of 35mph, and go completely through the BAX to the Texas Maintenance Facility. Fiber optic and copper cable between Bolio Lake and Texas Range would also have to be rerouted, as it is not buried deep

Mitigation 02
Please see newly added information in Section 4.3.10, *Infrastructure*.

enough to protect it from 105rnm and 120mm cannon fire. The environmental consequences of building this road and relocating utilities (i.e. filling of wetlands, removal of vegetation, and impacts to soils/geology) must be evaluated.

It is CRTC's understanding that the cost of this road was NOT included in the initial cost estimate. The cost of this road and the movement of fiber and copper communications cable must be estimated and added to the proposal.

Mitigation 03
Please see newly added information in Section 4.3.10, *Infrastructure*.

Issue #2. The BAX Safety Danger Zone, as currently depicted for the Texas Range option, will skirt facilities at Texas and Mississippi Ranges.

Cold Regions Test Center 02
Please see newly added information in Section 4.3.10, *Infrastructure*.

Problem: Weapons fired outside of the left range fan could impact CRTC Texas facilities. The Texas facility in particular is in the direct line of sight from either lane as currently depicted on the USARAK overlay. Weapons fired outside of the range fans could directly impact on the Texas facility. A similar problem exists for the USARAK UAV site and CRTC's Mississippi Range facility just outside the right range fan. The photos in figures 1.1, 1.2, and 1.3 show the visibility of these facilities from various points in the proposed firing area.

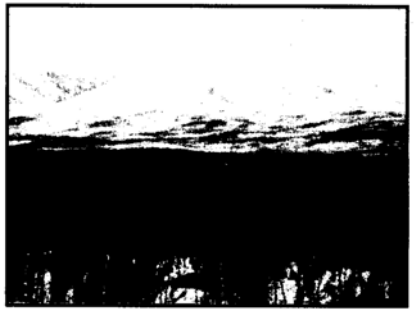

Fig 1.1 Photo from Grid 552811 near Big Lake.

This photo is from a point on the northern side of the proposed BAX location on Texas looking southwest across the range. The light in the center of the photo is Texas Maintenance Facility clearly visible just outside of the proposed range fan.

Fig 1.2 Photo from Grid 554810 oriented north.

The building in the center of the photo is the UAV facility visible just outside the proposed range fan. The Mississippi facility is in the tree line on the ridge behind the UAV facility. Both facilities are clearly within the line of sight of weaponry shooting on the range.

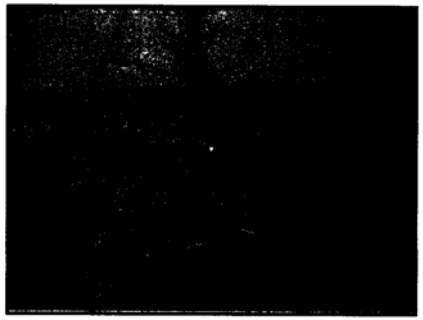

Fig 1.3 Photo from Grid 552804.

The light in the center of the photo is Texas Maintenance Facility; clearly visible just outside of the proposed range fan. It should be noted that the Texas Maintenance Facility is visible from almost every location along the ridge running SW to NE through the proposed BAX (grids 544797 to 557802).

Mitigation: While berms could be built around these facilities, the problem

Cold Regions Test Center 03
Please see newly added information in Section 4.3.10,

would still remain how to get to these facilities when units are firing. While technically out of the proposed surface danger zone (SDZ), all approaches to the Texas Maintenance Facility are also within the line of sight of firing units on the range. The facility could be moved, but this represents a significant cost, and site selection may be limited. A suitable location outside of the BAX SDZ and SDZs for various testing on Washington and Texas Ranges is not readily apparent.

Infrastructure.

Texas Maintenance Facility provides CRTC over 9,500 sq ft of maintenance space and 2,000 sq feet of office space with fiber optic connections, security fencing, motor pool parking, and vehicle plug-ins. While there is currently power running south of the Texas Maintenance Facility, it is insufficient for the requirements of the facility itself. Thus moving the facility will require extending increased power to the new location. A significant variable cost also exists in soil preparation to construct a durable pad on which to construct buildings and ground capable of holding heavy armored vehicles. Texas was originally chosen due to soil considerations.

The Mississippi Facility would have to be moved as well. It consists of a security-fenced compound with three buildings. These buildings house CRTCs Meteorology (MET) team, MET equipment, and Information Management Office (IMO) with its associated equipment. CRTC does not favor moving this facility. There are years of MET data collected from this site. CRTC's weather models, based on this data, are used to predict weather in the Texas microcosm. Movement of the MET site will degrade the usefulness of historical data in modeling because any new MET data, from a different location, will not be directly comparable. This may sound like a minor point, but consider that at the time of this writing (November 9,2004) the 8 a.m. temperature in Delta Junction was +IF. The temperature at Mississippi Range was -30F. Predicting weather in the Texas Range vicinity is a science dependant on localized data.

Cold Regions Test Center 04
Please see newly added information in Section 4.3.10, *Infrastructure*.

Cold Regions Test Center 05
Thank you for your comment.

The significant cost of rebuilding these facilities with security fencing, electrical power, fiber optic communications and leveled, compacted motor pool facilities has not been addressed in the Texas Range option. The environmental consequences of moving these facilities must also be evaluated.

Cold Regions Test Center 06
Please see newly added information in Section 4.3.10, *Infrastructure*.

Issue #3. The range fan from the BAX would close CRTC's indirect fire observation points.

Cold Regions Test Center 07
Please see newly added information in Section 4.3.10, *Infrastructure*.

Mitigation: There is no easy mitigation for this. We can still use Ops 3, 4, 5, 11 and 12. This simply limits CRTC's flexibility in conducting indirect fire testing. Of particular concern is the ability to execute triangulation from available OPs. A new OP south of OP 12 may be required along with a new road to get to such an OP.

Issue #4. The proposed siting of the CACTF on Texas Range would block CRTC firing from its missile launch site (Texas Condo).

Mitigation: A new facility (firing pad, control building and communications) would have to be sited and constructed to replace the lost facility. Unfortunately the Texas Condo is ideally situated on a bluff to observe firing from the pad below. OP 12 is likely the best site to obtain this same firing and over watch capability. Such a move, however, would involve significant cost to build a road to make it possible to over watch firing from OP 12. Again, the environmental consequences of moving this facility must be evaluated.

It should be noted that CRTC does not favor any plan involving moving these facilities. Moving facilities farther south serves to compress the area in which CRTC conducts system testing. Moving the Texas Condo farther south also limits CRTC's ability to test developmental missile and rocket systems with wide experimental surface danger zones. If USARAK chooses this site for the

BAX and CACTF, it is CRTCs contention that the test center should gain control over Texas Range (exclusive of the BAX and CACTF) and Washington Range to ensure that continued loss of test capability is kept in check. It should also be noted that any required new construction of CRTC facilities should be completed prior to the loss of existing facilities due to construction, or first use of the BAX and CACTF.

Issue #5. CRTC has tested systems, such as HIMARS, that required a surface danger zone so sufficiently wide that it blocked the area in which the proposed BAX will be located.

Problem: During such test firings CRTC has had to temporarily vacate the Texas and Mississippi facilities, and has at times had to vacate the Bolio Complex. While these firings required only temporary range shut downs, CRTC's requirement to fire at a specified temperature vs. a specified time make scheduling these shots nearly impossible.

Mitigation: There is no easy remediation for this. The occurrence of such shut downs is infrequent but definite. USARAK will simply have to accept that testing may interfere more with training on the BAX located at Texas than on

Eddy or Donnelly. Similarly, white light from CRTC testing on Texas Range may hamper night vision use of units operating on the BAX or CACTF.

Issue #6. The BAX will occupy ground currently used for mobility trials and Reliability, Availability, and Maintainability (RAM) testing.

Mitigation. We can clearly use other areas for mobility and RAM testing. CRTC would likely conduct vehicle and equipment testing in other areas of DTA such as Buffalo Drop Zone or the 33-Mile Loop area. The BAX would simply further limit mobility options. Some improvements to the Eddy or

Donnelly trail network would likely be needed for the future use of mobility testing. In addition, while vehicles are being tested, these areas would be closed to the public. Evaluation of the environmental impacts of relocating these test activities is needed. The cost of this is indefinite, but potentially high.

b. Wildlife, Fish and Game. Cumulative impacts to bison associated with the SMDC test bed and the CRTC test track should be considered. The Delta bison herd has been progressively moved southward as a result of fencing and increased human interaction. The Texas option would eliminate or move existing food plots, result in increased human activity around the herd, and likely result in accidental collisions between military vehicles and bison. We ask that a more detailed analysis of the cumulative impacts to bison be considered should Texas be selected as the preferred alternative. Additional mitigation measures to protect the bison herd must be proposed to include development of new food plots in areas away from military training.

Cumulative Impacts 03
Please see Section 4.3.11, *Cumulative Impacts* and Sections 3.2.6 and 4.2.6, *Wildlife and Fisheries* for updated information.

c. Noise. Historically, USAG-AK has fielded complaints from Delta Junction residents about noise coming from Oklahoma Impact Area and Texas Range during firing events. Due to the geography of the river valley, noise from firing can sometimes be heard as far away as Clearwater Lodge (on the NW side of Delta Junction) during certain cold weather conditions. We ask that more detailed historic information on noise complaints due to firing into the impact area be included in the discussion of noise impacts for the Texas alternative. In addition, we ask that an analysis that discusses the impacts of noise to those residences within the keyhole be included in regard to the Texas alternative. The channeling effects of the river basin on sound waves may well negate the dampening effect of the increased distance of Texas Range from Delta Junction. North Texas and Eddy options likely have approximately the same noise impacts to the community.

Noise Management 03
Please see additional information on peak noise impacts to areas within the “keyhole” in Section 3.2.4 and 4.2.4, *Noise*.

d. Socioeconomics. We feel that impacts to public recreation can be directly related to socioeconomic impacts. Families from Fort Wainwright, Fort Richardson, and the local Community frequently camp, sightsee, and fish on or around Twin Lakes and the other lakes within the North Texas study area. In previous years, Meadows Road and Windy Ridge Road were used by individuals giving guided wildlife tours to small groups. Should the North Texas alternative be selected, these recreation opportunities will be restricted or eliminated. We feel that opportunities for recreation on these high-quality lands help boost the local economy through gasoline, restaurant, food and equipment sales. The affect on tourism by military dependents, retirees, and the general public should be evaluated in more detail in regard to each of the three study sites and the no-impact alternative.

e. Subsistence. Berry-picking, plant gathering, and mushroom gathering are common activities in all three of the study areas. Opportunities for berry-picking are greatest in those areas with the least over-story vegetation (i.e. scrub areas). Donnelly and Texas Range, in general, offer better berry-picking opportunities than Eddy. Construction at these locations would impact these activities most severely. Though not significantly used by native Alaskan populations, these activities are popular and important to Delta Junction and Fort Greely residents.

f. Transportation Infrastructure. In regard to the road system and driver safety, a more complete discussion of the cumulative impacts of this project in relation to other large projects in the community is needed. This discussion should touch on the impacts on the transportation infrastructure associated with construction of the SMDC test-bed, Pogo Mine, the likely extension of the Railroad, and the Gas Pipeline. We feel that growth in the Delta Junction Community, as a whole will result in increased transportation options within the community –an overall ***positive*** impact greatly benefiting local residents and businesses. Currently, AK-DOT is working to realign the Jarvis

Socioeconomics 03

The North Texas Range has been redrawn and currently does not encompass any stockable lakes. However, training may impact public use depending on how training area restrictions are operationalized. If the entire Meadows Road is closed during training this will preclude public access to popular stocked fishing lakes. It is expected that several new gates will be installed to minimize access restrictions during training periods. The Transformation EIS (2004a) valued recreational sport fishing in the Donnelly Training Area at $3.75 million annually. This represents the value of lost recreational fishing if training resulted in a 100% restriction. However, if public access were overly restricted by USARAK, as determined by Alaska Dept. of Fish & Game, then fish currently stocked into these lakes would be placed in other accessible lakes in the region mitigating much of any impacts from increased training at DTA. Similarly, other recreational activities in the Donnelly Training Area could be impacted depending on the scope and extent of public access restrictions.

The recreational value of bison viewing is not presently known as no data exist. Anecdotal evidence suggests it is largely coincidental to view bison in the area. Currently there are no commercial operators offering tours for viewing bison which challenges the economic significance of this activity.
The current management plan for bison in the Donnelly Training Area provides protections for the “traditional range” of bison and other game animals. Impacts on bison calving, grazing and migration have been extensively considered in light of this plan. While the economic significance of the bison hunt in the Delta Junction area is small in relation to the moose harvest on military lands and the region, it still accounts for significant hunting effort. Currently bison migrate from their summer grounds on the Delta River flood plain to the Delta agricultural area from late August to early September. Some bison depredation occurs annually in the area however no estimate of the loss is available. It is speculated that training activities in the North Texas range may cause bison to migrate earlier in the summer and thus arrive in the agricultural area before the harvest of crops has started. This event could result in significantly greater crop losses. Based on 2003 harvest data the value of cultivated acreage in the Delta agricultural area was approximately $3 million. Training activities will be scheduled when possible to mitigate the impact on bison. The recreational value of bison viewing is not presently known, as no data exist.

Creek Bridge and possibly add passing lanes to the Richardson Highway between Delta Junction and Fort Wainwright, increasing capacity and safety of the highway. The presence of Stryker training at Fort Greely provides a significant incentive to the Alaska Railroad to extend their rail system to Fort Greely. Increasing numbers of military personnel in the Fort Greely area has resulted in the initiation of military transport flights from Fort Greely. There has also been discussion of beginning commercial flights from the airfield, providing a direct air route to Anchorage for the public.

2. In summary, we feel that locating the BAX/CACTF at North Texas Range will result in unacceptable environmental and mission impacts to CRTC. We fully support construction of the BAX/CACTF and wish to offer our assistance wherever possible in this endeavor. We feel this project is absolutely necessary to the training of Alaska based soldiers.

3. Thank-you for considering these comments in your analysis. Should you have any questions on these comments or any other aspect of CRTC's operations within Donnelly Training Area, please contact Mr. Michael Nuckols, Environmental and Safety Specialist, at (907) 873-1245 mike.nuckols@crtc.army.mil or LTC George Bond at (907) 353-4215 george-bond@us.army.mil.

GEORGE W. BOND
LTC, AR
Commanding

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

Currently there are no commercial operators offering tours for viewing bison that challenges the economic significance of this activity.

Cumulative Impacts 04
Please see Section 4.3.11, *Cumulative Impacts* for updated information.

-----Original Message-----
From: joannes [mailto:joanne-singer@dnr.state.ak.us]
Sent: Friday, December 10, 2004 11 :45 AM
To: kevin.gardner@ richardson.army.mil
Subject: Comments on location of Donnelly Training Area Range Project
Importance: High

Attached are comments written up by Chris Maisch, Northern Regional Forester from the Division of Forestry to address wildland fire risks associated with the Donnelly Training Area. These comments were submitted to the Army several years ago (not certain of the date) and we wish to submit our suggestions again.

The comments and observations in the attached document do not address a preference for a training area location. Rather, we propose that these actions and procedures be implemented to safeguard against wildfire risks.

Thank you.

Range Expansion Projects
Donnelly Training Area, Alaska
Observations and Suggestions From February 27th Meeting
John "Chris" Maisch, Division of Forestry

Public Relations:

- Develop a web site that shows daily Fire Weather Index (FWI) and training occurrence. This would be a place to keep the public up to date on what's happening during the fire season on the range.

Fire Management 06
An Alaska Fire Service (AFS) website shows daily FWI for Fort Greely. New weather stations installed in 2005 at DTA East will provide information to calculate localized FWI for range areas located near North Texas Range and Eddy Drop Zone. USARTRAK (automated check-in phone system) provides information on range closures as they are known. At a minimum, USARTRAK is updated (if needed) every Friday at DTA.

- At your public meetings, drop the acronyms and speak at a laypersons level.

Other 27
Your comment was taken into consideration.

- Consider having a "third party" calculate the FWI, maybe the Alaska Fire Service (AFS).

Fire Management 07
The FWI is calculated by the Fort Wainwright Fire Department Fire Chief, who provides the information to USARAK Range Control.

- Review the range "wavier" process. Perhaps the base commander should make the decision with the AFS Fire Management Officer. Either would have full veto rights in the process.

Fire Management 08
USARAK Range Control submits a waiver with AFS consultation for approval to the Range Commander. The AFS Fire Management Officer provides consultation on waivers, but does not have approval authority. USARAK takes into account AFS opinion during the decision making process. In addition, the Garrison Commander is informed of all waiver requests and has the ability to provide stricter guidance, if desired.

- Use local Type II crews in fuel treatment projects.

Fire Management 09
Thank you for your comment. AFS personnel have been used for fuel treatment projects on USARAK lands. Typically, mechanical methods and local contractors are used for fuels management.

- Develop and fully implement an aggressive fire prevention program that stresses fuel management and works with surrounding landowners to accomplish similar objective on their lands. Consider funding these projects or offering a cost share to the private landowners.

Fire Management 10
The Jarvis North Fire Mitigation Project (started in 2003 and ongoing), new weather stations (installed in 2005) and fuel assessments conducted by AFS in 2002 used to develop burn plans for North Texas Range and Eddy Drop Zone area all contribute to the existing fuels management program at USARAK. See Section 3.2.3, *Fire Management* for additional information.

Operational Considerations:

- Develop a "Staffing and Action Guide" for the manpower and equipment you will need on site at the different FWI levels. This should be customized to the different alternatives presented in the Environmental Assessment (EA), since access issues and fuel types will play a role in selecting the types of equipment that will be appropriate for each range. On days that waivers are approved, you should have higher levels of staffing for any given FWI.

Fire Management 11
A pre-attack plan is currently under development by AFS for DTA East.

- Develop corresponding costs for higher levels of staffing per the Staffing and Action Guide and pass these costs on to the range users. If a unit

Fire Management 12
Currently, fire management costs are not passed on to the using units. However, this method is used at other military installations.

trains on a FWI "High" day, it should cost them more. By pre-determining these costs, unit commanders can factor these numbers into their training budgets.

- Consider issues with ordnance. Indirect fire fighting methods may be favored over direct tactics. Keeping this in mind, have pre-designated "dip" sites for a medium helicopter and during training exercises have a helicopter on site.

Fire Management 13
Only non-duded munitions will be used at the BAX and CACTF under the proposed action. The proposed North Texas Range Surface Danger Zone would fall within an existing impact area, which most likely contains unexploded ordnance. This area would require indirect fire fighting techniques. However, the proposed Surface Danger Zone falls within a Limited fire suppression category.

- Construct a heliport with fueling capabilities and a building on site. I would put an extra medium on contract for 2-3 months each summer and base it at the Donnelly Training Area. This is one of your best resources for catching a fire when it's small and negates many of the ordnance issues that ground based direct attack could create. Mop-up could still be an issue.

Fire Management 14
Thank you for your comment. The closest refueling facility is located at Fort Greely's Allen Army Airfield.

- Develop a "worst case scenario" plan. Assume a fire escapes and heads toward Delta, what's the plan? Develop an evacuation plan and work out coordination issues and chain of command.

Fire Management 15
A pre-attack plan is currently under development by AFS for DTA East.

- Have an Incident Command Post (ICP) hard-wired and ready to go if you need a Type I1 or Type I team. Consider a fire cache on site in conjunction with this. Communication is a key element at this stage.

Fire Management 16
Existing facilities are available through the Fort Greely Fire Department. During "high" and "extreme" fire danger ratings, Soldiers are required to carry fire-fighting equipment.

- Work out jurisdiction issues between AFS, DOF and base fire departments. Conduct "table top" exercises with all these entities based on the worst-case scenario.

Fire Management 17
A pre-attack plan is currently under development by AFS for DTA East.

- Develop a cooperative agreement, mutual aid agreement or whatever you want to call it, so that your basic fire fighter staffing levels can be rapidly augmented with additional staff per your Staffing and Action Guide.

Fire Management 18
A pre-attack plan is currently under development by AFS for DTA East.

- Utilize a combination of fuel breaks, shaded fuel breaks and vegetation type conversions to manage vegetation and fire risk at each range. Different plans would need developed for each of your alternatives.

Fire Management 19
The Jarvis North Fire Mitigation Project, prescribed burns schedule for the Bolio Lakes area near North Texas Range and thinning at the Collective Training Range, both located near North Texas Range, serve to manage vegetation and fire risk at DTA East.

- Consider a "fire watch" when training is conducted at certain FWI levels. Detection flights a few hours after training is completed may be appropriate.

- Aggressive detection, rapid initial attack and assets on-site should go a long way toward preventing an escaped fire.

Fire Management 20
Under USARAK's existing Range Regulation 350-2, units are required to observe any device using pyrotechnics until it is completely burned out to ensure no fire is ignited during training.

Fire Management 21
Your comment was taken into consideration.

GMW Comments to BAX/CTAF Nov 2004 EIS

Number	Page	Para	Comment/ Rational
			General Comment (s)
1	-	-	Ft. Greely Fire Department (FGFD) is not addressed. Suggested Change: • USARAK should commit to executing an agreement covering the response of the FGFD to any range fire. The agreement should also contain a cost reimbursement mechanism so that the FGFD can recoup expenses associated with defending the resized installation from a range fire originating in the Donnelly Training Area (DTA). • The FGFD urban – wild land equipment (two pickup truck type vehicles complete with basic issue items) should be replaced by USARAK. Rational: • The FGFD is the only full time, professional fire department, for almost 80 miles. In the event of a major fire in the DTA, the public's expectations regarding the FGFD may not be met; USARAK's desires in this regard should be well documented and periodically updated. Conversely the FGFD is charged with defending the installation and will incur substantial over time and other related expenses if the uncontrolled fires of 1987 and 1999 are ever repeated. A mechanism for reimbursing these special expenses must be established. • The FGFD equipment to fight fires on the urban-wild land boundary has reached the end of its service life and needs to be replaced especially in light of the increased fire risk posed by the BAX Range.
			Specific Comment(s)
2	3-21	3.2.3.2 & Fig 3.h	The area designated for Critical Fire Management is not large enough. Suggested Change: The area designated for Critical Fire Management should extend in a straight line from Jarvis Creek, along the southern boundary of the resized Ft Greely, to the Delta River. Rational: The missile field (comprising approximately 1000 acres) is located south of the cantonment area, in an area not currently designated for Critical Fire Management. The missile field is a critical component of the national defense

1

Fire Management 22
Additional information has been added to Section 3.2.3.2, *Fire Policy*.

Fire Management 23
An agreement between USARAK and SMDC is currently under development.

Fire Management 24
Fire management options have been developed on an interagency, landscape-scale, and offer standardized policies and procedures for all agencies. Changes to these options are outside the scope of this document.

GMW Comments to BAX/CTAF Nov 2004 EIS

			infrastructure as such; the site is manned by operators and security forces 24/7. Furthermore, unlike any other structure or group of structures in the study area, the security and program protection requirements preclude evacuation of the missile field site. Extending the designation to Jarvis Creek and the Delta River will secure the flanks of the site by anchoring them to strong natural fire breaks.
3	4-28	4.2.3.3.2	Mitigation measures are considered inadequate. Suggested Change: USARAK should to commit to fuel (black spruce trees and grass) reduction program in a 1km wide swath running in a straight line from Jarvis Creek to the Delta River along the southern boundary of the resized Ft. Greely in the out years (minus the keyhole area). Rational: Under both the Eddy DZ and Donnelly DZ options for the BAX range, there are thousands of acres of impact area directly south of the Missile Field and west of Jarvis Creek. A range fire in this area could be blown by the prevailing south wind, out of control into the Missile Field or Cantonment Area. The area was burned in 1999, and has been regenerating ever since; therefore stands of black spruce and grass should be removed in the out years before a critical fuel load can develop. Anchoring the ends of this fuel reduction belt at Jarvis Creek and the Delta River will greatly limit the chances of the fire turning the flanks of this protective belt. The keyhole area since it is private property must wait until there is a fire.

Mitigation 04
Your comment was taken into consideration. Please see additional information in Section 4.2.3, *Fire Management*.

REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
3437 AIRPORT WAY
SUITE 206 WASHINGTON PLAZA
FAIRBANKS, ALASKA 99709-4777

January 7, 2005

Regulatory Branch
North Section

Directorate of Public Works
Attention: APVP-RPW-EV
Mr. Kevin Gardener
724 Postal Service Loop #6500
Fort Richardson, Alaska 99505-6500

Dear Mr. Gardner,

The U.S. Army Corps of Engineers, Regulatory Branch has completed our review of U.S. Army Alaska (USARAK) Draft Environmental Impact Statement that discusses the proposed construction of a Battle Area Complex and Combined Arm Collective Training Facility within U.S. Army Training Lands in Alaska. We ar forwarding our comments at this time. Thank you for this opportunity and we look forward to continuing our positive working relationship with USARAK.

Please contact me at (907) 474-2166, or by mail at the letterhead address, if you have questions.

Sincerely,

Forrest E. McDaniel
Project Manager

Comments on Draft Environmental Impact Statement (DEIS) for Construction of a Battle Area Complex (BAX) and Combined Arms Collective Training Facility (CACTF) within U.S. Army Training Lands in Alaska

by

Fairbanks Field Office
Regulatory Branch
U.S. Army Corps of Engineers

January 2005

The following comments will address both general concerns with the DEIS and specific CWA Section 404 permit related issues, which the Corps deems necessary for inclusion into the Final EIS, if supplemental environmental analysis prior to a permit decision is to be avoided.

Comments of a General Nature

1) Tense should be changed to present-future in the document, i.e., "the BAX would," and not "the BAX will". By stating what "will" happen, the document has a pre-decisional tone, which goes against NEPA.

Other 28
Please see changes throughout document.

2) What is the scope of analysis for the primary and secondary resource issues?

Purpose and Need 02
Please refer to the training, range design and range siting criteria within Section 1.2, *Purpose and Need for Action* and a discussion of resources analyzed within this EIS in Section 1.3, *Scope of Environmental Analysis*.

3) The baseline condition (which includes the transformation) is not adequately described.

Other 29
Chapter 3, *Affected Environment* describes the existing conditions at DTA East, providing a basis for identifying and evaluating the environmental effects of the proposed action. A discussion of transformation is included as part of the No Action Alternative within Chapter 4, *Environmental Consequences*.

4) The No Action alternative must get fair and equal treatment under NEPA.
   a) The No Action alternative is not adequately described.
   b) Only those impacts associated with implementing the No Action alternative should be included in the effects analysis for or this alternative.

Proposed Action and Alternatives 24
A discussion of transformation is included as part of the No Action Alternative within Chapter 4, *Environmental Consequences*. Please see additional information in Section 2.4.3.5, *No Action Alternative*.

5) There is poor distinction between Chapters 3 and 4. Data that describes the current, existing environment (including the transformation) should be included in Chapter 3. Chapter 4 should be devoted to mitigation and those direct, indirect, and cumulative effects that would occur under each of the proposed alternatives for the BAX/CACTF development, including the No Action.

Other 30
Chapter 3, *Affected Environment* describes the existing conditions at DTA East, providing a basis for identifying and evaluating the environmental effects of the proposed action. A discussion of transformation is included as part of the No Action Alternative within Chapter 4, *Environmental Consequences*.

6) There is a lack of quantitative analysis throughout Chapters 3 and 4. When data are available such that quantitative analyses can be conducted, such analyses need to be performed and their results presented in order to meet the disclosure requirements of NEPA.

Other 31
Additional quantitative information has been added to Chapters 3 and 4.

7) There is a lack of cumulative effects analysis in the EIS. Cumulative effects need to be analyzed, presented, and discussed for each alternative addressing primary and secondary resource issues.

Cumulative Impacts 05
Additional information was added to Section 4.3.11, *Cumulative Impacts*.

8) Data sources should be cited on all Tables and Figures.

Other 32
See changes throughout document.

Comments on Specific Sections of the DElS

EXECUTIVE SUMMARY:

PURPOSE AND NEED

This section should be much briefer: just a simple, clear, concise, statement of purpose and need. Although much of the verbiage in this section is designed to illustrate need, there is a lot of extraneous detail.

Purpose and Need 03
Your comment was taken into consideration. Please see updated information within the Executive Summary.

ENVIRONMENTAL CONSEQUENCES

The DElS contains a matrix of the alternatives, comparing and contrasting environmental impacts for the specific resource categories. In many instances, little or no data is presented to substantiate the description of impacts, even when the Bibliography indicates the availability of this data.

Qualitative terms used in the EIS matrix to compare and contrast environmental impacts are defined as:

Other 33
Please refer to Chapters 3 and 4 for additional information on the description of impacts.

None- No measurable adverse impacts is expected to occur.
Minor-Adverse impacts are expected to occur; impacts would be Measurable and may have a sight impact to resources.

Moderate- Impacts are expected to occur; impacts would be obvious and would have measurable effects on resources.
Severe- Adverse impacts are expected to occur; impacts would be obvious and would have serious consequences to resources.
Beneficial- Only beneficial impacts are expected to occur.

The intro to the table (Executive Summery, page x) says that the categories "none," "minor," and "moderate" are considered insignificant, and the category "severe" is significant. Yet footnote #1 on Table ES.a states the categories "none" and "minor" are insignificant and the categories "moderate" and "severe" are significant. Which is correct?

1) "Water Quality" should be broken out as a sub-issue under Surface Water and included in Table ES.a. "Water Quality" should also be given a specific header in Chapters 3 and 4, later in the document.
2) Similarly, Human Health and Safetv should be subdivided into "Traffic," "Hazardous Materials" (including contaminants), and "UXOs" in Table ES.a., as was done in Chapters 3 and 4.
3) Fire Management:
    a) The following sentence is confusing "The fire potential impact at Eddy Drop Zone study area is considered moderate to severe...and is still considered significant given the severity of potential harm.. .." Is the environmental effect of Fire Management at Eddy Drop Zone severe or not? If severe, go ahead and state this in table ES.a. It is okay to have a "severe" category (a significant effect) if this is true and accurate disclosure. Also, descriptors of impacts need to be consistent and have some definition, so they are meaningful to the reader.

Other 34
Unless otherwise noted, the general impact categories “none”, “minor”, and “moderate” are considered insignificant impacts and the category of “severe” is considered significant as explained at the beginning of each resource section within Chapter 4. Categories are further defined under each resource issue.

Water Resources 04
Please see changes to Table 2.o, *Summary of Environmental Consequences by Alternative*, and Sections 3.2.2.4, *Surface Water Quality* and 4.2.2, *Surface Water*. Individual sub-issues were identified.

Human Health and Safety 10
Please see changes to Table 2.o, *Summary of Environmental Consequences by Alternative*. Individual sub-issues were identified.

Fire Management 25
Please see changes to Table 2.o, *Summary of Environmental Consequences by Alternative*. Please refer to changes in the “Description of Methodology” sections throughout Chapter 4.

The EIS is inconsistent and vague in its use of these descriptors.

b) In Section 3.2.3.1.2.1 of Chapter 3, you write that the Eddy Drop Zone has a high hazard assessment, versus "moderate" at Donnelly and North Texas. This suggests that Eddy Drop Zone should have a "severe" categorization in Table ES.a.

Fire Management 26
Please refer to changes with the "Description of Methodology" sections throughout Chapter 4.

4) Human Health and Safety: The BAX/CACTF would support training for up to 1,000 personnel and 170 combat vehicles per training event, and up to 242 companies over a 242-day period each year. Given this information, it seems unlikely that impacts to human health and safety due to convoy use of highways would be the same as for the No Action alternative. This section either needs further explanation as to why the No Action and all alternatives have a "moderate" category, or the category for No Action should be revised.

Human Health and Safety 11
The number of Soldiers within USARAK will change under the proposed action. The frequency of convoys will increase between FWA and FRA and DTA, but the number of Soldiers and associated equipment in each convoy will not increase as compared to those analyzed for the Transformation of USARAK (USARAK 2004a). See additional information in Sections 3.2.5 and 4.2.5, Human Health and Safety.

5) Wildlife and Fisheries:

a) Use of the combined range would result in the presence of significant numbers of troops over a 242-day period each year, and a portion of the range would be closed 365-days each year. Given this, it seems unlikely that effects on terrestrial wildlife would be the same as for the No Action alternative. This needs better explanation or the categories assigned by alternative need to be revised.

Wildlife and Fisheries 22
Please see changes to Table 2.o, *Summary of Environmental Consequences by Alternative*, and additional information within Sections 3.2.6 and 4.2.6, *Wildlife and Fisheries*

b) Although much habitat would be converted to early successional stages, the presence of troops over 242-days might preclude active use of this new habitat; there are species that do not favor early successional habitat. This section mentions fish and mammals, especially moose and bison, but what of migratory birds? Further, are there any calving areas, den sites, or other such critical features in any of the proposed project areas?

Wildlife and Fisheries 23
Please see Sections 3.2.6 and 4.2.6, *Wildlife and Fisheries* for additional information and analysis based on habitat type.

6) Groundwater: This section states that USARAK would continue to use the DTA as an all-seasons maneuver area. How would the number of vehicles/troops/drops differ from the use of a combined BAX/CACTF? How much use is each of the three proposed sites getting now, and is this expected to change regardless of the construction/use of the BAX/CACTF? This comment harkens back to the fact that the No Action use of each of the three sites is not adequately described.

Proposed Action and Alternatives 25
Please see Section 2.2, *Description of the Proposed Action* and Table 2.o, *Summary of Environmental Consequences by Alternative*, for additional information.

7) Threatened or Endangered Species and Species of Concern: What Species of Concern were considered? How would the increased number of troops/vehicles/drops due to the combined BAX/CACTF not cause an increase in impacts to Species of Concern? The No Action alternative is not described adequately enough in the Executive Summary to provide a means of comparison to the proposed alternatives.

Threatened and Endangered Species 01
Please see Table 2.o, *Summary of Environmental Consequences by Alternative*, and Chapter 4.3.5, *Threatened or Endangered Species ad Species of Special Concern* for a discussion of impact levels to specific species of concern.

8) Subsistence: This section addresses subsistence across the DTA, but are there any key subsistence use areas within any of the proposed BAX/CACTF sites?

Subsistence 05
Studies have not been conducted to identify and evaluate traditional subsistence practices on lands managed by USARAK. Studies have been proposed as mitigation (see Section 4.2.7.2, *Mitigation*).

9) Public Access and Recreation: Why does the No Action alternative have a "moderate" category? And why would the impacts continue to be moderate (except for the "impact on specific, localized areas" being severe)? This section does not adequately explain your categorization.

Public Access and Recreation 12
Please see Table 2.o, *Summary of Environmental Consequences by Alternative*, and Chapter 4.3.8, *Public Access and Recreation* for a discussion of impact levels to specific portions of the proposed range complex.

CHAPTER 1 :

1.11 OTHER ENVIRONMENTAL ANALYSIS RELEVANT TO THE ACTION

The analysis in the current EIS should integrate itself back to the large-scale management plans listed here. For example, if the "Integrated Natural Resource Management Plan 2002-2006" addressed

Other 35
Please see new information within Sections 2.2.1.2.7 and 2.2.2.2.7, *Institutional Matters* addressing this topic.

management and tolerances of select resource issues, such as wildlife, the current EIS should specifically state that the impacts expected from each proposed action would or would not meet these tolerances and/or management decisions. Similarly, if USARAK Regulation 200- 3: Natural Resources - Land, Forest, and Wildlife Management, provides specific management policies and tolerances for resource issues, the discussion for each appropriate resource issue should state that the proposed actions would or would not comply with these regulations.

CHAPTER 2:

2.2.3 ALTERNATIVES CARRIED FORWARD IN THIS ANALYSIS

"A no action alternative has also been carried forward... and sets the baseline for the measurement and comparison of impacts." This sentence is factual, but there is no description of the No Action alternative. Under NEPA, all alternatives, including the No Action, must be given equal weight/consideration. Further, a detailed description of the No Action alternative is critical so that the decisionmaker has a basis of comparison for resource issues and impacts. A table that compares the No Action and three Action alternatives by activity: e.g., number of troops, number of drops, number of vehicles, duration of use, area of impact, etc., could be extremely useful. Transformation to Stryker Brigade Combat Team (SBCT) is independent of this EIS. Therefore impacts of the No Action alternative should be only those due to not constructing the BAX/CACTF, not those due to transformation. The impacts of the transformation should be included in the description of the affected environment (baseline) information.

Proposed Action and Alternatives 26
Please see additions to Section 2.4.3.5, *No Action Alternative* and Table 2.o, *Summary of Environmental Consequences by Alternative.*

CHAPTER 3:

3.1.1 ORGANIZATION
In the paragraph that follows Table 3.1.l b, you include some verbiage on

the analysis areas used (i.e, "These larger study areas are necessary for the detailed evaluation of environmental effects, as they extend beyond the immediate range sites."), but you don't fully define these areas. Why weren't the Surface Danger Zones included in the effects analysis? Were the study areas the extent of the analysis area for all Primary and Secondary Issues of Concern? Were the same analysis areas used for direct, indirect, and cumulative effects analyses? The analysis areas could be described up front under Organization, or they can be detailed in the discussion of each Issue of Concern.

Proposed Action and Alternatives 27
Please see Section 2.4, *Location Alternatives Carried Forward for Analysis* for a description of study areas.

3.2.1 SOIL RESOURCES

1) This EIS should be updated with the latest soil data from NRCS - draft 2004 soil survey data are available.
2) Nothing in the Affected Environment write-up explains a "moderate impact" categorization for the No Action alternative. What is currently happening on each of the three proposed sites that will continue to impact soil resources even if the No Action alternative is selected? The Affected Environment section should provide the baseline upon which an action alternative, with its associated impacts, would be enacted.

Soil Resources 03
The NRCS completed soil survey fieldwork in 2004. Data compilation from the survey is on-going. Results of the study are expected in 2006.

Soil Resources 04
Soil impacts associated with the no action alternative, or status quo, are discussed in 4.2.1, *Soil Resources*.

3.2.1.2 PERMAFROST

Conducting detailed geotechnical exploration programs are expensive. But by conducting such a program in only one of the three proposed sites, the EIS feels a bit pre-decisional. An EIS that is pre-decisional does not meet the requirements of NEPA. If this is the only resource issue in which there is disparity in available data, you are probably okay. However, if there are numerous resource issues in which data is available for the Eddy Drop Zone and not the other two sites, you will need to collect additional data prior to drafting the Final EIS.

Soil Resources 05
All available geotechnical exploration data have been included in the draft EIS.

TABLE 3.2.3.C CANADIAN FOREST SERVICE FUEL TYPES AND FIGURE 3.G FUEL TYPES

The "Spruce-Lichen Woodland" category described in the table is not depicted in the figure.

Soil Resources 06
The spruce-lichen woodland category has been deleted from the table, as it is not found on DTA East.

3.2.5.4 UNEXPLODED ORDNANCE AND RANGE SAFETY

You state in the third paragraph, "Access to impact areas will be restricted…" First, this statement, along with the remainder of the paragraph, sounds like mitigation for the action alternatives. If it is mitigation, the statement does not belong in Chapter 3, but rather in Chapter 4. Second, it should be rephrased to "Access to impact areas would be restricted.. .." so as not to sound predecisional.

Soil Resources 07
This sentence has been changed and moved to Chapter 4.

3.2.6 WILDLIFE AND FISHERIES

3.2.6.1 WILDLIFE

Although you have described species presence, relative abundance, and, distribution in qualitative terms, there is little analysis that pertains to wildlife. What type(s) of habitat(s) are important to each of species? Calculate the acres of habitat present in each of the study areas and present results in a table. For example, Townsend's Warbler (a State Species of Concern) is largely restricted to mature white spruce forests (Spindler and Kessel 1980). How many acres of such habitat occur at Eddy Drop Zone, Donnelly Drop Zone, and North Texas Range? How many acres of such habitat occur in the DTA East?

Wildlife and Fisheries 24
Please see additional quantitative habitat information in Sections 3.2.6 and 4.2.6, *Wildlife and Fisheries*.

3.2.6.1.2 AVIAN SPECIES

There is no mention of the Migratory Bird Treaty Act. How does USARAK conform to the terms of this Act?

Wildlife and Fisheries 25
Additional information has been added regarding the Migratory

Bird Treaty Act. Please see Section 3.2.6.1.2, *Avian Species* and Section 4.2.6, *Wildlife and Fisheries*.

3.2.6.1.4 SPECIAL STATUS FAUNA

When detailing wildlife resources at each of the three proposed BAX/CACTF sites, you mention USARAK "Special Interest Management Areas" under the header Special Status Fauna (sections 3.2.6.1.5.4, 3.2.6.1.6.4, and 3.2.6.1.7.4). However, there is no description or definition of USARAK "Special Interest Management Areas" in the introductory chapter of Special Status Fauna (section 3.2.6.1.4). Under what management plan were these areas created? What do they do or mean for wildlife?

Wildlife and Fisheries 26
Please see additional information in Section 3.2.6.1.4, *Special Interest Management Areas*.

3.3.5.2. SPECIES OF CONCERN

Just above Table 3.3.5.a you write, "Habitat and management concerns are listed in Table 3.3.5.a. See section 3.2.6 *Wildlife and Fisheries* for additional detail for each alternative study area." Unfortunately, there are no additional details for these species in section 3.2.6. Section 3.3.5.2 is the first time in the EIS that the State Species of Concern List and the specific species on that list are mentioned. Certainly, there is a lack of analysis relative to these species (see comments on Section 3.2.6.1 Wildlife).

Wildlife and Fisheries 27
Thank you for your comments. Please see additional quantitative habitat information in Sections 3.2.6 and 4.2.6, *Wildlife and Fisheries* and Sections 3.3.5 and 4.3.5, *Threatened or Endangered Species and Species of Concern*.

3.3.3 WETLANDS

3.3.3.1 WETLAND TYPES

You indicate that a wetland survey was conducted at Eddy Drop Zone and not the other two proposed sites. Although it is important that you present the results of the Eddy Drop Zone survey, you should also present the results of an NWI analysis on Eddy Drop Zone. By so doing, the decision-maker is better able to compare the three sites, and better able to understand how our knowledge of wetlands changes between

Wetlands 02
Please see updated information throughout Sections 3.3.3 and 4.3.3, *Wetlands*.

using just the NWI data and having site-specific survey data.

3.3.3.2.1 WETLAND MANAGEMENT

This entire section sounds like mitigation, rather than a description of the affected environment, e.g., "wetlands will be considered," "wetland delineations will be completed," "USARAK will submit an appropriate wetland application." Move such discussions to Chapter 4 or to a separate chapter/section on mitigation. Change the tense to "would" throughout.

Wetlands 03
Please see Section 3.3.3.2.1, *Wetland Types by Study Area* for updated information.

3.3.4 VEGETATION

3.3.4.1 VEGETATIVE COVER

1) There is no mention of the electronic data you have on vegetative cover types. Is it Landsat data? What year? What degree of resolution? Be sure to cite these data in this section and on each of the figures depicting vegetation.
2) Although you describe vegetation qualitatively, there is no sense of relative abundance or importance for vegetative communities. Further, there is no quantitative analysis. Because you have electronic vegetation data (as presented in Figures 3.w, 3.x, and 3.y), you should conduct an analysis of the vegetation types within each study area. How many acres of white spruce forest are in each study area? How many acres of scrub? Etc. Present results in a table. Be prepared to conduct a similar analysis for impacts in Chapter 4 (i.e, how many acres of each habitat type would be lost (irreversible) or modified (irretrievable) at each proposed site).

Vegetation 01
Vegetation data is based on methodology developed by Jorgenson et. al. 2001, including field surveys and aerial photo interpretation. This information has been added to Section 3.3.4, *Vegetation*.

Vegetation 02
Please see Section 4.3.4, *Vegetation* for additional information on the amount and type of potential vegetation disturbance as a result of the proposed action. Species habitat tables in Section 4.2.6, *Wildlife and Fisheries* also provides information on the amount of vegetation disturbance as compared to the total amount at DTA.

3.3.4.3. ECOLOGICAL LAND CLASSIFICATION

Under the header for each of the three proposed project sites, you include a qualitative statement about the relative area of wetland. What is the data source for such a statement? Considering no wetland survey has been conducted on either the Donnelly Drop Zone or the North Texas Range, is it possible that the older, less precise NWI data is skewing your perception of how wet these areas are? Statements need to be backed up with literature citations and/or data.

Vegetation 03
Please see Section 3.3.3, *Wetlands* for specific information about new wetland surveys at each alternative site location.

3.3.4.4 FOREST MANAGEMENT

1) The entire 6th and 7th paragraphs appear to belong in Chapter 4 under potential impacts or mitigation. They do not describe the existing environment, but are couched in terms of implementing one of the action alternatives. Be sure to change "will" to "would."

Vegetation 04
Please see Section 4.3.4, *Vegetation* for updated information.

2) In the detailed Forest Management descriptions for Eddy Drop Zone and Donnelly Drop Zone, you state that forest management "is" high priority at the actual drop zones, because they "must be" maintained free of trees. Why? What is currently happening at these sites that require them to be free of trees? What steps have been taken to free these sites of trees? Do these statements stem from a pre-decision to implement one of the action alternatives?

Vegetation 05
Forest management is required to protect, maintain, and enhance the military training environment including continued removal of trees to maintain open and safe areas for drop zones. These drop zones were originally cleared in the early 1950s for military training. This information has been added to Section 3.3.4, *Vegetation*.

3.3.5 THREATENED AND ENDANGERED SPECIES AND SPECIES OF CONCERNS

3.3.5.1 THREATENED AND ENDANGERED SPECIES
The last sentence on page 3-77 is a conclusion drawn on the impacts of the alternatives. This statement belongs in Chapter 4.

Threatened and Endangered Species 02
Please see Section 3.3.5, *Threatened or Endangered Species and Species of Concern*. This statement has been moved to 4.3.5, *Threatened or Endangered Species and Species of Concern*.

3.3.8 PUBLIC ACCESS AND RECREATION

3.3.8.2 USE AREAS

"The SDZ associated with the BAX and CACTF will be closed when the range complex is operational." This sentence sounds pre-decisional. Change tense ("will" becomes "would") and move sentence to Chapter 4.

Public Access and Recreation 13
This statement has been deleted.

3.3.8.9, 3.3.8.10, 3.3.8.11 RESOURCE USE

Are there any data for resource use within the proposed SDZs?

Public Access and Recreation 14
Clarifying information has been added to Sections 3.3.8.9, 3.3.8.10, and 3.3.8.11.

3.3.1 0 INFRASTRUCTURE

3.3.1 0.6.2.3 CONDITION

So what are the conditions assigned to the DTA and the three proposed action sites? If these data are not available, you may want to consider deleting this section. It doesn't seem to make a point.

Infrastructure 01
For additional information on land condition, as an index of ecological integrity, please refer to Volume 2, Appendix F of the *Final Environmental Impact Statement for Transformation of U.S. Army Alaska*, 2004. This condition refers to a range location's ability to support training.

3.3.1 1 PAST, PRESENT, AND REASONABLY FORSEEABLE ACTIONS

Pogo mine is under development now, though not yet actively mined.

You should probably rephrase the last bullet statement to bring it into current status.

Cumulative Impacts 06
Please see corrected text within Section 4.3.11, *Cumulative Effects Analysis*.

CHAPTER 4:

Any data that describes the current, existing environment, including data that illustrates existing impacts, should be included in Chapter 3, not Chapter 4. Chapter 4 should be devoted to those direct, indirect, and

Other 36
Chapter 3, *Affected Environment* describes the existing conditions at DTA East, providing a basis for identifying and evaluating the

cumulative effects that would occur under each of the proposed alternatives, including the No Action.

environmental effects of the proposed action. A discussion of ongoing activities is included as part of the No Action Alternative within Chapter 4, *Environmental Consequences*.

For example, existing soil contaminants might persist under the No Action alternative, and soil contamination due to already authorized activities could increase under the No Action alternative. But the No Action alternative would not create the soil contamination that is already present. Chapter 3 should describe the present baseline. You have a lot of this information imbedded in Chapter 4, and it needs to be moved.

4.2.1 SOIL RESOURCES

Possible soils impacts include compaction, erosion, rutting, reduce of soil strength, restricted water movement, contamination, and disturbance to vegetation and subsequent melting of permafrost. This section should be reorganized to include a header (or a paragraph) devoted specifically to a cumulative effects discussion. There are vague references to cumulative effects imbedded throughout this resource issue, but nothing specific. Similarly, there should be a cumulative effects header (or paragraph) for each of the primary and secondary resource issues. The cumulative effects analysis areas also need to be defined at the start of each of these discussions.

Cumulative Impacts 07
Cumulative impacts are discussed separately in Section 4.3.11.

Soil Resources (table 4.4.a). .....Impacts on Permafrost (4.2.1.2.3), (4), (5)
No Action- **Moderate**
Eddy Drop Zone- **Moderate..** ..... **Minor**
Donnelly Drop Zone- **Moderate..** ..... **Moderate**
North Texas Range- **Moderate..** ..... **.Moderate**

1) Soil impacts very greatly depending on site. Soil compaction, from increased use of existing trails, as well as creation of new trails

and structures, would lead to greater overland flow and reduce groundwater percolation. The DEIS does not address the impacts to the wetland areas outside of the construction footprint, but still within the boundaries of the CACTF and BAX range. DEIS does not explain why No Action has a moderate effect.

"(2-5) Although Stryker vehicles would likely use the hardened roads and trails, vehicles and Soldiers would have the ability to maneuver on all acreage within the BAX and CACTF. Within the BAX range, approximately 30 vehicles could potentially be maneuvering simultaneously during a combat training event."

"(2.2.3.1) Approximately 2,600 acres within the construction footprint of the Eddy Drop Zone's BAX and CACTF sites could be cleared of vegetation."

"(2.2.3.2) Approximately 3,500 acres within the construction footprint of the Donnelly Drop Zone's BAX and CACTF sites could be cleared of vegetation."

"(2.2.3.2) Approximately 2,200 acres within the construction footprint of the North Texas Range's BAX and CACTF sites could be cleared of vegetation."

Wetlands 04
Please see additional discussion of wetland impacts at each alternative site in Section 4.3.3.1, *Comparison of Alternatives*. Please see Section 4.2.1.1.2, *Impacts Common to All Alternatives* for a discussion of "moderate" impacts to soil resources.

2) There does not appear to be sufficient information on the location of permafrost soils in the Donnelly Drop Zone and the North Texas Range. In order to mitigate impacts, permafrost areas need to be identified. Although no recent soil studies had been completed at Donnelly Drop Zone and the North Texas Range, the DEIS states that these two sites would have greater permafrost impacts than at Eddy Drop Zone. The basis for this conclusion should be identified.

"(4.2.1.2.3) The Eddy Drop Zone study area has less permafrost compared to the Donnelly Drop Zone and the North Texas Range study areas. The overall impacts of the construction and use of the BAX and CACFT on permafrost at Eddy Drop Zone study area is considered minor."

"(4.2.1.2.4) No recent detailed geotechnical explorations are

Soil Resources 08
See additional information in Sections 4.2.1, *Soil Resources*.

available (for Donnelly Drop Zone). Additional drilling is planned to confirm initial interpretation."
"(4.2.1.2.5) No recent detailed geotechnical explorations are available (for North Texas Range). Additional drilling is planned to confirm initial interpretation

4.2.1 SOIL RESOURCES

Data from the soil samples collected at various locations in the DTA should be summarized in Chapter 3, not Chapter 4.

Soil Resources 09
A summary of data from soil samples is presented in Chapter 3.

4.2.1.2.1 METHODOLOGY

Define the terms "temporary" and "noticeable." Temporary in what context or timeline? How is "noticeable" different from "temporary"? How do you categorize permanent/persistent but not noticeable impacts?

Other 37
See new definitions throughout Chapter 4.

4.2.1.2.2. ALTERNATIVE 1

a) "Temporary, direct impacts would result on DTA soils from mission-essential construction projects..." What types of construction projects? If buildings or roads were constructed, how temporary would they be? This sentence requires additional explanation.

Proposed Action and Alternatives 28
See Section 4.2.1.2.2, *Proposed Mitigations* for additional information on mission essential construction projects.

b) What <u>are</u> the current levels of impacts from SUSV and wheeled support vehicles? What are the numbers of munitions expended? There is no basis of comparison. These activities and impacts are not described in Chapter 3 or in the description of the No Action alternative earlier in the document (if they were, please cross-reference the appropriate section).

Proposed Action and Alternatives 29
See Table 2.o, *Summary of Environmental Consequences by Alternative* for a comparison of current and proposed level of impacts. The No Action Alternative discussion references USARAK's Final EIS for Transformation, which includes a discussion of vehicles and munitions expenditures.

4.2.1.2.3, 4.2.1.2.4, 4.1.2.5 ALTERNATIVES 2, 3, and 4

"The overall impact of construction and use of the BAX and CACTF on soils at Eddy Drop Zone study area is considered moderate." From the previous section, 4.2.1.2.2, we know that impacts on soils from the transformation project were determined to be moderate, and thus soil impacts under the No Action alternative would be moderate. What we have here are cumulative impacts, yet we don't have a clear sense of whether the BAX and CACTF would greatly or marginally increase impacts from the transformation, because the impacts due to the transformation are not adequately described. The clearing of 2,600 acres could be a huge impact or a tiny one relative to what is already going on at Eddy Drop Zone (or the other proposed sites). This EIS fails to tell us what is currently going on, and what will go on even if the BAX and CACTF are not constructed. For example, how many acres are cleared (i.e., 80 acres cleared at North Texas Range) and will be cleared under the transformation? If this information is described elsewhere in the EIS, please cross-reference. A table comparing quantitative data between the No Action and Action alternatives would be very helpful (and belongs in Chapter 2, section 2.2).

Cumulative Impacts 08
Table 2.o, *Summary of Environmental Consequences by Alternative.* Cumulative impacts are discussed in Section 4.3.11.

Proposed Action and Alternatives 30
Please see Table 2.o, *Summary of Environmental Consequences by Alternative* for a comparison of current and proposed levels of impacts.

PAGE 4-1 1, FINAL PARAGRAPH

"The following mitigation measures are essential in addressing impacts associated with the proposed action." Change this sentence to: "The following mitigation measures are essential in addressing impacts associated with each of the proposed action alternatives." (This sentence is probably a carry-over from the EA. Be sure to edit document carefully to remove references to only a single proposed action.)

Other 38
Thank you for your comment, but this change was not made.

4.2.2 SURFACE WATER

Forrest McDaniel of our office spoke with Mr. Charlie Collins (CRREL) and Mr. Harlan Legare (AK District) in reference to conflicting information between the DEIS and Mr. Legare's report regarding compliance with

Executive Order 11988. There appears to be disagreement in their definition of the 100-year floodplain of Jarvis Creek. Mr. Collins stated that both the BAX and CACTF sites (Eddy Drop Zone) are located entirely within the 100-year floodplain of Jarvis Creek. Mr. Legare stated in his report that a portion of both projects are in the 100-year floodplain.

Flooding/Floodplains 01
Additional hydrological field investigations and modeling have been completed for Jarvis Creek within the boundaries of DTA East. Please see Sections 3.2.2 and 4.2.2, *Surface Water*.

The DEIS Surface Water and Floodplains at Eddy Drop Zone Study Area map *(Appendix, Figure 3.c)* shows the entire CACTF site and half the BAX site within the Jarvis Creek Floodplain. Without defining the 100-year floodplain of Jarvis Creek, both Mr. Collins and Mr. Legare, along with the findings in the DEIS, have concluded that construction of the BAX and the CACTF sites would not have a measurable impact on flooding outside the project area.

Surface Water- Floodplain *(table 4.4.a)*
No Action- **Minor**
Eddy Drop Zone- **Minor**
Donnelly Drop Zone- **Minor**
North Texas Range- **Minor**

1) Eddy Drop Zone FEMA 100-year floodplain maps are referred to in the DEIS, but are not included in the appendices.
   "(3.2.2.1.1)the proposed locations of the BAX and CACTF are within the mapped 100-year floodplain of Jarvis Creek, but outside of the active gravel-braided channel. The floodplain is subject to overbank flooding and aufeis overflows. The extent of such flooding up to the 100-year recurrence interval was estimated and mapped in 1978.. .and updated in 1982 by the Federal Emergency Management Agency."

Flooding/Floodplains 02
References used in preparation of the EIS are part of the administrative record and are not included as appendices to the document. They are listed in Chapter 6, *Bibliography*.

2) Construction in both the Eddy Drop Zone and the Donnelly Drop Zone will impact the 100-year floodplain of Jarvis Creek. No floodplain analysis has been done for Donnelly Drop Zone.

Flooding/Floodplains 03
Additional hydrological field investigations and modeling have been completed for Jarvis Creek within the boundaries of DTA

"(4.2.2.2.C3) construction projects under the proposed action include structures, targetry, and roads at the BAX and structures and roads at the CACTF. Approximately 1,800 acres lie within the recognized Jarvis Creek floodplain."
"(3.2.2.1.th2e) proposed range facilities (Donnelly Drop Zone) would be located along Jarvis Creek within its floodplain."

East. Please see Sections 3.2.2 and 4.2.2, *Surface Water*.

3) We do not have sufficient information on the increased flood risk to the city of Delta Junction as a result of the possible clearing of several thousand acres of wetlands/floodplain upstream.
"(2.2.3.1A)p proximately 2,600 acres within the construction footprint of the Eddy Drop Zone's BAX and CACTF sites could be cleared of vegetation. (Wetlands comprise 17% of BAX and 13% of CACTF using NWI mapping)"
"(2.2.3.A2)p proximately 3,500 acres within the construction footprint of the Donnelly Drop Zone's BAX and CACTF sites could be cleared of vegetation. (Wetlands comprise 30% of BAX and CACTF sites using NWI mapping)"

Flooding/Floodplains 04
Additional hydrological field investigations and modeling have been completed for Jarvis Creek within the boundaries of DTA East. Please see Sections 3.2.2 and 4.2.2, *Surface Water*.

4) No evaluation of practicable alternatives outside the floodplain on either of the alternate sites in accordance with Executive Order 11 988 has been made. It is not clear what data would be used to make the determination when the Final EIS is issued.
"(4.2.2.2.3) & (4.2.2.2.A4)d etermination must be made that there are no practicable alternatives to constructing the project within a floodplain, and that the adverse impacts of doing so would be mitigated. Such a determination would be provided when the Final EIS is issued."

Flooding/Floodplains 05
Additional information regarding this comment is addressed in Sections 3.2.2 and 4.2.2, *Surface Water*.

5) Information on construction of storm water runoff structures is inadequate.
"(4.2.1.2.3) erosion impacts are temporary, as buildings, pavement, lawn, or reseeded native vegetation would cover once barren land, and adequate storm water runoff structures would convey water from the site."

Flooding/Floodplains 06
A storm water pollution prevention plan is required prior to construction and will be prepared to address site-specific storm water management needs.

6) No information on how construction within natural drainage patterns (high water channels) will prevent ponding and diversion, or will be avoided or mitigated.

"(3.2.2.1) several high water channels or drainage ways cross the BAX site in the Eddy Drop Zone."

Flooding/Floodplains 07
A storm water pollution prevention plan is required prior to construction and will be prepared to address site-specific storm water management needs. See additional mitigation measures in Section 4.2.2.2.

4.2.6 WILDLIFE AND FISHERIES

4.2.6.2.1 DESCRIPTION OF METHODOLOGY

You state that impacts of human disturbance on wildlife have focused on behavioral effects and that population-level responses require qualitative evaluation. First, you need to provide citations for these sweeping statements. Second, disturbance can be quantified by calculating the effects of certain disturbances (e.g., land clearing) on important habitats and geographic areas for certain life stages (e.g., calving areas, migratory stop over areas, foraging habitat, or nesting habitats).

Wildlife and Fisheries 28
Please see Section 4.2.6, *Wildlife and Fisheries* for additional information.

4.3.8 PUBLIC ACCESS AND RECREATION

Public Access and Recreation *(table 4.4.a)*
No Action- **Moderate**

Eddy Drop Zone- **Moderate** (Severe if closed 365-days)
Donnelly Drop Zone- **Moderate** (Severe if closed 365-days)
North Texas Range- **Moderate** (Severe if closed 365-days)

Total days each year that the range will be closed to the public would be a minimum of the equivalent of 8 months (242 days). It is not clear how many days, or the time of year, the training range would be open to the public. DEIS does not explain why No Action has a moderate effect.

*"(2-3)*Army training standards require that a training range is available at least 242-dayslyear. Weather, operational

Public Access and Recreation 15
Certain portions of the range complex would be closed for longer periods than others. The required number of days the range must be available is 106. Actual estimated number of days the range complex must be available is 238. Although access to the areas surrounding the BAX and CACTF will be restricted during training events, access will continue to be permitted when training events are not

constraints, and range maintenance needs require additional days. The public will be restricted from the BAX, CACTF and associated SDZ sites during this time."

occurring. This information has been added to 4.3.8, *Public Access and Recreation*.

Public Access and Recreation 16
Please refer to discussion in Section 4.3.8.1.1, *Description of Methodology* for clarification regarding a "moderate" impact.

Comments Concerning Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act

Compliance with NEPA is required to support Federal decisions related to the issuance of the Department of the Army (DA) permits for discharge of dredged and/or fill material into waters of the United States pursuant to Section 404 of the Clean Water Act (CWA) and the construction of any structure in or affecting any navigable water of the United States. There are no Section 10 waters in the project area.

EVALUATION OF WETLAND IMPACTS:

A review of the DEIS document by this office indicates that the evaluation of wetland impacts section is inadequate for DA Permit review. Additional information/field work is still needed for a meaningful comparison of wetlands and impacts between Eddy Drop Zone, Donnelly Drop Zone, and North Texas Range alternatives.

1) There is conflicting information on the wetland delineations available for the site. Lichvar, R. 1998 (Wetland Delineation at Fort Greelv, Alaska. U.S. Armv Engineering and Research Development Center Cold Regional Research and Engineering Laboratory: Hanover, New Hampshire) is cited when discussing the total wetland acreage in the Donnelly Training Area, but does not appear to have been used in the analyses. A Preliminary Wetland Delineation was completed by ABR, Inc. in July 2004 for the Eddy Drop Zone site, as mentioned in the DEIS, but it was not used in the analyses either. The Fairbanks Regulatory Field Office has not verified the wetland delineation at this time. The DEIS references ABR's wetland report and implies that the wetland delineation

Wetlands 05
Please see Sections 3.3.3 and 4.3.3, *Wetlands* for additional information and changes to text.

map (Appendix, Figure 3.t) is from that report. This is not correct, the wetland information shown in Appendix, Figure 3.t appears to be from the 1999 USFWS National Wetland Inventory (NWI) Map, and the DEIS actually states that the NWI conducted in the late 1980's provides the basis for wetlands analyses.

> "(3.3.3.1) approximately 68% (431,940 acres) of DTA is wetland (Lichvar, 1998), with palustrine, riverine and lacustrine types included."
>
> "(3.3.3.1) Existing wetlands data consist of polygons mapped for the National Wetlands Inventory (NWI) conducted by USFWS in the late 1980s.. ..This inventory provides the basis for wetlands analyses in this document."
>
> "(3.3.3.1.1) A wetland survey was conducted within the BAX and CACTF study area (ABR, Inc. 2004) (Appendix, Figure 3.t)."

2) The functional assessment referenced in the DEIS is not complete. USARAK classifies wetlands as "high-function" and "low-function". It states that high-function wetlands include riverine, permanent emergent, semi- permanent emergent areas, riparian areas, and other sensitive wildlife habitats that lie in wetland areas. It does not state how the classifications were developed, or what "functions1' are being reviewed for a given area. Wetlands reviewed under this functional assessment were obtained from the NWI mapping.

Wetlands 06
Please see Sections 3.3.3 and 4.3.3, *Wetlands* for additional information and changes to text.

3) The DEIS does not define what is regulated under Section 404 of the Clean Water Act: Section 404 of the Clean Water Act requires that a DA permit be obtained for the placement or discharge of dredged and/or fill material into **all waters** of the United States, including wetlands, prior to conducting the work (33 U.S.C. 1344).

Wetlands 07
Please see Sections 3.3.3 and 4.3.3, *Wetlands* for additional information and changes to text.

3) Wetland definition not included in DEIS; The CE (Federal Register 1982) and the EPA (Federal Register 1980) jointly define wetlands regulated under the Clean Water Act as: Those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil

Wetlands 08
Please see Sections 3.3.3 and 4.3.3, *Wetlands* for additional information and changes to text.

conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

5) Consideration should be given to the relationship between the CE technical guideline for wetlands and the classification system developed for the Fish and Wildlife Service (FWS), U.S. Department of the Interior, by Cowardin et al. (1 979). The FWS classification system was developed as a basis for identifying, classifying, and mapping wetlands, other special aquatic sites, and deepwater aquatic habitats. Using this classification system, the National Wetland Inventory (NWI) is mapping the wetlands, other special aquatic sites, and deepwater aquatic habitats of the United States. The technical guideline for wetlands under the 1987 Corps of *Engineers Wetlands Delineation Manual* includes most, but not all, wetlands identified in the FWS system. The difference is due to two principal factors:

a. The FWS system includes all categories of special aquatic sites identified in the EPA Section 404 b. (I) guidelines. All other special aquatic sites are clearly within the purview of Section 404; thus, special methods for their delineation are unnecessary.

b. The FWS system requires that a positive indicator of wetlands be present for any one of the three parameters, while the technical guideline for wetlands requires that a positive wetland indicator be present for each parameter (vegetation, soils, and hydrology), except in limited instances identified in the manual.

6) Wetland delineations such as the one performed by ABR on Eddy Drop Zone have not been performed on Donnelly Drop Zone, and North Texas Range sites. A valid alternatives analysis requires equivalent information for each alternative.

7) The existing DA permit POA-1999-989-4, is mentioned several times in the DEIS. It should be understood that activities **not approved** under this permit include wetland impacts from Stryker vehicles, new construction, special training requiring access to wetlands or streams, facilities maintenance, planned firebreak construction or any activity that could discharge either dredged or fill material into streams, creeks,

Wetlands 09
Please see Sections 3.3.3 and 4.3.3, *Wetlands* for additional information and changes to text. The same classification was used for all alternative sites, so a comparison between NWI and CE technical guidelines is not necessary.

Wetlands 10
Please see Sections 3.3.3 and 4.3.3, *Wetlands* for additional information and changes to text.

wetlands, lakes, or rivers.

> *"(4.3.3.1)* Maneuver use of the BAX and CACTF will be permitted under the existing wetland permit."

8) Wetland impacts addressed in the DEIS are NWI wetlands area found within the proposed construction footprint of the training facility. The DEIS does not address the impacts to the wetland areas outside of the construction footprint, but still within the boundaries of the CACTF and BAX range.

> *"(2-5)* Although Stryker vehicles would likely use the hardened roads and trails, vehicles and Soldiers would have the ability to maneuver on **all acreage** within the BAX and CACTF. Within the BAX range, approximately 30 vehicles could potentially be maneuvering simultaneously during a combat training event."

9) There is insufficient information on the potential short and long-term effects to the aquatic environment as a result of the proposed activities, including both construction and operation of the facilities.

10) There is insufficient information on impacts to the wetlands during "staging" of military units not actually engaged in the use of the BAX and CACTF sites.

10) There is insufficient information on impacts to the wetlands from Soldiers transitioning between BAX and CACTF sites.

12) There is insufficient information on wetland impacts from existing and proposed material sites (gravel pits) and utility corridors outside BAX and CACTF. Information on material sites should include potential for contamination and required testing of material.

13) Insufficient information on avoidance and minimization of wetland impacts required under EPA 404 (b) (1) guidance.

ADDITIONAL INFORMATION NEEDED FOR SECTION 404 PERMIT REVIEW:

Wetlands 11
Please see Sections 3.3.3 and 4.3.3, *Wetlands* for additional information and changes to text.

Wetlands 12
Please see Section 2.4.3, *Description of Location Alternatives* for additional information on each site. Please see Sections 3.3.3 and 4.3.3, *Wetlands* for additional information and changes to text.

Wetlands 13
Please see Section 2.4.3, *Description of Location Alternatives* for additional information on each site. Please see Sections 3.3.3 and 4.3.3, *Wetlands* for additional information and changes to text.

Wetlands 14
Please see Section 2.4.3, *Description of Location Alternatives* for additional information on each site. Please see Sections 3.3.3 and 4.3.3, *Wetlands* for additional information and changes to text.

Wetlands 15
Please see Section 2.4.3, *Description of Location Alternatives* for additional information on each site. Please see Sections 3.3.3 and 4.3.3, *Wetlands* for additional information and changes to text.

Wetlands 16
Please see Section 2.4.3, *Description of Location Alternatives* for additional information on each site. Please see Sections 3.3.3 and 4.3.3, *Wetlands* for additional information and changes to text.

Eddy Drop Zone

1) Corrections needed to preliminary wetland delineation so approved jurisdictional determination can be made by Corps of Engineers.
2) A description (drawings, including cross-sections) of the proposed fills including location, dimensions, and depths of all fills. The drawings shall also show the placement of structures and facilities to be located on the wetland fill areas.
3) Address the wetland impacts from borrow sites (gravel pits) located onsite and offsite.
4) Address the wetland impacts from the installation of utilities.
5) FEMA 100-year floodplain mapping, or an agreement between CRREL and AK District to the floodplain boundaries of Jarvis Creek needed.
6) Address how natural drainage patterns (high water channels) will be maintained to prevent ponding, diversion, or concentrated runoff that would result in adverse impacts to adjacent wetlands.
7) Complete functional wetland assessment needed. Describe methodology used in analysis of waters of the US and address how impacts to "high-functioning" wetland will be avoided and/or minimized.

Wetlands 17
Please see Section 2.4.3, *Description of Location Alternatives* for additional information on each site. Please see Sections 3.3.3 and 4.3.3, *Wetlands* for additional information and changes to text.

Donnelly Drop Zone
1) Completed and COE approved wetland delineation for jurisdictional determination.
2) A description (drawings, including cross-sections) of the proposed fills including location, dimensions, and depths of all fills. The drawing shall also show the placement of structures and facilities to be located on the wetland fill areas.
3) A description (drawings, including cross-sections) on stream crossings at Jarvis Creek, Ober Creek, and other unnamed seasonal watercourses.
4) Complete functional wetland assessment needed. Describe methodology used in analysis of waters of the US and address how

Wetlands 18
Please see Section 2.4.3, *Description of Location Alternatives* for additional information on each site. Please see Sections 3.3.3 and 4.3.3, *Wetlands* for additional information and changes to text.

impacts to "highfunctioning" wetland will be avoided and/or minimized.
5) Address the wetland impacts from borrow sites (gravel pits) located onsite and offsite if needed.
6) Address the wetland impacts from installation of utilities.
7) FEMA 100-year floodplain mapping, or an agreement between CRREL and AK District to the floodplain boundaries of Jarvis Creek and Ober Creek.
8) Address how natural drainage patterns (high water channels) will be maintained to prevent ponding, diversion, or concentrated runoff that would result in adverse impacts to adjacent wetlands.

North Texas Range
1) Completed and COE verified wetland delineation.
2) Complete functional wetland assessment needed. Describe methodology used in analysis of waters of the US and address how impacts to "high-functioning" wetland will be avoided and/or minimized.
3) A description (drawings, including cross-sections) of the proposed fills including location, dimensions, and depths of all fills. The drawing shall also show the placement of structures and facilities to be located on the wetland fill areas.
4) Address the wetland impacts from borrow sites (gravel pits) located onsite and offsite if needed.
5) 100-year floodplain mapping, or an agreement to the location of the floodplain boundaries between CRREL and AK District
6) Address the wetland impacts from installation of utilities.
7) Address how natural drainage patterns (high water channels) will be maintained to prevent ponding, diversion, or concentrated runoff that would result in adverse impacts to adjacent wetlands.

Wetlands 19
Please see Section 2.4.3, *Description of Location Alternatives* for additional information on each site. Please see Sections 3.3.3 and 4.3.3, *Wetlands* for additional information and changes to text.

PUBLIC INTEREST REVIEW:

A review of the DEIS document by this office indicates that the Public

Interest Review is not clearly stated and all factors, which may be relevant to the proposal, not adequately addressed.

> The decision whether to issue a permit will be based on an evaluation of the probable impacts including cumulative impacts of the proposed activity and its intended use on the public interest. Evaluation of the probable impacts, which the proposed activity may have on the public interest, requires a careful weighing of all the factors that become relevant in each particular case. The benefits, which reasonably may be expected to accrue from the proposal, must be balanced against its reasonably foreseeable detriments. The decision whether to authorize a proposal, and if so, the conditions under which it will be allowed to occur, are therefore determined by the outcome of the general balancing process. That decision should reflect the national concern for both protection and utilization of important resources. All factors, which may be relevant to the proposal, must be considered including the cumulative effects thereof. Among those are conservation, economics, aesthetics, general environmental concerns, wetlands, cultural values, fish and wildlife values, flood hazards, floodplain values, land use, navigation, shore erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, considerations of property ownership, and, in general, the needs and welfare of the people. For activities involving 404 discharges, a permit will be denied if the discharge that would be authorized by such permit would not comply with the Environmental Protection Agency's 404(b) (I) guidelines. Subject to the preceding sentence and any other applicable guidelines or criteria a permit will be granted unless the District Engineer determines that it would be contrary to the public interest.

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

TAKE PRIDE IN AMERICA

ER 04/845

December 20, 2004

Headquarters, U.S. Army Garrison, Alaska
ATTN: APVR-RPW-GS (Gardner)
724 Postal Service Loop #6500
Ft. Richardson, AK 99505-6500

Dear Mr. Gardner:

The Department of the Interior has reviewed the October 2004, Draft Environmental Impact Statement for the Construction and the Operation of a Battle Area Complex and a Combined Arms Collective Training Facility within the U.S. Army Training Lands in Alaska. We have no comments to offer at this time.

Sincerely,

Pamela Bergmann
Regional Environmental Officer - Alaska

Other 39
Thank you. Noted.

-----Original Message-----
From: Brenda J Johnson [mailto:bjjohnso@ usgs.gov]
Sent: Friday, December 10, 2004 10:02 AM
To: kevin.gardner@ richardson.army.mil
Cc: James F Devine; Celso Puente; Paula J Helm; Juli B. Jaye Lunsford; Frances W Pierce; Franceska Wilde; Michalann Harthill; vijai-rai@ ios.doi.gov
Subject: Final comments for ER 04-845 U.S. Training Lands in Alaska

The U.S. Geological Survey (USGS) has reviewed the subject Draft Environmental Impact Statement (DEIS) and offers the following comments: Please let me know if you have any problems with the attachment.

(See attached file: ER-04 845.doc)

Thanks
Brenda Johnson
Office of Environmental Affairs Program
U.S. Geological Survey
423 National Center
Reston, VA 201 92
Tele (703) 648-6832
Fax (703) 648-4530

United States Department of the Interior

U.S. GEOLOGICAL SURVEY
Reston, VA 20192

TAKE PRIDE IN AMERICA

Reply Refer To:
Mail Stop 423
ER 04/845

DEC 10 2004

MEMORANDUM

To: Regional Environmental Officer
Anchorage, Alaska

From: James F. Devine
Senior Advisor for Science Applications

Subject: Review of Draft Environmental Impact Statement for the Construction and the Operation of a Battle Area Complex and Combined Arms Collective Training Facility within U.S. Army Training Lands in Alaska
(ER 041845)

As requested by the U.S. Department of the Interior, OEce of Environmental Policy and Compliance, in their correspondence of November 9,2004, the U. S. Geological Survey (USGS) has reviewed the subject Draft Environmental Impact Statement (DEIS) and offers the following comments.

SPECIFIC COMMENTS:

Page 3-30, Chapter 3 Affected Environment, Section 3.2 Primary Issues of Concern, Part 3.2.4 Noise:

The report indicates that "annoyance" is the major effect on humans of potential noise from artillery firing. The report continues that noise affects wildlife by inducing a "physiological stress response" (Janssen, 1980), but also states **(Page**

4-29, Chapter 4 Environmental Consequences, Section 4.2 Primary Issues of Concern, Part 4.2.4 Noise, Subsection 4.2.4.1 Impacts Common to All Alternatives) "each species of wildlife has unique sensitivities and responses to noise, and, without empirical data, it is impossible to extrapolate information from human annoyance."

Although the physiological effects of noise on wildlife are not well known, the USGS suggests for consideration recent research discussing effects of noise on wildlife endocrine disruption, affecting stress response. Research (Creel et al., 2002 and Seattle Department of Parks and Recreation Sand Point Magnuson Park Draft Supplemental Environmental Impact Statement or DraR Supplemental EIS, March 2003) addresses potential stress caused by snowmobile noise by monitoring fecal glucocorticoid *(GC)* levels in elk, wolves, and other mammals. These data found rises in *GC* concentrations correlated with snowmobile usage. The potential significance of this finding is that elevated *GC* levels are associated with physiologic suppression of mammalian immune systems and reproductive hormones. These results may provide insight into the potential welfare of mammals, for example, moose (Issue 7: Wildlife and Fisheries), at the project site.

Noise Management 04
Your comment was taken into consideration. However, USARAK believes the following citation is more relevant considering the proposed action. Krausman, P.R., L.K. Harris, and J. Francine. 2001. Noise Effects of Military Overflights on Sonoran Pronghorn. Final Report to the 56th FW/RMO Luke AFB, Arizona. Air Force Center for Environmental Excellence Contract F416-624-98-C-8020

Page 4-126, Chapter 4 Environmental Consequences, Section 4.5 Reasonable and Practicable Mitigation, Part 4.5.11 Vegetation:

The report identifies many existing and proposed vegetation mitigation strategies to supplement the project "ecosystem management program," yet nowhere in the report is mentioned the potential for invasive non-native plants. Westbrooks (1998) indicates that by 1994, Alaska had become host to 144 invasive non-native plants.

Vegetation 06
See Sections 3.3.4 and 4.3.4, *Vegetation* for updated information.

Weeds can become introduced by wind, animal, and traflFic/construction vectors. The establishment of these non-native plants is significant because weeds can encroach on the surrounding pristine ecological systems, are oRen difficult to eradicate, and have other costly effects. The USGS suggests that a monitoring and control plan for invasive plants be included in the project activities.

REFERENCES:

Creel, Scott, Jennifer E. Fox, Amanda Hardy, Jennifer Sands, Bob Garrott, and Rolf 0. Peterson. 2002. Snowmobile Activity and Glucocorticoid Stress Responses in Wolves and Elk, Conservation Biology 16(3): 809-8 14 http://www.montana.edu/wwwbi/staff/creel/snomoGC.pdf.

Sand Point Magnuson Park Drainage, Wetlandlhabitat Complex and Sports Fields/Court Projects Draft Supplemental Environmental Impact Statement Seattle Department of Parks and Recreation, March 2003 http://www.cityofseattle.net/parks/parkspaces/SPMP/documents/DSEIS.pdf.

Westbrooks, R. 1998. Invasive plants, changing the landscape of America: Fact book. Federal Interagency Committee for the Management of Noxious and Exotic weeds (FICMNEW). Washington D.C. 109 pp.

Thank you for the opportunity to review and comment on this DEIS.

Copy to: Office of Environmental Policy and Compliance

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

December 20, 2004

Reply To
Attn Of: ETPA-088

Ref: 04-036-DOD

Kevin Gardner
Attention: APVR-RPW-EV (Gardner)
Directorate of Public Works
724 Postal Service Loop # 6500
Fort Richardson, AK 99505-6500

Dear Mr. Gardner:

We have reviewed the draft Environmental Impact Statement (EIS) for the proposed **Construction and Operation of a Battle Area Complex (BAX) and a Combined Arms Collective Training Facility (CACTF) within U.S. Army Training Lands in Alaska** (CEQ No. 040505) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The draft EIS examines the no action alternative and three action alternatives related to the Donnely Training Area East (DTA). Alternative 1 (no action alternative) would not involve construction of the BAX and CACTF, but would include the continued transformation of a stryker brigade as analyzed in the Final Environmental Impact Statement for Transformation of U.S. Army Alaska, 2004

within the DTA. The three action alternatives are based on three different locations within the DTA for the proposed combined BAX and the CACTF training facilities.

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

Specific items are addressed in the attachment below.

We are concerned about the level of information, particularly quantitative information, provided in the document regarding alternatives, water resources, wetland impacts, and habitat. We believe this information is necessary in order to show comparisons of environmental impacts among alternatives. Moreover, we believe that additional criteria could be used to expand the range of alternatives beyond choices of location. Such alternatives have the potential to further minimize environmental impacts.

We are also concerned about the level of information regarding project time lines for construction, closure and reclamation. Because this area is frequently used as a recreational area and is a valuable resource for subsistence, reclamation and clean up are important activities to include in the final EIS and we recommend setting a clear direction for sustainable management of resources in this area.

We appreciated the opportunity to meet with you on December 8.2004 to discuss the draft EIS. It was a fruitful and informative discussion. As promised at our meeting, we have sent you an electronic version of the manual, *Design: Low Impact Development Manual* released on October 25,2004. EPA supports the low impact approach described in this manual and we were pleased to note that there is the expectation that it applies to all DOD projects. We recommend incorporating the concepts and strategies discussed in this manual into ongoing and future planning and design activities and the related environmental analyses unless current requirements provide more stringent environmental protection.

Thank you for the opportunity to review this draft EIS. Please feel free to contact Lynne McWhorter of my staff at (206) 553-0205 if you have comments or questions.

Sincerely,

Christine Reichgott, Manager
NEPA Review Unit

Enclosures

U.S. Environmental Protection Agency Detailed Comments on the Draft Environmental Impact Statement (EIS) for the Construction and Operation of a Battle Area Complex (BAX) and a Combined Collective Training Facility (CACTF') within U.S. Army Training Lands in Alaska

GENERAL COMMMENTS

Alternatives

Chapter 2 of the EIS describes a no action alternative and three action alternatives. Alternative 1 is the no action alternative and the three action alternatives are based on three alternate locations for the BAX and CACTF. Alternative 2 would be located within the Eddy Drop Zone, Alternative 3 would be located in the Donnelly Drop Zone, and Alternative 4 would be located in the North Texas Range area. Our main concerns with the alternatives are the level of information provided, ability to compare alternatives, and the criteria for the development of the range of alternatives.

Proposed Action and Alternatives 31
Please see updated information within Section 2.4, *Location Alternatives Carried Forward for Analysis* and Table 2.o, *Summary of Environmental Consequences by Alternative.*

At our meeting on December 8,2004 you explained that the no action alternative would be a partial implementation of the transformation of the 172nd Infantry Brigade to a Stryker Brigade Combat Team 2004 Final EIS and continual use of the Donnelly Training Area East (DTA) by battalions and companies, but without construction of BAX and CACTF. This is not entirely clear in the draft EIS. We recommend that the discussion of the No Action Alternative in Chapter 2 be expanded to provide a clear picture of current management. It would also be helpful to provide a background on past and current activities in the DTA in Chapter 1.

Proposed Action and Alternatives 32
Please see Section 2.4.3.5, *No Action Alternative* for updated information. A discussion of past and current activities at DTA can be found in Section 4.3.11, *Cumulative Effects Analysis*.

The EIS analyzes the three action alternatives based on three different locations. Table ES.a on page x compares all of the alternatives. Because information in this table is so limited, it is difficult to compare environmental impacts among alternatives. Originally, this led us to believe that perhaps additional criteria and an expanded range of alternatives were needed in order to show choices that minimize environmental impacts. We raised this concern at our meeting and the ensuing discussion was helpful in providing more information about various levels of impacts from the given alternatives to resources such as wetlands, air, wildlife, permafrost, recreation, and fire. We continue to believe that other criteria could be used to expand the range of alternatives, but it is clearer now that there are various degrees of impacts to resources among existing alternatives. We highly recommend providing more quantitative information and a table that more specifically lists these impacts (e.g. types of wetlands, acreage, and level of impact among alternatives). This information will be much more useful to reviewers and the decision maker who must comparatively evaluate environmental impacts.

Proposed Action and Alternatives 33
Table 2.o, *Summary of Environmental Consequences by Alternative* for an updated discussion of impact levels to specific portions of the proposed range complex for each resource.

Affected Environment
The EIS discusses current environmental conditions and various ongoing activities in the project area in Chapter 3**.** From information provided at our meeting, it is our understanding that the DTA has historically been used for training, which leads us to believe that there may be existing disturbance from

such activities. The EIS does not seem to adequately describe the current level of disturbance or where damage is most severe. We recommend adding a discussion about the level of army activities and current disturbance in the Affected Environment section. For example, the wetland section discusses the types and percentages of wetlands and provides some explanation of the Clean Water Act Section 404 permit, but the current level of disturbance to wetlands is not discussed. Also, the tables on pages 3-109 through page 3-111 provide some information of current activities in the DTA. However, it is unclear what impacts these various activities have caused and it is unclear what the current more site specific disturbance is in the DTA. While it is important to have a general description of activities, the proposed alternatives are site specific areas within the DTA, and therefore, it would be useful to have more site specific information in and around these proposed areas. It may be useful to display this information in a table format along with a figure depicting the current disturbance in the area.

Proposed Action and Alternatives 34
An updated discussion of past and current activities at DTA can be found in Section 4.3.11, *Cumulative Effects Analysis.* Impacts resulting from these activities are discussed as part of the No Action Alternative for each resource within Chapter 4, *Environmental Consequences*.

Wetlands 20
There has been little to no wetland damage within the proposed alternative range locations. Approximately 27 Clean Water Act Section 404 permits (involving approximately 290 acres of wetlands or streams) have been approved at DTA East since 1994. This information has been added to Section 3.3.3, *Wetlands*.

Proposed Action and Alternatives 35
Thank you for your comment. An updated description of the affected environment at each proposed alternative range location for each resource topic is presented throughout Chapter 3, *Affected Environment*. Additional information can be found within Section 2.4, *Location Alternatives Carried Forward for Analysis*.

Construction

On page 1-8, the EIS states that the construction period will be two arctic construction seasons. Readers outside the area will not be familiar with the term. We recommend further explanation about the duration of this season.

Other 40
A clarification was made to Section 1.2.4, *Range Siting Criteria*.

Water Resources

The EIS does not adequately describe water resources in the area and there is insufficient information regarding predicted impacts. We recommend including a table of the State Water Quality Standards and baseline data of surface water quality in the project area so that the reviewer will understand how current conditions compare with standards.

Water Resources 05
Additional hydrological field investigations and modeling have been completed for Jarvis Creek within the boundaries of DTA East. Please see Sections 3.2.2 and 4.2.2, *Surface Water*. A discussion of State of Alaska water quality standards has been added to Section 3.2.2.4, *Surface Water Quality*.

Also, on page 4-13 the EIS states that various metals such as lead, zinc, copper, and iron are used in munitionscomponents. In the Surface Water Section, the EIS discusses the pH level of soils in the area and that existing soils do not promote mobilization of these metals. However, the pH and redox potential of underwater

Water Resources 06
Please see updated information in Section 4.2.2.1.2, *Impacts Common to All Alternatives.* USARAK currently has on-going soil and water quality monitoring for its lands, in particular munitions components and their potential mobilization.

substrates may differ markedly from soils exposed to air. Because this information is not presented in the document, we are concerned about impacts to water quality and meeting water quality standards. We recommend that surface water and substrates in thearea be sampled so that mobilization of these metals to surface water can be predicted more accurately.

Wetlands

The EIS discusses the types of wetlands that exist in the project area and lists acres of impacted wetlands. First, EPA recommends avoiding impacts to high functioning wetlands. Second, we also recommend minimizing impacts to wetlands and last, compensating for any unavoidable impacts to wetlands.

Wetlands 21
Thank you for your comment. USARAK will use high function wetland location information to ensure avoidance during the design of the proposed range facilities.

The EIS states that there is a Corps of Engineers (COE) 404 permit for maneuvering in the DTA, and that maneuvering in the BAX and CACTF will be covered under this permit. Since this permit will expire in 2005, an additional wetland permit may be required. There will also be a permit needed for construction of the BAX and CACTF. It is our understanding from discussion at our meeting that consultation with the COE is currently underway. We recommend that information used in the Record of Decision, such as consultation information, permit requirements, and components of the practicability analysis be included in the Final EIS.

Wetlands 22
The U.S. Army Corps of Engineers, Alaska District, Regulatory Branch is a Cooperating Agency in the development of this EIS and the Clean Water Act, Section 404 permit application. Information contained in the Final EIS will be used to apply for a Clean Water Act, Section 404 permit.

The EIS describes three categories - green, yellow, and red - for wetland management in the project area. It is unclear what criteria are used for placing areas into one of these categories. We recommend explaining the criteria and how the category is determined for each area.

Wetlands 23
The “red”, “yellow”, and “green” categories for wetland management are based on low and high function wetlands. Please refer to Sections 3.3.3 and 4.3.3, *Wetlands* for updated information.

Soils

The EIS states that discontinuous permafrost exists in the project area and that impacts to valuable permafrost are likely to be long-term and irreversible. We understand that there is not enough data to quantify impacts or map permafrost

areas and that more information is needed in order to mitigate impacts. Therefore, we strongly support the strategy to avoid highly rich permafrost areas and avoid disturbance to the vegetative mat that can protect the permafrost layer. We also recommend developing a management plan for these areas that includes data collection so that impacts can be more adequately predicted and mitigated.

Soil Resources 10
Your comment was taken into consideration.

The 2004 Transformation of the of U.S. Army Alaska Final EIS contained information on the long-term impact to soils from construction, increased weapons training, and increased training use of Stryker vehicles in manuevers. The analysis acknowledged that while soil effects of Strykers are largely unknown, particularly in frozen soils since they have not yet been used in Alaska, significant rutting can be expected even in relatively high strength soils. Soil rutting can lead to increases in erosion, changes in surface and sub-surface water storage and runoff, and habitat impacts. Information on the potential impacts from vehicles such as the newly developed Stryker was not discussed in the current EIS. We recommend including a discussion on the types of vehicles that would be used and any known impacts as well as any information gaps that are lacking in the prediction of impacts.

Soil Resources 11
All vehicles within the Army inventory, including the Stryker, would utilize the range facilities as part of the proposed action. Additional information has been added to Section 4.2.1.1.2, *Impacts Common to All Alternatives*.

Floodplain

The EIS states that Donnely Drop Zone and Eddy Drop Zone are within the 100 year floodplain of Jarvis Creek. The EIS also states that no adverse impacts would result from the construction of the BAX and CACTF within the floodplain. However, EPA has concerns about building facilities in the floodplain because of likely impacts due to added sediment, altered channel morphology, and the obstruction of a flood like the one in Spring 2004 caused by aufeis, melt-induced runoff, and high rainfall. The EIS states that before the Army can proceed with a project in a floodplain, a determination must be made that there is no practicable alternative to constructing the project in the floodplain. We recommend including a discussion of how this analysis is done and including the determination of practicability in the Final EIS if it is completed by that time.

Flooding/Floodplains 08
Additional information regarding this comment is addressed in Sections 3.2.2 and 4.2.2, *Surface Water*.

The EIS states that the North Texas Range is not within the floodplain of the Delta River because of high cliffs that exist along the project area. We are concerned about potential erosion and landslides in steeply sloped areas that may result from disturbance due to construction and operation in this area during a heavy rain event. We recommend that a discussion of this issue be included in the EIS.

Flooding/Floodplains 09
Steeply sloped areas are not included within the revised maneuver or construction footprints under Alternatives 4 or 5.

Fire

EPA supports stringent fire management in the area due to the low precipitation and proximity to Delta Junction and the Class 1 Airshed, Denali. The EIS discusses impacts to the Class 1 Airshed. From discussions during our meeting we understand that' the potential impacts are not directly related to air quality in Denali, but the ability to view the Alaska range and Denali near the project area. We recommend that the EIS clarify this issue and provide a broader discussion on the direct and indirect impacts to air quality, specifically, to the Class 1 Airshed.

Air Quality 02
Thank you for your comment. Please see section 3.3.1 and 4.3.1, *Air Quality* for additional information.

The EIS discusses using fuel reduction in order to reduce fuel wood that could potentially increase the risk of fire. The EIS states that this has long term benefits for wildlife such as large grazing mammals on Page xii. However, we feel that this statement incorrectly characterizes this as beneficial since there would be negative impacts to birds in the area as discussed in Chapter 4. We recommend including more discussion on what the fuel reduction management would be and how that correlates with other management plans such as the wetland management plan, which requires 150 foot buffers for the red category as shown on Page 3-68. It is unclear if requirements such as the buffers would continue to be required for the fuel reduction plan. Removal of trees can increase sediment load to streams and cause habitat fragmentation. We strongly recommend maintaining adequate buffer zones and habitat for migrating birds.

Fire Management 27
Impacts related to fuel reduction activities at DTA have been analyzed under separate NEPA documents. A discussion of the impacts can be found in Section 4.2.3.1.3, *Impacts Attributed to Alternative 1 (No Action)*.

Wildlife

EPA supports the U.S. Army Alaska Regulation that includes a requirement for units to immediately cease firing if wildlife is discovered on training areas and to report the location and number of animals to the Range Control Office. The

Wildlife and Fisheries 29
Thank you for your comment.

regulation also requires that extreme care be taken to prevent harassment of wildlife.

The EIS states that bison migration and calving occur near the North Texas Range. This migration also occurs in the impact zone which is partially connected to the North Texas Range. The EIS is not clear about the current level of impacts to bison due to activities in the impact zone and what the cumulative impacts would be if the North Texas Range is selected. We support instituting a restriction of live fire for specific times of the year as mentioned in the EIS on page 4-52 for this area and including a discussion of the current and cumulative impacts to bison.

Wildlife and Fisheries 30
Please see Section 4.2.6.1.6, *Impacts Attributed to Alternative 4 (North Texas Range)* for revised information on bison at North Texas Range.

Contingency and Reclamation
The EIS discusses the value of the DTA for recreational and subsistence uses. The EIS discusses impacts to these uses, but does not provide information on how long these activities will be affected. It is unclear if this area is to be used indefinitely for training. There is no discussion about how the area will be reclaimed to accommodate these activities and wildlife use after cessation of training in the DTA. We recommend including a discussion of these issues in the EIS.

Other 41
DTA was withdrawn from the public domain for military training for 25 years in 1999 (USARAK 1999). The range can be expected to be used for that time period. Section 2.2.1.2.7, *Institutional Matters* provides a list of plans and programs that affect, protect, and manage the biological, physical, and socioeconomic environment at USARAK.

The EIS states that there will be no munitions clean up in the Surface Zone (SDZ) as there are no secondary detonation hazards that would require on-the-ground clearing. The EIS discusses cumulative impacts of potential contamination of munition-related residue, states that these effects are being evaluated at this time and that specific requirements are being crafted to address the cumulative effects of military munitions. We are concerned about the accumulation of metals and other constituents in the munitions that will not be cleaned up while these studies are being conducted. In the EIS there is no discussion of a contingency plan to handle potential contamination. We recommend striving to clean up munitions until the effects are known and for including a contingency plan if monitoring proves that there is mobilization

Human Health and Safety 12
Please see additional information in Section 4.2.2.1.2, *Impacts Common to All Alternatives.* USARAK currently has on-going soil and water quality monitoring for its lands, in particular munitions components and their potential mobilization.

DTA was withdrawn from the public domain for military training for 25 years in 1999 (USARAK 1999). Lands will continue to be used for military training purposes. Cost and lack of unexploded

of contaminants in the environment. Also, we recommend incorporating study results and recommendations into environmental planning to eliminate future contamination.

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

Public Access and Recreation

The EIS describes the DTA as an area frequently used for recreation. Permits are required to enter the area. The EIS states on page 4-97 that there are no data for public access and recreation. It would seem that the required permits would provide information for quantitative analysis. We recommend using the permitting as a means to quantify recreational use and public access and predict impacts based on these numbers.

Public Access and Recreation 17
Thank you for your comment. Access permits to Army lands are issued to individuals on a one time basis and are applicable to all three installations in Alaska.

SPECIFIC COMMENTS

Page 2-1. Please provide a broader description of the Surface Danger Zone (SDZ). They are shown in Figures 2.f, 2.g, and 2.h, and briefly discussed throughout Chapter 2. However, this seems to cover a fairly large area and therefore, we recommend including a section and explanation of this area in the EIS.

Proposed Action and Alternatives 36
A description of surface danger zones is included in Section 2.4.2, *Activity Areas.*

Page 2-4. The EIS states that "The largest training event at the co-located BAX and CACTF range complex would involve a brigade-sized unit of approximately 3,400 Soldiers for about 45 days." This is more than triple the amount of soldiers discussed in the document for the BAX (200 Soldiers) and the CACTF (800 Soldiers) and analyzed for environmental impacts. Per our meeting

Proposed Action and Alternatives 37
Please refer to Section 2.2.1.2.1, *Description of Units Using the BAX* for clarification. Similar information about activity at the CACTF can be found in Section 2.2.2.2.1.

Page 3-113. The EIS lists the Pogo Mine as a proposed project. The Record of Decision has been issued for this project and it is currently under construction. Please make correction.

Cumulative Impacts 09
Section 4.3.11 has been revised based on your comment.

We recommend including a topographical map of the project area.

Other 42
Your comment was taken into consideration.

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.

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9.4.3 Public Meetings, Comments and Army Responses

4 DONNELLY TRAINING AREA RANGE PROJECT
5 BAX/CACTF
6
7 PUBLIC COMMENT MEETING
8 DRAFT ENVIRONMENTAL IMPACT STATEMENT
9
10 Held on Wednesday, December 1, 2004
11 Time: 5:00 p.m. to 9:00 p.m.
12
13 Volume 1 of 1
14 Pages 1 through 4, inclusive
15
16 Meeting Proceedings Held
17 At
18 SPRINGHILL SUITES BY MARIOTT
19 575 First Avenue, Conference Room C
20 Fairbanks, Alaska
23
24 Reported by: Carol A. McCue, RMR
Heartland Court Reporters
25 Fairbanks, Alaska

1 P R O C E E D I N G S
2 (Meeting proceedings convened at
3 5:00 p.m., December 1, 2004.)
7 (Beginning of recorded statement.)

THE REPORTER: Go ahead with your statement.

MS. PHILLIS TATE: My name is Phyllis Tate and my address is P.O. Box 73648, Fairbanks, Alaska, 99707.

I'm a private pilot, an instrument rating. I have been flying since almost 40 years, 1966, I guess. We have a boat in Valdez which we've had down there for 20 years. I fly back and forth from Fairbanks to Gulkana, usually, via Delta.

I'm concerned about possible tactical air activity in the Delta area as a result of this training area range project being proposed. And I don't see how the aircraft activity and the UAV activity necessary to properly train people can be carried out without trespassing in civilian airspace, designated civilian airspace.

It's my understanding that generally these kinds of activities take place in restricted airspace, and I'm concerned about losing civilian airspace and having new restricted airspace established. I fly for myself, I'm not a commercial pilot.

I've got this form I can fill out if I have anything further.

THE REPORTER: Thank you very much for your statement.

(End of public comments.)

Airspace 02
An increase in special use airspace (i.e., the establishment of restricted airspace) is not part of the BAX/CACTF proposed action. Such a proposed action would be the subject of its own NEPA analysis and involve the affected stakeholders at that time. Please see additional information in Section 4.2.8, *Airspace*.

12 (Meeting proceedings adjourned
13 8:00 p.m., December 1, 2004.)

1 REPORTER'S CERTIFICATE
2 I, CAROL A. McCUE, RMR, hereby certify:
3 That I am a Registered Merit Reporter for
4 Heartland Court Reporters and Notary Public for the
5 State of Alaska; that the foregoing proceedings, the
6 Public Comment Meeting, held December 1, 2004, were
7 written by me in computerized machine shorthand and
8 thereafter transcribed under my direction; that the
9 transcript constitutes a full, true, and correct record
10 of said proceedings taken on the date and time
11 indicated therein;
12 Further, that I am a disinterested person to
13 said action.
14 IN WITNESS WHEREOF, I have hereunto subscribed
15 my hand and affixed my official s
eal this _____ day of
16 _____, 2004.
20 _____
CAROL A. McCUE, RMR
21 Registered Merit Reporter
Heartland Court Reporters
23 My Commission Expires: February 15, 2006

3 DONNELLY TRAINING AREA RANGE PROJECT

4 BAX/CACTF

5

6 PUBLIC COMMENT MEETING

7 TRANSCRIPT OF PRESENTATION QUESTIONS

8 DRAFT ENVIRONMENTAL IMPACT STATEMENT

9

10 Held on Thursday, December 2, 2004

11 Time: 12:00 p.m. to 9:00 p.m.

12

13 Volume 1 of 2

14 Pages 1 through 99, inclusive

15

16 Meeting Proceedings Held

17 At

18 DELTA JUNCTION COMMUNITY CENTER

19 Delta Junction, Alaska

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

HEARTLAND COURT REPORTERS 907-452-6727

1 P R O C E E D I N G S

2 (On record, meeting presentation

3 proceedings convened at 2:08 p.m.,
4 December 2, 2004, first public
5 presentation.)
6 COLONEL DONNA BOLTZ: Good afternoon.
8 (Presentation given by Col. Boltz.)
9 MR. KEVIN GARDNER: Thank you, ma'am. Kevin
10 Gardner, Chief of Environmental Planning at
11 Ft. Richardson for the U.S. Army Garrison Alaska.
12 (Presentation given by Mr. Gardner.)
13 MR. KEVIN GARDNER: I would like to entertain
14 whatever questions you might have first, then when we
15 kind of have run the course there, we'll go ahead and
16 take some comments, if you have them. Sir?
17 MR. TOM GEORGE: You mentioned the safety
18 areas that surround the footprint. Are the footprints
19 that we're looking at on the maps up there include
20 those safety areas or are those just the footprints of
21 the facility boundary itself?
22 MR. KEVIN GARDNER: Those, you're talking
23 about right over there?
24 MR. TOM GEORGE: In the corner of the image
25 map.

Proposed Action and Alternatives 38
The analysis of the effects of the proposed action on the human environment is divided into three “activity areas”: construction, maneuver, and surface danger zone. The study area “boxes on the maps surround the facility construction and maneuver areas, but not the surface danger zones.

MR. KEVIN GARDNER: That's generally the study area of the range itself. That doesn't depict the whole Surface Danger Zone for the weapons agents.

MR. TOM GEORGE: So how much larger area is that, and what are the nature of the restrictions, and what's the frequency that one would expect those restrictions to be in effect?

MR. KEVIN GARDNER: Surface Danger Zone for the Battle Area Complex roughly takes up about, what, 25,000 acres, George?

MR. GEORGE ALEXION: Yes.

MR. KEVIN GARDNER: And so basically, for the -- for a range that's oriented more to the south, toward the south, it would encompass a good chunk of additional lands within the existing Army training land.

Basically, the Surface Danger Zone has to be designed to keep the weapons engaged and then where those rounds could land inside on Army property, basically.

What kind of restrictions that would mean would be when the range is in operation, and there's actual active training going on, then those associated

Public Access and Recreation 18, and Airspace 03:
On average, the surface danger zone is 4.5 times larger than the maneuver and construction areas of the BAX. The construction and maneuver areas of the BAX and CACTF would be permanently off limits. The surface danger zone would be restricted to access during training events. The required number of days the range must be available is 242.

24 lands, which may be popular recreational access areas,
25 would be closed until training was complete.

1 (Continued presentation by
2 Mr. Gardner.)
3 MR. TOM GEORGE: And can you -- I believe you
4 state in your document that you're looking for 242 days
5 of training a year. Given that kind of loading, what
6 kind of a scenario -- you know, how often would these
7 safety areas be closed? Is that an 8:00 to 5:00,
8 24 hours a day whenever training is going on? What's
9 the nature of that?
10 MR. KEVIN GARDNER: I can address that or do
11 you want -- we have a representative, a gentleman who
12 runs the ranges for Alaska.
13 (Mr. George Alexion responds.)
14 MR. TOM GEORGE: But just to follow up on that
15 a little more, I guess I'm interested more in service
16 access and air access above it, what -- I mean, we know
17 the airspaces sometimes are used for 20 minutes,
18 30 minutes at a time and then sit for hours vacant.
19 Is this kind of training similar to that, or
20 when you're training would those areas be closed to the

Airspace 04
Close air operations could be incorporated at anytime into a training scenario at the BAX and CACTF. The required number of days the range must be available is 106. Actual estimated number of days the range complex will be used for training is 238. Air operations would most likely be less than that, since not all training events will involve air operations.

21 surface or air access on a 24-hour-a-day basis?

22 (Mr. George Alexion responds.)

25 UNIDENTIFIED SPEAKER: Is there, you know,

1 economic reasons to put one of these sites at one place

2 as opposed to another?

3 MR. KEVIN GARDNER: No. In terms of the -- in

4 an area, one of our areas of socioeconomic analysis,

5 they are pretty much a wash there. Equal.

6 You'll certainly have short-term benefits

7 because of construction and employment that that will

8 create, and then there certainly will be folks that

9 might be hired to run the ranges, but that would be the

10 same regardless.

11 UNIDENTIFIED SPEAKER: No, what I'm referring

12 to, the cost of putting the facility in, is there --

13 MR. KEVIN GARDNER: Oh, construction costs.

14 UNIDENTIFIED SPEAKER: Yeah.

15 MR. KEVIN GARDNER: They vary. They will --

16 they range from -- anywhere from 70 million up to near

17 120 million, depending on where.

18 UNIDENTIFIED SPEAKER: Would that be a reason

19 to -- is that going to -- I guess it would be a factor

Socioeconomics 04
Yes, certain environmental conditions, gravel and construction material requirements, available utilities, potential for unexploded ordnance removal, etc. all contribute to the cost of building the range facilities. These factors are different at each potential range location, creating different construction costs.

Proposed Action and Alternatives 39
In evaluating potential locations for construction and use of a

20 in which of those alternatives is chosen, right?
21 MR. KEVIN GARDNER: Well, it's a factor. It
22 may play in, but not for the environmental analysis.
23 UNIDENTIFIED SPEAKER: And then, you know,
24 what about the public opinion? Let's say they were
25 against the Eddy Drop Zone, is that going to be enough

1 to, you know, change it to one of the Donnelly Drop
2 Zone or the Texas Range?
3 (Mr. Gardner responds.)
4 MR. KEVIN GARDNER: Training effectiveness
5 factors and things like that -- I'm sorry, ma'am.
6 COLONEL DONNA BOLTZ: I guess as far as public
7 opinion, the thing that I would say is for public
8 comment, the thing that is most valuable to
9 General Hirai in the decision-making is the most
10 specific of information.
11 You have lived here for years. You have
12 anecdotal information that we might not have. You have
13 your observations. If you say, I don't like X range,
14 it's not as effective as saying, X range may not be the
15 best choice because, and then laying out those reasons.
21 UNIDENTIFIED SPEAKER: Okay. Let's say, for

BAX and CACTF, cost was taken into account to determine the viability of an alternative based on reasonableness of agency expenditures. No site was eliminated or will be eliminated or chosen on project cost alone.

Proposed Actions and Alternatives 40
The Army will take all public opinion into account when making a decision regarding the proposed action.

Fire Management 28
High winds in the DTA East area were taken into account during the analysis of fire risk. Please see Section 3.2.3.1.2, *Fire Hazard*

22 example, I would say, well, I'm not in favor of the
23 Eddy Drop Zone because it could create a fire hazard,
24 if you get a 50 or 60 mile an hour wind coming through
25 here, it could burn right through and cross the road in

1 a matter of minutes. Something like that.
2 COLONEL DONNA BOLTZ: That's the sort of
3 public comment that I would like for you.
6 COLONEL DONNA BOLTZ: But the more
8 specificity you can provide, the better.
9 And Kevin had a list of impacted -- Jessica,
10 could you go back to the impacts, a list of areas that
11 have been considered, and it might be one of those, it
12 might be something that we haven't thought of.

7 UNIDENTIFIED SPEAKER: I've got a question for
8 you.
11 UNIDENTIFIED SPEAKER: I just -- on your
12 impacts, I didn't see a specific impact on the amount
13 of traffic that will be coming through the area.
14 MR. KEVIN GARDNER: Vehicular traffic?
15 UNIDENTIFIED SPEAKER: Yeah. We're going to

16 transport, you're going to have 800 people to support

Assessment of USARAK Lands.

Human Health and Safety 13
USARAK Regulation 55-2, *Transportation Operations and Planning in Alaska* establishes polices and procedures for units using transportation resources to support military training. Convoys taking place on Alaska roads require approval by the state of Alaska at least 14 days prior to the event. Recovery of any vehicle breakdowns between Fairbanks and Delta Junction is supported by Fort Wainwright. All accidents require reporting to Fort Wainwright. Convoys will have a listing of available medical services along the transportation route. Please see Section 2.2.1.2.6 for additional information.

17 down here, you're going to take up a lot of road time
18 and what is your mitigation plan for -- for hazardous
19 materials, spills, or motor vehicle accidents?
20 MR. KEVIN GARDNER: I got to thinking about
21 that this morning as I was following a semi down the
22 Richardson Highway with the snow just thinking what if
23 this were, like, 10 Strykers in front of me. It would
24 really be snowy.
25 That's a good point. We have a section that

1 addresses that wherever it's at, the one, two, three,
2 four, fifth bullet down, Human Health and Safety. We
3 take into account convoys, things that could -- things
4 that could happen if there was a spill of some sort
5 during training, whatever. All the things that have to
6 be taken into account in those decisions.
7 UNIDENTIFIED SPEAKER: Because our local
8 emergency services are all volunteer. And then once
9 you get to the rural boundary, there's a whole area
10 that has no fire protection response, has ambulance
11 response, but, I mean, not a lot of bodies for
12 extrication if you have a major accident and things.
13 And it's not necessarily your drivers, but you

Human Health and Safety 14
Please see previous response.

14 get a lot of impatient drivers because of the speed
15 controls of the convoys that cause more aggravation as
16 people go along, and endanger others. And sometimes
17 the roads are just not very good.
18 MR. KEVIN GARDNER: Those are great points.
19 And to that degree of specificity that you just
20 articulated, please, give that to us.

1 UNIDENTIFIED SPEAKER: Okay. Now, after that,
2 it doesn't address your impact statement or anything
3 with regard to that? Why such a rush?
4 Eventually the railroad will come down here.
5 It's going to go down on the other side of the Big
6 Delta, as I'm told. It will come across somewhere in
7 Ft. Greely area here in Delta.
8 Now, why can't they wait and put a staging
9 area on the other side of the river where the military
10 is used, just to side track so they can pull in there
11 and unload, put your rangers on the other side of the
12 river and you won't bother anybody over here? I mean,
13 wouldn't that be logical?
14 MR. KEVIN GARDNER: It might be for some folks

Cumulative Impacts 10
Thank you for your comment. Please see Section 4.3.11, *Cumulative Effects Analysis* for more information.

Proposed Action and Alternatives 41
Thank you for your comment. This location alternative has been eliminated from further analysis in this EIS. Please refer to Section 2.3.3, *Alternative Viability Analysis* for more information.

15 if they look at it that way. I would --

16 UNIDENTIFIED SPEAKER: You have got the range

17 anyway, you've got firing back into the mountains, you

18 have got everything you need over there as well as you

19 do here. And you would relieve this road traffic, it

20 would relieve the congestion here, it would relieve the

21 fire danger, the whole thing would go away because

22 you're on the other side of the river and we wouldn't

23 have to worry about that.

24 MR. KEVIN GARDNER: That's a good comment, and

25 that's not the first time we had a suggestion that if

1 you could just go further to the west, you've got all

2 the land uninterrupted.

3 UNIDENTIFIED SPEAKER: And also that you would

4 have the railroad, undoubtedly it will come through one

5 day.

6 MR. KEVIN GARDNER: Yes. I expect that's

7 correct. One thing to keep in mind, it goes back to

8 the very beginning of the briefing of Colonel Boltz's

9 talk. And actually, even when we first envisioned

10 these range projects, we weren't actively at war. That

Human Health and Safety 15
Thank you for your comment. The Army acknowledges your concern and is taking it into account as part of the decision making process.

Fire Management 29
Thank you for your comment. The Army acknowledges your concern and is taking it into account as part of the decision making process.

11 all changed.

12 So there certainly is a sense of urgency more

13 so than there was to get a, you know, range facilities

14 that soldiers need to train. The standard in surviving

15 combat.

16 That certainly is a factor that we have to

17 take into consideration, as well as future actions that

18 another agency may or may not do down the road that may

19 impact us. We have to look at just what you're saying,

20 as well, and make it a fairly deliberate decision to

21 build here and now as opposed to wait five, ten years.

22 UNIDENTIFIED SPEAKER: But after you spend

23 $110 million?

24 MR. KEVIN GARDNER: Yes, sir. Yeah. That's a

25 factor. We've been reminded.

3 UNIDENTIFIED SPEAKER: When would you actually

4 start construction?

5 It sounds to me like this needs to happen

6 quick. That's my take on it, with the tactical

7 situation in Iraq, it's got to be now, these guys got

8 to be trained.

9 And are we talking like breaking ground this

Proposed Action and Alternatives 42
If a decision is made by the decision maker to build and operate range facilities at DTA, construction could begin as soon as summer 2006.

spring or something?

MR. KEVIN GARDNER: No. No. Timewise it probably would require two construction seasons, but that's after we've got the NEPA part done, permits in place, and so forth.

So -- and I don't have the construction time line because we're still kind of working through the process. But we've talked to our folks, it looks like it would require two full seasons to build these ranges.

UNIDENTIFIED SPEAKER: And it's still not this year, next year off at the earliest.

MR. KEVIN GARDNER: Possibly.

UNIDENTIFIED SPEAKER: And that would be quick.

MR. KEVIN GARDNER: As soon as -- as soon as we get -- as soon as we can fulfill our responsibilities with this and other things that we have to do to make sure the permits are in place before we build, that's -- we will build.

COLONEL DONNA BOLTZ: Yeah, I think there are two things to consider here. There are construction

7 seasons, there are environmental issues, and then you
8 framed it perfectly, if we had this range today to
9 train the Stryker Brigade combat team, I would feel
10 better sending soldiers into combat.
11 MR. KEVIN GARDNER: Yes. Right.
12 UNIDENTIFIED SPEAKER: Where are the soldiers
13 being trained today?
14 MR. KEVIN GARDNER: Well, they train at all
15 three Army locations in Alaska. You know, you guys are
16 probably aware, they have been training at Donnelly
17 Training Area doing maneuver training and some other
18 live fire training.
22 (Mr. George Alexion responds.)
23 UNIDENTIFIED SPEAKER: Just to follow up on
24 that, so you're saying Ft. Rich, Donnelly Training
25 Area, and then the Yukon, those are the three areas in

1 the state that training is going on now?
2 MR. GEORGE ALEXION: Training is going on in
3 all of the installations in the state. Ft. Wainwright
4 has got training events occurring there at certain
5 levels.
6 Colonel Boltz mentioned the war fighter

Other 43
Soldiers currently train at Fort Wainwright, near Fairbanks, Donnelly Training Area near Delta Junction, and Fort Richardson, near Anchorage. Fort Wainwright includes the Yukon and Tanana Flats Training Areas.

7 exercises, just one portion of what's going on. We've
8 got soldiers in the Yukon Training Area.
9 This summer we've got soldiers deployed at
10 Richardson, the Yukon Training Area, staging out at
11 Ft. Wainwright, and we also had a very large exercise
12 when the 172nd Brigade came down to the Donnelly
13 Training Area.
14 UNIDENTIFIED SPEAKER: Now, to the site of the
15 future that you're proposing here, are there other
16 things like it in other parts of the country, and if
17 so, where?
18 MR. GEORGE ALEXION: Yes, there are. There
19 has been a -- a growth, if you will. I can't think of
20 the real word I want to use, a maturation of these
21 ranges.
22 This Battle Area Complex, if you were to go to
23 Ft. Hood, Ft. Stewart, Ft. Benning, you would hear it
24 called a multipurpose range complex, which is more
25 tailored towards a mounted combat with tanks and

1 Bradley vehicles.
2 This will be the first Battle Area Complex
3 that has been built and not kind of morphed from a

Other 44
Yes, other Army installations have similar range facilities including Fort Hood in Texas, Fort Stewart in Georgia, and Fort Benning in Georgia.

4 multipurpose range complex.

5 There is one they have tailored down at

6 Ft. Lewis in Washington for the Stryker Brigade. This

7 will be the first one that was actually designed and

8 intended to be a Stryker supported range-type

9 opportunity.

10 (Mr. George Alexion continues with

11 response.)

13 UNIDENTIFIED SPEAKER: Those other training

14 facilities, how close are they to communities? Are

15 they affecting the communities?

16 MR. GEORGE ALEXION: The one that we are

17 building in the Yukon Training Area is roughly

18 4 kilometers from a housing area, which that is roughly

19 about 2.4 miles from the housing area.

20 And we also did some tests up there firing of

21 weapons systems. They have had a range closer than

22 that firing small arms that's been up there for years,

23 and they have existed in a very comfortable existence,

24 both the housing area and the ranges that have been up

25 there.

1 (Mr. George Alexion continues

Other 45
A Final Environmental Impact Statement was prepared for the construction and operation of a Digital Multi-Purpose Range Complex at Fort Benning, Georgia in April 2004. Issues identified during public scoping included noise impacts in adjacent communities and safety of range operations. Noise studies, environmental evaluation of impacts and mitigation were proposed as part of the project.

2 with response.)

3 UNIDENTIFIED SPEAKER: What type of munitions

4 would you be using?

5 MR. KEVIN GARDNER: Go ahead, George.

6 (Mr. George Alexion responds.)

7 UNIDENTIFIED SPEAKER: So it would be up to

8 105 millimeter Howitzers used here?

9 MR. GEORGE ALEXION: It's a canon.

13 MR. KEVIN GARDNER: And ranging down to the

14 individual rifles and machine guns and things like

15 that.

16 UNIDENTIFIED SPEAKER: 20 millimeters, that

17 kind of stuff.

18 MR. PETE HALLGREN: I'm Pete Hallgren and I

19 work for the city. If I could make some comments on

20 behalf of the city at this point.

22 MR. PETE HALLGREN: I'd like to

4 make some interim comments, mention six things.

5 I've got two other minor questions. You were

6 just asked about munitions, would there be a choice of rounds fired?

8 MR. GEORGE ALEXION: Yes, sir.

Proposed Action and Alternatives 43
Bullets fired at the BAX and CACTF do not contain explosives. There would be no possibility of unexploded ordnance (i.e., bullets or warheads) being used at the ranges. The largest weapon used would be the 105mm Mobile Gun System. Small munitions used would be by rifles and machine guns.

Proposed Action and Alternatives 44
The BAX and CACTF would support a variety of weapons and munitions. Please see Sections 2.2.1.2.2 and 2.2.2.2.2 for information on munitions training at the BAX and CACTF, respectively.

MR. PETE HALLGREN: The second comment is brought up about traffic. I believe it was over a year ago that the city made formal written statements concerning convoys and traffic between here and Fairbanks. I don't believe we've ever received any response. I know there's an editorial in the Fairbanks Daily News-Miner also concerning that problem.

Do we need to reinsert these detailed written comments in this EIS?

COLONEL DONNA BOLTZ: Pete, I think it's probably appropriate, and I'll tell you that already, General Hirai has asked us to re-look at that, as well, but there is no issue that you believe that exists in your mind that should be left out of the comments. So if you can, I definitely would also ask you to do that.

MR. PETE HALLGREN: Okay. We will dig that out. I think it might have been in the response to transformation EIS.

MR. KEVIN GARDNER: That's right. It was. That's correct.

MR. PETE HALLGREN: But we haven't seen that, have we?

6 MR. KEVIN GARDNER: We can certainly get -- I
7 can get to you a copy of the response, you know, that
8 we published in the final, in the Final EIS for that.
9 MR. PETE HALLGREN: We'll reissue those
10 comments.
12 MR. PETE HALLGREN: Six things that I want to
13 bring up.
14 Firstly, is selection of the Eddy Drop Zone a
15 foregone conclusion?
16 We worry that there's apparent bias in favor
17 of the Eddy Drop Zone. In discussions of flood risks,
18 flood risks to Donnelly are overstated, we believe.
19 The flood risks at Eddy are understated in the draft.
20 And we believe that we have seen an apparent
21 bias in favor of Eddy in discussion of wildfire risk.
22 We believe that risks at Donnelly are overstated in the
23 draft and the risks at Eddy are understated.
24 We will go into more detail on that in the
25 written formal comments.

1 We believe that there's much more extensive
2 discussion of Eddy than the Donnelly and North Texas
3 combined as to all the substantive issues, and we

Proposed Action and Alternatives 45
USARAK did not have a preferred alternative at the time the initial draft EIS was published for public comment. A preferred alternative has been identified in the Supplemental Draft EIS. Please see Section 2.5. The Record of Decision will identify the decision maker's final selection after taking into account all public, agency and tribal comments.

4 wonder if that indicates a preference toward Eddy Drop
5 Zone.
6 Comment two is why not just use Donnelly or
7 North Texas? The city will have no objections to use
8 of either alternative. The city objects only to Eddy
9 Drop Zone approach.
10 The use of Donnelly and North Texas solves or
11 at least reduces most of the city's major concerns.
12 Wildfire risk, noise, flooding, airport traffic.
13 Donnelly or North Texas do not violate
14 Executive Order 11988. We believe that Eddy Drop Zone
15 does violate that Executive Order.
16 Three, why is USARAK apparently or possibly
17 retreating from commitments regarding wildfire risks in
18 the earlier environmental assessment?
19 We asked the question earlier, and I think the
20 answer I got was that that USARAK will not be setting
21 out the full fire protection measures until a site is
22 actually chosen and a Record of Decision arrives on
23 this issue.
24 Our problem on that is that we have no way to
25 comment on such a ROD since this is our last comment

Proposed Action and Alternatives 46
Thank you for your comment. The Army acknowledges your concern and is taking it into account as part of the decision making process.

Flooding/Floodplains 10
Provisions of Executive Order 11988 have been incorporated into the EIS. Please see Sections 3.2.2 and 4.2.2, *Surface Water*.

Proposed Action and Alternatives 47
The Army will continue to accept comments regarding the proposed range projects. Please see Section 4.2.3 for a discussion of fire management mitigation measures.

period. Particularly since wildfire is a major portion of our worries in this town, we have a real problem with -- with that.

So we're concerned that either the EIS apparently could change less protections for the town than the EA did, and we felt the EA was insufficient in its projections for wildfires, or if those are going to be contained in the ROD, we don't have an opportunity to comment on them.

So that's perhaps a Catch-22 is what we were worried about.

We are worried that ranges in Eddy cannot be safely used when fire risk is high or extreme. We believe blank rounds and tracers can ignite fires. We believe a soldier careless with a cigarette butt could ignite a fire. We believe a vehicle whose exhaust brushes grasses could start fire.

In a wind over 10 miles an hour, a fire cannot be effectively controlled in this area. And the Eddy Drop Zone has considerably more fire fuel and is much closer to town than the other two alternatives. And we believe that during extreme fire conditions, no training should be permitted.

Fire Management 30
Thank you for your comment. The Army acknowledges your concern and is taking it into account as part of the decision making process.

24 Four, the Jarvis Creek 2004 flood. We learned
25 the roads, even roads with extensive culverts have

1 jams. We had to cut breaks in our roads in town to
2 avoid those problems. And we talked to you about the
3 flooding problems in town with the flood waters running
4 down right down the street from the school and
5 negotiating efforts that we had to do to keep it out of
6 downtown.
7 We believe that USARAK will build roads,
8 bunkers, and buildings. Either you will let them get
9 flooded or you will protect them if they are in Eddy.
10 If you build dikes, you'll alter the water flow. How
11 will that affect Delta? Most structures many times
12 have channelized flooding.
13 The Army Corps of Engineers and the Alaska
14 Department of Transportation Public Facilities say the
15 only way to manage off-ice affected and off-ice prone
16 areas is to not build there.
17 The city doesn't know of any off-ice related
18 issues at either Donnelly or North Texas, but has
19 studies which have been cited to the EA comments
20 specifically concerning the Eddy Drop Zone, and which

Flooding/Floodplains 11
Additional hydrological field investigations and modeling have been completed for Jarvis Creek within the boundaries of DTA East. Please see Sections 3.2.2 and 4.2.2, *Surface Water*.

Construction and operation of the BAX and CACTF would not cause a discernable impact to the floodplain. The design would not produce any discernable change to flood water travel through the Eddy Drop Zone area. Any diversion caused by the BAX or CACTF would channel water into other areas within the recognized floodplain.

21 was done years ago, which recommend no construction in
22 that area.
23 The city has aerial photos showing the 2004
24 flooding was much more extensive than described in the
25 Draft EIS with respect to the Eddy Drop Zone.

Flooding/Floodplains 12
These photos have been added to the administrative record and were reviewed as part of the hydrologic analysis of Jarvis Creek.

1 Item five. Which site gives U.S. Army Alaska
2 a better chance at achieving the minimum 242 days per
3 calendar year of use?
4 We heard George say it might not be 242 days,
5 but if you want an effective training area, I think you
6 have -- and you look at Eddy, you have to be concerned
7 that Eddy will be closed due to wildfire risk,
8 flooding, noise-magnifying inversions, and high wind at
9 short notice, and certainly the other site would be
10 very difficult to set advance training schedules for.
11 The 2004 flood this year was later than the
12 normal flooding, so it -- a normal scheduler would have
13 scheduled, not during the normal flooding when it was
14 dry, it would have scheduled for what really happened
15 in 2004, and they wouldn't have been able to use it.
16 So scheduling is extremely difficult for Eddy Drop Zone
17 with respect to the flooding.

Proposed Action and Alternatives 48
An availability analysis was performed for each alternative location All three locations would be unavailable during spring breakup. North Texas Range offers the fewest number of days available for training (approximately 184 days) primarily due to the presence of large numbers of bison. Eddy Drop Zone offers the most availability (311 days), given that it is only impacted by spring breakup and aufeis flooding. Donnelly Drop Zone (276 days) offers more availability than Texas (due to fewer days being impacted by bison), but less than Eddy (due to limited bison impacts during migration periods and a slightly longer breakup period). Copies of the availability analysis can be obtained by contacting the USARAK Public Affairs Office at 907-384-2193.

18 Fire danger also, extreme fire danger is often
19 on a day-to-day basis where the range can be shut down
20 in the morning where it may have been believed that the
21 day before you could do training, but the next morning,
22 the humidity may be down, the wind may be up, and you
23 may be shut down. It's extremely difficult to schedule
24 a good daily usage.
25 And even in the winter with temperature

1 inversions, it's difficult to tell when there will be
2 temperature inversions and when the noise bloom will
3 become unacceptable to areas off of the post.
4 So we believe that USARAK would be able to use
5 the range at Donnelly or North Texas much more often,
6 and at a minimum, we believe that the Draft EIS should
7 discuss potential availability of those three sites
8 based on the last 10 years of wind records.
9 Final item is number six, Executive Order
10 11988. Executive Order 11988, Floodplain Management,
11 dated May 24, 1977, in our opinion, prohibits USARAK in
12 the development of that floodplain unless that is the
13 only, quote, practicable alternative, end quote,
14 consistent with the law of floodplain management.

Flooding/Floodplains 13
Provisions of Executive Order 11988 have been incorporated into the EIS. Please see Sections 3.2.2 and 4.2.2, *Surface Water*.

EO 11988, Section 2(a)(2).

Most, if not all, of the area identified in the Draft EIS is a proposed location of CACTF and BAX, and Eddy Drop Zone is in the Jarvis Creek floodplain zone. Little, if any, of the area for the CACTF and BAX and the Donnelly Drop Zone are in a floodplain.

See Floodplain Management Studies, Delta Junction, Alaska, prepared by the U.S. Department of Agriculture Soil Conservation, November 1987, pages 5 and 6 and figure 3.

None of the areas selected for the CACTF and BAX and the Texas North Range are in a floodplain. The Draft EIS makes clear that both Donnelly Drop Zone and North Texas Range are practicable alternatives, both factually and by mere virtue of being included in the Draft EIS as potential alternatives.

Even without correcting the tables of the Draft EIS, page X through XI, Table ESA, for the overstatement of flood risk and fire risk at Donnelly Drop Zone and the understatement of flood risk and fire risk at Eddy Drop Zone, Donnelly Drop Zone and North Texas Range are practicable alternatives.

Proposed Action and Alternatives 49
Thank you for your comment. The Army acknowledges your concern and is taking it into account as part of the decision making process.

12 If you correct the misstatements of flood and
13 fire risk, Donnelly Drop Zone and North Texas are
14 actually preferable alternatives. Because they are --
15 there are practicable alternatives and because the Eddy
16 Drop Zone is in a floodplain, EO 11988 bars
17 construction of CACTF and BAX in the Eddy Drop Zone.
18 Decisions involving floodplain management are
19 appealed under the Administrative Procedures Act. They
20 are independent of and in addition to the appeal
21 procedures for challenges to the accuracy of a Draft
22 EIS under NEPA.
23 And that's the city's comments at this point.

1 UNIDENTIFIED SPEAKER: Will someone tell us
2 why that little plot of land is so special to the Army?
3 Why do they want that piece of land? Is it something
4 to do with the terrain or is it access or what is it
5 that you can't find somewhere else? I mean, why that
6 little piece of land?
7 MR. KEVIN GARDNER: You're talking
8 specifically Eddy Drop Zone?
9 UNIDENTIFIED SPEAKER: Yes.
10 MR. KEVIN GARDNER: Of the three alternatives,

Proposed Action and Alternatives 50
After the screening of available USARAK properties, three locations remain for further analysis: Eddy Drop Zone, Donnelly Drop Zone, and North Texas Range. These three sites offer suitable terrain features for enhanced training scenarios, and provide ready access for construction and training activities. Existing constraints -- which limit the ability to achieve range siting, design, and training requirements within a timely and cost-efficient manner -- and a lack of maneuver flexibility make the other potential locations unacceptable to meet current requirements. All of the sites outside of DTA East require either extensive bridge and infrastructure construction, or exhibit insufficient maneuver acreage, and/or are unable to accommodate the SDZ without unacceptable constraints on the training mission.

11 each of them, in fact, all the alternatives we started
12 with have plusses and minuses to them. Some of them,
13 they have a lot in common in terms of terrain, some of
14 them are very different.
15 Eddy, for example, is -- offers some just
16 basic, good terrains to build an urban and a rural
17 combat training area.
18 Much like Donnelly Drop Zone offers a variety
19 of different terrains than Eddy. Nonetheless we have
20 to weigh the factors there as well as Eddy. And the
21 same goes for North Texas Range, as well.
22 UNIDENTIFIED SPEAKER: In other words, there's
23 nothing really special about Eddy Drop Zone as far as
24 terrain?
25 MR. KEVIN GARDNER: There are things about it

1 that make it different than Donnelly Drop Zone.
2 As I -- remember, I pointed out earlier,
3 Donnelly Drop Zone, one of the geographic pieces there
4 has Jarvis Creek more or less dissecting the area where
5 the range would be constructed.
6 From one perspective, that's good because it
7 certainly -- it presents a realistic combat training

Proposed Action and Alternatives 51
All three locations meet range *training, design,* and *siting criteria.* Individually, these sites also have some characteristics that distinguish them, both from an environmental perspective and by their specific implications for the City of Delta Junction and surrounding areas, from each other. Many of the risks and potential impacts are influenced by the orientation of the facility, SDZ locations, and proximity to affected populations.

8 scenario that our soldiers would likely face.

9 On the other hand, there may be some other

10 environmental issues that aren't associated, for

11 example, with Eddy Drop Zone, which doesn't have Jarvis

12 Creek running right through it. And there may be some

13 other vegetation differences and things that makes that

14 one preferable to Donnelly.

15 And then you go over to the North Texas Range,

16 great example, North Texas Range sits right next to a

17 dudded impact area where we can fire artillery and

18 mortars and things and has restricted airspace that we

19 can fly military vehicles in --

20 UNIDENTIFIED SPEAKER: I can see why --

21 MR. KEVIN GARDNER: But so, yeah, all those

22 things sum it up, you have to juggle all of it.

23 UNIDENTIFIED SPEAKER: I can see how some of

24 the present ranges are usable and good for where they

25 are. But I just -- my recollection of that area from

1 hunting back in there years and years ago is mostly

2 black spruce and wetland. And maybe I'm wrong, maybe

3 there's some ridges and hills and stuff in there that I

4 don't know about.

Proposed Action and Alternatives 52
Please see previous response.

MR. KEVIN GARDNER: There's some pretty good information in the document that's specifically about the kind of vegetation, the presence or absence of wetlands in each of the three areas.

We tried to do a good comparison in there, and again, afterwards we've got the folks here that we can talk specifically about that so you understand more clearly what the differences are between the three sites, as we've identified them in the EIS.

Yes, Tom?

MR. TOM GEORGE: I think you mentioned last night or earlier about this earlier study that was produced from nine down to the current three alternatives you're looking at. For any of the alternatives that were west of the river, what factors other than access caused you to remove those from consideration?

MR. KEVIN GARDNER: Well, George, you're more familiar with that. I know any existing infrastructure is basically -- evacuation, for example, you know, for soldiers that may be injured or wounded was a

Proposed Action and Alternatives 53
This location alternative (i.e., West Donnelly Training Area) has been eliminated from further analysis in this EIS because it did not satisfy siting criteria. Please refer to Section 2.3.3, *Alternative Viability Analysis* for more information. Primarily, this site would require extensive bridge and infrastructure (road) construction requiring in excess of 3.5 additional years and extensive removal of unexploded ordnance.

consideration.

MR. GEORGE ALEXION: That was a very large consideration.

(Mr. George Alexion gives further response.)

MR. TOM GEORGE: And you're evacuating to Fairbanks or to Delta?

MR. GEORGE ALEXION: Really depended upon the injury. Each battalion will have its own aid station set up for an initial assessment. And then depending upon that, and depending on the severity of the injury, it would go to the closest place to sustain life.

And that would be, I guess, the on-site doc's call as to whether or not he felt it was time to get him to Anchorage or get him to Fairbanks or get him to use their own triage table.

MR. TOM GEORGE: Is the helicopter presumably your first line of transportation in a situation like that?

MR. GEORGE ALEXION: Again, depends on the severity. There are other areas to where there is use of land capability to stabilize the individual and get the individual to the appropriate facility.

Proposed Action and Alternatives 54
Medical emergencies requiring evacuations would be delivered to either Fairbanks or Anchorage, depending upon the severity of the emergency.

Proposed Action and Alternatives 55
A helicopter would most likely be utilized during emergency evacuations in areas without road access.

24 MR. TOM GEORGE: So anything, though, about
25 the land itself, permafrost or other geographic factors

1 that make that -- because, I mean, I understand not
2 being able to wait for the railroad, but if in this day
3 and age, and especially in the state of war, if the
4 U.S. Army can't find a way to get across the river, I'm
5 worried.
6 So I guess that's why I want to know other
7 than access, are there real geographic considerations
8 that cause those to be precluded from the alternatives
9 that you're evaluating today?
10 MR. GEORGE ALEXION: A lot of it revolves
11 around, I guess, relying on older studies with what we
12 saw in the land. And the ability to go out and train
13 to get the facilities built in a timely manner to
14 support soldiers that are engaged in combat today.
15 (Mr. Alexion continues with response.)
16 MR. TOM GEORGE: You're saying you couldn't
17 build this facility west of the river for reasons other
18 than access? I'm really confused now.
19 MR. GEORGE ALEXION: No, I can't build this
20 across -- when we sat down, we looked at training

Proposed Action and Alternatives 56
Some alternatives were eliminated due to insufficient maneuver acreage or unable to accommodate surface danger zones without constraints on the training mission or creating a safety hazard.

Proposed Action and Alternatives 57
This location alternative (i.e., West Donnelly Training Area) has been eliminated from further analysis in this EIS because it did not satisfy siting criteria. Primarily, this site would require extensive bridge and infrastructure (road) construction requiring in excess of 3.5 additional years and extensive removal of unexploded ordnance.

21 buildings, we looked at terrain that would support the
22 training events, and we had to, of course, look at cost
23 of getting across the river.
24 MR. TOM GEORGE: But are those factors that
25 you're considering in an EIS?

1 MR. GEORGE ALEXION: No. The factors that are
2 primarily, and when you look at socioeconomics in
3 there, that has a small bearing into that which
4 normally plays a part in the overall decisions being
5 made. Nobody has an infinite amount of knowledge to --
6 MR. TOM GEORGE: Well, just we're going to get
7 a copy of that study to look at it.
8 MR. GEORGE ALEXION: The EIS?
9 MR. TOM GEORGE: No, the earlier study that
10 reduced the count from nine to three.
11 MR. GEORGE ALEXION: Rasmussen Library at
12 Fairbanks.
20 MR. ED SHEEHAN: Okay. My name is Ed Sheehan.
21 And concerning Eddy only. I served as USARL CRTC for
22 23 years as a senior Army officer and a Department of
23 the Army Civilian. I was a senior test manager of the
24 Cold Region Test Center, and as such, was responsible

25 for all range planning, training, development, safety,

1 and testing, the cold region testing and environmental
2 expertise.
3 My thoughts on Eddy are, as proposed by the
4 city, which identifies environmental factors in a
5 letter to the Commanding General in February of 2003.
6 And basically, what we've said here today is all in
7 that letter that Pete's taken care of.
8 It is my opinion when the meeting is concluded
9 the public will have told you that. That's no reason
10 not to have a meeting because a lot of good things are
11 coming out right now.
12 And I agree with that person that said, in
13 addition to that letter, my primary concerns are there
14 is no interaction in the Environmental Impact Statement
15 with the railroad, the gas line, possible bridging of
16 the Delta River, airspace, you know, this type of
17 thing.
18 And even though a lot of this stuff is
19 tentative, at best, okay, you still have a Governor
20 pushing this and Senator pushing that and so on and so
21 forth, and these things will be realities in time.

Cumulative Impacts 11
A cumulative impacts analysis addressing your concerns has been completed. Please see Section 4.3.11 of the EIS.

Airspace 05
Please see new information in Sections 3.2.8 and 4.2.8, *Airspace.*

22 This is no reason to keep the Army from having
23 something in the interim. Okay? Because this may go
24 on for some time.
25 The object of the drill here, I think, is to

1 determine where we do this. Okay? So that my
2 statement here that's already been given to the
3 stenographer and my statements on Eddy have been given
4 to the stenographer.
5 Concerning the action of Donnelly, even if
6 only practice munitions are used, the range is unsafe,
7 in my opinion, from the following standpoint.
8 Fire protection, the reaction problems from
9 Eddy to here and Donnelly from here on a windy day, a
10 south wind, which is the problem, is only a few
11 minutes, at best. And that was elaborated on by the
12 fire protection people in our last meeting and with the
13 meeting with the General here recently.
14 For example, pyrotechnics. You can't run a
15 military operation without pyrotechnics. I would
16 guess, based on my own experience, that most of the
17 rivers across the range were caused by the Air Force
18 and most of them were caused by pyrotechnics, not bombs

Proposed Action and Alternatives 58
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

19 or machine guns or this type.

20 This range, in my opinion -- and I'm talking

21 about the range context here now -- does not meet DOD

22 and DA standards with respect to existing range and

23 terrain regulations, while the intent concerning

24 development of new impact areas for public use as

25 defined in the Public Land Laws.

1 Now, I have extensive experience in that area,

2 and when I asked you guys what the problem is, you tell

3 me your range guru down at Ft. Bragg or wherever is the

4 one telling us how to do this. And this guy has no

5 real experience on the ground at Ft. Greely, Alaska.

6 And I'm not trying to be critical, but what

7 I'm trying to tell you is that I still have a real

8 problem with Donnelly, just like Eddy.

9 As a former range planner at Ft. Greely, I

10 know that CRTC and USARL can use the same property that

11 has been going on since the inception of Ft. Greely, if

12 they just talk to each other. Okay?

13 The problem is -- the problem is somebody

14 says, I will need this area 300 days a year to fire my

15 tank, when in reality, they have never used over

Proposed Action and Alternatives 59
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

Proposed Action and Alternatives 60
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

16 30 days a year.

17 And the other guy says, I'm going to train for

18 241 days a year, when in reality, that's not happening.

19 And one needs temperatures and certain

20 conditions and the other one needs temperatures and

21 certain conditions. What we need to do, I think there,

22 is talk to each other better.

23 I think the rationale used, I'll say this

24 again, is grossly exaggerated, especially relative to

25 days of use. Okay? That's a hard thing to balance,

1 but it can be balanced.

2 As a citizen, and the things I'm saying right

3 now to you, I'm not advising the city, I'm talking for

4 myself. As a citizen, I take offense to spending

5 approximately $100 million to develop a range that has

6 little future application. And this is true of a

7 tester, too.

8 This year's tanks shoots 3500 meters. Next

9 year's tanks, they are not going to develop another one

10 if they can't shoot more than 3500 meters.

11 Future application of this range that's

12 lacking is it can't light fire on the move with

Other 46
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

13 multiple vehicles and fire a distance that's up to
14 5,000 meters. That's the future. That's right around
15 the corner. Okay?
16 So if you can't make a range to do that, don't
17 spend the money. Or find a place to do it or make an
18 interim range as United States Army Alaska did this
19 summer.
20 Also, I think we need to look at alternatives
21 of terrain. Donnelly or Eddy are not typical subarctic
22 terrain or arctic terrain. Okay? They are one little
23 piece of that. Okay? You get all on the back side of
24 Donnelly, you've got all kinds of things.
25 There's no place on Eddy or Donnelly you're

1 going to get a vehicle stuck. Okay? But you go on the
2 other side of that, there's places you will stick them
3 and you won't stick them. Okay?
4 You're going to have to learn to move around
5 on that and do it. That's the worst thing you could do
6 if you built this range on the other side would be to
7 build roads.
8 Build the roads with the vehicles, the lanes
9 you're trying to, and put the targets at various

Proposed Action and Alternatives 61
The three sites considered offer suitable terrain features for enhanced training scenarios and still provide ready access for construction and training activities.

Other 47
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

10 places, put up range boundary markers so they have to
11 keep it in there, and then they can free fire and free
12 fight. You can't do that at Donnelly or Eddy Drop
13 Zones. Thank you.
25 (Off record, meeting proceedings

1 recessed at 3:17 p.m.)
5 (On record, meeting presentation
6 proceedings reconvened at
7 5:15 p.m., second public
8 presentation.)

20 COLONEL DONNA BOLTZ: What we will do now is
21 open up to public comment.

2 UNIDENTIFIED SPEAKER: The information is
3 very -- it's very informative. I was just wondering
4 how this meeting was planned. I didn't read about it
5 in the paper. I got a phone call. That's how I found
6 out about it. Has it been advertised?
7 MR. KEVIN GARDNER: It has been. I'd say we
8 hoped -- we tried to reach as many folks as we could,
9 but maybe sometimes maybe the timing of when you were
10 looking at whatever paper --

Other 48
A 45-day comment period began on November 5, 2004 and extended through December 19, 2004. Public meetings were held in Anchorage on November 23, 2004, in Fairbanks on December 1, 2004, and in Delta Junction on December 2, 2004. USARAK announced the public meetings in the *Anchorage Daily News* and the *Fairbanks Daily News-Miner*, posted meeting notices on public bulletin boards in Delta Junction and on the Delta News Web, a community website. Copies of the initial Draft EIS were made available for review at Anchorage libraries, Noel Wien Public Library in Fairbanks, and at Delta Junction Community Library and City Hall. Additional copies of the draft were also available at Fort Richardson, Fort Wainwright, Donnelly Training Area Environmental Resource Departments, and on the USARAK Conservation Website (http://www.usarak.army.mil/conservation).

11 UNIDENTIFIED SPEAKER: Was it in the last
12 newspaper, though, or anything?
13 MR. KEVIN GARDNER: It should have been. Jan?
14 UNIDENTIFIED SPEAKER: I think it was.
15 COLONEL DONNA BOLTZ: And I think we had signs
16 posted, as well. And I know that depends on what
17 businesses you may frequent, but I think the IGA was
18 one of the places, Post Office may have been one. And
19 it was in the newspaper, as well, because it always is.
20 And we're aware that there are difficulties
21 reaching everyone.

In response to individual requests, the public comment period for the Draft EIS was extended for an additional 20 days to allow for continued comment until January 8, 2005. Notices of the extension were published in local newspapers.

19 (Off record, meeting proceedings
20 recessed 5:33 p.m.)
24 (Beginning of individual comment.)

2 MR. STEVE JOSLIN: Steve Joslin, P.O. Box 377,
3 Delta Junction.
9 MR. STEVE JOSLIN: Let's see. I came down
10 here to represent my boss, first and foremost, for the
11 State Forestry. He wanted me to reiterate his concern
12 for potential fires getting away from the spot out
13 there.

Fire Management 31
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

14 And also I want to talk for myself. I'm
15 currently a resident of Delta. I have a small office
16 in addition to working for Forestry.
17 I'm concerned about the noise from the
18 testing. I'd like to see maybe if they want to, I'm
19 not sure how serious a problem it would be, but I think
20 maybe they would do some preliminary shots with the
21 biggest guns they are planning on using, and then tell
22 us what that is going to be. We'll just all listen.
23 You know. And make an assessment of it more
24 rationally, I think, about the noise level.
25 And I am concerned about fire, too. Those

Noise Management 05
Average noise contours obtained from computer modeling indicate that no moderate or severe noise levels from small arms, large weapons, or demolition would be expected off-installation lands. Please see Section 4.2.4, *Noise* for additional information.

1 things that come into that, you know. Personally, I
2 think, you know, maybe they should think about having
3 the testing someplace else besides that close to town.
4 That's it.

Fire Management 32
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

11 (On record, meeting presentation
12 proceedings convened at 7:08 p.m.,
13 third public presentation.)

2 UNIDENTIFIED SPEAKER: Are those live rounds?
3 MR. KEVIN GARDNER: No. They are blanks.

(Further presentation given by Mr. Gardner.)

UNIDENTIFIED SPEAKER: I have a question. What was the public meeting in Fairbanks? Were you talking about this?

COLONEL DONNA BOLTZ: Yes, ma'am. Absolutely.

THE WITNESS: And what would Fairbanks have to input about?

COLONEL DONNA BOLTZ: That's a great question. Most of it -- it was a relatively small group that came, about six people. Most of them were private pilots. And their interest was how the airspace over the training ranges might be affected by the development of the ranges.

So there were about six people. And it was a single issue that was raised in Fairbanks. No other issues were raised in Fairbanks last night.

UNIDENTIFIED SPEAKER: So they weren't offering an opinion of where they thought it should be?

COLONEL DONNA BOLTZ: Well, they were --

MR. KEVIN GARDNER: I think we got one.

Other 49
Public meetings were held in Anchorage on November 23, 2004, in Fairbanks on December 1, 2004, and in Delta Junction on December 2, 2004. Public meeting participants in Fairbanks were primarily concerned with airspace issues.

THE REPORTER: One.

MR. KEVIN GARDNER: One person provided comment.

COLONEL DONNA BOLTZ: Who actually provided comment, yeah, to the court reporter. Otherwise, it was mostly questions that we got and a dialogue.

And then a real important thing that happened is the group that was interested, represented by -- Kevin, the AOPA, which is -- help me out with the acronym.

UNIDENTIFIED SPEAKER: Aircraft Owners and Pilots Association.

COLONEL DONNA BOLTZ: Thank you. Aircraft Owners and Pilots Association, was linked up with G-3 ranges today, Mr. George Alexion, who is the G-3 -- I guess, George, you are Chief of G-3 Training Ranges, is that the correct title for you?

MR. GEORGE ALEXION: It's the installation range officer, ma'am.

COLONEL DONNA BOLTZ: He the guy who knows everything about the ranges. We hooked him up with the folks that have a special interest, and also agreed to

13 bring in the Army liaison to the Federal Aviation and
14 an airport representative so we could sit down and talk
15 about these issues and hear some of the concerns.
16 But as currently is represented, and George,
17 make sure I say the right thing, the development of the
18 ranges does not require restricted airspace. Is that
19 right?
20 We don't envision the requirement for
21 restricted airspace, and that was their concern.
22 UNIDENTIFIED SPEAKER: In the other
23 alternative locations, we're down to three, all,
24 unfortunately, in Delta. There were nine, the other
25 six I'm interested in knowing, was there a lot of

1 public comment that prevented those six from being
2 considered? Is that part of what deterred you from
3 considering those areas?
4 MR. KEVIN GARDNER: The public comment was
5 part of that, yes. It wasn't the sole factor.
6 There were -- the analysis that went into that
7 took into account, will that -- would that site
8 accommodate a battalion, a company, coming into
9 training. Can we physically configure the site to that

Proposed Action and Alternatives 62
The three locations analyzed in this EIS offer suitable terrain features and access for construction and training. The other locations were eliminated because they did not satisfy basic range siting, design and training requirements within a timely and cost-efficient manner.

safely, with the range firing things that we would need and so forth.

That, for example, was one reason that some of them were eliminated.

Others, like, for example, closer to Ft. Wainwright and Eielson, the Yukon Training Area, a good training area. The training area, it's -- topographically it's got a lot of steeper ridges and hills and stuff that, again, you might be able to squeeze something in there, but you wouldn't get the engagement ranges that you needed with the weapon, for example. And the vehicles traversing and whatnot just didn't make it a more useful site, for example.

And then access, safely evacuating, reliably evacuating soldiers from other areas.

For example -- west of the Delta River, for example. Some -- some -- a lot of big space out there, but primarily primary access is through air in and out.

And if aircraft are grounded and you've got a real world emergency, if a soldier is wounded, you have to take into account, do we have reliable infrastructure there to get someone out on the ground,

7 or where we can do it.

8 So those are the kinds of things. We got some

9 public input on this, as well, folks that were

10 concerned about, you know, some of the same things you

11 all are concerned about.

12 So all of that with these three sites included

13 was all factored in and in our analysis, concluded that

14 the three that you guys are reading about in the EIS

15 now are the ones that we propose.

16 MS. LESLIE FEILNER: There was a fourth, and

17 you haven't mentioned it, the possibility of not

18 building a site at all.

19 MR. KEVIN GARDNER: Oh, yeah.

20 MS. LESLIE FEILNER: Is that still being

21 considered? Because that wasn't mentioned in your

22 presentation. There were three options, but there were

23 four, I wanted everybody to know.

24 MR. KEVIN GARDNER: Leslie, you're getting

25 really savvy with us.

1 We always have in our NEPA, if it's

2 environmental assessment or even more comprehensive

3 Environmental Impact Statement, you must consider a

Proposed Action and Alternatives 63
A no action alternative has also been carried forward for analysis in the EIS and it sets the baseline for the measurement and comparison of impacts.

4 no-action alternative, the status quo, living with what
5 you've got. So, yes, absolutely, that's still in
6 there.
7 MS. LESLIE FEILNER: That's written in the
8 DEIS, too.
9 COLONEL DONNA BOLTZ: It is actually the first
10 of the things discussed. First course of action.
11 MR. KEVIN GARDNER: It has to be there as a
12 baseline of comparison because the law dictates that
13 even if the agency conducting the analysis cannot
14 select the no-action alternative, for whatever reasons,
15 you still must consider it. But there are some cases
16 where it's an alternative, too.
17 MS. LESLIE FEILNER: How strong would our
18 public opinion in Delta have to be to dissuade you from
19 using especially Eddy Drop Zone as your number one --
20 COLONEL DONNA BOLTZ: I would love to address
21 this because I heard this earlier today.
22 MS. LESLIE FEILNER: Thank you.
23 COLONEL DONNA BOLTZ: And it's what you just
24 said that I want. Public opinion is one thing, Leslie,
25 but what we need is your comment with the greatest

Proposed Action and Alternatives 64
The Army will take all public opinion into account when making a decision regarding the proposed action. Comments identifying specific concerns are of the most value to the decision maker.

degree of specificity saying why you would or would not support any site or all sites.

So your opinion, although it is important, will not be as influential as fact and observation, and anecdotal information that you can provide.

So detail that is compelling, that requires us to do analysis, that is waiting for the decision-maker. And that's what I would distinguish between opinion and commenting. Comment with great specificity, the most that you can possibly offer is really what we're looking for.

MS. LESLIE FEILNER: If you were to get that kind of public opinion in detail about, especially, Eddy Drop Zone, that's our main against, but if you were to get it on all three sites, now, the other six have disappeared, we're down to three, the other -- the Anchorage and Fairbanks didn't want it, they said no, we're down to Delta.

If Delta was to take that kind of stand, we do not have the population that Fairbanks and Anchorage and certainly the weight of politics and other factors going into that. But how much of our opinion would it

Proposed Action and Alternatives 65
The Army will take all public opinion into account when making a

23 take to say no?

24 COLONEL DONNA BOLTZ: Gee, almost impossible

25 for me to answer tonight. The guy who has to make a

1 decision, Leslie, I'll tell you, has a tough decision.

2 And he is going to have to weigh every factor.

3 I don't want you to walk away tonight thinking

4 that of nine sites, six were eliminated because there

5 were strong community voices.

6 Some sites were not large enough. We couldn't

7 consider them. Some didn't have terrain that really

8 was suitable for the development of the types of ranges

9 that we wanted to build. They were eliminated.

10 Some didn't allow us to co-locate the ranges,

11 which we agree is critical. We want to be able to

12 transition from a rural to a city environment for

13 fighting. All those things are important.

14 Some of them, as Kevin said, would put us so

15 far from reasonable evacuation if aircraft were

16 grounded that we would endanger the lives of soldiers.

17 So what really matters is things that have

18 environmental impact and all of those -- Jessica,

19 please go back -- all of those impact areas that Kevin

decision regarding the proposed action. Comments identifying specific concerns are of the most value to the decision maker.

20 has mentioned, plus anything you feel as though we
21 haven't mentioned, will be important.
22 MR. KEVIN GARDNER: So one of the issues on
23 space available to build the range is keep in mind a
24 place like Ft. Richardson, I mean some great land
25 there, but there's a lot of range construction going on

1 there right now. Smaller --
2 COLONEL DONNA BOLTZ: Oh, gosh, yes.
3 MR. KEVIN GARDNER: -- level ranges, but
4 that's going to be a hopping place. Same as
5 Ft. Wainwright, too.
6 MS. LESLIE FEILNER: We've got a lot going on,
7 too. We're a small town, but certainly we have the
8 railroad to consider, you've got Allan Airfield right
9 there.
10 I'm surprised that they have not come into
11 play on this because you're surrounding them on three
12 sides with these considerations. And that's going to
13 be pretty heavy when the missiles start when they are
14 flown in. And I'm wondering about the conflicts with
15 airspace, that's got to be a consideration certainly.
16 So we have got a lot going on, too. And

Cumulative Impacts 12
These topics are considered as part of the cumulative impacts discussion. Please see Section 4.3.11 for additional information.

Airspace 06
The Army is not proposing any changes to existing airspace. In addition, it does not foresee any conflicts with existing airspace classifications or users. Please see Section 4.2.8, *Airspace* for additional information.

17 especially right now we've got the pipeline coming
18 through, which may not be an impact or not, but
19 certainly the railroad's a consideration, and Delta has
20 a lot going on right now. It's a small place but a lot
21 to consider.
22 So I would certainly ask, again, publicly that
23 Eddy Drop Zone be taken off your list of three. I will
24 say that very verbally.
25 COLONEL DONNA BOLTZ: Carol is typing as you

1 speak, Leslie.
2 MS. LESLIE FEILNER: Thank you. I appreciate
3 it, because that's something I want out there. That's
4 something that cannot be.
5 It is extremely dangerous. Every one listed
6 up there is a consideration for Eddy Drop Zone.
7 Actually, all three are Texas Range, Fish and
8 Game has stated there are a lot of animals out there,
9 we have a lot of -- we have bison out there, we have
10 moose, we have wolves, we have a lot of bear out there.
11 That's a consideration for them. So they have said
12 Texas isn't a viable option either.
13 So Donnelly, of the three, seems to be the

Proposed Action and Alternatives 66
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

Wildlife and Fisheries 31
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

14 appropriate location, although I know the most
15 expensive for you all. And probably the last of your
16 considerations, but please make it first. Thank you.
17 Appreciate you.

21 UNIDENTIFIED SPEAKER: I'm curious, I can see
22 the need for a training facility of this nature, but
23 the arctic environment doesn't seem to be entirely
24 where the conflicts are in the world right now.
25 Afghanistan can have some pretty inclement

1 weather and cold in the mountains and whatnot, but
2 we're engaged in Iraq right now and that really doesn't
3 mesh up with the arctic environment here.
4 And I was just curious, soldiers need
5 training. Ill-prepared soldiers are -- well, it just
6 doesn't work. So the arctic environment has my
7 curiosity.
8 COLONEL DONNA BOLTZ: Well, I think General
9 Hirai has said a number of times that although we train
10 in Alaska, we certainly don't think we'll fight the
11 next war in Alaska. But this is where we work and live
12 and where we would want to train our soldiers. The --
13 there is buildable space in Alaska; picking the right

Purpose and Need 04
USARAK requires a training facility in Alaska that allows military units to conduct live-fire combat training to raise and sustain their war-fighting skills to higher levels. These combat skills must be raised to levels required for military units to effectively conduct operations in the current global war on terrorism, to support other world-wide contingency operations, and to be prepared for future global combat operations.

14 site is key.

15 But the Army has made decisions to re-station

16 a number of units in Alaska, and it's our

17 responsibility to make sure that we have available

18 training ranges that address the needs and the

19 environment that we expect soldiers will face in

20 modern-day combat, and that includes development of

21 ranges like this that they can access and train on

22 regularly.

23 Yes, ma'am.

24 UNIDENTIFIED SPEAKER: I have a couple

25 questions. Was there any discussion or planning about

1 the proposed railroad? And do we know where that route

2 is and how it would fit in with that range -- any of

3 the ranges, for that matter?

4 MR. KEVIN GARDNER: No. We've heard the same

5 reports and things about possible proposal for rail

6 access from Fairbanks to Delta, and that may or may not

7 impact the Army.

8 We haven't been formally approached on that,

9 we do not take it into consideration in this since

10 that's -- you know, at the time, hypothetical action

Cumulative Impacts 13
These topics are considered as part of the cumulative impacts discussion. Please see Section 4.3.11 for additional information.

that was not an Army action.

And at the time we are approached by the railroad or whoever by this if it affects Army lands, then we'll certainly have to participate at that point.

UNIDENTIFIED SPEAKER: There is legislation passed that says somebody is tasked with determining a route from Ft. Greely to the Alaska border, I believe. Or from Delta to the Alaska border. So that -- I mean, to me, that's really pertinent.

And, you know, I don't know how all things work, but I'm a little bit surprised that whether you were approached or not, that someone on the team didn't approach the railroad people and say, what do you have in mind.

MR. KEVIN GARDNER: I think the answer at the time is there just wasn't -- there just isn't the information available that would be meaningful.

COLONEL DONNA BOLTZ: But there is a requirement to consider cumulative effects, and that's the sort of thing that you're talking about.

And as we moved forward in this process, the railroad has been raised, it has been raised by Delta

Cumulative Impacts 14
These topics are considered as part of the cumulative impacts discussion. Please see Section 4.3.11 for additional information.

8 Junction. You guys raised it to me last Monday and it
9 was mentioned again to General Hirai, so one of the
10 things that we will have to do is go back and explore
11 that as we complete this process. So it will not be
12 left out.
13 UNIDENTIFIED SPEAKER: Okay. And another
14 question, just because I am ignorant about this stuff,
15 but what is the definition of "restricted airspace,"
16 and how is it determined whether airspace is restricted
17 or not?
23 MR. GEORGE ALEXION: Restricted airspace is
24 basically a parameter established around a training
25 area or an installation to allow actions to influence

1 what happens above the ground safely.
2 Restricted airspace can be turned on and it
3 can be turned off. When it is turned off, aviation
4 elements other than elements in a training exercise can
5 be granted access through that. There are other areas
6 such as SARSAS, which is a small arms -- help me Steve,
7 I forget the letters.
8 MR. STEVE THURMOND: Small arms restricted --
9 MR. GEORGE ALEXION: Airspace, which again, is

Airspace 07
Restricted areas contain airspace identified by an area on the surface of the earth within which the flight of aircraft is subject to restrictions. These areas denote the existence of unusual, often invisible, hazards to aircraft such as artillery firing, aerial gunnery or guided missiles. The establishment of new restricted airspace is not proposed as part of this project. Existing restricted airspace would be utilized. If restricted airspace is not being used by the managing agency, aircraft can operate in the restricted airspace without needing a specific clearance to do so.

temporary in nature, as is a controlled firing area, which is a temporary measure, in both of these cases allows us to maintain the responsibility that the guy on the ground has got to watch out for the aircraft that may move through the area.

So we have to stop whatever we are doing when something gets into that airspace. Where it's a restricted airspace, when it's put in a hot status, everybody stays out other than the participating unit, and that's what maintains that viability of a smooth, if you will, flow through of the training exercise that we want to execute.

UNIDENTIFIED SPEAKER: Okay. And so did I understand that there will be no restricted airspace with these proposed ranges?

MR. GEORGE ALEXION: The G-3 position --

COLONEL DONNA BOLTZ: G-3 is training, plans, operations, the staff element that advises the commander in those areas.

MR. GEORGE ALEXION: Which is basically my boss, with the commander's guidance, is that as long as the Army can use Notices to Airmen, ads, either in

7 newspapers, television, radio, whatever the command and
8 the garrison side of the command, being Colonel Boltz's
9 office and General Hirai's office being the mission
10 side of the command, find the most effective way to
11 maintain communications with the public. They do not
12 intend to pursue a restricted airspace over the ranges
13 on the east side.
14 UNIDENTIFIED SPEAKER: Will there be times
15 where no one is allowed to enter the airspace except
16 the people that are participating in the operation?
17 MR. GEORGE ALEXION: There will be times that
18 we would ask the public, depending upon the range, to
19 maintain its activity off the installation. It would
20 still leave a corridor from the Isabel Pass
21 northeastward, if you will, along the mountain range,
22 and it would still always leave that open because we
23 would not affect any area.
24 The effects of our weapons systems, the
25 effects of what lands down range all must be contained

1 within installation boundary.
2 So worst case, we would ask the public to stay
3 out of the installation boundary where the exercises

were taking place, and use either the corridor around the mountain range or a corridor going up the Richardson Highway.

UNIDENTIFIED SPEAKER: What about traffic going along the Alaska Highway, if you chose Eddy Drop Zone, or if Eddy Drop Zone was chosen?

COLONEL DONNA BOLTZ: You're talking about vehicular traffic?

THE WITNESS: No, I'm talking about air traffic.

MR. GEORGE ALEXION: It would have no impact on that. And I'm taking what you're saying is basically flying along the Alaska Highway?

UNIDENTIFIED SPEAKER: In that vicinity, right. Like using that as a guide but not necessarily just hovering right over it, but perhaps to the sides.

MR. GEORGE ALEXION: Again, if -- just looking at Eddy, and you wanted to talk about that site, we begin, we've got the installation boundary up here that we must maintain all effects of anything that we do within that boundary.

When we start at Eddy Drop Zone, if you were

Airspace 08
Two civilian flight corridors were established along the Alaska Highway near Delta Junction and the Richardson Highway near Donnelly Dome. All proposed activity areas (construction, maneuver and surface danger zone) for the BAX and CACTF at Donnelly Drop Zone are located within at least a portion of the Richardson Highway VFR corridor. A portion of the surface danger zone proposed under the Eddy Drop Zone alternative is also within the Richardson Highway VFR corridor. Proposed actions under the North Texas Range alternative would not construct or operate a BAX or CACTF within either VFR corridor.

talking about Eddy Drop Zone, the effects of our munitions would go down this way. So it's not going to have any effect on anything up here.

UNIDENTIFIED SPEAKER: And I guess I'm thinking about air traffic that's associated with training in there.

MR. GEORGE ALEXION: Air traffic associated with training.

UNIDENTIFIED SPEAKER: Right.

MR. GEORGE ALEXION: There's a lot of different ways that you could bring that in. If the aviation assets were to have a requirement to come in from the north, then they would have to establish NOTAMs and be in MOAs, and it would be a flight, sight, and avoidance case that they would have to maintain which is what they have got to do.

For instance, when we were doing an airborne operation down in the Donnelly area down here, we've got big aircraft flying and they are dropping soldiers, they have got to maintain a sight and avoidance with any of the aircraft in that area, and/or cease of operations.

23 So if whatever you're doing out of these other
24 areas, it would be the -- kind of the best words would
25 be the standard sight and avoidance that you would have

1 to use whenever you are not flying into a controlled or
2 restricted airspace.
3 And in all probability, what you would
4 normally see there would be units coming in from the
5 west and egressing and ingressing through the Army
6 installation properties that it's got before it would
7 go to any kind of a tactical level.
8 In short, it may fly at a thousand or 2000
9 feet to get here, but before it's going to go down to a
10 training or a tactical level, it's going to be within
11 the installation boundary.
12 UNIDENTIFIED SPEAKER: So there will be air
13 traffic coming in with whatever zone you use?
14 MR. GEORGE ALEXION: There's a possibility of
15 it.
16 UNIDENTIFIED SPEAKER: Helicopters.
17 UNIDENTIFIED SPEAKER: Why I ask, this past
18 summer, we had one fly over the house, and I ran to see
19 if the sky was falling, it was so close, and it shook

Noise Management 06
Aviation elements must adhere to established altitude travel restrictions established by the Federal Aviation Administration, where applicable. Unfortunately, there are instances where both civilian and military aircraft travel below the established altitudes. However, these occurrences are not expected to happen on a regular basis as violations are reported to Range Control.

20 the house.

21 MR. GEORGE ALEXION: Aviation elements have

22 got a standard altitude that they are supposed to

23 maintain prior to entering into installation

24 properties. And the unfortunate side is there are

25 instances where people do, for whatever reason, go

1 below those altitudes. But it's not something that the

2 Army encourages.

3 It's not the Army nor the Air Force's intent

4 to train over populated areas and come screaming in at

5 treetop level like they possibly might in a combat

6 area. And that type of flying is only associated, and

7 I would say very strongly, directed by commanders that

8 it doesn't happen. But there are instances where it

9 does.

10 COLONEL DONNA BOLTZ: And I think one of the

11 things we did last week, Brenda, was give you guys --

12 leave you with a phone number that you immediately

13 could call if you observed something like that so that

14 you have a direct line because not only should that not

15 happen, we need to know when it does.

16 UNIDENTIFIED SPEAKER: Another thing, we're

Noise Management 07
USARAK Range Regulation 350-2 prohibits any training activity that generates noise (firing of blanks, pyrotechnics, simulators,

17 real close to that Eddy Drop Zone, and usually when
18 they have been having that training down here, it will
19 be in our local paper, they are going to have training
20 and we will have firing from such and such an hour to
21 such and such an hour at night. They extend beyond
22 that hour at night. We have gone to bed many a night
23 and still had the shooting going on.
24 COLONEL DONNA BOLTZ: And that's another time
25 when it merits a phone call because we need to know,

1 and if there are posted hours, we need to make sure we
2 keep within those hours. I think, Steve, you gave the
3 phone number last week.
4 MR. STEVE THURMOND: Yes, ma'am, it's
5 873-1447.
7 UNIDENTIFIED SPEAKER: What size guns are they
8 going to be using up in the Eddy Drop Zone?
9 MR. GEORGE ALEXION: The largest caliber we
10 anticipate at this point is the 105 mobile gun system
11 when it comes in. This range is designed -- and when I
12 say largest caliber, I really should say the one with
13 the largest SDZ, which is a canon, a direct fire will
14 really be the 105 because technology has not caught up

etc.) between 10:00 p.m. and 6:00 a.m. in areas adjacent to populated areas. Exceptions to firing hours require public notification at least 12 days before the training event.

Proposed Action and Alternatives 67
The largest caliber direct fire weapon proposed for use at the BAX would be the 105mm Mobile Gun System. Please see Section 2.2.1.2.2, *Munitions Training at the BAX* for additional information. Live fire ammunition would be utilized only at the BAX. “Simulated” training munitions and laser training devices would be primarily used at the CACTF. No indirect or explosive ammunition would be used at either the BAX or CACTF.

15 with that round, so it takes a bigger space to expend
16 its energy.
17 But we could fire a 120 millimeter canon on
18 this range. All the weapons systems that we're firing
19 in this range will fire either small arms or inert
20 large caliber munitions in a direct fire mode.
21 UNIDENTIFIED SPEAKER: This is all live
22 ammunition then? Small arms?
23 MR. GEORGE ALEXION: Small arms live. Now,
24 when we get into that, we have to differentiate where
25 we are talking about. We are talking about the BAX

1 right now into that live mode.
2 We do have certain munitions, which are small
3 arms, short range training munitions that we can use
4 inside the BAX. It's got roughly a 600 meter open area
5 Surface Danger Zone that -- and again, this is
6 dependent upon the type of munition that they use.
7 We've got some staining munitions that
8 basically will dissipate, we have got the paint-type
9 munitions that in warmer weather we can go ahead and
10 fire against each other or other soldiers to force on
11 force engagement.

But no munitions are currently projected to go into this area that would leave a dud or an unexploded piece of ordnance on the ground. Leave a chunk of metal.

The 105 or the 120, they've got a ballistically balanced and replica of what the high explosive would be, so the soldier can train with his weapons system and have confidence in that system, but it doesn't explode like it normally would if it were a surface munition.

UNIDENTIFIED SPEAKER: I think the biggest thing that people in Delta are worried about is fire, of course. And you had that up there as management, fire management.

Has anything been thought about, you know, that area where Jarvis Creek is to build some kind of containment for it? Or ponds or something to give water to use?

MR. GEORGE ALEXION: A lot of thought has gone into this. And we work hand in hand with the BLM and the Alaska Fire Service to insure a safe environment.

If I were -- and I'd like to think I'm not --

Fire Management 33
The Jarvis North Fire Mitigation Project (started in 2003 and ongoing), new weather stations (installed in 2005) and fuel assessments conducted by the Alaska Fire Service in 2002 used to develop burn plans for North Texas Range and Eddy Drop Zone area all contribute to the existing fuels management program at USARAK. See Section 3.2.3, *Fire Management* for additional information.

9 a totally cold and uncaring individual, I would look at
10 this in terms of I'm going to do everything I can do to
11 protect this $67 million investment I've got there,
12 which means that my sole concern would be protecting --
13 and we'll pick on the Eddy right now, this area here
14 because anything that comes through, wherever --
15 wherever I fire on this east side, my fire is going to
16 start in here if I'm going to get a fire start.
17 The BLM has got what we call a fire weather
18 index, I'm sure you all have probably heard of that,
19 that Tammy and Chief Swinn (ph) thrashed me severely
20 whenever Steve has a commander that asks to go into a
21 higher category of that, and I have to go in and give a
22 recommendation to the CG, or his direct representative,
23 which is my boss, the G-3, before we exceed that.
24 So there's a lot of, I guess, anguish and
25 agonizing that goes through before we violate, if you

1 will, or waive whatever that fire index is.
2 And regardless, most of the time when I even
3 suggest going to it and ask, I get severely pounded by
4 the fire community about, you know, you shouldn't do
5 this and we have to weigh the requirements of training

the soldiers against the risk of getting a fire start.

Other things that we will do, just naturally, at any site we select, we try and clear it in a manner that you would find on the battlefield. And if I could ask you to please take and roll that little clip, the Parsons clip, please.

We try and make it as realistic as possible so that once we get the city built, it will look very much like a city that you could go downtown any place. It will have areas to where the grass is cut and groomed, it will have trees in there that are wind -- act or serve as a windbreak. We'll have roads and trails in here. And just the natural process of construction will end up with a degree of fuel mitigation.

We want to be good neighbors, and put sufficient fire service and sufficient assets on the ground that can hit these things in an immediate manner. That's why one of the things that looked really good about this site is because the historical data says, hey, we haven't fired dud-producing

munitions over there.

That way I can look at Tammy and say you're

3 cleared to send your crews in because I'm not sending
4 you into a dud-infested area so they can get in there,
5 get immediate response, get the fire contained, and
6 then we can continue training on.
7 Because if I burn -- if I allow this training
8 facility to burn down, I've lost this facility for a
9 generation or two. Even if it never escapes past my
10 boundary with what I've gone into here, I do not have
11 the natural vegetation and the challenges that I would
12 expect to give that soldier in his training
13 environment.
14 So we are very, very concerned, not only as a
15 neighbor, but as a proprietor of a very expensive
16 facility. And when we say $67 million, we will put
17 another 10 to $20 million of instrumentation,
18 computers, cameras, feedback capabilities, inside this
19 to where we can't afford to make a decision lightly
20 that would allow a fire to get started and go out.
21 So it's -- there may be some days that we look
22 at the soldiers and say, hey, guys, de-link every
23 tracer that you've got. You're not firing tracers. So
24 they have got to take a time if they haven't ordered
25 straight ball ammunition and get rid of the tracer.

So there's a lot of steps in the process that we do to, not only protect the community, but to protect the rather large investment.

And what I think the biggest investment that we really protect is the soldier that we're allowed to train on it.

Like you heard Kevin say, we've got an after-action facility in here, review facility, that allows us to capture film, capture voice input to where when you go, Kevin, why did you tell Al to go right at that corner? Well, I didn't tell him to go right. You hit the button and there's Kevin saying, Al, right. Oh, I guess I did.

So that's the most valuable tool that these bring to us is our capability to capture what we've done and let the soldiers talk about what they did so that they don't make the mistakes on the battlefield.

UNIDENTIFIED SPEAKER: Another thing, you -- as far as the Eddy Drop Zone, I think another thing you have to consider is the noise level that's going to be for all the people that are living right in that area.

MR. GEORGE ALEXION: We have done that. And

Noise Management 08
Modeling of the sound energy (noise) over a 24-hour hour period (the average noise level) at the BAX and CACTF shows that noise levels above 65 dBA would not be experienced outside the DTA installation boundary. For comparison, a vacuum cleaner can be expected to emit a 70 dBA sound level. Thus, average noise contours obtained from computer modeling indicate that no moderate or severe noise levels from small arms, large weapons,

23 two things I will offer you on that is when we put Eddy
24 in here, we went to United States Army Health Center
25 For Preventative Maintenance and Medicines, and I know

1 I really messed that up bad, but it's what is called
2 USACHPPM, and it's too many words for me to remember.
3 But they've got noise modeling that they do.
4 And when they build a noise model, they do it on a flat
5 glass plane, basically. It has no obstructions.
6 Nothing to lessen or abate the noise.
7 And they have found that approximately
8 115 decibels, noise becomes an irritant. And normally
9 associated with things like that below 115 decibels
10 people look at pretty much as wide noise, and it
11 doesn't really affect their --
12 UNIDENTIFIED SPEAKER: Unless they are living
13 in that area, and listening to it for 242 or whatever
14 many days a year.
15 MR. GEORGE ALEXION: No, ma'am. What we did
16 is we found in this area right around in here, the
17 noise level shooting in this direction to even putting
18 45 degree slant on it does not exceed, I believe it is
19 Kevin, 63 decibels in this area here.

or demolition would be expected off-installation lands. Additional information can be found in Sections 3.2.4 and 4.2.4, *Noise*.

The BNOISE2 model was used to generate “peak contours” which show expected noise levels from a single noise event. The model was run using a worst case scenario (adverse weather conditions). Adverse weather conditions are defined as a stiff wind, extreme cold weather or low cloud layer, all of which occur in Delta Junction. Peak noise levels indicate the probability (under certain conditions) of an activity being loud enough to generate complaints. Figures 4.c, 4.e, 4g, and 4.i show that approximately 10% of the time large caliber weapons are used at the BAX, noise levels would be high enough to generate complaints up to 2,000 meters beyond the installation boundary. An example of a worst case scenario would be if the range was used for the maximum number of anticipated days (238), training on 24 of those days (10% of 238) could generate high enough noise levels to elicit complaints from residents near the installation boundary. In addition, on those 24 days, climatic conditions must include a stiff wind, extreme cold temperatures, or a low cloud layer. If these conditions are not present, than even fewer complaints from noise would be expected. Please see Section 4.2.4.1.1, *Heavy Weapons and Demolition Noise* and Section 4.2.5.1.4, *Impacts Attributed to Alternative 2 (Eddy Drop Zone)* for further information.

MR. KEVIN GARDNER: If you go to the next map right over to the left, there's the noise section.

UNIDENTIFIED SPEAKER: Here we go. See this yellow line in here is our noise level zone 2, which, I believe, is at 63 to 74 decibels.

UNIDENTIFIED SPEAKER: Okay. So you're saying if I live over on the Alaska Highway, I won't hear it at all?

MR. GEORGE ALEXION: No, ma'am. I'm saying it would appear, if you sat down on the back porch and you said, I have a need to be angry about something and an exercise were going on there, you would probably hear the 105 in a barely audible range.

But if you wanted to be angry about something, you could definitely talk to yourself, you could say I could hear it and that makes me angry.

But if you were sitting in the back talking, picnic out on the back porch and just carrying on your daily duties, you might hear it, but it wouldn't be audible enough to where you would even stop and give it the time of day.

UNIDENTIFIED SPEAKER: Okay. Just on their

Proposed Action and Alternatives 68
The proposed layout for the BAX at Eddy Drop Zone would

17 training now, then, where are they shooting? In
18 comparison to where the Eddy Drop Zone is? Where are
19 they training?
20 MR. GEORGE ALEXION: Well, they do some
21 training up here in Buffalo, they are doing training
22 down here. We have artillery that has got the, what I
23 would say a double boom, you've got the boom when the
24 round is fired and you've got the boom from the impact
25 of the round that travels up and down the Delta River

1 very nicely because it channelizes and moves the noise
2 on up.
3 Two other things I would offer up to you, in
4 the Yukon Training Area, less than 4 kilometers or
5 right at 4 kilometers, which is about 1. -- 2. -- 2.4
6 miles, which is far closer than where you are in here.
7 We have an MPTR, which is the mounted portion
8 of this range going in, and probably for the past 30 to
9 40 years, have been firing 50 caliber 7.62 mortars in
10 this area next to a housing area that's, again, closer
11 than what we have in most cases the town, say, here.
12 And they have been able to cohabitate, if you
13 will, very successfully to where it doesn't disrupt

incorporate the existing drop zone into the design to utilize already cleared/disturbed area. Please see Section 2.4.3, *Description of Location Alternatives* for additional information.

14 their family lives.

15 UNIDENTIFIED SPEAKER: Is that military

16 housing or civilian housing?

17 MR. GEORGE ALEXION: It's a mixture of it.

18 Most of it is military housing and then there's a

19 community of Moose Creek that's off at an angle that I

20 would say probably 5 to 6 kilometers, maybe a mile

21 further.

22 UNIDENTIFIED SPEAKER: Just a couple comments.

23 As far as fire in the BAX, there's no guarantee that if

24 a fire starts it's going to be caused by arms that

25 shoot in a particular direction. There's human

1 activity that can start a fire anywhere in that area

2 where humans are. So I just want to make that point.

3 And before I get into the noise, I had a

4 question that on the map it shows the direction of the

5 fire, and I -- again, I don't understand this so that's

6 why I'm asking, but so does that mean that everyone who

7 is on that range is always shooting in that direction?

8 How do you guarantee that all the firing goes that way?

9 MR. GEORGE ALEXION: Well, the way that we --

10 the way that we guarantee that is one, when we take the

Fire Management 34
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

Proposed Action and Alternatives 69
The BAX would support direct live-fire operations only. A direct fire operation occurs when ammunition is delivered on target by sighting directly on the target using the weapon system's sighting equipment. During a direct fire training event, Soldiers will maintain an unimpeded direct line-of-sight between their location and the targets, while shooting real bullets at those targets. All targets would be located downrange and would require all weapon's to be fired in the same direction. Soldiers are not

11 soldiers out there, the soldiers understand why they
12 are out there to train.
13 We also have noncommissioned officers and
14 officers that provide leadership to the unit, and we
15 have what we call observers and controllers that follow
16 along behind units to help keep them oriented in a safe
17 direction.
18 It's not -- we don't go to the extremes that
19 you would actually find in a combat zone to where you
20 walk truly into a free fire zone.
21 We very specifically sit down and the
22 commander comes in and says this is what I want to do,
23 and works with somebody like Steve back there and Steve
24 helps guide them along in the process to say, okay, you
25 can shoot in this direction and you can have another

1 element maneuver and shoot in this direction at this
2 engagement.
3 Now, maybe the next one or the one further
4 down because there's a possibility of the rounds going
5 off range because he will sit down with each engagement
6 that this commander tells him that they want to make
7 and they build a Surface Danger Zone for that

allowed to fire their weapons anywhere but at the applicable target.

8 engagement with the weapons that they intend to engage
9 in. And it's done a step by step.
10 If you follow this process through, you've
11 seen an overall, all encompassing, very large SDZ.
12 That is made up of probably 3 to 400 smaller SDZ's that
13 as they maneuver across this range and they select the
14 ways that they want to use their weapons systems to
15 support the soldiers that are maneuvering on it, which
16 way they maneuver on it.
17 So it's going to have a different look each
18 time. And not each time will it take that overall,
19 all-encompassing area on it.
20 UNIDENTIFIED SPEAKER: So one number I read,
21 like the BAX in Eddy Drop Zone or any of them actually
22 is about 3500 acres, but the SDZ --
23 COLONEL DONNA BOLTZ: Surface Danger Zone.
24 UNIDENTIFIED SPEAKER: Right. Is 24,000
25 acres?

1 MR. GEORGE ALEXION: It could be into that
2 neighborhood. That -- when they say that they are
3 talking about the overall all-encompassing capability
4 of that. That would take a -- probably a very plussed

Proposed Action and Alternatives 70
An on-the-ground surface danger zone would be associated with both the BAX and CACTF. The size of the surface danger zone is based on empirical data and is designed to contain all fired rounds. Within the assortment of weapon systems used at the BAX, the 105mm Mobile Gun System requires the largest surface danger zone and a firing distance of approximately 7.5 miles. The somewhat triangular shaped surface danger zone would be approximately 24,000 acres.

5 up force to be able to move down and eat at that whole
6 area at any one given time.
7 For instance, if I'm not using the mobile
8 gun system with what is called a sabot round, which
9 is a very, very small projectile that will travel
10 11.3 kilometers, my SDZ cuts back to 6300 meters for
11 the 105 HE simulated round or a 50 caliber round.
12 So if I were having a very, very robust
13 activity in this area, I'm only going to eat up this
14 much of this space in here, I'm only going to go down
15 6300 meters from my start and finish points, and that's
16 what we base that off of.
17 So depending on the exercises that the
18 commander plans it, one time it may look like it's a
19 very cylindrical, very long axis, and other times it
20 could be opened up to where it's very wide but short.
21 UNIDENTIFIED SPEAKER: And the BAX is where
22 you want to do the hill to hill, tree to tree?
23 MR. GEORGE ALEXION: Uh-hum.
24 COLONEL DONNA BOLTZ: Yes, ma'am.
25 UNIDENTIFIED SPEAKER: It's hard for me to

1 imagine that with everyone shooting pretty much in one

Proposed Action and Alternatives 71
The BAX would be used to train and test combat skills such as the ability to detect, identify, engage and defeat stationary and moving infantry and armor targets in a rural, tactical situation. Please see Section 2.2.1.2, *Operation of the BAX* for additional information.

direction, but I'll -- I'll go on faith here.

MR. GEORGE ALEXION: Well, really, when you say one direction, it's --

UNIDENTIFIED SPEAKER: I'm looking at the arrow.

MR. GEORGE ALEXION: They are shooting in a very safe direction. You've got objectives along the way. I wish I had a board to draw on.

COLONEL BOND: George, can I speak to this?

MR. GEORGE ALEXION: Sure.

COLONEL BOND: Now, I'm not actually with them, I command at the Cold Weather Test Center, and in tactical, I've been observing this for years.

What that range will look like, you will have range fans on the side, it will be lit up pointing in. So in the dark, so you can see you've got to fire in between these.

The vehicles go down set course roads that would keep the vehicle pointing in the general direction. So while certainly you could have some deviation to norm, for someone to fire 180 would really be puzzling how that could happen.

Because you have a vehicle, then you have a

25 safety that watches each of these two vehicles, and

1 there are two lanes that go down. So that's really
2 quite controlled. The Army doesn't just turn the
3 troops loose with ammunition willy-nilly because they
4 would accidentally kill each other.
5 The building that you saw, they looked kind of
6 helter-skelter with the blanks, that's why they do that
7 with blanks. It's a little more realism. But they
8 really have to put serious control when they're firing
9 live. So that's why.
10 COLONEL DONNA BOLTZ: When they are doing that
11 kind of firing in the city-type environment, it is with
12 blanks. It's not in live fire.
13 The other thing George talked about earlier is
14 when they are on a live fire range, they are doing
15 exactly what Colonel Bond said, they are travelling
16 generally in the same direction, firing in the same
17 direction, we don't want soldiers to kill themselves,
18 kill one another in the exercises.
19 And we also kind of have what we call a crawl,
20 walk, run training mentality in the Army. So the first
21 time they go on a range they might just walk through it

22 and talk about it. And then they'll go through and
23 fire blanks.
24 So before they ever are issued live
25 ammunition, putting rounds down range, they know

1 exactly what the parameters are within which they must
2 fire. So we -- we are very serious about training
3 smartly and training safely.
4 UNIDENTIFIED SPEAKER: Okay. Well, I
5 appreciate your answers and I don't mean to belabor it
6 or -- but --
7 COLONEL DONNA BOLTZ: That's okay. We are
8 here to answer your questions.
9 UNIDENTIFIED SPEAKER: -- I don't understand
10 it at all.
11 COLONEL BOND: The other thing that we need to
12 understand through the EIS is what kind of ammunition
13 is going down range. Nothing's going down range --
14 nothing's going down range and then exploding.
15 COLONEL DONNA BOLTZ: That's exactly what
16 George said. There's no second guess.
17 COLONEL BOND: This is live ammunition, but
18 it's a nerd ammunition. So the tank round is going to

19 send a hunk of steel down range, it will go through a
20 plywood target. Nothing's going down and exploding,
21 which obviously --
22 COLONEL DONNA BOLTZ: That's what we talked
23 about.
24 MR. GEORGE ALEXION: We've got what we call
25 battlefield effects simulator that we can simulate

1 those secondary explosions with.
2 But it -- be very well assured that what's
3 going down range can kill you, and we don't want
4 soldiers killed in training. We train so that we keep
5 soldiers from being killed. We do have accidents from
6 time to time.
7 But, I mean, even to reiterate what
8 Colonel Bond was saying, technology has progressed
9 now to where we've even got in-sight cameras so that
10 what the gunner is looking at, the guy in the control
11 tower is also looking at.
12 And he can hit kill switches, puts all targets
13 down, call a cease-fire, you've got generally -- a guy
14 even rides on the tank that's a not a member of the
15 crew, but is an observer, controller-type guy, that

16 walks through this stuff. And as Colonel Boltz said,
17 the Army's got a four-phase approach to doing something
18 like this.
19 We'll talk about it, and they will sit in a
20 room very much like we are now, they will get an
21 operations order, it's going to tell them where you're
22 going and what you're going to do. Then if they are on
23 the actual site, they can walk it and talk it.
24 Or they will get out on a big open field to
25 where the commander can watch everybody that's going.

1 Kevin, when we hit the first objective, you lay down,
2 your fire is from there and you point that way.
3 Colonel Bond, I want you to maneuver this way
4 and come up on the objective. Kevin, when the Colonel
5 hits this point, he's going to fire a red star cluster
6 or he's going to do this and you're going to get this
7 call, you're going to stop firing or you're going to
8 fire in a different direction and he's going to go
9 across it this way. So it's very, very controlled.
10 After they do it in the open field, then, like
11 Colonel Boltz said, they will load with magazines, with
12 blank munitions, and they will go through it at combat

speed with blank munitions.

And again, they will stop after each one of these phases. Kevin, what are your questions? What did you do right? What did you do wrong? Well, I didn't shift my fire soon enough.

Colonel Bond might say, yeah, you're right, because I was watching your guys and we would have been in your kill zone. So Kevin knows he's got to do that when they go out.

If Colonel Boltz is not happy with what she saw that time when they went through at that blank fire, say, hey, fellas, load the blanks up again, we're doing it again.

And then when she's comfortable as the commander that they are prepared to go through with live munition, then they will take that final step and get into the live fire.

UNIDENTIFIED SPEAKER: Okay. And then two more things, I think. I just want to make a comment about the fire issue again because those of us who lived here in '99 know that there's almost nothing that will stop a fire that wants to go through this stuff.

Fire Management 35
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

10 It doesn't matter if it's Jarvis Creek because
11 it jumped it in '99, it doesn't matter if it's a road.
12 I mean, it's going to go. So that's one point I wanted
13 to make.
14 And then in regard to the noise, the diagrams
15 we have there I think are about the average level,
16 correct?
17 MR. GEORGE ALEXION: They are averaged.
18 UNIDENTIFIED SPEAKER: That's an average
19 level. And does the average include days where
20 nobody's training, or does the average -- is the
21 average, like, every training day?
22 MR. GEORGE ALEXION: The average is, as I
23 understand it from USACHPPM, is if I tell them that I'm
24 going to fire my strack allocation out there, then they
25 will take a portion of my strack allocation, they will

1 put those number of rounds fired on that over a
2 weighted period and that's where the -- the curves come
3 out at.
4 UNIDENTIFIED SPEAKER: So that -- those curves
5 reflect only firing, no dead days?
6 COLONEL BOND: Correct. Well, to decipher

Noise Management 09
The number, or contour, presented in the figures represents the average noise level over a 24-hour hour period at the BAX and CACTF during training operations. Modeling of the sound energy (noise) takes into account all operations, including those that produce noise and quiet times, during the course of a year and produces noise contours. The figures show that noise levels above 65 dBA would not be experienced outside the DTA installation boundary. Additional information can be found in Sections 3.2.4 and 4.2.4, *Noise*.

7 what you just said, yes, that's an average over firing.
8 When he says the strack, he's looking at all different
9 types of ammunition because a rifle is not going to be
10 as loud as the canon in the vehicle.
11 MR. KEVIN GARDNER: We're going to dig into
12 that and make sure you get information.
13 MR. GEORGE ALEXION: And what this is done off
14 is this is done off the 105 millimeter canon because
15 USACHPPM has found that the automobile noise levels of
16 the small arms fires are not a contentious issue, but
17 more the crack of the canon and the higher level of
18 decibel output that it puts out.
19 And that's -- I guess what I'm saying in a
20 very fumbling way that if the canon is not -- which is
21 our noisiest noise maker here is not exceeding these
22 levels, then the 50 caliber and everything down to the
23 5.56 doesn't overshadow what the 105 is doing. So...
24 UNIDENTIFIED SPEAKER: Okay. I saw in the
25 Draft EIS, Figure 4(b) that shows peak noise level at
1 any range, and I think -- I'm not sure I'm reading it
2 right, but there is a yellow band around the outside
3 that says 115 DBP, which I assume is decibels. And it

Noise Management 10
The BNOISE2 model was used to generate "peak contours" which show expected noise levels from a single noise event. The model was run using a worst case scenario (adverse weather conditions). Adverse weather conditions are defined as a stiff wind, extreme cold weather or low cloud layer, all of which occur in Delta Junction. Peak noise levels indicate the probability (under certain conditions) of an activity being loud enough to generate complaints. Figures 4.c, 4.e, 4g, and 4.i show that approximately

4 goes across the Alaska Highway by the Clearwater Road.
5 And it says this is in adverse weather.
6 So I'm curious what adverse weather is, and do
7 we know how many days a year we have adverse weather
8 that produces conditions like this.
9 MR. GEORGE ALEXION: I wasn't part of that
10 particular --
11 COLONEL DONNA BOLTZ: I think we've probably
12 gotten -- outside of what George normally would answer,
13 and so I think that I see Carrie taking that question
14 and we have a do-out on that to you. But we don't have
15 an expert here that can answer this tonight. I'm not
16 going to let you walk away with half an answer, you
17 need the right answer. So we do have a do-out to you.
18 UNIDENTIFIED SPEAKER: One other question. At
19 the last meeting you told how many days a year, but
20 what are the hours per day? Is it 24 hours a day? The
21 training.
22 COLONEL DONNA BOLTZ: George, this one you can
23 talk about.
24 MR. GEORGE ALEXION: On this one, we have
25 looked at, or the Army I should say, has looked at

10% of the time large caliber weapons are used at the BAX, noise levels would be high enough to generate complaints up to 2,000 meters beyond the installation boundary. An example of a worst case scenario would be if the range was used for the maximum number of anticipated days (238), training on 24 of those days (10% of 238) could generate high enough noise levels to elicit complaints from residents near the installation boundary. In addition, on those 24 days, climatic conditions must include a stiff wind, extreme cold temperatures, or a low cloud layer. If these conditions are not present, than even fewer complaints from noise would be expected. Please see Section 4.2.4.1.1, *Heavy Weapons and Demolition Noise* and Section 4.2.5.1.4, *Impacts Attributed to Alternative 2 (Eddy Drop Zone)* for further information.

Proposed Action and Alternatives 72
Training events at the BAX and CACTF would vary in length based on training needs and strategy of each unit. Both day and night operations would be conducted. USARAK Range Regulation 350-2 prohibits any training activity that generates noise (firing of blanks, pyrotechnics, simulators, etc.) between 10:00 p.m. and 6:00 a.m. in areas adjacent to populated areas. Exceptions to firing hours require public notification at least 12 days before the training event.

1 approximately how long it takes a unit to go through
2 here.
3 And with a company going through here, we look
4 at the outside estimate that it could take it up to
5 16 hours to go through that. That's to go through
6 its -- remember we talked about the talk, the walk, the
7 crawl, and the whole nine yards of it.
8 We have to do two of those on this particular
9 piece of ground. We have got to do the blank fire and
10 the live before we do the live fire on the same piece
11 of terrain that they are going to live fire on.
12 What the Army uses for a planning figure is
13 these ranges could run 20 hours a day. Now, even if it
14 runs 20 hours a day, that does not mean 20 hours of
15 constant bang, bang, bang, bang, bang.
16 You'll have more periods of silence in that
17 20 hours as units are moving and maneuvering on
18 something with roughly a 30 second mad -- mad fire, if
19 you will, to where they are trying to, you know, really
20 suppress this one target, put maximum fire power on it,
21 and then a few sporadic rounds that would go into their
22 reacting to possibly a counter-attacking force. These
23 are what you would find that would go through this.

24 If a commander chose to use the 105 and do a
25 training crew qualification, you would hear the crack

1 of the gun approximately every minute and a half to two
2 minutes for about a 10-minute period, and then probably
3 nothing again for another 45 minutes to an hour.
4 And in between, there's times in how that
5 20 hours can roll around, you put in there to where the
6 commander has said, unless I've got a real press, I
7 want to you train between -- what are your hours,
8 Steve, 8 and 20 -- or 6 and 22.
9 UNIDENTIFIED SPEAKER: 22 correct.
10 MR. GEORGE ALEXION: 200.
11 COLONEL DONNA BOLTZ: So 6:00 a.m. until
12 10:00 p.m., basically, if you don't normally operate on
13 24 hour clock.
14 MR. GEORGE ALEXION: Again, you still wouldn't
15 hear a constant bang, bang, bang, because of the way of
16 natural things, there's a lot of movement in there that
17 you're not just constantly shooting.
18 MS. LESLIE FEILNER: But if it was down in the
19 Donnelly Drop Zone, likely nobody would hear that,
20 then?

Noise Management 11
Modeling of the sound energy (noise) over a 24-hour hour period (the average noise level) at the BAX and CACTF shows that noise levels above 65 dBA would not be experienced outside the DTA installation boundary. For comparison, a vacuum cleaner can be expected to emit a 70 dBA sound level. Thus, average noise contours obtained from computer modeling indicate that no

21 MR. GEORGE ALEXION: That's a possibility.
22 Your noise decibels, they are going to change the
23 directions that they go in. But even if you look at
24 the bell curves, they will tell you approximately how
25 far that they are going.

1 And these curves are predicated off the
2 direction of fire, unlike the circular one that you
3 saw. These are direct -- directionals and that's based
4 off of from 45 degrees in front of them to -- to
5 directly in front.
6 UNIDENTIFIED SPEAKER: I guess I just have one
7 more question. Did you record any of the comments that
8 was made at the last meeting?
9 COLONEL DONNA BOLTZ: Which last meeting?
10 UNIDENTIFIED SPEAKER: The last meeting we had
11 here.
12 COLONEL DONNA BOLTZ: When I came here on
13 Monday?
14 UNIDENTIFIED SPEAKER: Yeah, I believe it was
15 on Monday.
16 COLONEL DONNA BOLTZ: We did not record
17 comments, that was not a public meeting. And I think I

moderate or severe noise levels from small arms, large weapons, or demolition would be expected off-installation lands. Additional information can be found in Sections 3.2.4 and 4.2.4, *Noise*.

Other 50
All comments submitted regarding the proposed construction of the BAX/CACTF facilities have been taken into account during this environmental analysis. Discussion began in 2003 with the publication of an Environmental Assessment. Please see Section 1.7, *Scoping and Public Review Process* for additional information.

said at the beginning we would not be recording comments, but I asked if you had comments to come during this period and make them, write them, send an E-mail, however you would like to do it.

But I have to have someone who can accurately record the comments and we did not have a court reporter. That was a meeting offered to the community to come and answer questions like these.

MR. GEORGE ALEXION: If I can give you one -- on the noise stuff, remember that these -- these scales or these diagrams that you see, they are based off of a flat mirror with nothing to abate the noise in there.

So once you start adding into the trees, the buildings, and other things that naturally will come along in there, then you start decreasing where you're hearing the noise at, as well.

MR. KEVIN GARDNER: We've been digging in the book, when we're done for a few minutes if you want to join us over at the noise chart, we can put to rest a number of your questions.

COLONEL DONNA BOLTZ: Great. Thank you, Kevin. All right. Yes, sir?

15 MR. WHIT AILLAUD: Not a question, just a
16 statement. We've heard a great deal --
17 COLONEL DONNA BOLTZ: If I may, because we do
18 have a court reporter here, would you mind stating your
19 name so we have your comment for the record, sir?
22 MR. WHIT AILLAUD: Whit, W-H-I-T; Aillaud.
23 A-I-L-L-A-U-D.
24 We've heard a lot tonight about the ideals,
25 and all the work that the military has done to make

1 sure that everything that is going to go well and
2 perfect and everything's going to be cool. But it is
3 nonetheless an ideal world.
4 When you get out to the real world, things go
5 wrong. And for example, we talk about the decibels.
6 Well, Ft. Greely main post is 8 kilometers that way, I
7 live as the crow flies 7 kilometers that way.
8 And when there are war games going on at my
9 house is the decibels may not be very high but I feel
10 like I'm living in Suburban Fallujah, and the annoyance
11 factor is off the chart.
12 And that has -- that's the real world issue
13 versus an ideal issue. Ideal world issues. We've

Human Health and Safety 16
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

14 talked a great deal about the fire. I know that your
15 words are genuine when you talk about all that you have
16 considered about fire problems.
17 But if you go back to the big fire of '99, and
18 feel free to correct me if I'm mistaken on this, but I
19 believe that fire was started by a military action out
20 there.
21 It started like all fires, just a small fire
22 and should have, and could have been controlled right
23 away. But for whatever reason, it got out of control,
24 quickly became just this raging inferno that very
25 nearly took out Ft. Greely and threatened the town

1 sight.
2 Residents of this town are constantly having
3 to deal with military convoys coming down from
4 Fairbanks. And I know the military has rules and
5 regulations about these things in the ideal world
6 that's supposed to work.
7 In the real world they all get bunched up
8 behind the slowest vehicle so we are getting behind
9 35 mile an hour or 35 vehicle convoys that are
10 35 inches of vehicles, are 35 inches apart from one

Fire Management 36
The cause of the 1999 Donnelly Flats fire was not attributed to military training.

Human Health and Safety 17
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.
The Army will continue to follow its internal transportation regulations and obtain all necessary state and federal permits.

11 another travelling on the highways, at best,
12 frustrating and at worst, just outright hazardous.
13 And I know you've talked a great deal about
14 the safety of your training exercises here, but things
15 do go wrong and they go terribly wrong, and people who
16 have been in this town for a while can remember three
17 or four years ago, this March, where in a live fire
18 exercise out there, a jet, military aircraft, whatever,
19 dropped a giant bomb way off target, way too close to
20 town.
21 The shockwaves went right through town, caused
22 structural damage. About knocked me flat in my house,
23 again, that way, quite a distance away. Things will go
24 wrong, no matter how great a plan you do. Things are
25 going to go wrong.

1 Also in this town, it seems like every
2 12-year-old kid has access to a four-wheeler. And you
3 may seem like this town is out in the middle of
4 nowhere, I guess by Pennsylvania standards or something
5 it probably is.
6 But the reality is all that area you're
7 looking at there is criss-crossed with trails that

Human Health and Safety 18
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

8 12 year olds use on their four-wheelers. Now, you put
9 that right there at Eddy Drop Zone and that's going to
10 be a 12-year-old magnet.
11 You're inviting all kinds of trouble from
12 kids on four-wheelers or snow machines heading out
13 there to an area that they are used to just cruising
14 around on and ignoring the U.S. Government property,
15 no trespassing signs. Not justifying their behavior,
16 just merely stating that's the way it is in the real
17 world.
18 I cannot urge you enough to put your facility
19 in one of the southern sites. Get it away from this
20 town.
21 COLONEL BOND: I would point out by way of
22 clarification, it's not noise -- if it's rumbling in
23 your house, that is not tactical weapons.
24 What you're feeling is the impact of artillery
25 or Air Force ordnance. And that will remain the same
1 no matter what you do here, all of that's still going
2 to go on in that impact area. And the noise, the
3 vibration is going to come up the river.
4 So the type of weapons that George Alexion

Human Health and Safety 19
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process. Please see Section 2.2.1.2.2.1, *Safety Precautions* for a discussion on safety measures at the BAX. Public access to and recreation within the immediate footprint of the range complex would be eliminated under the proposed action. Access to areas within the Surface Danger Zone would be limited to those times the range is not in use.

5 referred to do not cause the vibration that the
6 gentleman was referring to.
7 MS. TAMMY DEFRIES: Just a clarification.
8 I'm Tammy DeFries, Alaska Fire Service, BLM.
9 And the Donnelly Flats fire of 1999 did
10 not start on a military activity. It was an after
11 hours civilian on military lands that did start that
12 fire.
13 The fire was initially attacked very
14 aggressively by Division of Forestry, couple loads of
15 helitac with the local firefighters, two loads of
16 smokejumpers, so that would be 16 additional
17 firefighters on that initial call, we had several loads
18 of -- it was very well -- it was hit hard.
19 What happened was due to a natural fire
20 occurrence, a fire whirl happened, and kind of threw
21 things into a little bit of a mix. And people had to
22 pull off for some safety reasons. And the fire got
23 larger.
24 We went in as soon as that was over and, you
25 know, it did get larger and we had to kind of change

1 our tactics as far as not direct but go indirect.

So it was a fire scenario that we do hope that doesn't happen again.

Which I want to clarify, I wanted to touch on a couple of things you said. Yes, there will be more people, you know, more troops in the field.

One of the mitigation measures is to have an initial attack response team on site for all military activity in spite of what the fire weather index there is.

So I think we're one step ahead of the game by having an initial attack response team during, or on scene. It will take care of, you know, other human cause, maybe not just troop activity.

It will also be quick response as far as quick reporting and actual quick response on a small fire. And a direct communication link not only to the Division of Forestry here, but to Alaska Fire Service for the air tankers and helicopters and all those things are available.

But I guess BLM and Alaska Fire Service is in support of the -- you know, the range expansion given, you know, the mitigation measures are upheld, you know,

24 the response team, as well as the hazard and following
25 the fire weather index. I think we're ahead of the

1 game in the long run.
2 UNIDENTIFIED SPEAKER: Tammy, you're saying
3 that you can commit a team for BLM. What kind of
4 team -- number one, sizewise, what kind of team are we
5 talking about?
6 And the 242 days, that's 365 a year, that's a
7 lot of days. Can BLM -- are you willing to commit --
8 MS. TAMMY DEFRIES: Well, right now we do have
9 a proposal we have been working on range on the
10 environmental and part of this plan is a fire engine.
11 Somewhat mimicking what the Division of Forestry has
12 now is your Type 6 engines, there are 200 and
13 300 gallon trucks, fully loaded as -- just as they
14 have.
15 A team of three, you know, fully qualified,
16 just as they have at Division of Forestry as far as
17 wildland fires. That's one proposal. BLM would assist
18 in staffing that.
19 No, we haven't come to a conclusion as to how
20 that will actually work, but we do have that proposal

Fire Management 37
Stationing of a wildland fire crew at Fort Wainwright, that would accompany all troops training at DTA during high and extreme fire danger rating periods is proposed to address potential fire risks associated with the BAX/CACTF facility. This crew would solely support military training operations. This proposed mitigation measure reflects all reasonable and practicable measures to mitigate adverse impacts. Proposed mitigation measures to be implemented will be identified in the Record of Decision, which follows the Final EIS.

21 forwarded up.

22 UNIDENTIFIED SPEAKER: So it hasn't been

23 decided at this point whether BLM can commit or will

24 commit people to it?

25 MS. TAMMY DEFRIES: Oh, we're committed. You

1 know, as I say, there are options put forward, it's

2 just a matter of deciding on which actual option is --

3 is, I guess, decided upon with the commander.

4 MR. GEORGE ALEXION: Tammy, our preferred

5 option, as we were working this, was to have that crew

6 with the truck there on a full-time basis through the

7 fire season.

8 MS. TAMMY DEFRIES: The fire season, which

9 would include mid April, mid to late April, depending

10 on when your snow cover is off and off the other ranges

11 until, you know, into September, whenever the rains or

12 whenever the indices drop to low.

13 COLONEL BOND: So again, if I can, just by

14 way of explanation, not in support of any of these,

15 but it doesn't surprise me that fire was not caused

16 by military for the simple fact that soldiers never go

17 out and train one soldier smoking a cigarette, throwing

Fire Management 38
Please see previous response.

18 it. What I'm saying there is not one soldier out
19 training.
20 So the military ranges, it's one of the
21 advantages of military ranges, again, I've been doing
22 this from 18 years of tactical experience. You know,
23 respond very quickly if you start a fire.
24 Fortunately, what we are not going to have
25 here is M-1 tanks which are notorious for starting

1 fires with a 900 degree exhaust. My experience with
2 that is you quickly know if you start a fire, training
3 ceases, you put a fire out.
4 It didn't surprise me that fire was caused by
5 a civilian because how big did the fire get before
6 anyone even knew it existed?
7 UNIDENTIFIED SPEAKER: The initial report, I
8 can tell you right now, was over 20.
9 COLONEL BOND: It doesn't matter. But I think
10 that's -- the concern that a fire will go unnoticed by
11 soldiers, in my experience, it doesn't pan out in any
12 of these because it's seen.
13 COLONEL DONNA BOLTZ: Brenda, did you have a
14 comment?

UNIDENTIFIED SPEAKER: Yes. If you have a team that would be there, would they be a dedicated team and not be called off for other forest fires?

UNIDENTIFIED SPEAKER: Absolutely.

MS. TAMMY DEFRIES: That is the deal I promised George.

MR. GEORGE ALEXION: And we did sign that if we didn't have training going on, and they had a fire elsewhere they needed to commit that to, that we would be open, I guess the best word to put it is for negotiation.

Again, someone like Colonel Boltz would be the person to make the decision to whether or not to release this crew back to the BLM to someplace else. And that would be because we didn't have training forecasted for that period of time.

MS. TAMMY DEFRIES: One of the other duties of this type of a team is that, you know, in the morning they are kind of right there in their fire clothes, they can do -- they can deliver a prevention sort of message to the troops, and just by sheer, you know,

Fire Management 39
See previous response.

exposure, I think there is a good fire prevention message we are promoting, you know, from the very start of an activity.

MR. STEVE THURMOND: And also when they are not fighting the fires or training, they can be down range mitigating fires around the target areas and take care of all that stuff.

MS. TAMMY DEFRIES: Absolutely. They will have a chain saw in their hand completing the hazardous fuel reduction.

MR. GEORGE ALEXION: I think the efforts of Tammy's crews up here throughout the year on trying to mitigate and lessen the fuels that we've got there.

And that's a real good point that Steve brought up was that because I asked Tammy the question, well, what are they going to do when we are not training.

And the first words out is, well, George, they are going to be out doing fuel reduction, fuel mitigation efforts, and watching the areas for, you know, more problem areas may come up and see what

9 efforts we can take to do that, looking in the areas
10 that, you know, eventually may take a lot of fire. So
11 Tammy has been working with us for quite some time,
12 huh, Tammy.
13 COLONEL DONNA BOLTZ: Yes, sir.
14 MR. WHIT AILLAUD: Yeah. Thank you for
15 correcting me on the cause of that fire. But again, I
16 want to emphasize in the '99 fire, you were on that
17 right away, it got out of control.
18 You know, I've lived up here long enough,
19 I have -- in the summer was on a fire line, I know
20 what these fires can do. It's very frightening,
21 even with all of what you have to say, when these
22 fires get going, with a 50 mile an hour wind out of
23 the south going through black spruce, there is no
24 stopping them.
25 And the case of the '99 fire, you were there,
1 it got out of control. It can happen again.
2 And as far as the small arms live
3 ammunition on the proposed range, that's true,
4 we are talking about rifles. And they don't make
5 the noise as the explosions, exploding-type arms

Fire Management 40
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

6 that you're going to see out on the ranges, Texas
7 Range or whatever.
8 But nonetheless, either by accident or by
9 design in the real world, it's going to happen, we're
10 going to have the exploding-type arms that are in the
11 training areas.
12 And also one thing we get here in the winter
13 are the inversions. And boy, sound can carry well when
14 we get the inversions. And people who have lived here
15 for a while can hear a conversation from somebody a
16 half mile down the street. You get that thermal layer,
17 it bounces right back down.
18 Then all of a sudden the small arms do get to
19 be a big deal when it sounds like you've got a gunfight
20 in your backyard that's really a few miles away. Back
20 to the real world.

22 UNIDENTIFIED SPEAKER: One other thing with
23 the Eddy Drop Zone is the backs -- it backs a whole
24 bunch of businesses right on the Alaskan Highway. So
25 if they used one of the other sites, it's not close to

Proposed Action and Alternatives 73
Bullets fired at the BAX and CACTF do not contain explosives. There would be no possibility of unexploded ordnance (i.e., bullets or warheads) being used at the ranges.

Noise Management 12
A model was run using a worst case scenario (adverse weather conditions). Adverse weather conditions are defined as a stiff wind, extreme cold weather or low cloud layer, all of which occur in Delta Junction. Peak noise levels indicate the probability (under certain conditions) of an activity being loud enough to generate complaints. Figures 4.c, 4.e, 4g, and 4.i show that approximately 10% of the time large caliber weapons are used at the BAX, noise levels would be high enough to generate complaints up to 2,000 meters beyond the installation boundary. An example of a worst case scenario would be if the range was used for the maximum number of anticipated days (238), training on 24 of those days (10% of 238) could generate high enough noise levels to elicit complaints from residents near the installation boundary. In addition, on those 24 days, climatic conditions must include a stiff wind, extreme cold temperatures, or a low cloud layer. If these conditions are not present, than even fewer complaints from noise would be expected. Please see Section 4.2.4.2.1, *Heavy Weapons and Demolition Noise* and Section 4.2.4.3.2, *Alternative 2 (Eddy Drop Zone)* for further information.

Socioeconomics 05
Property values could be impacted in various ways by the proposed action. First, property values in the area will generally increase as a result of the economic benefits from the construction, employment, and the indirect/multiplier effects of USARAK expenditures. This benefit extends broadly around Delta Junction. Second, property values increase differently depending on the suitability for various uses. For example property nearest to active training areas will have a higher commercial value to support the

1 any business or any home.

2 COLONEL DONNA BOLTZ: Got it. Thank you.

3 Further comments?

13 I think General Hirai has said before, you

14 know, no choice will make everyone happy. And I think

15 everyone realizes that. But for him to make the best

16 choice, he needs information from everyone, to include

17 all of you, and I greatly appreciate your taking the

18 time.

22 So thank you very much for your time and your

23 comment this evening. We really appreciate it.

7 (Off record, end of third

8 presentation, 8:38 p.m.,

9 December 2, 2004.)

10

11 *

12

13 (End of Public Comment Meeting,

14 December 2, 2004.)

1 REPORTER'S CERTIFICATE

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

construction, operation and maintenance of range facilities by businesses awarded contracts by USARAK. Finally, property can be negatively impacted by externalities like noise or traffic congestion from training exercises. A search of property records around the Donnelly complex revealed most of the land adjacent to the Donnelly Training Area is currently under federal control. The nearest private property is approximately 5 miles from the closest training area under consideration. Under ideal conditions some noise will be audible at this range but perfect conditions occur less than 10% of the time and since training will not occur every day noise produced by use of the range are not expected to impact property values.

Another factor identified during the public scoping meetings concerned the increase risk of wild fires as a result of training exercises. This factor is discussed at length in the EIS (Section 4.2.3, *Fire Management*) and adequate measures will be employed to negate this threat as well.

That I am a Registered Merit Reporter for Heartland Court Reporters and Notary Public for the State of Alaska; that the foregoing proceedings, the Public Comment Meeting held December 2, 2004, were written by me in computerized machine shorthand and thereafter transcribed under my direction; that the transcript constitutes a full, true, and correct record of said proceedings taken on the date and time indicated therein;

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

IN WITNESS WHEREOF, I have hereunto subscribed my hand and affixed my official seal this _____ day of _____, 2004.

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

My Commission Expires: February 15, 2006

4 DONNELLY TRAINING AREA RANGE PROJECT
5 BAX/CACTF
6
7 PUBLIC COMMENT MEETING
8 TRANSCRIPT OF PUBLIC COMMENTS
9 DRAFT ENVIRONMENTAL IMPACT STATEMENT
10
11 Held on Thursday, December 2, 2004
12 Time: 12:00 p.m. to 9:00 p.m.
13
14 Volume 2 of 2
15 Pages 1 through 31, inclusive
16
17 Meeting Proceedings Held
18 At
19 DELTA COMMUNITY CENTER
20 Delta Junction, Alaska

24 Reported by: Jeanette Blalock
Heartland Court Reporters
25 Fairbanks, Alaska

1 P R O C E E D I N G S

2 (Meeting proceedings convened at

12:00 p.m., December 2, 2004.)

MS. SANDRA DIGHTON: My name is Sandra Dighton, and my mailing address is Post Office Box 121, Delta Junction, Alaska, 99737.

I have made public comments at least three times on this issue before. And I want to voice my opinion one more time of what a poor idea it would be to develop an Arms Collective Training Facility and Battle Area Complex at the Eddy Drop Zone area.

It is too close to town. We live three-and-a-half miles out the Alaska Highway, so as the crow flies, this area would be very close to my home.

I have children and animals that are affected as it is whenever there are any Army or war games going on. The noise pollution especially would make it unbearable to live there.

In addition, the fire danger would be horrible, especially in the summertime, because that's the -- We are downwind, the way the prevailing winds blow from that area, so we would receive any of the

Location 02
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

5 noise or any pollution or -- fire danger would be
6 horrible where we live now.
7 As far as property values go, I believe that
8 this project, if it was located at the Eddy Drop Zone,
9 would decrease our property values to a level that we
10 would never be able to sell, to escape from the
11 negative affects that putting this complex so close to
12 our home would have.
13 And I think that's it. Thank you very much.
21 MR. ED SHEEHAN: Ed Sheehan, Post Office Box
22 472, Delta Junction, Alaska, 99737.
23 One, I served in USARL or CRTC for 23 years
24 as a senior Army officer and DAC. I was a senior test
25 manager for the Cold Regions Test Center. As such, I

1 was responsible for range and terrain planning,
2 development and safety.
3 Two, my thoughts on the proposed courses of
4 action in the EIS are the same as the February 6, 2003
5 letter from the mayor of Delta Junction to the
6 Commanding General of the United States Army Alaska
7 concerning this EIS.
8 It is my opinion that when this meeting is

Socioeconomics 06
Property values could be impacted in various ways by the proposed action. First, property values in the area will generally increase as a result of the economic benefits from the construction, employment, and the indirect/multiplier effects of USARAK expenditures. This benefit extends broadly around Delta Junction. Second, property values increase differently depending on the suitability for various uses. For example property nearest to active training areas will have a higher commercial value to support the construction, operation and maintenance of range facilities by businesses awarded contracts by USARAK. Finally, property can be negatively impacted by externalities like noise or traffic congestion from training exercises. A search of property records around the Donnelly complex revealed most of the land adjacent to the Donnelly Training Area is currently under federal control. The nearest private property is approximately 5 miles from the closest training area under consideration. Under ideal conditions some noise will be audible at this range but perfect conditions occur less than 10% of the time and since training will not occur every day noise produced by use of the range are not expected to impact property values.

Another factor identified during the public scoping meetings concerned the increase risk of wild fires as a result of training exercises. This factor is discussed at
length in the EIS (Section 4.2.3, *Fire Management*) and adequate measures will be employed to negate this threat as well.

9 concluded, the public will have reiterated the points
10 made in the February 2003 letter. Otherwise, we're
11 beating a dead dog to death.
12 Additionally, the final EIS does not address
13 the interaction with the proposed gas pipeline,
14 railroad, railroad bridging of the Delta River, et
15 cetera, which even though they are tentative, greatly
16 affect both the United States Army Alaska and Delta
17 Junction's future.
18 Some of the courses of action use some of the
19 same terrain, as of the problems mentioned about -- in
20 other words, if we bridge the river, it's going to be
21 using the same terrain as the easy one, so on and so
22 forth.
23 Anyway, three, concerning the course of
24 action Donnelly, my previous experience convinces me
25 that: (a) Even if practice ammunition is the only

1 ammunition used, the range is unsafe from the
2 standpoint of fire protection, ricochets, duds, and
3 the use of lasers; (b) This range does not meet DOD or
4 DA standards with respect to existing range and
5 terrain regulations or their intent concerning range

Cumulative Impacts 15
This information has been added. Please see Section 4.3.11, *Cumulative Impacts.*

Location 03
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

safety, the development and use of new impact areas, or public use and access, as specified in the public land law; (c) The Donnelly Range precludes moving vehicles and multiple vehicle use movement and firing, and doesn't have the typical subarctic terrain found west of the Richardson Highway.

Four, as a former range planner at Fort Greely, I know, and I'd underline that, that CRTC and the United States Army Alaska can use the same property west of the Richardson Highway as they have done since the inception of Fort Greely. The rationale used to justify why each needs their own range is greatly exaggerated, especially relative to days of use.

Cold Regions Test Center 08
Thank you for your comment.

Five, Speaking as a citizen, I take offense to spending $100 million to develop a range that doesn't have future application, (live fire on the move by multiple fighting vehicles firing live rounds out to 5,000 meters), on non-typical terrain, when better alternatives are or will become available.

Other 51
Thank you for your comment.

MR. SAM DIGHTON: All right. Sam Dighton, 1418.5 Alaska Highway.

I've lived there with my wife and four children for 17 years. This is downwind and downstream of the Eddy Drop Zone project.

Our whole family is opposed to this for some of the following reasons.

Noise impact generated on site and from aircraft in the area.

I'm worried about air and water pollution from the project, wherever chemicals from simulated explosions, or whatever goes on there, will be coming our way.

We all have private wells in that area. The military has never done anything that hasn't polluted the water.

I'm concerned with whatever -- with the diversion of surface runoff. Whatever the military does to protect their own property would be channeling water into our areas, where we have already had previous flooding.

I'm worried about fire. I believe the military or the BLM can't control a wind-driven wild fire.

Location 04
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

Noise Management 13
Average noise contours obtained from computer modeling indicate that no moderate or severe noise levels from small arms, large weapons, or demolition would be expected off-installation lands. Please see Section 4.2.4, *Noise* for additional information.

Air Quality 03
Unnecessary vehicle idling during cold temperatures is prohibited on USARAK lands. Vehicles are expected to release fugitive emissions into the air and the duration these pollutants remain airborne is dependant on the meteorological conditions during training. Emissions modeling indicated that pollutant concentrations were below the national air quality standards for all criteria. Please see Section 4.3.1, *Air Quality* for additional information.

Groundwater 01
The impact of construction and use of the BAX/CACTF on groundwater would be minor. High explosives would not be used as part of the proposed action, eliminating possible contamination concerns as a result. Disturbance and thawing of permafrost within the range complex would not affect the regional groundwater system. Please see Section 4.3.2, *Groundwater* for additional information.

Flooding/Floodplains 14
Additional hydrological field investigations and modeling have been completed for Jarvis Creek within the boundaries of DTA East. Please see Sections 3.2.2 and 4.2.2, *Surface Water*.

Fire Management 41
The Alaska Fire Service performed a fire hazard assessment at Eddy Drop Zone. This area was assigned a rating of high. Please see Section 3.2.3.1.2.1 for additional information. In addition, mitigation is proposed that would allow for a wildland fire crew to be present at training events during high and extreme fire danger days.

8 Also, private land in that area is so close
9 to the Eddy Drop Zone that there won't be a response
10 time in the case of a wild fire.
11 Also, a lot of this area is used for
12 recreational and subsistence hunting and gathering
13 purposes.

14 And I think this project will decrease our
15 property values without any compensation.
16 I am also concerned about live fire zone at
17 Donnelly for many of the same reasons, water and air
18 pollution, depleted uranium, stray impact.

Public Access and Recreation 19
Certain portions of the range complex would be closed for longer periods than others. Public access to and recreation within the immediate footprint of the range complex would be eliminated under the proposed action. Access to areas within the Surface Danger Zone would be limited to those times the range is not in use. The required minimum number of days the range must be available is 106. Actual estimated number of days the range will be used for training is about 238.

Socioeconomics 07
Property values could be impacted in various ways by the proposed action. First, property values in the area will generally increase as a result of the economic benefits from the construction, employment, and the indirect/multiplier effects of USARAK expenditures. This benefit extends broadly around Delta Junction. Second, property values increase differently depending on the suitability for various uses. For example property nearest to active training areas will have a higher commercial value to support the construction, operation and maintenance of range facilities by businesses awarded contracts by USARAK. Finally, property can be negatively impacted by externalities like noise or traffic congestion from training exercises. A search of property records around the Donnelly complex revealed most of the land adjacent to the Donnelly Training Area is currently under federal control. The nearest private property is approximately 5 miles from the closest training area under consideration. Under ideal conditions some noise will be audible at this range but perfect conditions occur less than 10% of the time and since training will not occur every day noise produced by use of the range are not expected to impact property values.

Another factor identified during the public scoping meetings concerned the increase risk of wild fires as a result of training exercises. This factor is discussed at length in the EIS (Section 4.2.3, *Fire Management*) and adequate measures will be employed to negate this threat as well.

Location 05
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

MR. LESTON McNEIL: My name is Leston L. McNeil. I live on Spengler Road.

And I have been a resident of this area for quite a while. I spent a total of 44 years as a civil service and a military person. So I should come down and tell you what I think.

I have always been supportive of military training, and even here at Fort Greely, until recently.

I have lost most of my faith in the Department of Defense's ability to be honest with the people in the area.

And what brings it to mind is the big bomb they dropped over there on the 26th of March in 2001. I don't think there was a house in Delta that wasn't damaged by it.

It was that thing they call M-O-A-B, mother of all bombs, at least that's what I'm told. They flew out of Elgin Air Force Base in California, dropped it and flew back, and they dropped it in the wrong place.

As proof that they changed the aiming fins,

25 after the incident, the control fins on the bomb,

1 because it didn't go where it was supposed to go.

2 Anyway, I filed a complaint -- not a

3 complaint, but a claim with the Air Force, because my

4 basement was cracked somewhat and my garage floor was

5 cracked quite badly.

6 Well, they said they can't -- they rejected

7 the claim. And the excuse they used was: Our

8 professional consultants tell us there is nothing we

9 did that could have caused any damage at Delta

10 Junction. How can you rebut that, you know, their

11 consultants?

12 Well, anyway, my home and my garage was

13 damaged. I have been unable to insure them with one

14 company because of that. This is unrepaired damage,

15 and they won't insure it. Anyway, it's caused me

16 quite a bit of anxiety.

17 Otherwise, I have always supported the

18 military and their training.

19 My comments directly to the training is,

20 there is a railroad coming to Delta eventually. It'll

21 come across the river. It'll be on the other side of

Cumulative Impacts 16
This information has been added. Please see Sections 3.3.11 and 4.3.11, Cumulative Impacts.

22 the river, and then it'll cut across and come across
23 somewhere here in the Delta Junction area.
24 Why doesn't the military study about building
25 a staging point on the other side of the river, and

1 use that whole area over there for training, rather
2 than trying to save a few miles -- highway miles to
3 get to where they want to train?
4 They'll -- after the railroad comes in,
5 they'll be using the railroad for their transportation
6 anyway, so why not build a railhead over there on the
7 other side for the military, where they can have their
8 water pools and their compounds, and so forth. And
9 that way, they'll never have to bother people over
10 here.
11 Okay. My second objection to them doing what
12 they're going to do here, particularly if they use
13 this closest range, what do they call that, the drop
14 zone, Eddy Drop Zone, is water table.
15 Water flows from that area through the
16 Granites under this system, and that's where we all
17 get our water.

Proposed Action and Alternatives 74
Thank you for your comment. This location alternative (i.e., West Donnelly Training Area) has been eliminated from further analysis in this EIS because it does not satisfy basic siting criteria. Please refer to Section 2.3.3, *Alternative Viability Analysis* for more information.

Groundwater 02
The impact of construction and use of the BAX/CACTF on groundwater would be minor. High explosives would not be used as part of the proposed action, eliminating possible contamination concerns as a result. Disturbance and thawing of permafrost within the range complex would not affect the regional groundwater system. Please see Section 4.3.2, *Groundwater* for additional information.

18 And I'm not sure what they would do to
19 contaminate the water, maybe nothing, but the
20 potential is there.
21 And if they do contaminate Eddy Drop Zone,
22 they contaminate the whole area, because that's where
23 our water comes from, flowing from the Granites
24 towards the Tanana and Big Delta Junction.
25 I guess that's about all I've got to say,

1 except -- Well, that's good enough, I guess.
9 MR. LARRY FETT: My name is Larry Fett. My
10 address is Box 49, Delta. And I live at Mile 1417.3
11 Alaska Highway.
12 My biggest concern is the Eddy Drop Zone
13 area, because it's going to cause a number of social
14 problems. It's in the direct fire range of the Delta
15 Junction city, and all of those people living along
16 the highway until about Mile 1412.
17 It has the potential of burning out everybody
18 when the fire starts, because where an Army exercises,
19 fire is going to start, as it has across the river at
20 Texas Range on a regular basis every year.
21 The other thing is, Eddy is in a known flood

Location 06
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

22 plain. In the last 40-some years I've been here, I've
23 known it to flood personally three or four times, and
24 there's been some major water coming through there.
25 Because I used to trap in that area, still do

1 sometimes. And it comes down one of the drainage
2 ditches that was an old creek bed at one time, and
3 it's wiped that out considerably in the last 20 years.
4 And the other thing is, because it's so close
5 to the Junction and it's -- it hampers the utilization
6 of the 33 Mile Loop hunting area that's open for
7 hunting, that people have been hunting on there ever
8 since before I got up here. And it always was a
9 really good area, a lot of moose taken out of there
10 every year.
11 And this year, because of some screw-up on
12 the Army's part, not getting the proper information
13 out and not allowing the people to hunt, they -- the
14 Army itself didn't use the area, but they posted it as
15 non-accessible for the hunters. And they said clear
16 up to within the last few days that it was going to be
17 accessible. And that was a bad PR problem on the
18 Army's part.

Public Access and Recreation 20
Certain portions of the range complex would be closed for longer periods than others. Public access to and recreation within the immediate footprint of the range complex would be eliminated under the proposed action. Access to areas within the Surface Danger Zone would be limited to those times the range is not in use. See note on page 290.

Training areas used for military training at DTA will remain closed during the specified timeframe. However, training areas not used for field training exercises can be released for recreational activities, as available. Information on which training areas are open is recorded on USARTRAK (Delta Junction call in number: 873-3181). There is no hunting on Fort Greely. Recreational Access Permits (RAPs) for DTA are available at the Fort Greely Visitor Center, located at the Front Gate. This facility is accessible to the general public Monday through Friday from 6 a.m. to 8 p.m. In addition, RAPs can be obtained from either Fort Wainwright or Fort Richardson as the RAP is applicable to all three military installations

19 It's also going to create a lot of extra
20 noise close to a lot of areas that are habitable, that
21 have people living all along the highway area.
22 It's on this side of the Jarvis Creek, which
23 doesn't produce any fire protection at all.
24 Any of the other two ranges would be more
25 acceptable. But in all reality, the best area would

1 be across the Delta River, where they already have
2 some complexes and they do a lot of training.
3 There may be problems on getting there
4 presently, and if that was so, Donnelly or Texas Range
5 would give them the opportunity to build an interim
6 range, so that troops could start training sooner, and
7 then have the ability and the foresight to plan a
8 larger and better range across the river.
9 That's it.
18 MR. ROBERT ALLEN: Okay. My name is Bob
19 Allen, Robert P. Allen, P.O. Box 1277, Delta Junction,
20 Alaska.
21 I have been a resident of Delta since July of
22 1981, and Alaska since April of 1975.
23 And I support what Pete Halgren, who spoke

Noise Management 14
Average noise contours obtained from computer modeling indicate that no moderate or severe noise levels from small arms, large weapons, or demolition would be expected off-installation lands. Please see Section 4.2.4, *Noise* for additional information.

Location 07
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

24 for the City of Delta Junction, said. I think what he
25 said made a lot of sense.

1 And I also support the comments made by
2 Colonel Ed Sheehan. He worked out on the ranges at
3 Fort Greely for 20-plus years. And probably -- In
4 addition to that, he's well known as a trapper and a
5 hunter, and he understands the terrain and what's
6 going on around here. I think he should be relied on
7 heavily for his comments.
8 I am opposed to the use of the Eddy Drop Zone
9 for the training facility. And after hearing Colonel
10 Sheehan, I would be opposed also to the Donnelly Drop
11 Zone.
12 Fire hazard here can be a very big thing.
13 Back about five years ago, we had a fire. If the wind
14 had not shifted and changed direction, most of Fort
15 Greely would have burnt down. All the quadrangles,
16 the office buildings, everything there would have gone
17 up in smoke.
18 As it was, some of the quads, the school on
19 the southern edge of the post, the roof had started to
20 catch fire. And it was only a matter of minutes to

Location 08
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

the quadrangles, wooden habitations, going up. If it would have kept going that way, it would have probably wiped out the post.

You can have hurricane force winds here several times a year. It could be in the winter; it could be in the summer.

And if you are at the Eddy Drop Zone, and even Donnelly, the Donnelly Drop Zones, fire could just roar through like a blowtorch. And we're not talking here hours; we're talking minutes until it could be out of control and raging like -- just a locomotive gone wild, jumping the highway, burning the houses there, and there would be no way to stop it. The only thing that would help, if the wind had shifted direction.

So therefore, I think that the best alternative is the Texas Range.

I support the building of the facility. I think it needs to be done for the training of our troops so they can be better prepared. And, you know, I would like that to happen as soon as possible. But I would encourage it to be done at the Texas Range.

24 MR. ROBERT CROWELL: My name is Robert
25 Crowell. I live in Delta Junction, Alaska. My

1 mailing address is P.O. Box 1061.
2 I primarily support also the Texas Range, for
3 the main reason that there is a safety cushion of
4 distance between the town and that range.
5 And additionally, the noise that -- from the
6 report of the cannon is a disturbing noise during the
7 night, and they will have to train during the night
8 sometimes.
9 And basically, it just makes common sense,
10 although there isn't much common sense left in the
11 world, to put the range out a distance away from the
12 town.
13 The other range, the Eddy Range that's being
14 proposed, may be more convenient to build or
15 construct, but the other range offers the ability to
16 let the town be at peace with the military operation.
17 And I also support getting this facility
18 built as quickly as possible, so our troops can be
19 properly trained.
25 MR. ROBERT ALLEN: Can I add on to my

Location 09
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

Noise Management 15
Average noise contours obtained from computer modeling indicate that no moderate or severe noise levels from small arms, large weapons, or demolition would be expected off-installation lands. Please see Section 4.2.4, *Noise* for additional information.

1 comments?
2 Another reason for selecting the Texas Range
3 as the site of this facility is you'd have two natural
4 fire breaks. One would be the Richardson Highway, and
5 the other one would be Jarvis Creek, that, you know,
6 could break the flow of flames should they start.
7 And in addition, it's a much greater distance
8 from the Texas Range to buildings in the Delta
9 Junction community.
18 MR. DAVE CORY: My name is Dave Cory. And my
19 partner and I, Betty Johnson, have a residence at 740
20 Mellow Glow Lane, which is off of Dorshorst Road,
21 which pretty much borders the military land there.
22 And so we're concerned with the proposed area of the
23 BAX and CACTF training areas.
24 And basically, our opposition is -- concerns
25 the -- well, for one thing, the noise level. And we

1 have, from just training in the past from near the
2 Delta River, we get a lot of noise and vibration. But
3 it's understandable, there has to be an area to train.
4 But with the proposed area in the Eddy Drop

Location 10
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

5 Zone and the BAX area off 33 Mile Loop will be really
6 close to our residence and several residences in the
7 area. And I think the noise will be a definite
8 problem.

Noise Management 16
Average noise contours obtained from computer modeling indicate that no moderate or severe noise levels from small arms, large weapons, or demolition would be expected off-installation lands. Please see Section 4.2.4, *Noise* for additional information.
A model was run using a worst case scenario (adverse weather conditions). Adverse weather conditions are defined as a stiff wind, extreme cold weather or low cloud layer, all of which occur in Delta Junction. Peak noise levels indicate the probability (under certain conditions) of an activity being loud enough to generate complaints. Figures 4.c, 4.e, 4g, and 4.i show that approximately 10% of the time large caliber weapons are used at the BAX, noise levels would be high enough to generate complaints up to 2,000 meters beyond the installation boundary. An example of a worst case scenario would be if the range was used for the maximum number of anticipated days (238), training on 24 of those days (10% of 238) could generate high enough noise levels to elicit complaints from residents near the installation boundary. In addition, on those 24 days, climatic conditions must include a stiff wind, extreme cold temperatures, or a low cloud layer. If these conditions are not present, than even fewer complaints from noise would be expected. Please see Section 4.2.4.1.1, *Heavy Weapons and Demolition Noise* and Section 4.2.4.2.3, *Impacts Attributed to Alternative 2 (Eddy Drop Zone)* for further information.

9 And other concerns were -- I know the Eddy
10 Drop Zone, there's like a big -- kind of a low lying
11 area that comes through where the CACTF range is
12 supposed to be placed. And it's a flood plain.
13 And I know last spring, there was a lot of
14 high water, and it washed out the road there at 33
15 Mile Loop. And there was quite a bit of water that
16 come through the low lying areas out throughout the
17 military land on the Alaska Highway. And I think
18 that's a concern.

Flooding/Floodplains 15
Thank you for your comment. This information is contained within Sections 3.2.2 and 4.2.2, *Surface Water*.

19 And I know there's been a lot of clearing and
20 stuff of the black spruce, and trying to make fire

Fire Management 42
Thank you for your comment. The Alaska Fire Service performed a fire hazard assessment at Eddy Drop Zone. This area was

21 trails and stuff, but there's still a lot of thick
22 black spruce out there, especially towards the BAX
23 range, between there and the residences on the Alaska
24 Highway.
25 And the way the wind blows in Delta, I think

1 that there's still an extreme fire danger at certain
2 times of the year that could be caused by the
3 increased activity.
4 And another point is in -- the BAX range is a
5 very rich archaeology area. And I work currently as
6 an archaeologist. And there are many sites out there
7 that are -- I know we've done a lot of survey, and
8 it's -- that particular area is just very rich, and
9 there's a potential of sites maybe being destroyed or
10 damaged from the artillery fire.
11 And I guess that pretty much sums it up.
12 There was one other thing also, was with the
13 recreational side of it. And I know ever since we've
14 lived here, we've been here about eight years, and we
15 know that people all through the years have always
16 used that 33 Mile Loop for hunting and other
17 recreational activities.

assigned a rating of high. Please see Section 3.2.3.1.2.1 for additional information.

Cultural Resources 07
Historic and prehistoric archaeological sites within the Eddy and Donnelly Drop Zone sites are located primarily on the southern aspects of slopes. A substantial amount of additional mitigation would be required to protect those archaeological sites located on southern slopes. A larger amount of funding would be required for protection measures (due to a greater number of sites) if the Donnelly Drop Zone alternative was selected.

Public Access and Recreation 21
Certain portions of the range complex would be closed for longer periods than others. Public access to and recreation within the immediate footprint of the range complex would be eliminated under the proposed action. Access to areas within the Surface

18 And it seemed to work out fine with the
19 military, because they were doing their training on
20 the other side of the Rich near the Delta River. And
21 there was never any problems. And that would
22 definitely be impacted.
23 And plus, I think all that noise and
24 artillery fire and things, that kind of disrupts the
25 wildlife in the area, also.

Danger Zone would be limited to those times the range is not in use. See note on page 290.

Training areas used for military training at DTA will remain closed during the specified timeframe. However, training areas not used for field training exercises can be released for recreational activities, as available. Information on which training areas are open is recorded on USARTRAK (Delta Junction call in number: 873-3181). There is no hunting on Fort Greely. Recreational Access Permits (RAPs) for DTA are available at the Fort Greely Visitor Center, located at the Front Gate. This facility is accessible to the general public Monday through Friday from 6 a.m. to 8 p.m. In addition, RAPs can be obtained from either Fort Wainwright or Fort Richardson as the RAP is applicable to all three military installations

1 And in closing, I think that one of the
2 alternative areas, which is Texas Range, I think would
3 be an excellent choice, since there are plenty of
4 roads out there, and it's on the other side of the
5 Richardson Highway. And there's lots of acreage
6 there.
7 And I think that the cost element would be a
8 little more to move it over there, but as far as
9 what -- the impact to the people that live in Delta,
10 and especially along the Alaska Highway, I think that
11 that far outweighs any costs associated with moving
12 the area to Texas Range.
13 And that's about all I have to say.

Location 11
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

21 MR. TODD HANSON: Todd Hanson, Box 1121,
22 Delta Junction, Alaska.
23 Having reviewed the charts out here and
24 having spoken with local community members, I think
25 that the North Texas Drop Zone would be the best
1 choice for the Army.

Location 12
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

9 MR. JACK DETZEL: Jack Detzel, 5210 Tanana
10 Loop Road, Post Office Box 278, Delta Junction, 99737.
11 895-4939, area code 907.
12 I'd like to go on record as opposing the Eddy
13 Drop Zone as the Army's choice for their training
14 center. I would prefer to see the training center
15 move further away from the city limits of Delta
16 Junction, to the other ranges that have been
17 identified as potential sites.

Location 13
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

25 MS. DEVRA MILLIGAN: My name is Devra
1 Milligan, P.O. Box 972, Delta Junction, Alaska, 99737.
2 And I just have concerns with the Eddy Drop
3 Zone being so close to town. We live out on the
4 Alaska Highway, and it's about a mile and a half from
5 our house.

Location 14
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

And when they have training now in that area, or even farther away, the house rattles and keeps you awake all night. We've had soldiers come through our back yard and down our driveway when they were lost. And you can hear machine gun firing, which is a little nerving.

Mostly concerned with, not only the noise, but fire danger. It's very -- once a fire gets going, that's awfully close to our house and the rest of the town.

I also work out at Fort Greely at the Delta school, and it's very noisy already with training. The kids are constantly distracted by the bombing going on that's happening.

I'm aware that we need training zones, and I am in support of them. I like the one that's farthest from town, though, the North Texas Range, I believe, which also has a river to separate it from the town. If there is a fire danger, that seems to help control fires.

Another concern is that my family lives subsistence. We do a lot of hunting for our food,

Noise Management 17
Average noise contours obtained from computer modeling indicate that no moderate or severe noise levels from small arms, large weapons, or demolition would be expected off-installation lands. Please see Section 4.2.4, *Noise* for additional information.

Fire Management 43
Thank you for your comment. The Alaska Fire Service performed a fire hazard assessment at Eddy Drop Zone. This area was assigned a rating of high. Please see Section 3.2.3.1.2.1 for additional information.

Subsistence 06
There are many other areas available for rural residents to participate in subsistence activities around Delta Junction. Also, although access to the areas surrounding the BAX and CACTF

3 caribou, and mostly moose. The 33 Mile Loop area is a
4 big hunting area for our family, plus recreation. And
5 I hate to see that closed and taken away from the
6 people of Delta.
7 I guess that's pretty much it.
8 Well, one other thing I thought. With the
9 north Texas Range, we were talking about some of the
10 limitations of the Eddy Drop range. And it seems like
11 having the restricted air space around the Texas Range
12 and the impact area so close, that that might be more
13 suitable to the Army's needs, rather than the Eddy
14 Zone, which would have more restrictions.
15 So I'm all for having a training zone close
16 to Delta, but not quite in our back yard.
17 And that's it.
25 MR. KENT BROWN: My name is Merrell Kent

1 Brown. I live at -- What is our address -- 1152
2 Salcha Avenue, Delta Junction, Alaska, 99737.
3 I guess I would like to state that I am in
4 favor of the -- of military training. I support the
5 military. Everybody that I have spoken to feels the
6 same way.

will be restricted during training events, access will continue to be permitted when training events are not occurring. Therefore, the proposed ranges will not significantly restrict rural Alaskans' access to subsistence resources. Please refer to Sections 3.3.7 and 4.3.7, *Subsistence* for additional information.

7 The big concern that everybody I speak to has
8 is they all say no to Eddy Drop Zone. They all want
9 or would desire to have the facilities in either of
10 the other locations.
11 The reasons that I've heard so far against
12 the Eddy Drop Zone is it's too close to town, the
13 noise problems. There's increased risk of public
14 interaction, especially of young people. That's many
15 kids' back yards.
16 There are others that hunt there. It's a lot
17 of people's local winter playground, so they go out on
18 their snow machines and four-wheelers.
19 The increased risk due to flyovers over
20 residential areas.
21 There's a plethora of reasons. But I guess
22 the biggest one is that I could point to the map, and
23 I could ask any person in this room if they had spent
24 the last year building a house, which of the -- if
25 they were going to support one of the areas, which one
1 would they support. And there's not a single person
2 here that would support the -- or that would support
3 the one closest to town, if that was their house.

Location 15
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

4 And I guess that's it. Thank you.

12 MS. CHARLENE LUNDY: My name is Charlene

13 Lundy. My address is Mile 1419.5 Alaska Highway, and

14 in Delta Junction.

15 And I'm here to make a statement, because I

16 am very much concerned about the drop zone -- the Eddy

17 Drop Zone being used for the range, because it's

18 directly behind where I live. I am concerned about

19 the noise and fire danger.

20 And I just feel the military has plenty of

21 land south of town that they could use for this kind

22 of range, that they don't need to do it right here in

23 town, where it could disrupt a lot of people's lives,

24 and possibly bring down our property values.

25 And so I would hope that the military would

1 take these things into consideration and plan on

2 putting the range further south of town.

10 MS. JUDY HICKS: I'm Judy Hicks, P.O. Box

11 1417, Delta Junction.

12 I'm representing myself, and we also have a

13 bed and breakfast, Checkpoint Alaska, which is on

Location 16
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

Noise Management 18
Average noise contours obtained from computer modeling indicate that no moderate or severe noise levels from small arms, large weapons, or demolition would be expected off-installation lands. Please see Section 4.2.4, *Noise* for additional information.

Fire Management 44
The Alaska Fire Service performed a fire hazard assessment at Eddy Drop Zone. This area was assigned a rating of high. Please see Section 3.2.3.1.2.1 for additional information.

14 Fleet Street, which is one of the access roads into 33
15 Mile Loop and the drop zone.
16 I think choosing Eddy Drop Zone for the
17 development of the Battle Area Complex and the
18 Combined Arms Collective Training Facility is a very
19 poor selection, for the following reasons.
20 One is socioeconomic. My family operates a
21 bed and breakfast on Fleet Street. And buffalo
22 hunters, families on vacation and other people wanting
23 a quiet, out-of-town place are our main clients.
24 The noise of a nearby training facility and
25 increased use of our road and a decreased

1 accessibility to the trails will have a negative
2 impact on our business. I'm sure there are other
3 businesses nearby that have similar concerns. During
4 the EIS research, no one contacted us about the
5 potential impact to our business.

6 One of the other reasons is wetlands. Eddy
7 Drop Zone is a drained wetland. And each spring, a

Socioeconomics 08
Property values could be impacted in various ways by the proposed action. First, property values in the area will generally increase as a result of the economic benefits from the construction, employment, and the indirect/multiplier effects of USARAK expenditures. This benefit extends broadly around Delta Junction. Second, property values increase differently depending on the suitability for various uses. For example property nearest to active training areas will have a higher commercial value to support the construction, operation and maintenance of range facilities by businesses awarded contracts by USARAK. Finally, property can be negatively impacted by externalities like noise or traffic congestion from training exercises. A search of property records around the Donnelly complex revealed most of the land adjacent to the Donnelly Training Area is currently under federal control. The nearest private property is approximately 5 miles from the closest training area under consideration. Under ideal conditions some noise will be audible at this range but perfect conditions occur less than 10% of the time and since training will not occur every day noise produced by use of the range are not expected to impact property values.

Another factor identified during the public scoping meetings concerned the increase risk of wild fires as a result of training exercises. This factor is discussed at length in the EIS (Section 4.2.3, *Fire Management*) and adequate measures will be employed to negate this threat as well.

Flooding/Floodplains 16
Additional hydrological field investigations and modeling have been completed for Jarvis Creek within the boundaries of DTA East. Please see Sections 3.2.2 and 4.2.2, *Surface Water*.

8 section of 33 Mile Loop Road floods during break-up.
9 There are several drainages that come out of Eddy Drop
10 Zone, and they gush water towards the Alaska Highway,
11 not towards Jarvis Creek. And building training
12 facilities on Eddy Drop Zone will create more
13 impervious surface, and it will reduce the plant
14 uptake of the water and it will speed up the flow of
15 the water, which will exacerbate spring floods towards
16 the highway and towards the homes that are by the
17 highway there.

Construction and operation of the BAX and CACTF would not cause a discernable impact to the floodplain. The design would not produce any discernable change to flood water travel through the Eddy Drop Zone area. Any diversion caused by the BAX or CACTF would channel water into other areas within the recognized floodplain.

18 And of course, the big one is fire. There's
19 no excuse to intentionally create a greater fire
20 danger for the homes and businesses in Delta Junction
21 than already exists. Military activity started the
22 last big fire that threatened Delta Junction and
23 burned across Fort Greely.
24 Eddy Drop Zone is even closer than the source
25 of that fire was to the rest of our homes, and there'd

Fire Management 45
The Alaska Fire Service performed a fire hazard assessment at Eddy Drop Zone. This area was assigned a rating of high. Please see Section 3.2.3.1.2.1 for additional information.

1 be no way of stopping a fire in that black spruce
2 before it gets to my house and before it gets to a lot
3 of people's homes. There's no way.
4 There are other viable options for the

5 construction of these military training facilities.

6 To me, it's insulting to have the military choose Eddy

7 Drop Zone because we are told the others cost too

8 much. And I feel like my home, my business, my life,

9 the fire danger have to be worth more than, you know,

10 thousands of dollars in a multi-billion dollar

11 construction project. So it's hard to be told, you

12 know, that other options aren't better.

20 MS. BRENDA BURKE: Brenda Burke, 1418.4

21 Alaska Highway.

22 I would really like to see either the

23 Donnelly area or the other area, the Texas area, used

24 rather than the Eddy Drop Zone, because it is so close

25 to the houses, and it backs up a lot of businesses

1 right along the highway, if we were to have a fire.

2 I know the BLM said that they were going to

3 have a crew here likely, but with three people, it can

4 still get out of control if there were a fire.

5 Also, the noise. I question the noise,

6 because right now, in the summer, when they have

7 maneuvers, not necessarily in the summer, but they

8 have it in our local paper that they're supposed to

Proposed Action and Alternatives 75
In evaluating potential locations for construction and use of a BAX and CACTF, cost was taken into account to determine the viability of an alternative based on reasonableness of agency expenditures. No site was eliminated or will be chosen on project cost alone.

Location 17
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

Noise Management 19
Training events at the BAX and CACTF would vary in length based on training needs and strategy of each unit. Both day and night operations would be conducted. USARAK Range Regulation 350-2 prohibits any training activity that generates noise (firing of blanks, pyrotechnics, simulators, etc.) between 10:00 p.m. and 6:00 a.m. in areas adjacent to populated areas. Exceptions to firing hours require public notification at least 12 days before the training event.

9 run from one hour to a certain hour. And we go to
10 bed, and there is still shooting going on that we can
11 hear from our bedroom.
20 MR. WHIT AILLAUD: Whit Aillaud, 2583 Winter
21 Road, Delta Junction, Alaska.
22 And I'd encourage the placement of the
23 facility to be in Texas Range. That would put it as
24 far as possible away from the Delta town site, and
25 would cut down on noise, limit risk of fire.

Location 18
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

1 It would also cut down on kids on
2 four-wheelers from being curious and checking out the
3 facilities, which I fear would be a real high risk in
4 the Eddy Drop Zone.
5 It also makes sure that the line of fire is
6 away from any civilized area. And judging from errors
7 that have occurred in the area in the past five years,
8 despite the best of intentions by the military, things
9 will go wrong. And they need to build in this safety
10 right now, before something terribly goes wrong.
16 (End of public comments.)
17 (Meeting proceedings adjourned
18 9:00 p.m., December 2, 2004.)

Human Health and Safety 20
Please see Section 2.2.1.2.2.1, *Safety Precautions* for a discussion on safety measures at the BAX. Public access to and recreation within the immediate footprint of the range complex would be eliminated under the proposed action. Access to areas within the Surface Danger Zone would be limited to those times the range is not in use.

REPORTER'S CERTIFICATE

I, JEANETTE BLALOCK, hereby certify:

That I am a shorthand reporter for Heartland Court Reporters and Notary Public for the State of Alaska; that the foregoing proceedings, the Public Comment Meeting, held December 2, 2004, were written by me in computerized machine shorthand and thereafter transcribed under my direction; that the transcript constitutes a full, true, and correct record of said proceedings taken on the date and time indicated therein;

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

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal this _____ day of _____, 2004.

JEANETTE BLALOCK
Heartland Court Reporters

My Commission Expires: July 16, 2007

AIRCRAFT OWNERS AND PILOTS ASSOCIATION
421 Aviation Way • Frederick, MD 21701-4798
Telephone (301) 695-2000 • FAX (301) 695-2375
www.aopa.org

January 10, 2005

Mr. Kevin Gardner
Directorate of Public Works
Attn: APVR-RPW-GS
730 Postal Service Loop #6500
Fort Richardson, AK 99505-6500

RE: 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

Dear Mr. Gardner;

The Aircraft Owners and Pilots Association (AOPA), representing over 400,000 general aviation pilots, submits the following comments in response to the Draft Environmental Impact Statement (DEIS) for the Construction and Operation of a Battle Area Complex/ Combined Arms Collective Training Facility (BAC/CACTF) within U.S. Army Training Lands in Alaska. The Army has failed to fully address the issue of Special Use Airspace (SUA) and the impact it could have on general aviation in Alaska. AOPA is especially concerned that the Army will subsequently ask for SUA, after construction of the BAC/CACTF has occurred. With this letter, the Association requests that any additional SUA needed for the planned complex should be fully analyzed and incorporated in this initial DEIS.

Airspace 09
The Army has no plans to increase special use airspace (i.e., the establishment of restricted airspace), nor does it foresee the need to, as a result of the BAX/CACTF proposed action. If such a need were to arise in the future, that proposed action would be the subject of its own NEPA analysis and would involve the affected stakeholders at that time. Please see additional information regarding this topic in Section 4.2.8, *Airspace*.

According to the DEIS, Chapter two, Section 2.1.1.2, Military Use of the Battle Area Complex states, "Any fixed wing involvement would use currently established Military Operations Areas (MOA). If changes to existing SUA restrictions should be needed in the future, including an increase in flying location, duration, frequency or intensity thresholds, such change would require additional planning, coordination, and NEPA documentation prior to implementation."

The current proposal does not adequately address the SUA requirements that may be needed to make the proposed facilities viable. AOPA is concerned the BAC/CACTF is taking a "piecemeal" approach by committing significant financial resources to building the facility, while holding off on expanding SUA, with the intention of expanding the airspace at a future date. AOPA contends that any additional SUA needed for the planned complex should be fully analyzed and incorporated in this initial DEIS.

Any expansion of SUA in the area would have a significant negative impact on general aviation. Delta Junction is surrounded by multiple SUA areas including Restricted Areas 2202A/B/C, Buffalo MOA, and the Yukon and Birch MOAs. Three vital Visual Flight Rules (VFR) corridors provide the only VFR access through this massive area of existing SUA.

Based on the alternatives discussed in the DEIS, the Eddy Drop Zone underlies the Alaska Highway VFR Corridor connecting Fairbanks to points southeast. The Donnelly Drop Zone underlies the Richardson Highway VFR corridor and connects Fairbanks to south central Alaska via Isabel Pass while the North Texas Range borders the corridor. Both of these VFR Corridors provide air traffic unrestricted access through a complex area of SUA with floors lower then 500 feet MSL and more then 150 nautical miles long.

The aviation community went through an extensive process in the mid-1990's to assist the military in mitigating the impacts of the existing SUA complex surrounding Delta Junction. Both VFR corridors were created during that process to provide adequate access for non-participating air traffic transitioning this area. It is therefore difficult to contemplate any further restrictions to the only remaining VFR corridors transitioning this massive SUA area.

Finally, we note that the Air Force, the civil aviation community and the FAA established a Special Use Airspace Information Service (SUAIS) that operates in this area. SUAIS has been highly successful at improving the safety of civil and military pilots when navigating in the MOAs and Restricted Areas. It is important the Army become integrated in this service to increase the situational awareness of all users of the airspace. AOPA highly recommends the Army participate in this successful service.

AOPA appreciates the opportunity to comment on this proposal and we look forward to working with the Army to help mitigate potential airspace impacts associated with the BAC/CACT.

Sincerely,

Heidi J. Williams
Director
Air Traffic, Regulatory & Certification Policy

Cc: Col. Donna Boltz

ALASKA AIRMEN'S ASSOCIATION
P. 0. BOX 2411 85
ANCHORAGE, ALASKA, 99524-1 185

Mr. Kevin Gardner
Directorate of Public Works
724 postal Service Loop #5500
Fort Richardson, AK 99505-66500

Attn: APVR-RPW-GS (GARDNER)

The Alaska Airmen's Association is a statewide organization with over 2100 members dedicated to the safety and enhancement of general aviation.

The purpose of this letter is to provide comment from the Alaska Airmen's Association regarding the Draft Environmental Impact Statement (EIS) for the Construction and the Operation of a Battle Area Complex and Combined Arms Collective Training Facility within U.S. Army training Lands in Alaska.

The Draft EIS provides a thorough review of environmental factors related to four alternatives for a Battle Area Complex and a Combined Arms Collective Training Facility near Fort Greely, Alaska. The first of these alternatives involves no action. The remaining alternatives (alternatives 2, 3, and 4) suggest three possible sites for construction of the training facilities.

Our concern is that the document does not address the potential impacts of the three sites on airspace classification over the proposed sites, particularly the potential for new Restricted Area airspace in the area.

Airspace 10
The Army has no plans to increase special use airspace (i.e., the establishment of restricted airspace), nor does it foresee the need to, as a result of the BAX/CACTF proposed action. If such a need were to arise in the future, that proposed action would be the subject of its own NEPA analysis and would involve the affected stakeholders at that time. Please see additional information

Therefore, we suggest a fifth alternative, a site well to the west in existing Restricted Area R-2202.
First class facilities for military maneuvers are very much needed in Alaska to meet national requirements for warfare training especially in these times of international terrorism and uncertainty. U.S Amy personnel deserve the best training facilities possible to meet this need. Investment in such facilities is well justified in view of missions U.S military forces are asked to accomplish world wide. Therefore, alternative 1 should not be considered.

Our concern, however, is that the maximum use of new training facilities should be hampered by lack of airspace over training sites for the most effective and coordinated training of land and air forces. Existing airspace classification in the vicinity of Fort Greely was planned in the mid- 1990s with the help of both military and civilian groups to provide airspace for military operations and training as well as air routes for the safe passage of civil air traffic. This was not an easy task because the geography in the vicinity of Fort Greely limits routes for civil traffic especially small general aviation aircraft.

For example, major civil airways for air traffic flying under instrument conditions cross near Fort Greely from the northwest and southeast as well as from north and south. In addition, the topography associated with Isabel Pass through the Alaska Range to the south as well as features such as the Alaska Highway and the Tanana River Valley provide routes for traffic flying under visual flight conditions. In short, the geography of the area limits these air routes to their existing locations.

Thus, if aviation safety issues emerge after the proposed Battle Area Complex and Combined Arms Collective Training Facility are completed and operational, it could become necessary to limit the use of military aircraft over these sites. This would not provide the very best training for coordinated operations between U.S. military ground and air forces.

regarding this topic in Section 4.2.8, *Airspace*.

Proposed Action and Alternatives 76
Thank you for your comment. This location alternative (i.e., West Donnelly Training Area) was initially considered but has been eliminated from further analysis in this EIS because it did not satisfy the screening criteria. Please refer to Section 2.3.3, *Alternative Viability Analysis* for more information.

Proposed Action and Alternatives 77
Thank you for your comment.

Airspace 11
There is sufficient special use airspace in DTA to allow for nearby coordinated air operations. Please see additional information in Section 4.2.8, Airspace.

We understand that airspace classification is not part of the Draft EIS. Nevertheless, it would seem prudent to consider a fifth alternative site for the Battle Area Complex and Combined Arms Collective Training Facility, a site farther west in the extensive Restricted Area (R-2202) adjacent to the proposed alternative sites. The North Texas Range area (alternative 4) is located at the eastern edge of this Restricted Area, but it's proximity to air traffic corridors still warrants safety concerns.

We recognize that an alternative site farther west in the existing Restricted Area would require a bridge across the Delta River to provide access. However, such an alternative would provide the very best long term return on major investments made in constructing the training facilities.

Civil aircraft are prohibited from entering Restricted Areas during times that training is active within the areas. Locating the new training facilities well inside Restricted Area R-2202 would ensure the maneuverability, expansion, and flexibility needed for joint air and ground exercises well into the future. Therefore, all relevant equipment and aircraft could be used during the exercises. Moreover, there would be no conflict with existing Federal Airways or with routes for air traffic flying under visual flight rules.

Thank you for this opportunity to comment on the Draft EIS.

Sincerely,

Felix M. Maguire, Director
Government and Legislative Affairs Committee
January 9,2004

TEL: (907) 245-125 1 FAX: (907) 245-1259
e-mail: Info@alaskaairmen.com

-----Original Message-----
From: Michael Vivion [mailto:mvivion@acsalaska.net]
Sent: Sunday, November **28,** 2004 9:30 AM
To: Ken A Thomas; james.w.watson@faa.gov; James.Smith@wainwright.army.mil; Genter Keith D CW4 HQ USAG AVN SAFETY OFFICER; Andy Greenblatt; Bill O'Halloran; Bill Rimer; bob bursiel; Bob McAlpin; Darrel Zuke; Chris Matthews; David James; Francie Thomas; George, Tom; Harry Cook; jeff saling; Jim Drew; Kevin Haines; Mike Luts; Miller Janet S GS-06 3540GlCCS; Myron Babcock; Pete

Haggland; Randy Rogers; Ric Barnett; Richard Wien; Rick Schikora; Robert McGurn; Roger Stirm; Kurt Norby; Gordon Morey; Clarence Sumpter; Danielle Barnes; Mark McNay; Ski Marcinkowski; Shedrick Lewis; Gene Scarboro; Gene McCabe; Jim Truitt; Earl Valley; Paul Johnson
Subject: US Army's Meetings on Draft EIS for Battle Area Complex

Folks,

The first meetings on the Army's proposed Battle Area Complex (BAX) near Delta Junction will be held this coming week. The first meeting is in Fairbanks, at the Springhill Suites Hotel downtown, from 5 PM to 8 PM on Wednesday, December 1. The second meeting will be the following evening in Delta Junction, at the Delta Junction Community Center, from Noon till 8 PM (or until completed).

I strongly encourage everyone who has an interest in aviation in the interior to take a close look at the proposed actions and offer your recommendations to the Army as they develop their project.

It is worthy of note that there is virtually no reference to airspace in the DEIS document, but the document does note that wherever the Battle Area Complex is finally constructed, there will be Tactical UAV and Tactical aircraft operations overhead, which implies some sort of airspace restrictions. Unfortunately, the Army has chosen not to discuss airspace in this EIS. I encourage everyone to let the Army know that airspace is an important component of the battle area complex project, and discussions of airspace should be incorporated at this stage, NOT after a BAX has been developed.

Airspace 12
Airspace sections have been added to this Supplemental Draft EIS. Please see Sections 3.2.8 and 4.2.8, *Airspace* for information regarding your comment.

Of the three alternatives offered in the DEIS, the only one in my opinion that would not significantly inhibit access to Isabel Pass is the North Texas Range alternative. encourage you to attend one of the meetings, look at the alternatives, and offer your comments.

If you can't make the meeting, or if you need more information, contact Ellen Clark (907) 873-1614 ellen.clark@wainwriqht.army.mil or Carrie Barta (907) 353-9507 carrie.barta@us.armv.mil

So far, I have not found an internet source for the DEIS, but these folks have it on CD.

Please get involved in this process now, as opposed to trying to inject airspace recommendations after a BAX has already been sited.

Mike Vivion

Location 19
Thank you for your comment.

From: Michael Vivion [mailto:mvivion@acsalaska.net]
Sent: Sunday, December 05,2004 9:26 PM
To: donna.boltz@richardson.army.mil
Cc: Ric Barnett; Robert McGurn; Paul Johnson; George, Tom; Richard Wien
Subject: DEIS for USARAK Training Areas

Colonel Boltz:

It was good to meet you Wednesday evening in Fairbanks at the public hearing on the draft EIS for construction of training areas in the vicinity of Fort Greeley. I appreciate your willingness to discuss issues of mutual concern regarding this draft EIS.
First, let me state clearly that I support the US Army wholeheartedly in their endeavor to construct the best possible training facility possible

for training our troops in urban and rural warfare, and I believe this is a widely shared sentiment in this community. Unfortunately, without a significant segment of restricted airspace overlying the proposed facility, the proposed Battle Area Complex and Combined Arms Collective Training Facility will not meet the test of affording the most realistic joint operations training complex possible.

It is my opinion that the Army has too quickly rejected alternative siting that could readily offer the level of joint training and complexity that I believe is essential for an effective training facility. It is clear that in this day and age, the Army cannot operate in any theater without close air support, including both tactical fighter aircraft and tactical unmanned aerial vehicles (TUAV's). These types of air assets require restricted airspace to operate, and trying to fit an adequate sized block of restricted airspace into the Fort Greeley area is simply not possible or practical.

Location 20
This location alternative (i.e., West Donnelly Training Area) was initially considered but has been eliminated from further analysis in this EIS because it did not satisfy the screening criteria. Please refer to Section 2.3.3, *Alternative Viability Analysis* for more information.

As you know, the draft EIS as presented by USARAK does not address any airspace issues. In my opinion, this is a serious strategic error and could severely restrict the effectiveness of training conducted at these facilities once they are operational. Further, the DEIS has rejected from consideration all alternatives that lie on the west side of the Delta River, even though there is tremendous potential for siting these training areas in that area. While portions of land on the west side of the river are unuseable due to unexploded ordinance, there is considerable useable area available, much of which is used by the Army for winter training. The area west of the Delta River is overlain by Restricted Area R-2202 already, which is a huge area of restricted airspace currently reserved for joint use by Army and Air Force units.
All that is missing to make the area west of the river a superior site for

these world class facilities is a bridge to afford year round access. In fact, with the arrival of the Stryker Brigade in Alaska, I would think that such a bridge to open more of the vast Tanana Flats training area to the Army year round would be a very high priority for Army Commanders in any case.

I realize that such a bridge would take time to engineer and construct, and that it would require considerable additional funding to construct. Nonetheless, to spend millions of dollars to construct a training complex which cannot be utilized for real life joint training exercises, and precluding one of the Stryker Brigade's primary tools, the TUAV, would indeed be short sighted, in my opinion.

I would like to propose a meeting between Army personnel and members of the civil aviation community in the very near future to discuss these matters. In addition, I believe that it is essential that we include tactical aviators from the US Air Force in such discussions, since they understand the requirements of tactical air support far better than we do.

I suggest this coming Friday, December 10 as a possible date to meet on this topic. Alternatively, sometime early in the following week, such as the 13th or 14th could possibly serve.

Please understand that it is my interest to see the Army develop a world class joint training facility. In constructing such a facility under existing Restricted airspace, such as R-2202 would serve the Army's needs, the tactical aviators needs, while imposing no additional restrictions on civil aviation. In this, we would all be winners.

I fear the selected alternatives proposed in the Draft EIS will severely

Proposed Action and Alternatives 78
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

hamper the effectiveness of these training facilities.

Please let me know what day would be best for a meeting on this subject, and I will do my best to get all the appropriate players to the table.

Thanks again for your willingness to meet with us.

Michael T. Vivion
Vice Chairman
Alaskan Aviation Safety Foundation

Alaskan Aviation Safety Foundation
P.O. Box 73274
Fairbanks, AK 99707

January 3, 2005

Directorate of Public Works
Attn: APVR-RPW-EV (Gardner)
724 Postal Service Loop #6500
Fort Richardson, AK 99505-6500

Dear Mr. Gardner:

We have reviewed the Draft Environmental Statement (DEIS) for the Army's proposed Battle Area Complex (BAX) and Combined Arms Collective Training Facility (CACTF), to be located near Delta Junction, Alaska, and offer the following comments regarding the subject proposal:

We have no doubt that there is a need for a world class training facility to accommodate the needs of the USARAK troops stationed in Alaska. It is also quite apparent to anyone who watches the evening news that a facility such as the proposed BAX/CACTF is needed to realistically simulate today's difficult combat scenarios.

Our concerns with the DEIS are two fold:

First, it appears to us that the Army is being very short sighted by failing to seriously consider an alternative that lies west of the Delta River. There currently

Location 21
This location alternative (i.e., West Donnelly Training Area) was initially considered but has been eliminated from further analysis in this EIS because it did not satisfy the screening criteria. Please

exists to the west of the Delta River a vast region of Army land that is rarely used outside the winter season, when an ice bridge facilitates access to the area. This entire area is currently under Army reservation, offers vast areas for maneuvers, and is entirely overlain by large blocks of restricted airspace.

refer to Section 2.3.3, *Alternative Viability Analysis* for more information.

With the transition of the Alaska based light infantry brigade to a Stryker Brigade it appears that this combat team will need much larger areas to maneuver and train in. While this DEIS is limited to discussions of the BAX/CACTF, it seems to us that the Army, the nation and the troops would be' much better served if the Army took an integrated approach to its training needs over the next ten years. The DEIS has taken the narrow and, in our opinion, short sighted view that it would be too expensive and time consuming to construct a bridge to access this vast area.

Proposed Action and Alternatives 79
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

The only proposals offered in this DEIS are sited around the town of Delta Junction, Fort Greely's installations, the Trans Alaska Pipeline, a major highway, and significant terrain features, all of which would severely restrict future expansion of these important training areas.

We respectfully suggest that if the Army is to have any hope of meeting any of its three stated objectives for these training areas (stated on December 22, 2004, as flexibility, maneuverability, and expandability), it must seriously consider alternative sites on the west side of the Delta River, such as the Donnelly West training area. Construction of a bridge to access this area would also facilitate access for the Stryker Brigade to train in this general area on a year round basis, a notion that seems inevitable, unless the Army intends only to train in winter months, and ship its troops elsewhere to train in the summer months.

Our second concern has to do with airspace. There is no reference whatever in the DEIS to the potential impacts these training facilities may have on civil and military aviation in the area. This is a serious failing of the scoping process of this NEPA process, since this issue was presented to the Army in writing during the scoping meetings held in Fairbanks in summer of 2004.

Airspace 13
Airspace is addressed in Sections 3.2.8 and 4.2.8, *Airspace.*

We have repeatedly requested maps from Army planners that illustrate on the same map accurate airspace boundaries and their relationship to the proposed alternatives. Unfortunately, these maps have not been made available on a widely accessible basis. We realize that this review period lies over the Christmas holiday period, which makes it difficult to develop maps quickly, but this is the time frame chosen by the Army, not by the civil community. Had the Army considered airspace in the original DEIS, these maps would have logically been incorporated in the product from the beginning.

Airspace 14
Please see additional information in Sections 3.2.8 and 4.2.8, *Airspace.*

The Army plans to conduct live fire operations in the BAX/CACTF. The DEIS does not explain under what airspace authority or restrictions this live fire activity will be conducted. In a meeting with Army planners on 22 December, Army representatives stated that the maximum height of a .50 caliber round is approximately 900 meters. Other live munitions will be expended in the area of these training areas, as well. Obviously, some form of airspace authorization or reservation will be required to accommodate this use of live ammunition, yet there is no mention of airspace at all in the DEIS.

Airspace 15
This information has been added. Please see additional information in Sections 3.2.8 and 4.2.8, Airspace.

At the above referenced meeting, Army planners noted that the Fort Wainwright Range routinely experiences 8 to 10 interruptions to its live fire activities per day, due to civil aircraft in the area. The Fort Wainwright Range is overlain by a Controlled Firing Area (CFA), which, simply put, requires the user agency to check fire any time an aircraft is in the vicinity, for as long as the aircraft is in the vicinity. There is no requirement on the part of the aviator to avoid a CFA, in fact, it is quite difficult for the average aviator to determine that a CFA exists, or that it is active. This is by design, since a CFA is intended to be transparent to the aviator.

If the Army intends to operate the proposed BAX/CACTF under a CFA designation alone, it is probably a given that there will be numerous disruptions to training due to passing aircraft. This will obviously negatively affect the quality of training conducted in these facilities.

Airspace 16
This information has been added. Please see additional information in Section 4.2.8, Airspace**.**

The Army will also need to train jointly with the other military services in and around these training facilities. It is probably safe to suggest that the single most frequent participant in these joint training exercises will be the US Air Force, in the form of tactical aircraft support. One need only observe the evening news to understand the importance of an integrated combat team, composed of both ground and airborne units.

The DEIS states that tactical aircraft "such as the F-16 and Navy and Marine Corps aircraft" will be flown in support of training at these facilities. The DEIS also states that Tactical Unmanned Aerial Vehicles (TUAV's) will be operated over these training facilities.

While "virtual" munitions delivery may be accomplished at a distant site by tactical aircraft, there seems to be little doubt that at some point, there will be a need to operate tactical aircraft in the airspace over the BAX/CACTF and TUAV's will routinely operate overhead these areas, certainly during operations by the Stryker Brigade.

While it may be technically possible (but extremely rare at present) to operate TUAV's outside restricted airspace, tactical operation of fighter aircraft outside military airspace is simply impractical, if not illegal. In any case, operation of both these types of assets would certainly be facilitated by and enhanced by Restricted airspace overhead the BAX/CACTF complex.

Airspace 17
Specific plans for TUAV use by the Army in non-restricted airspace will be evaluated by the FAA prior to the action to ensure positive control over any TUAV activities. Please see additional information in Section 4.2.8, *Airspace*.

Two of the proposed alternative sites for the BAX/CACTF (the Eddy Drop Zone and the Donnelly Drop Zone Alternatives) lie directly under charted civilian airspace. These civilian corridors through military airspace are not depicted on any of the Army's DEIS figures, even though their existence has been pointed out repeatedly to Army planners, and they are clearly charted on Sectional Aeronautical charts.

Location 22
Thank you for your comment.

These corridors were established as a result of an Environmental Impact Statement and subsequent airspace action proposed by the US Air Force. The

Federal Aviation Administration, the civil aviation community and the Air Force agreed to the provisions of this airspace agreement. The mitigations of this airspace action include these civil corridors, which form exclusions from military airspace extending east and south from Delta Junction, and extending up to 3500 feet msl. As previously noted, the trajectory of a .50 caliber projectile extends well above this height, thus it would appear that both the Eddy and Donnelly sites for the BAX/CACTF would violate this previous agreement, since their operation would, at the very least, require a CFA.

Frankly, any violation of that airspace agreement is an unacceptable outcome from the perspective of the civil aviation community.

While the proposed North Texas Range alternative for the BAX/CACTF is clearly the lesser of evils when viewed only against the alternatives carried forward by this DEIS, it will still suffer some limitations, in our opinion. The majority of this proposed area appears to lie under existing Restricted Airspace. This will permit TUAV operations and live fire to be conducted over much of the area (without accurate maps showing existing airspace boundaries relative to the North Texas BAX/CACTF it is still difficult to assess the potential difficulties this area might experience) without danger to civil aircraft, or disruptions to training to accommodate passage of aircraft.

This clearly suggests that the North Texas Range is the only one of the alternatives brought forward that could reasonably meet any of the Army's stated objectives.

Nevertheless, operation of tactical fighter type aircraft in this area would be limited, due to the constraints of the airspace and the terrain in the area, but this is the only one of the three alternatives brought forward that takes advantage of any of the extensive restricted airspace available in the area.

In summary, we believe the US Army Alaska is talng a very short-sighted approach to siting of this critical training facility. It seems clear to us that to

afford our troops the most realistic, flexible and expandable training site, the Army should give serious consideration to siting these training facilities on the west side of the Delta River. This would offer vast areas of Army land to utilize both for these training facilities and to expand other training into, and restricted airspace to operate TUAV's and tactical aircraft routinely as an integral part of realistic combat team training.

If it is really not feasible to site these training facilities to the west of the Delta River, then we would argue that of the three alternatives offered in the DEIS, only the North Texas Range siting of the BAX./CACTF would provide adequate safety margins for civil aviators, while allowing the Army to conduct its training mission.

Finally, as part of the NEPA process, the US Army should commit to participate in the Special Use Airspace Information Service, which is currently utilized only by the Air Force. In our opinion, this valuable service would offer a significant safety enhancement during the Army's use of TUAV's, artillery, and other live fire operations, both inside and outside restricted airspace. We also understand that the character of the Army's aviation assets in interior Alaska will significantly change soon, with the addition of a number of OH-58 helicopters to be based at Fort Wainwright and Fort Greely. Adoption by the Army of the Special Use Airspace Information System will become even more vital to aviation safety as these aircraft enter this very busy airspace. The Army's participation in this important service will assist, in our opinion, in the avoidance of serious conflicts between the Army and civil aviators.

Airspace 18
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

As always, the Alaskan Aviation Safety Foundation is willing to continue our discussions with the Army as the planning process continues for this and other projects. Please feel free to call on us at any time with regard to aviation safety and advocacy issues.

Thank you for the opportunity to provide comments in this planning process.

Sincerely,
Michael T. Vivion
Vice Chairman
Alaskan Aviation Safety Foundation

U.S. ARMY GARRISON- ALASKA
PUBLIC MEETING
Delta Community Center
Delta Junction, Alaska
December 2, 2004

COMMENT SHEET

NAME: Letha Burcham

ADDRESS: PO Box 441
Delta Jct, AK 99737

REPESENTING: Self ✓ Organization

ORGANIZATION NAME AND ADDRESS:

COMMENT: Please do NOT ENDANGER our town — USE TEXAS RANGE ONLY!

Location 23
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

U.S. ARMY GARRISON- ALASKA
PUBLIC MEETING
Delta Community Center
Delta Junction, Alaska
December 2,2004

COMMENT SHEET

NAME: Dave Cory, Betty Johnson

ADDRESS: P.O. Box 1425, 740 Mellow Glow Lane
Delta Jct., AK 99737

REPESENTING: Self X Organization_____

ORGANIZATION NAME AND ADDRESS:_____

COMMENT: (enclosed)

U.S. Army Alaska, Donnelly Training Area - Range **Expansion**

To Whom It May Concern,

Myself and Betty R. Johnson own a residence off Dorshorst Rd. in Delta Jct., Alaska and we are deeply concerned about the impact of a Training Area and BattIe Area Complex being proposed by USARAK in the Eddy Drop Zone at the Donnelly Training Area just south of town. We are vehemently opposed to this site under consideration.

Location 24
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

The Eddy DZ is a very poor choice as a proposed site because of it's close proximity to residential areas, the extremely high fire potential, and the environmental problems associated with areas of wetlands, and wildlife displacement. I am very familiar with the Eddy DZ, having done extensive survey work in the area and also hunting excursions. Eddy DZ is heavily laden with black spruce forests and dry deadfall timber that are an extremely high fire danger. The 33 mile loop road passing through the area is subjected to major bog and runoff during spring breakup and times of heavy rain and pre winter freezeup. Much of the area is of poor drainage and will be impacted by increased equipment usage.

Fire Management 46
Results of a fire hazard assessment at Eddy Drop Zone are discussed in Section 3.2.3.1.2.1.

Wetlands 24
Impacts to wetlands from off-road maneuver are discussed in Section 4.3.3.

Eddy DZ practically borders several residences and businesses in the area including ours, and is very close to the Alaska hwy. and the town proper. This land is traversed by buffalo and is prime moose habitat. We understand the need for additional training areas for our Military, but there are enormous amounts of designated land on the other side of the Richardson hwy. which could accommodate the new training requirements. Texas and Minnesota Range are prime examples.

Wildlife and Fisheries 32
Thank you for your comment.

Proposed Action and Alternatives 80
Thank you for your comment.

In the past, our house and many others have been exposed to vibrations and loud noise from live exercises. Children and animals in the vicinity were often traumatized and on some occasions low flying military aircraft would fly very near the houses causing more vibration and noise. We don't need to have a major training zone set up in our own backyards when there are many options available on other lands away from residential areas. The community of Delta Jct. is your neighbor and their concerns should be your concerns.

Noise Management 20
Munitions containing high explosives (which create an explosion, vibrations, and noise upon impact with the ground) will not be used as part of the proposed action. Soldiers are required to comply with existing regulations for the safe firing of ammunition. Please see Section 2.2.1.2.2.1, *Safety Precautions* for additional information. Noise from aircraft is more fully addressed in Section 4.2.4, *Noise*.

Sincerely, David W. Cory, Betty R. Johnson
740 Mellow Glow Lane, P.O. Box 1425
Delta Jct., Ak. 99737
Email dwcory@wildak.net

Ronald K Dearborn
2095 Toboggan Lane
Fairbanks, AK 99709

Directorate of Public Works
Attn: APVR-RPW-GS (Gardiner)
730 Postal Service Loop #6500
Fort Richardson, AK 99505-6500

8 January 2005

Re: Construction and Operation of a Battle Area Complex and Combined Arms Collective Training Facility within U.S. Amy Training Lands in Alaska

Gentlemen:

As a pilot located in Fairbanks, AK I am very supportive of the needs for the US Military to provide varied and extensive training. I understand the value of and support the development of a Battle Area Complex and Combined Arms Collective Training Facility in Interior Alaska. From review of the EIS for the several proposals in the Isabel Pass area south of Ft. Greeley and Delta Junction however, the suggested areas seem to diminish the future value of these training assets by limiting their flexibility and expandability. Given the importance of this type of training into the foreseeable future, it seems silly to jeopardize the usefulness of the planned facilities by:

a) placing them outside areas now protected by Restricted Airspace, as is the case for the Eddy and Donnelley Drop Zones, or

b) placing the facility at the very edge of a 480,000 acre area of Restricted Airspace, in fact the specific edge of that Restricted area which is nearest to a population area, a scenic Alaska Highway, and adjacent to a civilian-military negotiated VFR corridor for civilian aircraft.

Location 25
See Section 4.2.8, *Airspace* for additional information on airspace use during training at the proposed range facilities.

By not considering the airspace needs for a facility that lists both manned and unmanned aircraft support as part of the anticipated training, the future value of the facility is compromised. Not considering airspace requirements for the

announced planned use of other substantial ground based firepower adjacent to civilian areas, and especially the low altitude air corridor earlier agreed upon to enable civilian aircraft to safely negotiate Isabel Pass during inclement weather further exacerbates use of the facility.

Airspace 19
See Section 4.2.8, Airspace for additional information on airspace use during training at the proposed range facilities.

Isabel Pass in one of the two passes through the Alaska Range between Fairbanks (and other Interior locations) and South Central Alaska. The environmental situation of Alaska makes these passes critical for the safe passage of general aviation aircraft. Recognizing this there was developed in the past decade a civilian/military agreement for a safe corridor of passage through Isabel Pass. Placing training facilities which anticipate the use of helicopters, fixed-wing, manned and unmanned aircraft at the very edge of this corridor will either severely limit the flexibility and expandability of the proposed training facilities, or will violate the agreement. Why go there? Why not place these critical training facilities well within the 480,000 acres of protected space so that all operations, currently planned or conceived in the future as the demands of the world dictate, can be assured.

Cordially,

R. K. Dearborn
Cc: Alaska Congressional Delegation

DELTA FISH & GAME ADVISORY COMMITTEE
BOX 468 DELTA JCT AK. 99737

January 2, 2005

Gale Skaugstad
United States of America
Directorate of Public Works
Environmental Resourses
Ft. Wainwright Ak. 99707

To Whom It May Concern:

The Delta Fish and Game Advisory has been briefed on the pending construction of the new stryker and BAX facilities. Since the initial briefing the Delta Fish & game Advisory committee has attended the public meetings held in Delta Junction and made our official comments known at those meetings. The Advisory Committee commented on the previous EIS and wishes to make additional comments.

The Delta Junction Advisory Committee has several areas of specific concerns

1. The last free ranging bison herd in the United States migrates through or extensively uses both the proposed Eddy Drop Zone and Texas Range sites that are being considered as striker range sites.

2. The amount of activity and level of firing created by the new range will not only disrupt bison but will also negatively impact the McComb and Delta Caribou Herds that use the area during the winter months.

3. That hunting and fishing opportunities will suffer as a result of increased security and the level of activity being planned. Access is gained to several popular hunting and fishing areas by crossing the Ft. Greely military reservation especially by use of the 33 mile loop road. Enclosure #1 is a letter addressed to Senator Ted Stevens and written by Mr .Don Quarberg who is a member of our Advisory Committee. We believe that the Army's action as described in Mr. Quarberg's letter is but the tip of the iceberg with regard to access on Ft. Greely. We also believe that closures of the access points realistically demonstrates the Army's intent to deny access whenever possible.

4. That all species of game animals both large and small will be negatively impacted by the range. Especially the use of large artillery pieces which could potentially have a negative impact on all game species.

5. That mitigation of the above impacts will happen after the range is constructed not before construction.

We specifically recommend that existing ranges be used to preclude disrupting additional habitat. Should the new range be approved, we recommend using the existing impact area on the West side of the Delta River. Enclosure #2 is a letter written by advisory committee member David Luntz describing how this would likely resolve all of the above issues. If the above issues cannot be resolved, especially habitat loss and access, the best solution would be to construct the range at another site.

Sincerely,
Darell Darland
Chairman Delta Fish & Game Advisory Committee

Wildlife and Fisheries 33
Please see Section 4.2.6, *Wildlife and Fisheries* for revised information regarding your comment.

Wildlife and Fisheries 34
Please see Section 4.2.6, *Wildlife and Fisheries* for revised information regarding your comment.

Public Access and Recreation 22
Additional mitigation has been proposed to address this issue. Please see revised Section 4.3.8, *Public Access and Recreation.*

Wildlife and Fisheries 35
Thank you for your comment.

Mitigation 05
Many mitigation measures included as part of the proposed action incorporate existing, on-going plans, programs and activities at USARAK. Additional mitigation measures would be implemented once a final decision has been made and documented in the Record of Decision. Implementation is based on the issue being addressed and available funding.

Location 26
This location alternative (i.e., West Donnelly Training Area) was initially considered but has been eliminated from further analysis in this EIS because it did not satisfy the screening criteria. Please refer to Section 2.3.3, *Alternative Viability Analysis* for more information.

(Enclosure 1)

10/07/04

FROM: Don Quarberg
HC 60 Box 3070
Delta Junction, AK 99737
(907) 89504650

TO: Honorable Senator Ted Stevens
Federal Building
101 W l2th Ave, Room 210
Fairbanks, AK 99701-5236

RE: Unreasonable restrictions for public recreational access to Ft Greely and Donnelly Training **Area** Lands by the US ARMY during the 2004 moose hunting season.

Dear Senator Stevens,

The following Draconian measures were implemented against civilian access to military lands on Ft Greely and the Donnelly Training Area, by the US ARMY (Ft Greely Range Control Officer, Steve Thurman and. his supervisor George Alexion) during the 2004 moose hunting season (month of September).

1: The very popular Jarvis East Recreational Area was closed and patrolled to prevent civilian access, beginning in late August. There was no military training activity on these lands during this time.

2: The Jarvis East Recreational Area was apparently opened to public access in the final days of the moose season (approx. 9/13/04). However this information was not publicized to the general public.

3: The US ARMY maintained a range closure information system (recorded message available via telephone) through Recreational Access System (873-3181). However, to enter the system you must first enter your Permit Number- AND when I tried to obtain

Public Access and Recreation 23
Areas used for military training at DTA close during training events to protect the public and prevent disruption to the training exercise. However, training areas not in use for field training exercises are released for recreational activities, as available. Information on which training areas are open is recorded on USARTRAK (Delta Junction call in number: 873-3181). There is no hunting on Fort Greely. Recreational Access Permits (RAPs) for DTA are available at the Fort Greely Visitor Center, located at the Front Gate. This facility is accessible to the general public Monday through Friday from 6 a.m. to 8 p.m. In addition, RAPs can be obtained from either Fort Wainwright or Fort Richardson as the RAP is applicable to all three military installations.

this Recreational Permit through, the main gate Security Guards, I was told that the base was closed to hunting and these permits were not being issued. I attempted to obtain this permit on numerous occasions and always met with the same result.

4: Signs erected by the military, indicating the boundary of military land were often erroneous, (not in their proper place) or placed at the entrance to military land with no corresponding sign indicating the exit of military property. The ARMY erroneously implied by this signage technique that they controlled all the land beyond the entrance sign.

5: The boundaries of Military Land were not delineated, even where major ATV trails entered Military Land.

Public Access and Recreation 24
USARAK is currently working towards improving its boundary demarcation, especially at access points along the eastern boundary, at DTA.

6: The US ARMY Range Control Officer failed to have range closure signs removed along major access points on weekends for areas such as the Donnelly Dome Recreational Area, Meadows Road Recreational Area and the Jarvis West Recreational Areas even though the military training activities had been suspended there for the weekend.

7: The US ARMY closed restricted airspace 2202A, from 6 00 AM until 10:OO PM every day of the week, whether there was any ARMY activity present or not. This absolutely unnecessary inconvenience forced local aviators to fly all the way around this airspace to access areas to the west of Delta Junction. In contrast, the US AIR FORCE, who is the primary user of Restricted Airspace 2202A,B and C with supersonic aircraft delivering live ordinances, maintains a Special Use Airspace Information Service on VHF radio frequency 125.30 (Eielson Range Control). If the restricted airspace is in use they will communicate with pilots on this frequency and often permit flights through this airspace if the Air Force is between sorties at that time. When the Air Force vacates this restricted airspace and closes down their Eielson Range Control station, they broadcast over that frequency (125.30) that the specific airspace has been deactivated for a certain period of lime. The US ARMY would simply have the Air Force broadcast that Restricted Airspace 2202A remained active with Army activity, whether they were actually conducting any activity in that area or not!

Airspace 20
Airspace used for military training at DTA will remain closed during training events.

8: Conversations with members of other agencies (Alaska Department of Fish and

Airspace 21

Game and the University of Colorado) that had legitimate cause to fly wi1dlife and environmental surveys over military lands, (they are cooperators with the US ARMY in managing wildlife and environmental issues on military lands) revealed that US ARMY Range Control Officers were also non-accommodating in their requests to fly through military airspace. It was difficult to obtain permission for the activities for which they were to cooperate with the military on!

All of these situations appear to be contrary to the conditions set forth by the US ARMY in their INTEGRATED NATURAL RESOURCES MANAGEMENT PLAN 2002-2006 as follows:

1.: Page ER-2, Environmental Compliance: "The Sikes Act, as amended in November 1997, requires that an INRMP include": --- "Sustainable use by the public of natural resources to the extent that the use is not inconsistent with the needs of fish and wildlife resources". --- And

2: Continuing on Page ER-3, --"Public access to the military installation for sustainable use of natural resources, subject to the safety requirements and military security."

3: Page ER-4, Partnerships: --- "Major partners in the implementation of this plan are the ---- ADFG". "Other partners --- include --- universities”---

4: Page 1-2, Goals and Objectives, Quality of Life: "Improve the quality of life for the Fort Greely and Donnelly Training Area community and the general public through development of high quality natural resources-based recreational opportunities."

5: Page 1-3, Objectives: Stewardship: 'Provide economic and other human-valued products of renewable natural resources when such products can be produced in a sustainable fashion without significant negative impacts on the military training mission."

6*:* Page 1-3, Quality of Life: "Provide opportunities for consumptive uses of natural resources within the biological, and recreational carrying capacities" and "Provide natural resources-based opportunities for other outdoor recreation" ---.

7: Page 1-3, The Plan: "The Sikes Act Improvement Act of 1997, Public Law 105-85,

USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

Public Access and Recreation 25
USAG-AK supports the military mission by protecting and enhancing the training lands upon which the mission is critically dependent. The Integrated Natural Resources Management Plan (INRMP) is a tool to help the Army fit natural resource goals into the framework of the military mission. The main goal of the INRMP is to support USARAK military and nonmilitary activities while maintaining a functional, healthy ecosystem.

Section 670a(a.)(3), states: --- the Secretaries of t11.e military departments shall carry out he program required by this subsection to provide for the ---- sustainable multipurpose use of the resources which shall include hunting, fishing, trapping and non-consumptive uses; and ----public access to military installations to facilitate the use."

8: Page 1-23, Responsibilities: " The U.S. Fish and Wildlife Service (USFWS) and the Alaska Department of Fish and Came (ADFG) are responsible for the management of fish and wildlife populations on military lands in Alaska".

9: Page 6-6, Outdoor Recreation Program Goals and Objectives: "Provide high quality opportunities to the Fort Greely and Donnelly Training Area community and the general public for hunting, trapping, and fishing within biological and recreational carrying capacities of the resources".

10: Page 6-9, Outdoor Recreation Management, Description and Justification: "Manage recreational use on fort Greely and Donelly Training Area to include hunting, trapping, and fishing management --- and management of other recreational activities". "Actions include --- improving access for --- hunting opportunities". "Conducting outdoor recreation management required by Public Law 106-65" ---.

11: Page 6-9, Outdoor Recreation Management, Recreation Management Areas: "Fort Greely and Donnelly Training Area is managed for a number of different types of public recreational use. All areas --- open for recreational use may be closed temporarily during periods of military use".

12: Appendix A: Specific Items of Cooperation Between the Bureau of Land Management, U.S. Fish and Wildlife Service, Alaska Department of Fish and Game, and the U.S. Army Alaska: Mutual Agreement: "Representatives of ADF&G --- will be admitted to the installation at reasonable times, subject to the requirements of military necessity and security. Such personnel may use U.S. Army transportation on a nonreimbursable basis, to include aircraft, for wildlife-related functions ---provided such transportation is available without detriment to the military mission.

13 : Page A-2, Mutual Agreements continued: Public access for hcmting, trapping, and fishing is approved under a system of controls established by USARAK in cooperation

with ADFBG. Civilians will be considered on an equal, basis with military and Army civilian employees for permits and access" ---. " Hunting, trapping, and fishing will be allowed only on those areas where there is no conflict with military training activities and no unreasonable safety hazard to participants, military personnel and dependents, or Amy civilian employees."

14: Page B-4, Responsibilities: Access: "The military's need for secure and safe training areas dictates that USARAK has responsibility for controlling access to these withdrawn land. In the exercise of these responsibilities --- USARAK: --- will maintain signs at all major road and trail entrances to withdrawn lands identifying the property and the requirements for entering. --- May allow specific nonmilitary uses and users into closed areas as appropriate."

SUMMARY OF MY CONCERNS: I fully understand the reason that public lands are withdrawn for military use is to "enhance military readiness in the interest of national defense" (page 1-23, Paragraph 1). However, when the military is not using these lands, there is 110 reason why the designated recreational areas can not be opened for access to the general public, especially during the autumn moose hunt when these lands are subject to the greatest public recreational demand. The US ARMY can certainly develop a better method of public communication than they now utilize, if they have any at all. They could certainly take a lesson from their military partner, the US AIR FORCE in that regard. If the US ARMY is indeed utilizing an area for training purposes the public will surely understand why it is closed to recreational use. BUT just to close a recreational area for no military justification, other than because they can, is totally unacceptable to the public! Perhaps the Range Officers are more than content to simply close the recreational areas to the public for their own convenience - so they don't have to deal with the general public. Whatever the reason, it is not a valid one. Their signature on the INRMP 2002-2006 specifies that they try harder than that or is the INRMP simply a play on words. I find the ARMY'S intentions despicable in regard to their public recreational use plan!

Sincerely,

Don Quarberg
References:

INTEGRATED NATURAL RESOURCES MANAGEMENT PLAN 2002-2006

Photocopy of DONNBLLY TRAINING AREA MAP

Photocopy of ANCHORAGE SECTIONAL AERONAUTICAL CHART with restricted airspace 2202A

(Enclosure 2)

Darland Debra S FGA FAMILY SPT COORDINATOR
From: Luntz David R FGA BASE OPS LOGISTICS MGR(ctr)
Sent. Thursday, December 16,2004 3:21 PM
To: Darland Debra S FGA FAMILY SPT COORDINATOR
Subject: Please pass to Darrell
Importance: High

For input on comments in regard to EIS

A Bridge and Construction of Ranges/Firing points and Training Complexes in support of EIS across Tannana River would allow for the use of already approved range land that does not get proper use to date.

Ranges and training complexes across the river would allow for a more realistic training environment due to the ability to combine live fire exercises with close air support, combined arms and Air Force for airlift for resupply which would not be available on Eddy or Donnelly training drop zones.

Currently there exists a land shortage for Brigade sire training opportunities, the establishment of ranges across the river would also allow the existing drop zones (Buffalo, Eddy and Donnelly) to be used as Forward Operating Bases, for large units that have a hard time finding a large enough footprint to realistically deploy, such as the Support Battalion, units could then rotate across the river for their live fire exercises and training.
As US Army Alaska grows the development of this prime training land would allow for the growth of USARAK and add numerous opportunities for future development of a combat training center that would emulate JRTC and NTC, providing convoy live fire

Location 27
This location alternative (i.e., Tanana Flats Training Area) was initially considered but has been eliminated from further analysis in this EIS because it did not satisfy the screening criteria. Please refer to Section 2.3.3, *Alternative Viability Analysis* for more information.

ranges for the STRYKER vehicles and allow integration of Air Force and other military services, as well as host-nation and civilian personnel, making training uniquely realistic to future battlefield environments.

Dave Luntz
Logistics Manager
Chugach/Alutiiq JV.

Fort Greely, Alaska
Ph# 907-873-3011
David.luntz@greely.army.mil

DPW
Attention: Kevin Hardner

Kevin,
DT Holding passed this to BG Hirai when he visited.

Library

Virtual Library & Electronic Reading Room

Executive Order 11988 -- Floodplain Management

SOURCE: The provisions of Executive Order 11988 of May 24, 1977, appear at 42 FR 26971, 3 CFR, 1977 Comp., p. 117, unless otherwise noted.

By virtue of the authority vested in me by the Constitution and statutes of the United States of America, and as President of the United States of America, in furtherance of the National Environmental Policy Act of 1969, as amended (42 U.S.C. 4321 et seq.), the National Flood Insurance Act of 1968, as amended (42 U.S.C. 40011 et seq.), and the Flood Disaster Protection Act of 1973 (Public Law 93-234, 87 Stat. 975), in order to avoid to the extent possible the long and short term adverse impacts associated with the occupancy and modification of floodplain development wherever there is a practicable alternative, it is hereby ordered as follows:

Section 1. Each agency shall provide leadership and shall take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health and welfare, and to restore and preserve the natural and beneficial values served by floodplains in carrying out its responsibilities for (1) acquiring, managing, and disposing of Federal lands, and facilities; (2) providing Federally undertaken, financed, or assisted construction and improvements; and (3) conducting Federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulating, and licensing activities.

SEC. 2. In carrying out the activities described in Section 1 of this Order, each agency has a responsibility to evaluate the potential effects of any actions it may take in a floodplain; to ensure that its planning programs and budget request reflect consideration of flood hazards and floodplain management; and to prescribe procedures to implement the policies and requirements of this Order, as follows:

a.

1. Before taking an action, each agency shall determine whether the proposed action will occur in a floodplain--for major Federal actions significantly affecting the quality of the human environment, the evaluation required below will be included in any statement prepared under Section 102(2)(C) of the National Environmental Policy Act. This Determination shall be made according to a Department of Housing and Urban Development (HUD) floodplain map or a more detailed map of an area, if available. If such maps are not available, the agency shall make a determination of the location of the floodplain based on the best available information. The Water Resources Council shall issue guidance on this information not later than October 1, 1977.

2. If an agency has determined to, or proposes to, conduct, support, or allow an action to be located in a floodplain, the agency shall consider alternatives to avoid adverse effects and incompatible development in the floodplains. If the head of the agency finds that the only practicable alternative consistent with the law and with the policy set forth in this Order requires sitting in a floodplain, the agency shall, prior to taking action, (i) design or modify its action in order to minimize potential harm to or within the floodplain, consistent with regulations issued in accord with Section 2(d) of this Order, and (ii) prepare and circulate a notice containing an explanation of why the action is proposed to be located in the floodplain.

3. For programs subject to the Office of Management and Budget Circular A-95, the agency shall send the notice, not to exceed three pages in length including a location map, to the state and areawide A-95 clearinghouses for the geographic areas affected. The notice shall include (i) the reasons why the action is proposed to be located in a floodplain; (ii) a statement indicating whether the action conforms to applicable state or local floodplain protection standards and (iii) a list of the alternatives consid-ered. Agencies shall endeavor to allow a brief comment period prior to taking any action.

Flooding/Floodplains 17
Thank you for your submission. Provisions of Executive Order 11988 have been incorporated into the EIS. Please see Sections 3.2.2 and 4.2.2, *Surface Water*.

4. Each agency shall also provide opportunity for early public review of any plans or proposals for actions in floodplains, in accordance with Section 2(b) of Executive Order No. 11514, as amended, including the development of procedures to accomplish this objective for Federal actions whose impact is not significant enough to require the preparation of an environmental impact statement under section 102(2)(C) of the National Environmental Policy Act of 1969, as amended.

b. Any requests for new authorization or appropriations transmitted to the Office of Management and Budget shall indicate, if an action to be proposed will be located in a floodplain, whether the proposed action is in accord with this Order.

c. Each agency shall take floodplain management into account when formulating or evaluating any water and land use plans and shall require land and water resources use appropriate to the degree of hazard involved. Agencies shall include adequate provision for the evaluation and consideration of flood hazards in the regulations and operating procedures for the licenses, permits, loan or grants-in-aid programs that they administer. Agencies shall also encourage and provide appropriate guidance to applicants to evaluate the effects of their proposals in floodplains prior to submitting applications for Federal licenses, permits, loans or grants.

d. As allowed by law, each agency shall issue or amend existing regulation and procedures within one year to comply with this Order. These procedures shall incorporate the Unified National Program for Floodplain Management of the Water Resources Council, and shall explain the means that the agency will employ to pursue the nonhazardous use of riverine, coastal and other floodplains in connection with the activities under its authority. To the extent possible, existing processes, such as those of the Council on Environmental Quality and the Water Resources Council , shall be utilized to fulfill the requirements of this Order. Agencies shall prepare their proce-dures in consultation with the Water Resources Council, the Director of the Federal Emergency Management Agency, and the Council on Environmental Quality, and shall update such procedures as necessary.

[Sec. 2 amended by EO 12148 of July 20, 1979, 44 FR 43239, 3 CFR, 1979 Comp., p. 412]

SEC. 3. In addition to the requirements of Section 2, agencies with responsibilities for Federal real property and facilities shall take the following measures:

a. The regulations and procedures established under Section 2(d) of this Order shall, at a minimum, require the construction of Federal structures and facilities to be in accordance with the standards and criteria and to be consistent with the intent of those promulgated under the National Flood Insurance Program. They shall deviate only to the extent that the standards of the Flood Insurance Program are demonstrably inappropriate for a given type of structure or facility.

b. If, after compliance with the requirements of this Order, new construction of structures or facilities are to be located in a floodplain, accepted floodproofing and other flood protection measures shall be applied to new construction or rehabilitation. To achieve flood protection, agencies shall, wherever practicable, elevate structures above the base flood level rather than filling in land

c. If property used by the general public has suffered flood damage or is located in an identified flood hazard area, the responsible agency shall provide on structures, and other places where appropriate, conspicuous delineation of past and probable flood height in order to enhance public awareness of a knowledge about flood hazards.

d. When property in floodplains is proposed for lease, easement, right-of-way, or disposal to non-Federal public or private parties, the Federal agency shall (1) reference in the conveyance those uses that are restricted under identified Federal, State or local floodplain regulations; and (2) attach other appropriate restrictions to the uses of properties by the grantee or purchaser and any successors, except where prohibited by law; or (3) withhold such properties from conveyance.

SEC. 4. In addition to any responsibilities under this Order and Sections 202 and 205 of the Flood Disaster Protection Act of 1973, as amended (42 U.S.C. 4106 and 4128), agencies which guarantee, approve, regulate, or insure any financial transaction which is related to an area located in a floodplain shall, prior to completing action on such transaction, inform any private parties participating in the transaction of the hazards of locating structures in the floodplain.

SEC. 5. The head of each agency shall submit a report to the Council on Environmental Quality and to the Water Resources Council on June 30, 1978, regarding the status of their procedures and the impact of this Order on the agency's operations. Thereafter, the Water Resources Council shall periodically evaluate agency procedures and their effectiveness.

SEC. 6. As used in this Order:

SEC. 6. As used in this Order:

a. The term "agency" shall have the same meaning as the term "Executive agency" in Section 105 of Title 5 of the United States Code and shall include the military departments; the directives contained in this Order, however, are meant to apply only to those agencies which perform the activities described in Section 1 which are located in or affecting floodplains.

b. The term "base flood" shall mean that flood which has a one percent or greater chance of occurrence in any given year.

c. The term "floodplain" shall mean the lowland and relative-ly flat areas adjoining inland and coastal waters including floodprone areas of offshore islands, including at a minimum, that area subject to a one percent or greater chance of flooding in any given year.

SEC. 7. Executive Order No. 11296 of August 10, 1966, is hereby revoked. All actions, procedures, and issuances taken under that Order and still in effect shall remain in effect until modified by appropriate authority under the terms of this Order.

SEC. 8. Nothing in this Order shall apply to assistance provided for emergency work essential to save lives and protect property and public health and safety, performed pursuant to section 305 and 306 of the Disaster Relief Act of 1974 (88 Stat. 148, 42 U.S.C. 5145 and 5146).

SEC. 9. To the extent the provisions of section 2(a) of this Order are applicable to projects covered by Section 104(h) of the Housing and Community Development Act of 1974, as amended (88 Stat. 640), 42 U.S.C. 5304(h)), the responsibilities under those provisions may be assumed by the appropriate applicant, if the applicant has also assumed, with respect to such projects, all of the responsibilities for environmental review, decisionmaking, and action pursuant to the National Environmental Policy Act of 1969, as amended.

Last Updated: Friday, 22-Oct-2004 13:15:41 EDT

FEMA 500 C Street, SW Washington, D.C. 20472 Phone: (202) 566-1600

From: Preusser Scott L CPT AIDE DE CAMP
Sent: Tuesday, November 30, 2004 11:18 AM
To: Boltz Donna G COL USAG CDR
Cc: Feistner Alan W LTC Deputy CDR, USAG-AK
Subject: Comments from the Aide on Meeting with Mayor Gilbertson

Ma'am,

Here are some comments made to BG Hirai by the **townspeople of Delta Junction**, Wednesday 24 November 2004.

Delta Junction is convinced of the future development of a Delta River Bridge (RR), Gas Pipleine, Oil Pipeline, Railroad to Canada and have concerns that the BAX/CACTF at Eddy will interfere. (Possible about 10 years into future)

Fire concerns that a fire started at Eddy could not be contained if conditions are extreme and could potentially destroy the community of Delta Junction. Potentail of fire is high, while mitigation is low.

Stated EIS does not agree with US Army Engineer Study. (Hard Copy with send to FRA Office)

Expressed concern with military use of private road (Fleet Access Rd) mile 1414 on Alaskan Highway.

All of the points you discussed in your info mail to BG Hirai were also addressed. They were very pleased that th CG gave them a meeting to discuss their issues and concerns. One woman stated how appreciated they all were that their issues were entertained by the CG himself and that they were not put off to the side. The entire room said "Amen". The CG gave not indication to the members on his decision and that in every case there will be people that will not be happy with whatever decision is made.

I apologize on the lateness of this corrsepondence. I will have the engineer memo (statement) to your office by tomorrow AM.

V/R

Scott

Cumulative Impacts 17
Thank you for your comment. See Section 4.3.11 for additional information on cumulative impacts.

Fire Management 47
The Army acknowledges your concern. Thank you for your comment. The Jarvis North Fire Mitigation Project, prescribed burns scheduled for the Bolio Lakes area near North Texas Range and vegetation thinning at the Collective Training Range, both located near North Texas Range, serve to manage vegetation and fire risk at DTA East. Results of a fire hazard assessment at Eddy Drop Zone are discussed in Section 3.2.3.1.2.1.

Water Resources 07
Additional hydrological field investigations and modeling have been completed for Jarvis Creek within the boundaries of DTA East. Please see Sections 3.2.2 and 4.2.2, *Surface Water*.

To: US Army Training

From: Larry Dorshorst
PO Box 389
Delta Junction, AK 99737

Subject: Comment Regarding Striker Training Area, Particularly Alternative 2 (Eddy Drop Zone). Please refer to the October 2004 EIS for the proposed Combat Training Facility.

I would like to address the problem with fire to the community of Delta Junction and residences along the Alaska Highway.

I have worked in fire suppression for the past thirty-five years here in the Delta Junction area and know well what escaped fire can do in the wind in Delta. In your draft EIS you came right out and state it isn't if, but when fire escapes there could be problems. Especially in the Eddy Drop Zone. No matter what precautions are taken it will not alleviate the potential for disaster.

Fire Management 48
The Army acknowledges your concern and is taking it into account as part of the decision making process. Several mitigation measures are proposed to lessen the probability of fires moving off military lands onto private property, or fires starting on private property and moving onto military lands. Please see Sections 3.2.3.4, *Fuels Managemen*t and 4.2.3.2, *Mitigation*.

I am the owner of the Alaska Homestead and Historical Museum which is less than 1.5 miles from the proposed training area. To say you will make sure of routes of egress will not cut it. I ask you what will be your settlement if you burn me out and kill one of us because of escaped wild fire.

Too many years of experience firefighting fire tells me nothing you can do will stop a wild fire in the extreme Chinook winds in Delta (south winds). My place is due north of the proposed training area and will be in the direct path of an escaped fire. I am not the only one that will be threatened. I and others will hold the military responsible. Especially when we are pointing at the serious potential problems with this site.

I would also like to address the problems of noise. Your EIS states that there definitely will be noise problems. There will be times that the noise level will be

Noise Management 21
Modeling of the sound energy (noise) over a 24-hour hour period at the BAX and CACTF shows that noise levels above 65 dBA

twice what OSHA's minimum standards are for ear protection. Even if this is only occasional there will be the obnoxious noise most every day to be put up with by Delta residents for years to come. Why does this have to be when there are other areas to choose from that would have a much lesser chance for disaster?

would not be experienced outside the DTA installation boundary. For comparison, a vacuum cleaner can be expected to emit a 70 dBA sound level. Additional information can be found in Sections 3.2.4 and 4.2.4, *Noise*.

Last but not least are the possible problems of potential arms fire in the wrong direction. I know you can not guarantee that this can not happen. None of my children should chance get killed how will you compensate us for that?

Human Health and Safety 21
Please see Section 2.2.1.2.2.1, *Safety Precautions* for a discussion on safety measures at the BAX.

There are so many possible chances for problems or disasters that I am not sure how you could justify putting this training area in the Eddy Drop Zone.

Location 28
The Army acknowledges your concern and is taking it into account as part of the decision making process.

Larry Dorshorst

Public Comment: Eddy DZ

I do not want the training area to be at the Eddy DZ because of the fire threat to Delta Junction residences. It also would cause loss of recreational opportunities and possible safety concerns for the youth in Delta Junction who do ride 4-wheelers and snowmachines in the area.

I do not want the training area to be at the North Texas Range because of the Delta Bison Herd proximity.

I propose the Donnelly Drop Zone as the logical choice for the training area because it is a reasonable distance from Delta Junction and doesn't pose as great a fire threat. There might be more time to evacuate and fight a fire as was the case in summer of 1999.

Thank you for the opportunity to comment.

Sincerely,

Kenna G. DuBois
P.O. Box 702
1395 Raspberry Rd.
Delta Junction, AK 99737

.

Fire Management 49
The Army acknowledges your concern and is taking it into account as part of the decision making process.

Public Access and Recreation 26
Public access to and recreation within the immediate footprint of the range complex would be eliminated under the proposed action. Access to areas within the Surface Danger Zone would be limited to those times the range is not in use. See note on page 290.

Human Health and Safety 22
Please see Section 2.2.1.2.2.1, *Safety Precautions* for a discussion on safety measures at the BAX.

Location 29, and Wildlife and Fisheries 36
The Army acknowledges your concern and is taking it into account as part of the decision making process.

9-352

December 2,2004

To Whom It May Concern;

I am opposed to the Army using the Eddy Drop Zone. The other two sites are further away from our community and homes.
Please consider this.

Melinda Eggleston
P.O. Box 722
Delta Junction, AK 99737
907-895-4332

Location 30
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

The Experimental Aircraft Association
Chapter 1 129
P.O. Box 83913
Fairbanks, Alaska 99708
December 12,2004

Department of the Army
Headquarters United States Army Garrison Alaska
800 Richardson Drive, # 6000
Fort Richardson, Alaska 99505-6000

Colonel Boltz:

The Experimental Aircrafl Association (EAA) Local Chapter 1 129, Fairbanks, Alaska on behalf of the Interior Alaska pilots would like to express grave concern over the Environmental Impact Statement whereby the United States Army proposes the construction and operation of the Battle Area Complex (BAX) and Combined Arms Collective Training Facility (CACTF) near Fort Greely, Alaska.

This drafl Environmental Impact Statement (EIS) is seriously flawed in one major aspect. During the scoping process for this document the United States Army Alaska has failed to consider all of the environmental impacts of the project. There was no mention or consideration of the airspace restrictions that would apply through the operation of such a facility. This major purposeful shortcoming applies to all of the EIS Alternatives.

Airspace 22
This information has been added to Sections 3.2.8 and 4.2.8, *Airspace*.

Since this facility is envisioned to be used as a live fire facility; and further, since this facility will employ the use of a wide variety of ordnance up to and including 105 mm gun systems on the Stryker vehicle (with the possibility of 120 mm in follow-on systems) it is both reasonable and prudent to employ airspace restrictions above such a facility. In addition the EIS scarcely mentions tactical close air support, UAV operations and helicopter operations in conjunction with the operational use of this facility.

Airspace 23
Please see additional information regarding air support in Sections 3.2.8 and 4.2.8, *Airspace*.

In the scoping criteria of this draft EIS airspace is neither mentioned nor evaluated.
Back in the late 1980's when the United States Air Force developed airspace restrictions in Alaska for the "Cope Thunder" training exercises, there was much discussion over the requirement to retain VFR and IFR corridors transiting both the ALCAN and Isabell Pass routes. These are the primary routes to the Lower 48 States and Southeast Alaska utilized by

both commercial and private aircraft in this part of Alaska. The Federal airways that are potentially impacted by this project are: A2-15 airway between Delta Junction and Nabesna, V-444 airway between Big Delta and Northway, B25 between Delta Junction and Glennallen and V-48 1 between Big Delta and Gulkana. The close proximity of the proposed range to Big Delta (Delta Junction) intersection of these important airways would constitute a blockade of these routes. None of this airspace is included in any of the numerous Restricted Areas that currently exist. The potential for additional Restricted Areas in these corridors is simply unacceptable.

Airspace 24
The Army has no plans to increase special use airspace (i.e., the establishment of restricted airspace), nor does it foresee the need to, as a result of the BAX/CACTF proposed action. If such a need were to arise in the future, that proposed action would be the subject of its own NEPA analysis and would involve the affected stakeholders at that time. Please see additional information in Section 4.2.8, *Airspace*.

Discussions held by the Aircraft Owners and Pilots Association (AOPA), the Alaska Airmen's Association, the Seaplane Pilots Assoication (SPA) and our organization have resulted in a complete lack of concern on the Army's part. This is not in keeping with the intent of the National Environmental Policy Act (NEPA) in that all environmental consequences of a proposed action are to be both considered and evaluated in the scoping process. The Army's current attitude is that they will build and operate the facility and wony about airspace at some undertemined future date.

The potential and extensive airspace restrictions required to operate such a range as the BAX/CACTF should be addressed. It is suggested that this subject be a matter of discussion with the Civil/Military Airspace Committee and the Alaska Civil/Military Airspace Committee with the local aviation organizations invited to participate.

We recommend that the EIS scope be expanded to include consideration of airspace restrictions required in the operation of such a training range. We further recommend that the comment period for this EIS be extended in order to properly address airspace issues.

Airspace 25
Please see additional information regarding Airspace in Sections 3.2.8 and 4.2.8, *Airspace*. The public comment period for the first draft EIS was extended for an additional 20 days.

Sincerely:

Pete Haggland
President EAA Chapter 1129

Cc:
Senator Ted Stevens, Senator Lisa Murkowski, Congressman Don Young, FAA Airspace Coordinator

U.S. ARMY GARRISON- ALASKA
PUBLIC MEETING
Delta Community Center
Delta Junction, Alaska
December 2, 2004

COMMENT SHEET

NAME: Marie G. Fetl

ADDRESS: PO Box 881 - Delta Jct. Residence Mile 1417 AK Hgwy -

REPESENTING: Self ✓ Organization_____

ORGANIZATION NAME AND ADDRESS:_____

COMMENT: I have been here since 1961. Closely affiliated with Fort Greely thru all these years - My husband was chief Buildings and Grounds engineer till he retired in 1987. Deceased in 2003.

My Concern is why is it so important to use Eddy, so close to Delta and places, property and homes along the Alaska Hgw - which will be so near to the activity of training.

Another Concern is what effect will this have on our property Value - will people be able to sell for what its worth.

Traffic is another Concern - and will there be money available for road maintance, police protection, for an influx of people to our Community.

Thank you

Location 31
The Army is currently considering four location alternatives and a no action alternative. A final decision has not been made on the location of the proposed range facilities.

Socioeconomics 09
Property values could be impacted in various ways by the proposed action. First, property values in the area will generally increase as a result of the economic benefits from the construction, employment, and the indirect/multiplier effects of USARAK expenditures. This benefit extends broadly around Delta Junction. Second, property values increase differently depending on the suitability for various uses. For example property nearest to active training areas will have a higher commercial value to support the construction, operation and maintenance of range facilities by businesses awarded contracts by USARAK. Finally, property can be negatively impacted by externalities like noise or traffic congestion from training exercises. A search of property records around the Donnelly complex revealed most of the land adjacent to the Donnelly Training Area is currently under federal control. The nearest private property is approximately 5 miles from the closest training area under consideration. Under ideal conditions some noise will be audible at this range but perfect conditions occur less than 10% of the time and since training will not occur every day noise produced by use of the range are not expected to impact property values.

Another factor identified during the public scoping meetings concerned the increase risk of wild fires as a result of training exercises. This factor is discussed at length in the EIS (Section 4.2.3, *Fire Management*) and adequate measures will be employed to negate this threat as well.

Human Health and Safety 23
No additional troops would be stationed at Fort Greely or DTA under this proposed action. The number of military vehicles traveling to DTA for training events would not be expected to increase. Military convoys comprise a fraction of a percent of the existing vehicle load to the Alaska highway system (USARAK 2004a). Thus, roadway impacts are expected to be negligible.

-----Original Message-----
From: Jim DeWitt [mailto:jdewitt @ guessrudd.com]
Sent: Thu 1 2/23/2004 2: 17 PM
To: Gardner Kevin R DPW Strategic Planning
Cc: Pete Hallgren
Subject: City of Delta Junction Comments - Draft EIS Donnelly Range Expansion

Mr. Gardner:

Enclosed is a copy of the City of Delta Junction's comments on the Draft Environmental Impact Statement for the Construction and Operation of the Battle Area Complex and Combined Arms Collective Training Facility within U.S. Army Training Lands in Alaska ("the Draft EIS"). The City's Comments are in MS Word document format. If you have problems opening the Comments, please let me know.

A signed copy is en route via U.S. Postal Service, certified mail/return receipt.

If you have questions, please do not hesitate to contact me.

Jim DeWitt

James D. DeWitt Voice: (907) 452-8986
Guess & Rudd P.C. Fax: (907) 452-701 5
100 Cushman Street, Suite 500 Email: jdewitt@guessrudd.com
Fairbanks, Alaska 99701

December 23, 2004

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Directorate of Public Works
ATTN: APVR-RPW-EV (GARDNER)
724 Postal Service Loop #6500
Fort Richardson, AK 99050-6500

Re: Draft Environmental Impact Statement
Construction and Operation of a Battle Area Complex
and Combined Arms Collective Training Facility of
U.S. Army Training Lands in Alaska (October 2004)
Comments of City of Delta Junction, Alaska
File No. 11025.014

Dear Sir or Madam:

The City of Delta Junction ("the City") appreciates the opportunity to offer written comments on the Draft Environmental Impact Statement ("Draft EIS") for the Donnelly Range Expansion. These written comments are intended to supplement and detail the comments made by citizens and interest groups at the public hearings in Delta Junction and elsewhere.

As in the past, the City remains a strong supporter

of the Department of Defense, and USARAK in particular. As you may know, many of the citizens of the City and the surrounding area are former USARAK soldiers who retired in the area. The City has a long and strong relationship with USARAK. It is a measure of the concern the City has with the use of the Eddy Drop Zone for the proposed range improvements that the City, once again, is addressing these comments to you.

Other 52
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

Some prefatory matters. The City has two broad categories of concerns. First, the City believes that the Draft EIS may be legally insufficient for several reasons. Second, the City believes that the Draft EIS misstates and mischaracterizes important factual issues. While these two categories are addressed separately, there is substantial overlap in those concerns.

Additionally, as you may know, the City submitted extensive comments on the earlier Draft Environmental Assessment, Final Environmental Assessment, and Finding of No Significant Impact. The City incorporates those earlier comments, objections, and concerns by reference in these comments. The materials associated with the Environmental Assessments were furnished to you earlier, in the Scoping Process for this Draft EIS.

LEGAL ISSUES

1. The Draft EIS Fails to Explicitly Identify a Preferred Alternative

The Draft EIS fails to identify a preferred alternative.' The regulations issued by the Council on Environmental Quality ("CEQ") implementing the National Environmental Policy Act ("NEPA") provide, at 40 CFR S1502.14:

This section is the heart of the environmental impact statement. Based on the information and analysis presented in the sections on the Affected Environment (S1502.15) and the Environmental Consequences(§1502.16), it should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public. **In this section agencies shall**:

(e) **Identify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement unless another law prohibits the expression of such a preference.**

(emphasis added). This section appears to permit the U.S. Army to fail to identify a preferred alternative if, in fact, one genuinely does not exist. Otherwise, a preferred alternative must be identified unless prohibited by law. The U.S.

Other 53
USARAK did not have a preferred alternative when the initial Draft EIS was published for comment. A preferred alternative has been identified in the Supplemental Draft EIS. Please see Section 2.5.

Army's regulations appear to address this requirement at two points. The regulations provide, at AR 200-2, Appendix D, SD-5, "A preferred alternative need not be identified in the DEIS; however, a preferred alternative generally must be included in the FEIS (40 CFR §1502.14(e))." However, later in that regulation, the Army states:

In sum, **the following points are required:**

b. A **comparative presentation of the environmental consequences of all reasonable alternative actions including the preferred alternative.**

(emphasis added). The Army's regulations are internally inconsistent within Appendix D, SD-5, at one point suggesting a preferred alternative need not be identified and in the next part suggesting a preferred alternative is mandatory.

So far as the City can discover, no cases address the inconsistencies in the Army regulations or, more broadly, the requirement of identification of a preferred alternative in a Draft EIS. The cases addressing other aspects of these regulations seem to assume that the agency sponsoring the Draft EIS will have and disclose its preferred alternative.

Of course, the U.S. Army has already identified a preferred alternative in the abandoned 2003 Environmental Assessment ("the 2003 EA"): the Eddy Drop Zone. That earlier effort colors and informs review of this Draft EIS. USARAK has done nothing that would suggest it has abandoned the Eddy Drop Zone as its preferred alternative, other than failing to identify a preferred alternative in the Draft EIS. That suggests that the drafters have not been entirely candid when failing to identify that preferred alternative. That inference is supported by an analysis of key issues in the Draft EIS, as described in Part B of these comments.

The City respectfully suggests that the Draft EIS should explicitly identify a preferred alternative. As the CEQ regulations state, only by such a means can USARAK and the public have a Draft EIS "sharply defining the issues and providing a clear basis for choice." Such an amended Draft EIS should then be subjected to further public comment.

2. The Uneven Treatment of Issues in the Draft EIS Demonstrates a Bias and a Failure to Take the Required "Hard Look. "

The depth and scope of discussion of critical environmental issues is uneven across the three alternatives. For example, the discussion of surface waters in Jarvis Creek and its tributaries

Other 54
Studies and field investigations have recently been conducted to obtain additional information on hydrology, wildlife, cultural resources, and wetlands at DTA East. Additional hydrological field investigations and modeling have been completed for Jarvis Creek within the boundaries of DTA East. Please see Sections 3.2.2 and 4.2.2, *Surface Water*.

at Eddy Drop Zone extends over two pages and seven paragraphs. The discussion of surface waters in the Donnelly Drop Zone is only half a page long and consists of three short paragraphs.

Figure 3.c, showing surface water flows in the Eddy Drop Zone, probably understates the extent of the 2004 aufeis flooding in the area. By contrast, Figure 3.d, showing the 100 year flood zone in the Donnelly Drop Zone, probably significantly overstates the extent of that flood zone, particularly for Ober Creek and an unnamed creek. The discussion of the effect of improvements in Eddy Drop Zone on water flow paths, water velocity and depth, and channelization, is omitted. The effect of overstating flood risk in the Donnelly Drop Zone and understating flood risk in the Eddy Drop Zone creates the appearance that the risks are similar. That flawed analysis is carried into the summary tables, resulting in both sites being given the same "moderate impact" rating. The City believes that characterization is seriously inaccurate, and the uneven treatment demonstrates a bias and failure to take the required "hard look."

3. The Failure to Consider Flood Plain Management in the Draft EIS is Improper.

Flooding/Floodplains 18
Provisions of Executive Order 11988 have been incorporated into the EIS. Please see Sections 3.2.2 and 4.2.2, *Surface Water* for additional information.

The entire proposed location for the CACTF and BAX in the Eddy Drop Zone is admittedly within the

Jarvis Creek Flood Plain. Executive Order 11988 (May 24, 1977) ("EO 11988") requires that government construction occur in flood plains only when that "is the only practicable alternative." The Draft EIS fails to address the mandates of EO 11988. The Draft EIS states only that "Such a determination would be provided when the Final EIS is issued. "But the entire EIS process is a consideration of all environmental impacts of the alternative locations. The mandated environmental policy set out in EO 11988 is a core issue that cannot be ignored or deferred in the Draft EIS. The plain language of EO 11988 requires that Eddy Drop Zone be selected only if neither of the two alternatives is practicable. Flood plain management is a critical environmental concern. Unless USARAK concedes that EO 11988 bars construction of the CACTF and BAX in the Eddy Drop Zone, the Draft EIS should fully and fairly address the issue and the existence of practicable alternatives. The public comments process should apply with equal force to the flood plain management issue. Deferral of analysis of that issue frustrates the purpose of the environmental laws.

As the U.S. Supreme Court has noted, major capital projects have a "steamroller" effect. Once undertaken, they can be difficult to stop. To avoid triggering the "steamroller" effect, important environmental issues like flood plain management should be analyzed in the context of the Draft EIS

and not as an afterthought. Otherwise, the requisite "hard look" does not occur.

4. Application of EO 11988 Requires Exclusion of the Eddy Drop Zone from Consideration.

EO 11988 permits development in flood plains only if that is "the only practicable alternative" consistent with the law and flood plain management policy. All of the areas identified in the Draft EIS as the locations for the CACTF and the BAX are in a flood plain. Government studies, let alone the Spring 2004 Jarvis Creek Flood, demonstrate that those parts of the Eddy Drop Zone selected for the CACTF and BAX are in the Jarvis Creek flood plain. The City can make available to USARAK National Oceanic and Atmosphere Administration ("NOAA") aerial photographs demonstrating the extent of the flooding in the Spring 2004 flood event over the Eddy Drop Zone.

The Draft EIS makes clear that there are practicable alternatives to the Eddy Drop Zone as the site for the CACTF and BAX. Even before correction of the misstated facts in the table at Draft EIS at x-xi., it is clear that the Donnelly Drop Zone and North Texas Range sites are perfectly practicable alternatives.

As discussed below, there are fact errors in the

Flooding/Floodplains 19
Provisions of Executive Order 11988 have been incorporated into the EIS. Please see Sections 3.2.2 and 4.2.2, *Surface Water* for additional information.

Draft EIS that make the Eddy Drop Zone appear to be a better choice than it is, and make the Donnelly Drop Zone appear to be a worse choice than it is. When those errors are taken into account, the case for practicable alternatives to the Eddy Drop Zone is overwhelming. Issuing the Draft EIS without that required analysis under EO 11988 severely impairs the process for public comments and input. It also demonstrates a failure to take the "hard look" required by the NEPA process.

Because there are practicable alternatives and because Eddy Drop Zone is in a flood plain, EO 11988 bars construction of the CACTF and BAX in the Eddy Drop Zone as a matter of law. The City notes that Ninth Circuit Court of Appeals decisions specifically hold that a person in the position of the City can bring a lawsuit to enforce the requirements of EO 11988. Such a right exists independently of the NEPA environmental impact statement review process. Enforcement of EO 11988 is not bound by the constraints of the NEPA process.

B. FACTUAL ISSUES.

Surface Water Concerns.

(a) Overstatement of Flood Risk at Donnelly Drop Zones. The discussion of the flood plain at Donnelly Drop Zone seriously overstates the extent of the

Flooding/Floodplains 20
Additional hydrological field investigations and modeling have been completed for Jarvis Creek within the boundaries of DTA East. Please see Sections 3.2.2 and 4.2.2, *Surface Water*, for additional information relating to both the Eddy Drop Zone and

area susceptible to flooding. The City has performed a preliminary analysis of the map at Figure 3.d, overlaying that drawing against a USGS topographic map for the area. Portions of the area marked as flood plain on Figure 3.d appear to be more than fifty and perhaps as much as one hundred feet above the mean high water level of Jarvis Creek, based on that USGS map. An area more than a quarter mile wide is marked along the course of a small, seasonal stream course. Figure 3.d appears to be largely speculative; certainly nothing in the discussion in the Draft EIS points to a source for the speculative conclusions on the extent of the flood plain.

Jarvis Creek is described as having a 100 Year Flood Discharge of 15,400 cubic feet per second. The total discharge may be somewhat smaller as far upstream as the proposed site of the CACTF and BAX in Donnelly Drop Zone. It is extremely improbable that flooding could occur to the extent stated in Figure 3.d.

For these reasons, the City believes that the largely speculative assessment of flood risk at Donnelly Drop Zone significantly overstates that risk.

(b) Understatement of Flood Risk at Eddy Drop Zone. By contrast, the flood risk at Eddy Drop Zone is

Donnelly Drop Zone locations. Construction and operation of the BAX and CACTF would not cause a discernable impact to the floodplain at either location. The design would not produce any discernable change to flood water travel through the areas. Any diversion caused by the BAX or CACTF would channel water into other areas within the recognized floodplain.

Flooding/Floodplains 21
Additional hydrological field investigations and modeling have been completed for Jarvis Creek within the boundaries of DTA East. Please see Sections 3.2.2 and 4.2.2, *Surface Water*, for

significantly understated. For example, the 2004 aufeis-induced flooding through the BAX area was approximately twice as extensive as shown in Figure 3.c. NOAA aerial photographs taken during that event show flooding extending much further to the east than illustrated; the map in Figure 3.c shows the flood area as almost a mile away.

There are further errors in the discussion of the aufeis flooding. Those include an oversimplification of the weather patterns that can cause that kind of flooding. For example, a late spring, in which the snow pack melts late and suddenly, without any associated rain, can trigger the flooding.

The extensive network of roads, bunkers, and raised areas planned for the BAX will channel what has historically been a shallow surface floor. The channels will increase water velocity, concentrate flows, and cause unpredictable effects downstream. The only known effective solution is the diking and trenching solution proposed by the Soil Conservation service in its 1987 publication. The Draft EIS fails to discuss the recommendations of the SCS 1987 Report. In particular, the City notes that the Report states:

Flooding due to aufeis blockage in Jarvis Creek will cause delays, damage and inconvenience as described in this report, until a remedy to flooding is acted

additional information relating to both the Eddy Drop Zone and Donnelly Drop Zone locations. Construction and operation of the BAX and CACTF would not cause a discernable impact to the floodplain at either location. The design would not produce any discernable change to flood water travel through the areas. Any diversion caused by the BAX or CACTF would channel water into other areas within the recognized floodplain.

upon. It is estimated that the personal residences, apartment buildings, scattered cabins, highways, roads, culverts, and farmland affected by flooding [will] incur annual damage costs of approximately $30,000. Should a 100-year storm event occur at a time when ground is frozen or partially thawed, estimated damages could exceed $3,000,000. The land area which would be inundated by such an event would be in excess of 30,000 acres.

The Draft EIS fails to address the requirement that "a remedy to flooding be acted upon." Rather, the Draft EIS proposes the construction of $65 million or more in improvements in the area susceptible to that aufeis-induced flooding, increasing more than 20-fold the value of the property at risk.

An additional effect of creating raised areas was graphically illustrated in the Spring 2004 flood: those raised areas serve as dams, impounding water and flooding surrounding property, sometimes at great depth. Culverts are simply unable to manage those amounts of water. In the Spring 2004 flood, the City and the State of Alaska were forced to cut trenches through existing roads to prevent even worse problems.

That potential for road-induced impounding could easily jeopardize the sophisticated and expensive electronic equipment that USARAK intends to install

in the BAX. Putting that equipment on raised dikes or platforms would not only compromise the utility of the range; it would create more barriers and waterchanneling structures.

The Draft EIS gravely misstates this risk, making the unsupported claim that "The design of the range facilities would not produce any discernable [sic] change to flood water travel through the Eddy Drop Zone study area."14 Nothing in the rest of the Draft EIS, the experience of the 2004 flood, or earlier floods supports such an assertion. Nothing in the literature known to the City supports such an assertion. The only reference in the literature cautions against building anything in areas prone to aufeis-induced flooding until flood control structures are built. The characterization of construction of the CACTF and the BAX at Eddy Drop Zone as having 'minor" impact on floodplains is insupportable.

The Draft EIS proposes culverts to manage the surface flow. This attempt at mitigation failed in the Spring of 2004. Water "overtopped," to use the Draft EIS phraseology, Nistler Road, Jack Warren Road, Emmaus Street, and Rapids Street. The culvert failure required emergency trenching along Rapids Street and emergency cuts by the State of Alaska through Tanana Loop Extension Road to manage the impounded water and extensive flooding. The

experience of the City is that culverts are unsuccessful in mitigating the flood water impoundment effects caused by the extensive sheet flows. The Draft EIS cites no authority and provides no basis for believing that the unspecified culvert efforts at Eddy Drop Zone would be more successful.

The Draft EIS states: "This proposed range complex is designed to convey water flow along its traditional path." But there is nothing in the Draft EIS either to support that statement or the assumption that water flow is consistent enough to allow planning. The only diagram of a BAX layout reveals nothing to indicate that it incorporates a tested, proven design for management of unpredictable surface flow waters.

Flooding/Floodplains 22
Thank you for your comment. This statement has been deleted.

The Draft EIS also assumes the aufeis-damming and overflow will occur at the same place in every year. The City is not aware of any research or literature supporting that assumption. The Draft EIS does not cite any authority for that assumption.

Flooding/Floodplains 23
Additional hydrological field investigations and modeling have been completed for Jarvis Creek within the boundaries of DTA East. Please see Sections 3.2.2 and 4.2.2, *Surface Water*.

The only clear conclusion from the Draft EISrs discussion of flooding in the Eddy Drop Zone is that flooding has occurred in the past, will occur in the future, and the proposed construction of the CACTF and BAX will have an unknown and unknowable effect on downstream behavior of future flood waters. Only if extensive and expensive flood control structures

are built, as described by the SCS 1987 study, can USARAK make the assumptions it has. Those flood control structures are not proposed for construction as a part of the range expansion.

(c) Implications for Draft EIS. The Draft EIS mischaracterizes both the Donnelly Drop Zone and the Eddy Drop Zone as having "moderate" hydrological impacts. As these comments show, such a characterization is simply wrong. The risk of adverse impact at Donnelly Drop Zone, where there is no known record of aufeis or other flooding, is minor. The risk at Eddy Drop Zone is severe. Describing both as "moderate" creates an inference that the authors of the Draft EIS have been purposive. A purposive analysis violates the spirit and letter of NEPA.

Flooding/Floodplains 24
Please see section 4.2.2, *Surface Water* for updated information.

2. Wildfire Hazard.
The Draft EIS describes issues of fire management at Donnelly Drop Zone and Eddy Drop Zone as equivalent: "moderate to severe." Again, this is achieved by overstating the risk at Donnelly Drop Zone and understating the risk at Eddy Drop Zone.

Fire Management 50
Thank you for your comment. Please see Table 2.o, *Summary of Environmental Consequences by Alternative.*

(a) The Risk of Wildfire at Donnelly Drop Zone Is Overstated. In terms of wildfire management, Donnelly Drop Zone offers several advantages that are only partially or incompletely analyzed in the Draft EIS. First, recent fires between Donnelly

Fire Management 51
Fire history at DTA East is discussed in Section 3.2.3.3.

Drop Zone and Eddy Drop Zone have removed most wildfire fuels. Regrowth will require many years. In particular, the 1999 Donnelly Flats Fire, as shown in Figure 3.i, burned most of the vegetation between Donnelly Drop Zone and Eddy Drop Zone. An earlier fire in 1987 had already consumed much of the vegetation east of Jarvis Creek between Donnelly Drop Zone and Eddy Drop Zone. At present, there are only limited fuels immediately north of the Donnelly Drop Zone. The effect of those earlier fires was to create an extensive buffer zone between Donnelly Drop Zone and the City. That extensive buffer zone is a natural mitigation of wildfire risk from the Donnelly Drop Zone.

It is approximately 12 miles from the northerly of the proposed BAX site at Donnelly Drop Zone to the City limits. Even in severe conditions, the distance permits time to mount a massive response to a threatening fire, as happened in 1999. If at some future date there are wildfire fuels between Donnelly Drop Zone and the Eddy Drop Zone, the greater distance will allow a longer interval for response. The greater distance operates as another natural mitigation.

Also, most of the native vegetation immediately north of the Donnelly Drop Zone, and especially east of Jarvis Creek, is scrub, which is less likely to burn, burns less intensely and is more manageable

when it does burn, providing another natural mitigation.

The Draft EIS characterizes the risk assessment for the Donnelly Drop Zone as "moderate." The Draft EIS acknowledges that "Fuel loads immediately adjacent to the BAX/CACTF sites are smaller, affording more wildfire suppression response time before high intensity fuel sources are reached." Yet, inexplicably, despite the much greater distance from the City, the acknowledged lower fuel levels, and the earlier burns, the Donnelly Drop Zone is given the same wildfire risk level as Eddy Drop Zone.

Fire Management 52
The Alaska Fire Service performed a fire hazard assessment at Donnelly Drop Zone. This area was assigned a rating of moderate. Please see Section 3.2.3.1for additional information.

The Draft EIS further clouds a meaningful assessment of wildfire risk for this alternative by characterizing the risk as "Moderate to Severe," rather than "Moderate," the term used in the analysis itself.

Fire Management 53
Please see revised section 4.2.3, *Fire Management*.

As a consequence of these mischaracterizations and the use of more than one qualitative term, the risk of wildfire is overstated as to the Donnelly Drop Zone.

(b) The Risk of Wildfire at Eddy Drop Zone is Understated. By contrast, the risk of wildfire in the Eddy Drop Zone is significantly understated. First, the forest around Eddy Drop Zone is mature

Fire Management 54
The Alaska Fire Service performed a fire hazard assessment at Eddy Drop Zone. This area was assigned a rating of high. Please see Section 3.2.3.1for additional information.

black spruce, and there are extensive corridors of mature, unburned forest in continuous bands between the Eddy Drop Zone and the City. In contrast to the Donnelly Drop Zone, no fires in the last 40 years are known to have burned any significant parts of the vegetation between the Eddy Drop Zone and the City. This area is characterized by very long stringers of mature black spruce, some of the largest trees in the easterly Donnelly Training area. The size and density of the forests would support a crown fire in many weather conditions. The problem is particularly acute along the westerly side of the Eddy Drop Zone. The extensive areas of mature black spruce forest between the Eddy Drop Zone and the City present a grave risk of wildfire.

It is approximately two miles from the northerly edge of the proposed Eddy Drop Zone BAX site to developed areas along the Alaska Highway. In severe conditions, there is insufficient time to mount an effective response to a fire (as discussed more fully below).

The on-going fire management techniques discussed at length in the Draft EIS may or may not help the areas along the Alaska Highway southeast of Delta Junction; they have never been tested. Given the City's experience in the 1999 Donnelly Flats fire, when burning cinders fell two miles or more

Fire Management 55
Thank you for your comment. No fire has occurred within DTA East since the initiation of the Jarvis North Fire Mitigation Project.

downwind from the actively burning wildfire front, the City is skeptical. But those mitigation areas offer little, if any, protection for the City itself.

The City attaches little significance to the proposed mitigation effort of a "USARAK quick-reaction fire suppression capability at DTA." The City continues to point to the three fires discussed in its Comments to the Draft EA and its pleadings in the litigation surrounding the earlier EA. Those fires demonstrate that under moderate to extreme fire conditions, when there is a wind of 10 MPH or greater, wildfires cannot be reliably contained, even when ground crews are in place when the fire is first ignited. See, for example, the discussion of the 2001 Fish Creek Fire. A ground crew was at the site at the moment that fire ignited, equipped with ground-clearing tools. They were unable to contain the fire.

Fire Management 56
Your comment was taken into consideration.

Even that dubious commitment is undercut by the proposed mitigations. The drafters propose stationing a USARAK wildland fire crew at Fort Wainwright, 90 miles from the Donnelly Training Area, "depending upon type of range use, fire weather index rating, and available personnel." Such a mitigation measure, while described as "essential," is so "soft" and remote as to be meaningless.

Fire Management 57
Thank you for your comment. The existing and proposed mitigation measures in Section 4.2.3.2, *Mitigation* reflect all reasonable and practicable actions to mitigate adverse impacts associated with fire management activities at DTA.

The Draft EIS relaxes the more rigorous limits on range activities imposed under the former Environmental Assessment. It appears to the City that a wider range of activities would be permitted under High and Extreme Fire conditions. The failure to limit the kinds of activities permitted in extreme fire conditions is shocking. Even under high and extreme conditions, USARAK would continue to allow discharge of ammunition and use of motorized vehicles. The City objects in the strongest possible terms to ***any*** use of any range in the Eddy Drop Zone in extreme fire conditions. Only the most limited uses, confined to activities having no risk of fire ignition, should be permitted in the Eddy Drop Zone during periods of high fire risk. Any lesser standards unfairly and senselessly jeopardize the lives, safety, and property of citizens of the Delta area.

Fire Management 58
Your comment has been taken into consideration.

The Draft EIS acknowledges that the risk assessment for the Eddy Drop Zone is "high."" The Draft EIS acknowledges that a fire starting in Eddy Drop Zone "would likely move off military lands." The Draft EIS acknowledges that, unlike wildfires in Donnelly Drop Zone, "The fire history and localized weather pattern indicate an extreme hazardous fire

situation" in the Eddy Drop Zone. Yet the Draft EIS characterizes the fire management consequence as

"Moderate to Severe," the same level assigned to Donnelly Drop Zone. Given the greater volumes of fuels, the character of those fuels, the proximity to the City, and the Draft EIS's own characterizations of the wildfire risk at the Eddy Drop Zone, it is indefensible to characterize the wildfire risk at the Donnelly Drop Zone as the same as that at the Eddy Drop Zone.

(c) Impact of Wildfire Issues on Draft EIS. Because of the Eddy Drop Zone's proximity to the City, Eddy Drop Zone's substantially greater quantities of fuels, and its substantially more volatile vegetation, the Eddy Drop Zone presents a much greater risk of wildfire hazard to the City than does the Donnelly Drop Zone. In contrast to the scrub forested areas of the Donnelly Drop Zone and the North Texas Range, the Eddy Drop Zone presents a much higher risk of fire and affords a much shorter time to respond.

Alaskans' fears of the consequences of wildfire are borne out of actual circumstances. The entire City was only minutes from evacuation during the 1999 Donnelly Flats fire. In 2004, the State and federal governments expended over $100,000,000 in wildfire suppression efforts. More than 6.7 million acres burned, and for much of the summer the wildfire smoke made the air "unhealthy," "very unhealthy," and even "hazardous." The City's concerns regarding

wildfires are not hypothetical.

Under those circumstances, it is error to characterize the Donnelly Drop Zone and the Eddy Drop Zone as each carrying a "Moderate to Severe" wildfire risk. The overstatement of the wildfire risk at the Donnelly Drop Zone and the understatement of the wildfire risk at the Eddy Drop Zone improperly mis-states the environmental impact of the CACTF and BAX in both cases. Describing the wildfire risk at both as "Moderate to Severe" creates an inference that the drafters of the Draft EIS have been purposive. A purposive analysis violates both the spirit and letter of NEPA.

Fire Management 59
Thank you for your comment.

3. The Draft EIS Understates the Impact of Noise on Developed Areas.

The City appreciates the more detailed analysis of noise levels attendant to range expansion. The Draft EIS concludes that the impact of noise is minor in the case of all alternatives. However, that conclusion is not supported by the language of The Draft EIS itself.

The Draft EIS notes that the nearest school is 3,910 meters from the northernmost edge of the Eddy Drop Zone. Elsewhere, the Draft EIS notes that the location of the proposed ranges in the Donnelly Drop Zone is 10.5 miles (approximately 16,900 meters)from

Noise Management 22
Thank you for your comment. Section 4.2.4.1, *Description of Methodology* defines the impact categories assigned to proposed actions occurring at each alternative location. Both small arms and blast noise contours (24 hour average levels) do not extend beyond the installation boundary.

The BNOISE2 model was used to generate “peak contours” which show expected noise levels from a single noise event. The model was run using a worst case scenario (adverse weather conditions). Peak noise levels indicate that under certain conditions an activity may be loud enough to generate complaints. Noise was modeled using the assumption that weapons would be fired from firing points located at the baseline of the range complex. Please see Section 4.2.4.1.1, *Heavy Weapons and Demolition Noise* for further information.

the nearest school. To characterize the two situations as equivalent is wrong.

The Draft EIS acknowledges that under fairly common, cold weather inversion conditions, noise levels can be significantly louder at greater distances. However, the Draft EIS fails to describe the methodology used to derive the 115 dBP (10%) boundary. The City grants that noise levels vary depending on orientation. But the City is unable to find an explanation in the Draft EIS as to why the 115 dBP (50%) line is centered on the BAX, while the 115 dBP (10%) line is offset from the center by approximately a mile; offset in a way that tends to minimize the impact of noise on the Delta area. If there is a demonstrated basis for describing such conditions, it should be set out. If there is not, then the 115 dBP (10%) boundary should be re-drawn, demonstrating its true area.

The Draft EIS acknowledges that at and inside that boundary, noise levels will be higher. The Draft EIS acknowledges that there are residential and agricultural/livestock areas in those affected zones described in Figure 4.b. The Draft EIS concedes that noise levels at "NZ 111" levels will occur at times along the Alaska Highway roughly centered on Clearwater Road. Yet the Draft EIS sets the environmental impact at the same "Minor" level for the Eddy Drop Zone as it does for the much more

remote Donnelly Drop Zone and North Texas Range. While there is admitted noise impact in the Eddy Drop Zone, the City is unable to identify any impact of noise in the Donnelly Drop Zone. What is the basis for characterizing them both as “Minor”.

The discussion of noise levels also fails to take into account future growth in the Delta area.

Cumulative Impacts 18
Please see revised Section 4.3.11, *Cumulative Effects Analysis* for additional information.

Private land for future development, particularly along the Alaska Highway east of the City, the intersection of Clearwater Road and the Alaska Highway and the Richardson Highway south of the City, is likely to be impacted by noise levels of ranges at the Eddy Drop Zone. Those noise levels are not issues for either the Donnelly Drop Zone or the North Texas Range

Put in plain terms, development of the City in the area of the intersection of Clearwater Road and the Alaska Highway would be significantly impacted during periods of adverse weather. It is improper to characterize such an impact as minor and then to apply that term to the minimal impact at the Donnelly Drop Zone and the North Texas Range. Describing the noise impact as "Minor" in all three cases creates an inference that the drafters of the Draft EIS have been purposive. A purposive analysis violates both the spirit and letter of NEPA.

4. Analysis of Cultural Impacts.

The Draft EIS identifies the impact on cultural resources in the Eddy Drop Zone as "Moderate" and the impact on cultural resources in the Donnelly Drop Zone and the North Texas Range as "Severe." Review of the descriptions of those impacts elsewhere in the Draft EIS would not appear to support those conclusions. If the City's understanding of those impacts is correct, the Draft EIS once again misstates the overall impacts in a way that favors the Eddy Drop Zone.

The City recognizes that archaeological surveys in the Donnelly Training Area are ongoing. Based on the data to date, however, as described in the Draft EIS, the following table summarizes known archaeological sites in the respective alternatives:

Known Archaeological Sites	Eddy	Donnelly	North Texas
In the Construction Footprint	12	2	28
In the SDZ	109	105	Unknown[38]

There is nothing in that data to suggest that the impact of locating the CACTF and BAX at the Donnelly Drop Zone would be more "severe" than construction at the Eddy Drop Zone.

Apparently, the Draft EIS relies upon an estimation

Cultural Resources 08
Historic and prehistoric archaeological sites within the Eddy and Donnelly Drop Zone sites are located primarily on the southern aspects of slopes. The proposed firing direction at Eddy Drop Zone would be from north to south. Those archaeological sites located on the southern side of the slopes would be protected from direct fire from ammunition. At the Donnelly Drop Zone, proposed firing would be from the south to the north. A greater number of sites (because the majority is located on south-facing slopes) would be impacted by direct fire if the BAX was placed at Donnelly Drop Zone. The *Annual Report Archaeological Survey and Evaluation: Fort Richardson and Fort Wainwright, 2004* is available for review at the following website: www.usarak.army.mil/conservation. The report details the archaeological reviews and analyses conducted for each USARAK proposed project, including those at DTA.

that a disproportionate number of sites in the Donnelly Drop Zone would be "eligible for inclusion in the National Registry of Historic Places", as compared to similar prehistoric sites in the Eddy Drop Zone. The City has not had the benefit of study of this apparently incomplete and unpublished investigation. Because the reported studies are incomplete and, so far as the City can discover, unavailable for review, the City objects to their use in the Draft EIS.

The Draft EIS also fails to explain why the "Proposed Mitigations" for this category of impacts would be effective as to the Eddy Drop Zone but ineffective as to the Donnelly Drop Zone, or so ineffective as to require a characterization of the environmental impact as "Severe." The proposed mitigation efforts reduce the Eddy Drop Zone environmental impact to "Moderate;" there is no explanation of why those same mitigation efforts at the Donnelly Drop Zone leave the environmental impact as "Severe."" Because the study supporting the representation as to the extraordinary number of sites in the Donnelly Drop Zone eligible for designation for the NRHP is unpublished, the City is not in a position to comment on that issue. In any event, the Draft EIS promises elsewhere that all munitions used in the new CACTF and BAX will not contain explosives and will not be dudproducing munitions. Since the munitions are not explosives and will not create a risk of unexploded ordinance,

Mitigation 06
A substantial amount of additional mitigation would be required to protect those archaeological sites located on southern slopes. A larger amount of funding would be required for protection measures (due to a greater number of sites) if the Donnelly Drop Zone alternative was selected.

the damage to prehistoric sites will presumably be much lower than, say, on the west side of the Delta River. Similarly, except when the ranges are active, the prehistoric sites in the Surface Danger Zones would still be accessible.

(To the extent that the Surface Danger Zone will present a risk when ranges are not active because of unexploded ordinance, dudded or non-dudded, then the representations elsewhere in the Draft EIS assessing that risk as low are wrong. To the extent that there is any significant risk associated with unexploded ordinance, the City objects in the strongest possible terms to the Eddy Drop Zone. It is within easy access to children who may be injured.)

Human Health and Safety 24
Bullets fired at the BAX and CACTF do not contain explosives. There would be no possibility of unexploded ordnance (i.e., bullets or warheads) being used at the ranges. Thus, unexploded ordnance is not considered a human health and safety issue as a result of the proposed action.

5. Omission of Effective Availability Analysis.

From the outset, dating back to the Environmental Assessment, the City has asked the U.S. Army to analyze the extent to which ranges at each alternative would be available under the constraints imposed by the known environmental conditions and mitigation efforts. The Draft EIS states that the new training ranges need to be available 242 days out of a calendar year. In the case of each alternative, restrictions imposed by environmental impacts or for mitigation of impacts will limit the availability of the proposed ranges.

Proposed Action and Alternatives 81
An availability analysis was performed for each alternative location. All three locations would be unavailable during spring breakup. North Texas Range offers the fewest number of days available for training (approximately 184 days) primarily due to the presence of large numbers of bison. Eddy Drop Zone offers the most availability (311 days), given that it is only impacted by spring breakup and aufeis flooding. Donnelly Drop Zone (276 days) offers more availability than Texas (due to fewer days being impacted by bison), but less than Eddy (due to limited bison impacts during migration periods and a slightly longer breakup period). Copies of the availability analysis can be obtained by contacting the USARAK Public Affairs Office at 907-384-2193.

For example, use of the Eddy Drop Zone would be impossible during flood conditions. Use of the Eddy Drop Zone would be seriously curtailed during periods of moderate to severe fire danger. Costs of operation during periods of moderate to severe fire risk would be much higher if USARAK followed through on its fire staffing commitments. The Draft EIS fails to evaluate the impact of these restrictions, mitigation efforts, and expenses on range availability under each of the three alternatives.

As an illustration, it might be that the combined impacts of flooding, high winds, wildfire risk, and very cold temperatures, based on the last ten years of climate data, would make a training range at the Eddy Drop Zone unavailable for use an average of 100 days a year. The same impacts might have restricted use of the Donnelly Drop Zone or the North Texas Range just 50 days a year. The City believes such an analysis is critical; the City suspects that compliance with the restrictions, mitigation requirements, and practical weather considerations will demonstrate that over the last ten years the Eddy Drop Zone would not have been available even once for the minimum 242 days per year that USARAK requires. If more prudent and responsible wildfire restrictions were imposed, prohibiting any use of the Eddy Drop Zone in High and Severe fire conditions, then availability of the Eddy Drop Zone is even more problematic.

Proposed Action and Alternatives 82
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Proposed Action and Alternatives 83
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An analysis based on historic data may be too conservative. There is mounting evidence of warming temperature trends in interior Alaska. See "Impacts of a Warming Arctic." To the extent that warmer temperatures do occur and, as forecast, trigger drier weather and drought, then future restrictions owing to High and Extreme fire conditions are even more likely to occur. This recent report states with regard to Alaska:

This sub-region, especially Alaska and the Canadian Yukon, has experienced the most dramatic warming of all the sub-regions, resulting in major ecological impacts. Rising temperatures have caused northward expansion of boreal forest in some areas, **significant increases in fire frequency and intensity**, and unprecedented insect outbreaks; **these trends are expected to increase. One projection suggests a threefold increase in the total area burned per decade.**

(emphasis added). Increase in fire frequency cannot occur without increases in high and severe fire conditions. This recent study, then, suggests that the availability of the Eddy Drop Zone, in particular, will decline over the next few decades. In light of these projections, when considering range availability, it makes better sense to select an alternative that offers the highest assurance of

availability now and in the future and the lowest risk of wildfire ignition. As has been shown earlier in these comments, that alternative is any site except the Eddy Drop Zone. Because of the increasing risk of wildfire ignition, the Eddy Drop Zone is the site least likely to be available.

A further complication for USARAK training is the uncertainty and unpredictability of events that can make the Eddy Drop Zone unavailable. Spring flooding can occur anywhere in a three to four week window; it is worth noting that the 2004 Jarvis Creek flood was unseasonably late. High and extreme weather conditions can vary from day-to-day and even within the same day. A day that starts with calm air can have strong, gusty, dangerous winds in the afternoon. There are two consequences to the unpredictable availability that results from these changeable and unknowable weather conditions.

Proposed Action and Alternatives 84
Your comment was taken into consideration.

First, USARAK will have grave problems assuring that facilities will be available in the Eddy Drop Zone. This will make scheduling and planning for training highly problematic. The 2004 Jarvis Creek flood happened very quickly. What would have happened if a company of soldiers had been in the field, or another company scheduled in while the site was under water?

Second, and more troubling, the investment in

getting troops to the Donnelly Training Area will create pressures to train them in conditions that jeopardize the health and safety of residents of the City and the surrounding areas. For example, in the worst case, if USARAK has scheduled a brigade-sized training event with 3,400 soldiers for early summer in a CACTF and BAX located in the Eddy Drop Zone, and on the second day of the planned 45 day event, weather conditions move from moderate to hazardous, there will be immense pressure to proceed with the planned full-scale training. The opportunity cost in moving that many soldiers to the site and the difficulty in scheduling a new date would create immensely powerful incentives to proceed with planned training despite risks. What the U.S. Supreme Court has characterized as the "steamroller effect" would create severe risks.

Both of these problems can be partially mitigated by locating the CACTF and BAX at either the Donnelly Drop Zone or the North Texas Range, rather than at the Eddy Drop Zone.

Apart from the potential frustration of the essential and critical purpose for the range expansion, the omission of such an analysis and the omission of a discussion of these economic pressures violates the requirement of a "hard look" at the full range of environmental impacts of the range expansion. Unless such an analysis in included, it

is not possible to fully compare the functional availability of the three sites.

6. Human Health and Safety - Traffic.

The Draft EIS describes a substantial increase in military convoy traffic to the Donnelly Training Area, whichever alternative is selected. The Draft EIS states that present deployment miles are 437,600 to 1,042,000 in the short term. The City understands that to be about a 238% increase in traffic levels, and a doubling of company and battalion sized deployments. The Draft EIS correctly notes that this issue was raised in the *Final Environmental Impact Statement for Transformation of U.S. Army Alaska* ("Transformation EIS"). In its comments to the draft of the Transformation EIS, the City pointed out that the increased traffic presented significant safety hazards to persons traveling between Delta Junction and Ft. Wainwright, and that the proposed mitigation was inadequate.

Appropriate mitigation must go beyond simply breaking the convoys into 20 vehicle units and staggering their departure times. The City renews its suggestion that adequate mitigation must include more extensive four lane segments, passing lanes, and realigned curves on the Richardson Highway, particularly between the Tanana River and Harding Lake. Without these improvements to the Richardson Highway, the substantial additional deployment miles

Human Health and Safety 25
Thank you for your comment. The Army acknowledges your concern and is taking it into account as part of the decision making process. Information about traffic and military convoys has been added to Section 4.2.5, *Human Health and Safety*.

Mitigation 07
Thank you for your comments.

will result in traffic congestion. Drivers may attempt to pass convoy vehicles in dangerous and inappropriate places, jeopardizing themselves as well as the military personnel and assets in the convoy. Military convoys may be delayed and convoy intervals disrupted by summer traffic, and in particular slow moving recreational vehicles. As a matter of safety, these highway upgrades need to be performed.

C. Corrected Comparison of Alternatives and Environmental Consequences.

The City has taken the Comparison of Alternatives and Environmental consequences and corrected the treatment of the environmental impacts for the issues addressed in these comments. The City believes that the higher extent of adverse impacts from use of the Eddy Drop Zone and the lower extent of adverse impacts from use of the Donnelly Drop Zone or the North Texas Range is plain (only changed values are shown):

Resource Categories	Alternatives			
	1 No Action	2 Eddy Drop Zone	3 Donnelly Drop Zone	4 North Texas Range
Surface Water - Flood Plains	Minor	~~Minor~~ Severe	Minor	Minor
Fire Management	Moderate	~~Moderate to Severe~~ Severe	~~Moderate to Severe~~ Moderate	Moderate
Noise	Minor	~~Minor~~ Moderate	Minor	Minor
Cultural Resources	Minor	Moderate	~~Severe~~ Moderate	Unknown

D. Conclusion.

Again, the City thanks USARAK for the opportunity to submit these comments. The City renews its position with regard to the proposed range expansion: the range expansion is necessary, the City supports it, and the City has no objection to the location of the BAX and CACTF at either the Donnelly Drop Zone or the North Texas Range. The City unequivocally objects to locating the BAX and CACTF at the Eddy Drop Zone.

Location 32
Thank you for your comment. The Army acknowledges your concern and is taking it into account as part of the decision making process.

For the reasons set out in Part A of this letter, the Draft EIS is deficient as a matter of law. In

particular the requirements of Executive Order No. 11988, the CACTF and BAX cannot be built in the Eddy Drop Zone. The Eddy Drop Zone is an admitted, demonstrated flood plain; USARAK cannot construct improvements there unless there is no practicable alternative. The Donnelly Drop Zone and the North Texas Range both represent practicable alternatives, as shown by the Draft EIS. The City notes this is an issue independent of the NEPA process and, standing alone, would be a basis for challenging any decision to construct the CACTF and BAX at Eddy Drop Zone.

Since the litigation over the earlier Environmental Assessment, the Eddy Drop Zone's unsuitability has been further underscored by the 2004 Jarvis Creek Flood. After a record 2004 forest fire season, with forest fires burning into September, it is difficult to overstate the City's level of concern regarding wildfire risk. The flooding, followed in mid-June through early fall by the wildfire risk, would have made the new training facilities essentially unavailable all of the late spring and summer of 2004 if the facilities had been built at the Eddy Drop Zone.

It is clear to the City that the environmental impacts of construction of the BAX and CACTF at the Eddy Drop Zone are potentially catastrophic for the City, the Delta Junction area, and for USARAK. The City will strongly oppose any effort to construct

the BAX and the CACTF in the Eddy Drop Zone. For the reasons set out in these comments, the City does not oppose and will not object to construction of the BAX and CACTF in either the Donnelly Drop Zone or the North Texas Range.

The City would welcome the opportunity to meet with you and answer any questions you have about these comments or about the Draft EIS.

Thank you again for your consideration.

Sincerely yours,

GUESS & RUDD P.C.

James D. DeWitt

cc: Roy Gilbertson, Mayor
City of Delta Junction

Pete Hallgren, City Administrator
City of Delta Junction

U.S. ARMY GARRISON- ALASKA
PUBLIC MEETING
Delta Community Center
Delta Junction, Alaska
December 2, 2004

COMMENT SHEET

NAME: Frances Hallgren

ADDRESS: P.O. Box 1625
DJ AK 99737

REPESENTING: Self ✓ Organization _____

ORGANIZATION NAME AND ADDRESS: _____

COMMENT: Anywhere but Eddy Drop Zone.
Thankyou.

Location 33
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

12/2/04

ANY PLACE BUT EDDY!!!

I am in full support of nearly anything that the army does. After all they are protectors of our country, our rights and our freedom. I am concerned though as to why the army would choose an area for training that is so close to a community when they have two other alternative sites, North Texas Range and Donnelly Drop Zone, to perform their training. The Eddy Drop Zone could not only cause problems with noise, but the potential threat of fires and floods. This may not be a concern because it is winter, but what about summer time?

ANY PLACE BUT EDDY!!!

Thank You,

Cheryl Hanson
Delta Resident
PO Box 1121
Delta Junction, AK 99737

(907) 895-5457

Location 34
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

U.S. ARMY GARRISON- ALASKA
PUBLIC MEETING
Delta Community Center
Delta Junction, Alaska
December 2, 2004

COMMENT SHEET

NAME: Eileen Herman

ADDRESS: PO Box 327
Delta Junction, AK 99737

REPESENTING: Self x & Family Organization

ORGANIZATION NAME AND ADDRESS:

COMMENT: We live @ mile 1413.4 of the AK Highway & are concerned about EDZ because of the closeness to our home. The noise & fire are the main concerns but not the only ones. I would like to see this training located @ either Texas Range or Donnelly.

Earlier this year @ hunting season there were Hummers & other army vehicles driving by our house @ excessive speed. I have a young son that I am concerned about. I fear if EDZ is established we will become a major throughfare & that could be hazardous to my son & property.

Please consider any location other than EDZ.

Thank you,

Location 35
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

U.S. ARMY GARRISON- ALASKA
PUBLIC MEETING
Delta Community Center
Delta Junction, Alaska
December 2, 2004

COMMENT SHEET

NAME: Whit Hicks

ADDRESS: P.O. Box 1417
Delta Jct., AK 99737

REPESENTING: Self X Organization

ORGANIZATION NAME AND ADDRESS:

COMMENT:
Eddy Drop Zone is a poor choice for this range, both environmentally and socioeconomically
My major concerns are:
1) Noise - the OSHA standard 1910.95(b)(2) TABLE G-16 indicates likelyhood of hearing loss with exposure of less than 15 minutes per eight hour day of noise exceeding 115 dB. If I work in a noisy work place then this additional level of noise at my home could, according the the standard, cause hearing loss.
2) Eddy Drop Zone is in a wetland.
3) It will burn, and it is unlikely that it will be controlled.

OVER

Location 36
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

Noise Management 23
Average noise contours obtained from computer modeling indicate that no moderate or severe noise levels from small arms, large weapons, or demolition would be expected off-installation lands. Please see Section 4.2.4, *Noise* for additional information.

Wetlands 25
Thank you for your comment. Please see Sections 3.3.3 and 4.3.3, *Wetlands* for additional information.

Fire Management 60
Thank you for your comment. The Army acknowledges your concern and is taking it into account as part of the decision making process.

Developing infrastructure further out (south) the Richardson is good for the future of this State. Go South!

Please add in extra pages, if needed.

You may leave your completed form with representatives from tonight's public meeting,
OR
Submit your comments:
Via fax: (907) 873-1616
E-mail: *kevin.gardner@richardson.army.mil*
OR
Fold this sheet in half and staple, fill in your return address, attach a stamp and mail to the below address.

Please submit comments by December 20, 2004

From: Murray & Phyllis Tate [nuliaq@alaska.net]
Sent: Monday, January 10,2005 4:06 PM
To: Gardner Kevin R DPW Strategic Planning
Subject: Donnelly Training Area Range Project

Midnight Sun 99s
C/O Phyllis Tate
P. 0. Box 73648
Fairbanks, AK 99707
January 10,2005

Mr. Kevin Gardner
Directorate of Public Works
730 Postal Service Loop #6500
ATTN: APVR-RPW-GS (Gardner)
Fort Richardson, AK 99505-6500

Email: Kevin.gardner@richardson.army.mil

Re: Donnelly Training Area Range Project

Dear Sir:

I am writing on behalf of the members of The Midnight Sun Chapter (Fairbanks) of The Ninety-Nines, Inc., the International Organization of Women Pilots. Our members range from student pilots to high-time commercial pilots. Throughout the year, our members fly for work, training, business, medical, recreational, and search and rescue purposes.

We understand from information provided concerning the construction of BAX and CAC facilties in the subject area at the December 1, 2004 public meeting held in Fairbanks, Alaska that the Army has four alternatives in mind for the subject project.

We would like to be put on record as favoring Alternative #I (No Action) OR adding an Alternative #5 (building facilities in an existing restricted area) for the following reasons.

The proposed facilities and activities are much too close to the Richardson Highway and Isabel Pass the only low-altitude VFR route available to pilots through the Alaska Range between Delta Junction and Gulkana. Emergency landing fields are few and far between. The Richardson Highway provides one long emergency airfield the entire route for all pilots.

Additionally, we see a high probability for conflict between proposed military activities and civilian flight operations in the Ft. Greely area. One of our members survived a mid-air collision near Fairbanks. We are very much aware of the VERY REAL POSSIBILITY of a repeat of this type accident with increased military flights, live fire, and UAVns traveling in VFR aviation corridors.

The only logical means to avoid such high risk conflicts is to: (I) designate the area a restricted area a designation that is totally unacceptable to a population that depends upon air travel more than any other state in the union; (2) take no action at all; or, (3) build the facilities in an existing restricted airspace such as R-2202.

Already, pilots must travel out of their way to circumvent the nearly half-million acres within R-2202 between Fairbanks and Donnelly, even though a more direct route is possible. Isabel Pass is the pilots only low altitude choice on this route through the Alaska Range when the weather is bad, which it frequently is in mountainous regions. If the corridor north of Isabel Pass were essentially closed by restricted airspace, the only alternative for civilian pilots would be to fly via Windy and Chickaloon Passes to the west more than twice the distance and time to reach the

Location 37
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

Airspace 26
Safety precautions during airborne operations are discussed in Section 2.2.1.2.2.1. Also, please see additional information in Sections 3.2.8 and 4.2.8, *Airspace*.

same destination. Some civilian aircraft do not even have that fuel capacity.

Many forget that humans are part of the environment as much as the fish, moose, trees, etc. The impact upon Alaskans lives, livelihoods, safety and lifestyles needs to be thoroughly addressed, too.

Socioeconomics 10
Please see revised Sections 3.3.6 and 4.3.6, *Socioeconomics* for information regarding your comment.

We strongly support the military's vision, purpose, and training goals; however, we question the feasibility and practicability of constructing facilities that really require exclusive use of land and airspace in an area that must be traversed by general aviation pilots, pipeline surveillance aircraft and commercial air carriers.

We encourage you to reconsider your alternatives for the Donnelly Training Area Range Project in light of the staggering impact a project of this magnitude will have on civilian pilots who utilize the airspace above the proposed complexes.

It would be ironic to have the U.S. Army fighting for the freedom of others in the Middle East while at the same time taking freedom from Americans on American soil.

For these reasons we urge you to consider incorporating your proposed operations within the existing R-2202 area.

Sincerely,

Phyllis Tate
Chapter Chairman
CC: Senator Ted Stevens
Senator Lisa Murkowski, Representative Don Young

U.S. ARMY GARRISON- ALASKA
PUBLIC MEETING
Delta Community Center
Delta Junction, Alaska
December 2, 2004

COMMENT SHEET

NAME: Toni J. Johnson

ADDRESS: P.O. Box 818
Delta Jct AK 99737

REPESENTING: Self X Organization

ORGANIZATION NAME AND ADDRESS:

COMMENT: DTA seems to be the best place to build/train. It's far enough from town to lessen the impact from firing. Flooding in Eddy OZ - Eddy flooded last year, the last time that happened was 1968 or thereabouts. Fire - fires get started everywhere all the time!
Texas Range would be my last resort to build/train due to the impact on CRTC

Location 38
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

From: Luntz David R FGA BASE OPS LOGISTICS MGR(dr)
Sent: Monday, December 20, 2004 9:06 AM
To: Gardner Kevin R DPW Strategic Planning
Subject: RE: EIS USARAK / Ft Greely

Thank you Sir,
One more thing I thought about that may need to be looked at, I know one of the justifications for building at an established area is to save money and use existing phone and power lines.. I thought ide add that if the phone lines are anything like what Greely has dug up and HAD to replace lately, the theory of saving money is null and void because the infrastructure is so archaic that it will probably have to be replaced anyways in order to support new digital and fiber optic requirements ... Im sure the 507th and 59th could well support this statement.

Thanks again.

Dave Luntz
Logistics Manager
Chugach/Alutiiq JV.
Fort Greely, Alaska
Ph# 907-873-301 1
David.luntz@greely.army.mil

Infrastructure 02
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

-----Original Message-----
From: Gardner Kevin R DPW Strategic Planning
Sent: Monday, December 20, 2004 9:01 AM
To: Luntz David R FGA BASE OPS LOGISTICS MGR(ctr); 'cbagley@cemml.colostate.edu'
Cc: Barta Carrie L MS DPW NEPA COORDINATOR; Sayre Roger W MR DPW NEPA COORDINATOR
Subject: RE: EIS USARAK / Ft Greely

Mr. Luntz:

Thanks for the comments. I will ensure they are included with other input for the Draft Environmental Impact Statement for the proposed range project at Donnelly Training Area. The Commander, U.S. Army Garrison, Alaska has extended the comment period until 10 Jan 05, by the way, so if you or others desire to submit additional comments, feel free to send them on to me. Thanks again.

Kevin Gardner
US Army Garrison, Alaska
DPW, Master Planning (Environmental)
Fort Richardson, AK
907.384.3331 Cell: 907.952.4230
fax: 907.384.3028

From: Luntz David R FGA BASE OPS LOGISTICS MGR(ctr)
Sent: Thursday, December 16, 2004 3:39 PM
To: Gardner Kevin R DPW Strategic Planning; cbagley@cemml.colostate.edu
Subject: EIS USARAK / Ft Greely

Hello my name is Dave Luntz and Im not sure that I am sending my comments to the correct people so if not and you know who should get them can you please let me know or forward on.

In regard to the decision of building new ranges on Eddy, Donnelly or Texas Ranges…

A Bridge and Construction of Ranges / Firing points and Training Complexes across Tannana River would allow for the use of already approved range land that does not get proper use to date.

Ranges and training complexes across the river would allow for a more realistic training environment due to the ability to combine live fire exercises with close air support, combined arms and Air Force for airlift for resupply which would not be available on Eddy or Donnelly training drop zones.

Currently there exists a land shortage for Brigade size training opportunities, the establishment of ranges across the river would also allow the existing drop zones (Buffalo, Eddy and Donnelly) to be used as Forward Operating Bases, for large units that have a hard time finding a large enough footprint to realistically deploy, such as the Support Battalion, units could then rotate across the river for their live fire exercises and training.

As US Army Alaska grows the development of this prime training land would allow for the growth of USARAK and add numerous opportunities for future development of a combat training center that would emulate JRTC and NTC, providing convoy live fire ranges for the STRYKER vehicles and allow integration of Air Force and other military services, as well as host-nation and civilian personnel, making training uniquely realistic to future battlefield environments.

Thank you very much.

Dave Luntz
Concerned Citizen and USA Retired MSG
Fort Greely, Alaska

These comments were addressed above (Delta Fish and Game Advisory Committee).

December 3, 2004

Steve McCombs
HC 60 Box 3760
Delta Jct., AK 99737

Kevin Gardner
Director Public Works
Kevin.qardner@ richardson.army.mil

Dear Mr. Gardner,
Here are my personal comments in reference to the proposed training site near Ft. Greely. Eddy Drop Zone is too close to private property, private residents, and population. Texas Range is too close to some of my favorite stocked lakes for recreational fishing. It has also served as a calving ground for the local bison herd. This leaves Donnelly Drop Zone as my preferred site.

Location 39
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

According to the information at the meeting in Delta Junction, Donnelly has high potential for wildland fire. This has been proven historically by the fires that have already occurred. Three items should be in place for wildland fire response: first, a medium helicopter with a bucket and a five to seven person helitack load; second, a CL-215 air tanker to support the helicopter; third, a Nodwell with at least 500 gallons of water to use when the wind prevents air operations. The aircraft should be stationed at Allen Airfield. Response time from Ft. Wainwright could allow for too much fire growth. The Nodwell should be stationed on the range itself. The helitack load would be used to

Fire Management 61
Thank you for your comment. Please see Section 4.2.3.2, *Mitigation* for a discussion of existing and proposed measures to mitigate adverse impacts due to potential fire risk.

personnel the Nodwell. Considering the limited road access and the nature of the terrain, this should be the miniumum equipment available to prevent another Donnelly Flats Fire.

Another area of concern is the impact of convoys and other traffic that will be used to support the range. The Richardson Highway is a two-lane road with limited passing. Convoys presently tend to frustrate drivers. The frustration and increased number of vehicles on the road will increase the potential for motor vehicle accidents. Much of the road is not within a fire service district. Most of the Ems response is volunteer service. There needs to be a mitigation plan for vehicle extrication, vehicle fires, medical rsponse, and hazzardous materials containment. Relying on local resources is not realistic. Will the response become the responsibilty of the Ft. Greely and Ft. Wainwright fire departments? Will they travel 50 miles off post for a response? Will local authorities be given information on the nature of materials being transported? Will the information be provided to the Ft. Greely and Ft. Wainwright fire departments? The mitigation plan should address these questions and concerns.

Sincerely,
Steve McCombs

Human Health and Safety 26
Thank you for your comment. This information has been added to Section 4.2.5, *Human Health and Safety*.

Mitigation 08
USARAK Regulation 55-2, *Transportation Operations and Planning in Alaska* establishes polices and procedures for units using transportation resources to support military training. Convoys taking place on Alaska roads require approval by the state of Alaska at least 14 days prior to the event. Recovery of any vehicle breakdowns between Fairbanks and Delta Junction is supported by Fort Wainwright. All accidents require reporting to Fort Wainwright. Convoys will have listing of available medical services along the transportation route. Please see Section 2.2.1.2.6 for additional information.

-----Original Message-----
From: Pat [mailto:schlich @wildak.net]
Sent: Monday, January 10,2005 9:13 AM
To: Gardner Kevin R DPW Strategic Planning
Subject: Public comment Ft. Greely range construction

We support locating the combined BAX and CACTF on Texas Range in Donnelly Training Area because of its distance from most area residents. We are opposed to locating the combined BAX and CACTF in the Eddy Range near Delta Junction, Alaska based on five factors that make it the undesirable for all parties.

Location 40
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

1. Fire: The Delta area has experienced a number of sweeping fires that have required millions of dollars to fight. Seasonal conditions ranging from dry springs, to hot summers with low RH, to dry falls are often fueled by strong winds that continue for days. Winter fires have also been harbored in muskeg and moss only to erupt when moisture is low. We have lived on the Alaska Highway for over 20 years across from the proposed build up on Eddy Range. Three times we have had AST knock on our door and urge evacuation because of fire. Rivers, highways, creeks do not stop the fires we get when "start conditions are right and the Delta wind blows.

Fire Management 62
Thank you for your comment.

2. Noise: EIS Figure 4.b peak Noise Levels at Eddy Drop Zone Study Area (Adverse Weather) show 115 dBP (1 0%) at our house site. This is unacceptable for our family and all that live closer to the Range. Personnel at the Dec. 2 hearing in Delta Junction could tell us that low clouds, winds and extreme cold are characteristic of "adverse weather." No one could tell us specifically how cold is "extreme cold," the speed, duration of qualifying "winds," therefore no one can tell residents approximately how many days a year these conditions exist and therefore increase the possibilities of being subjected to 115 dBP.

Noise Management 24
Thank you for your comment. The BNOISE2 model was used to generate “peak contours”, which show expected noise levels from a single noise event. The model was run using a worst case scenario (adverse weather conditions). Adverse weather conditions are defined as a stiff wind, extreme cold weather or low cloud layer, all of which occur in Delta Junction. Peak noise levels indicate the probability (under certain conditions) of an activity being loud enough to generate complaints. Figures 4.c, 4.e, 4g, and 4.i show that approximately 10% of the time large caliber weapons are used at the BAX, noise levels would be high enough to generate complaints up to 2,000 meters beyond the installation boundary. An example of a worst case scenario would be if the range was used for the maximum number of anticipated days

(238), training on 24 of those days (10% of 238) could generate high enough noise levels to elicit complaints from residents near the installation
boundary. In addition, on those 24 days, climatic conditions must include a stiff wind, extreme cold temperatures, or a low cloud layer. If these conditions are not present, than even fewer complaints from noise would be expected. Please see Section 4.2.4.1.1, *Heavy Weapons and Demolition Noise* and Section 4.2.4.2.3, *Impacts Attributed to Alternative 2 (Eddy Drop Zone)* for further information.

3. Public Safety: Weapons discharge is an issue when residents are as near as they are and recreational riders expect to use trails that have been used for the last 50 years. Air traffic is an issue because the Alaska Highway corridor is an established route for private pilots and private strips are nearly adjacent to the Eddy Range. Without designated "restricted airspace" the possibility of an air accident is all too possible.

Human Health and Safety 27
The public must obtain permission before entering military lands. Persons intending on recreating on USARAK lands must obtain a Recreational Access Permit and use the USARATRAK call-in system, which provides the latest information on range and training area closures. Additional information can be found in Section 3.3.8, *Public Access and Recreation*.

Airspace 27
Please see additional information in Sections 3.2.8 and 4.2.8, *Airspace.*

4. Flooding: The Range has a history of flooding. The Spring 04 flood is a clear example of the complications including expense and destruction of building a complex on that range. Measures to avoid flooding would have to monitored and orchestrated on an annual basis. All downwater lands would also have to be accommodated.

Flooding/Floodplains 25
Thank you for your comment. Please see Section 4.2.2.2, *Mitigation* for additional information about existing and proposed surface water mitigation measures.

5. The EIS failed to address future developments in the area, ie., the extension of the AK Railroad. The historically proposed route positioned on various "official" maps is shown running through Eddy Range. Though the 23rd Alaska State legislation session produced a law that grants authority to the Alaska Department of Transportation to designate the route to the Canadian boarder.

Cumulative Impacts 19
Thank you for your comment. Please see Section 4.3.11, *Cumulative Effects Analysis* for more information.

In conclusion I would offer a recommendation of Texas range for the location of the proposed BAX and CACTF facilities. In addition to all

the favorable elements required for candidacy, it has the added geographical feature of having Windy ridge as a natural barrier for a backdrop. All of the above mentioned 5 points become non-issues at that location. We recognize and appreciate the Army's need for training space although placement of these ranges should accommodate, to the greatest extent possible, the concerns and issues of the public and the adjacent communities.

Sincerely,
Patrick L. Schlichting and
Mary R. Corcoran

Seaplane
Pilots
Association
4315 Highland Park Blvd. • Suite C • Lakeland, FL 33813 • Phone (863) 701-7979 • Fax (863) 701-7588

December 30, 2004

Directorate of Public Works
Attn: APVR-RPW-GS (Gardner)
730 Postal Service Loop #6500
Fort Richardson, AK 99505-6500

Dear Sirs:

I am writing to you on behalf of the 7,800 individual members of the Seaplane Pilots Association to express our concern about deficiencies in draft EIS for the BAX/CACTF.

The Draft EIS is deficient in that it did not incorporate comments regarding the inclusion of airspace considerations, and the potential impacts on general aviation. Our Northern Alaska Field Director submitted these comments in writing and in a timely manner during the scoping process.

The draft EIS does not consider airspace or requirements for additional airspace restrictions for operations over the proposed training facilities. The draft EIS does include verbiage which clearly states that tactical aircraft (including, according to the document, F-16 and Navy and Marine Corps tactical aircraft) and tactical unmanned aerial vehicles (TUAV's) will be used in joint training exercises over the BAX and CACTF on some regular basis. Simulated combat operation of tactical aircraft and TUAVs both require Restricted airspace under current regulatory requirements, yet no consideration or planning is provided for or discussed in this document. Considering that the military services are required to operate more and more as an integral team, it is incredible that planning for airspace to accommodate joint operations is not incorporated in this document.

The area immediately south of Fort Greely/Delta Junction is a heavily used civil aviation corridor, and Isabel Pass, just to the south of this area, offers one of only two passes through the central Alaska Range for civil aviators. Any airspace restrictions over the BAX/CACTF proposals would virtually block access to this important pass.

The Draft EIS eliminates from consideration any potential sites west of the Delta River for construction of these training facilities. This area is already overlain by restricted airspace, and thus would provide ideal training capabilities for joint training with tactical aircraft and tactical UAV's. While year around utilization of areas west of the Delta River would require construction of a bridge, there is no question that the U.S. Army Alaska will eventually need to utilize these areas on a year round basis regardless. It would be very short sighted on the part of the Army to construct these supposedly "high tech" training facilities in an area where joint operations of tactical aircraft and/or TUAVs would be impractical or impossible. To do so would certainly not be in the best interests of USARAK or the troops who train there.

Either the Donnelly or Eddy siting for the BAX/CACTF would place these facilities in a position that would virtually eliminate the ability to utilize either tactical aircraft or TUAVs. The U.S. Air Force conducted an Environmental Impact Statement on establishment of airspace in the eastern Alaska MOA complex. Part of the record of decision in that document was establishment of protected civilian corridors running both eastward

Airspace 28
Please see additional information in Sections 3.2.8 and 4.2.8, *Airspace*.

Airspace 29
Specific plans for TUAV use by the Army in non-restricted airspace will be evaluated by the FAA prior to the action to ensure positive control over any TUAV activities. Please see additional information in Sections 3.2.8 and 4.2.8, *Airspace*.

Airspace 30
The Army has no plans to increase special use airspace (i.e., the establishment of restricted airspace), nor does it foresee the need to, as a result of the BAX/CACTF proposed action. If such a need were to arise in the future, that proposed action would be the subject of its own NEPA analysis and would involve the affected stakeholders at that time. Please see additional information in Sections 3.2.8 and 4.2.8, *Airspace*.

Proposed Action and Alternatives 85
This location alternative (i.e., West Donnelly Training Area) was initially considered but has been eliminated from further analysis in this EIS because it did not satisfy the screening criteria. Please refer to Section 2.3.3, *Alternative Viability Analysis* for more information.

and southward from Delta Junction. Both the Donnelly and the Eddy alternatives in this DEIS would virtually eliminate one or both of these corridors, either with Controlled Firing Areas or Restricted Airspace. Frankly, while Controlled Firing Areas do not preclude civil aircraft operations, no civil aviators that we know care to operate in an environment where heavy artillery and machine gun fire is being conducted, relying on soldiers on the ground to prevent conflicts with aircraft overhead. The civil corridors were established in good faith, in a contract with the U.S. military establishment, with the understanding that these corridors would be sacrosanct and would not be violated by military operations.

Of the three alternatives offered in the DEIS, only the North Texas Range alternative is not in direct conflict with civil aviation operations. A portion of this area currently lies under existing restricted airspace, which would permit the operation of TUAVs. However, for any of these areas to be functionally useful for joint training with tactical aircraft, they would have to be much deeper in Restricted airspace, to afford the aircraft maneuvering room after delivering ordinance.

Of the alternatives proposed in the DEIS, the North Texas Range alternative imposes the least impact on civil aviation. That said, the DEIS is deficient in its consideration of airspace and civil aviation conflicts. When airspace issues are contemplated, sites west of the Delta River are much more attractive for unfettered use of aerial vehicles, despite the initial cost of constructing a bridge. In our view, this is the only solution that will truly provide the Army with a world-class training venue.

Sincerely,

Michael Volk
President

Cc: Senator Ted Stevens
Senator Lisa Murkowski
Representative Don Young
Michael Vivion, SPA Field Director, Northern Alaska

STATEMENT REGARDING EDDY DROP ZONE SELECTION

To whom it may concern:

I am very opposed to the selection of Eddy Drop Zone for major range construction for the following reasons:

Location 41
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

Noise: Sound cannot be contained within the boundaries of the range. There are no significant land contours to contain the noise which will most definitely affect the quality of life of the residents in the area.

Noise Management 25
Thank you for your comment. Average noise contours obtained from computer modeling indicate that no moderate or severe noise levels from small arms, large weapons, or demolition would be expected off-installation lands. Please see Section 4.2.4, *Noise* for additional information.

Flooding: I have lived in close proximity to the proposed site for sixteen years and can tell you without a doubt that flooding on Eddy is a common occurrence.

Flooding/Floodplains 26
Thank you for your comment.

Fire: The fire that started down by Donnelly Dome several years ago from MANY miles away, came very close to burning down our home. Efforts to contain the fire were very nearly unsuccessful. Eddy is in much closer proximity to residential areas. Even vehicle exhausts will easily start a fire when conditions are dry. If training occurs on Eddy, it's not a matter of "IF", but "WHEN the Army will bum us out. This not only involves a loss of property for which the Army will be held responsible, it could also involve a loss of life.

Fire Management 63
Thank you for your comment.

Degradation of air quality: Numerous idling diesel vehicles, for long extended periods, in the vicinity of Eddy will greatly impact the air quality of the community. Cold temperatures and inversion layers of our locale will hold exhaust and moisture down close to the ground, and should be considered as they haven't been addressed in the EIS. Ground fog, such as that produced by the power plant at Ft. Wainwright next to the highway, have had a negative effect on visibility, transportation, and air quality of that area.

Air Quality 04
Unnecessary vehicle idling during cold temperatures is prohibited on USARAK lands. Vehicles are expected to release fugitive emissions into the air and the duration these pollutants remain airborne is dependant on the meteorological conditions during training. Emissions modeling indicated that pollutant concentrations were below the national air quality standards for all criteria. Please see Section 4.3.1, *Air Quality* for additional information.

Safety issues: In order to support the firing on the range, truckloads of ammunition will need to be transported to the range and downloaded to the Stryker. Even though explosive projectiles are not expected to be used on the range, the ammunition propellants are explosive and potentially dangerous.

Human Health and Safety 28
All established Army safety measures will be followed during loading, transport, and unloading of ammunition in support of training events.

Deforestation: Black spruce and hardwoods are slow growing in Interior Alaska. Disruption and destruction of the trees will certainly mean a lengthy period of deforestation. Even if the Army would choose to reforest this area, it would take decades for it to recover.

Vegetation 07
See Section 4.3.4, *Vegetation* for additional information on predicted impacts to forest resources as a result of the proposed action.

Disruption of permafrost: Major portions of Eddy are covered in black spruce which means the ground contains continuous and discontinuous permafrost. Any disruption of the ground covering will cause a warming of the soil and melting of the permafrost. As evidenced on the North Slope, once the thawing starts, you end up with bottomless bogs and lots of mud. Are these conditions you want troops and the Stryker to attempt to train in? I don't think your studies or EIS has fully taken the effects of this into consideration.

Soil Resources 12
Geotechnical investigations (drilling) would occur prior to construction of the range facilities to ensure permafrost avoidance. The most desirable building sites are those located in non-permafrost areas. If disruption of permafrost is unavoidable, arctic engineering construction methods will be utilized to prevent adverse impacts to the surrounding landscape and facilities.

Requires special use airspace: It takes about two years to get restricted airspace designated. Any projectile that can ricochet requires special airspace over the area of use. Remember just because you control the ground on the range, you don't control the airspace over it!

Airspace 31
The Army has no plans to increase special use airspace (i.e., the establishment of restricted airspace), nor does it foresee the need to, as a result of the BAX/CACTF proposed action. If such a need were to arise in the future, that proposed action would be the subject of its own NEPA analysis and would involve the affected stakeholders at that time. Please see additional information in Sections 3.2.8 and 4.2.8.

No designated impact areas: It takes powers a lot higher than those in Alaska to create new impact areas. Is it just assumed you'll try to get it approved later, or are you certain there will be no need for an impact area at Eddy?

Other 55
Thank you for your comment. Establishment of a new dedicated impact area is not planned as part of the BAX/CACTF proposed action.

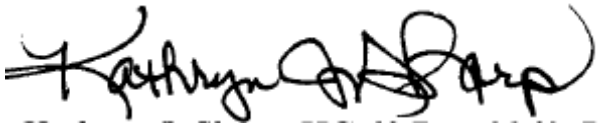
Not optimum training for our military: Members of our armed forces DESERVE to have the BEST training opportunities. Without special use airspace and designated impact areas, all training of that nature will need to be simulated. Why create new range construction at Eddy when the options there

are limited and Texas Range has all the necessary features to give them optimum training opportunities?

New helicopters and close air support training: I heard 50 new helicopters will be arriving in Alaska as part of the Stryker brigade. Close air support training with the Stryker and helicopter flights will mean noise and low flying aircraft that will significantly impact the community if this training occurs at Eddy. The arrival of the helicopters is a new issue and has NOT been addressed in the EIS.

Cumulative Impacts 20
Thank you for your comment. For a discussion of cumulative impacts, please refer to Section 4.3.11.

Army officials and decision makers have been "railroaded" into believing that Eddy DZ is a good place for this range. My husband was the previous Range Manager, for a period of 15 years, and an expert on training in this area. He was adamantly opposed to the selection of Eddy for professional reasons, but his input was ignored. He has always done what is right for our military members and our country, but his opinion was "blown off' because we happen to live close to Eddy. With inflated home values in the Delta Junction area, we can easily sell our home for a huge profit. That's not the issue. The issue is that Eddy DZ is just a BAD selection. It's bad for the Army and it's BAD for the community.



Kathryn J. Sharp HC 60 Box 3060 Delta Junction, AK 99737

U.S. ARMY GARRISON- ALASKA
PUBLIC MEETING
Delta Community Center
Delta Junction, Alaska
December 2, 2004

COMMENT SHEET

NAME: Chris Sheehan

ADDRESS: PO Box 472 Delta Jct AK

REPESENTING: Self_____ Organization_____

ORGANIZATION NAME AND ADDRESS:_____

COMMENT: I agree with everything Ed Sheehan said. You all need to listen to him.

Other 56
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

U.S. ARMY GARRISON- ALASKA
PUBLIC MEETING
Delta Community Center
Delta Junction, Alaska
December 2, 2004

COMMENT SHEET

NAME: John Sloan

ADDRESS: P.O. Box 1092
Delta Jct., AK 99737

REPESENTING: Self X Organization

ORGANIZATION NAME AND ADDRESS:

COMMENT: I am opposed to the use of Eddy Drop zone for several reasons. I'm not opposed to the military practicing and training, just not at Eddy Drop zone.

I am very familiar with fire behavior in the Delta Area and especially the area south of Ft. Greely. I don't want to see anymore activity there that will increase the chance of runnaway fire as in 1999.

I'm concerned with the noise level. Increased activity this close to Delta is unwarranted. We can still get an earful from across the Delta River. We don't need it in our back yard.

I'm concerned with stray ordnance or unexploded ordnance - When the military uses lands across the Delta River or way south of town, we know the boundaries. Kids may wander onto testing grounds this close to town. I'm afraid of losing a child.

I worry that an incident as in, (I think New Jersey), where a school was shot during weekend break. I may not be a

Location 42
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

Human Health and Safety 29
The Army maintains a comprehensive safety program. Please refer to Section 2.2.1.2.2.1, *Safety Precautions* for additional information.

school in Delta, it may be a home or a business so close to Eddy Drop Zone. Please don't put us in jeopardy.

All in All I believe there are viable alternatives to Eddy Drop Zone. I don't think the military should be or even would want to be this close to a town. You ought to be able to test your equipment unencumbered by the thought of civilians so close at hand.

Please add in extra pages, if needed.

You may leave your completed form with representatives from tonight's public meeting,
OR
Submit your comments:
Via fax: (907) 873-1616
E-mail: *kevin.gardner@richardson.army.mil*
OR
Fold this sheet in half and staple, fill in your return address, attach a stamp and mail to the below address.

Please submit comments by December 20, 2004

U.S. ARMY GARRISON- ALASKA
PUBLIC MEETING
Delta Community Center
Delta Junction, Alaska
December 2, 2004

COMMENT SHEET

NAME: Sheryl Smith

ADDRESS: P O Box 1083
Delta Junction, Ak

REPESENTING: Self ✓ Organization _____

ORGANIZATION NAME AND ADDRESS: _____

COMMENT: I am against the army putting in the Eddy Rose Zone. Fire is a major concern in this forested, windy, dry area. I am a home/property owner and am concerned that if a fire started in the drop zone that it would destroy the entire town.

Location 43
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

Draft Environmental Impact Statement
Comments and Concerns
12/2/04

Dear Sirs,

We live out on the Tanana Loop Extension Rd. in Delta Junction. We are very concerned about the proposed Eddy Drop Zone and it's impact upon our community and lives. We already know and have felt the effects from the current explosions and war games conducted in the area. We have opened this letter to all living at New Hope for their personal comments, which you will find stated below.

For the sake of our quality of living I object to the proposed Eddy drop Zone because of it's proximity to Delta Junction. Presently the bombs being dropped and other explosives at the current level, personally affect me with sinus and breathing conditions. To bring this closer to our community when it is not the only choice is the wrong course of action in relationship and concern for our health.

Linda Samuel

Eddy Drop Zone is too close to Delta. Use of other Zone ~~is~~ would have less negative effects for us.

Barbara Schneider

Please do Not use Eddy Drop Zone. We already have enough trouble with fires, sinus problems + cancer rates!

Stefanie Massick

Please choose another site than the Eddy Drop Zone. Use of this zone so close to town would not be beneficial to residents of Delta, as we already feel the effects of the current locations being used.

Linda Reed

Location 44
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

My major concern about the drop zones is the ~~chemicals~~ chemicals used. If the Eddy Drop Zone were used, (or Texas or Donnelly), would it be like the Gerstle River area? Yes, training and testing are necessary but please don't use Eddy!

David J. Plumley
Marlana Plumley

Human Health and Safety 30
Bullets fired at the BAX and CACTF do not contain explosives and no chemical munitions would be used. There would be no possibility of unexploded ordnance (i.e., bullets or warheads) being used at the ranges. Thus, unexploded ordnance and their constituents are not considered a human health and safety issue as a result of the proposed action.

-----Original Message-----
From: "Art Warbelow" <art@warbelows.com>
Sent: 1211 1/04 12:36:14 PM
To: "Gardner Kevin R DPW Strategic Planning"
<kevin.gardner@us.army.mil>
Subject: complex

Hello Kevin - I am concerned that this does not seem to address any of the potential issues in the air. Would you not be using helicopter etc? Would activities on the ground potentially create restrictions for aircraft flying overhead? These need to be addressed, especially given the potential proximity to the entrance to Isabelle pass.

Art Warbelow, President
Warbelow's Air Ventures, Inc.

Airspace 32
Please see additional information in Sections 3.2.8 and 4.2.8, Airspace. Yes, helicopters would be used during some training operations at the BAX and CACTF. For additional information on close air support, please see Section 2.2.1.2.4, *Joint Operations - Air Support at the BAX*.

U.S. ARMY GARRISON- ALASKA
PUBLIC MEETING
Delta Community Center
Delta Junction, Alaska
December 2, 2004

COMMENT SHEET

NAME: Pat White

ADDRESS: POB 431
Delta

REPESENTING: Self X Organization

ORGANIZATION NAME AND ADDRESS:

COMMENT: For the sake of our community and our lifestyle please move your high fire risk, increased noise and danger of firing as far from civilization as possible. Don't choose the Eddy Drop but consider the alternative.

We've lived too long here to up and move because our neighbors profess to be good.

Location 45
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

U.S. ARMY GARRISON- ALASKA
PUBLIC MEETING
Delta Community Center
Delta Junction, Alaska
December 2, 2004

COMMENT SHEET

NAME: David S. Zimmerman

ADDRESS: PO Box 1047
Delta Junction AK 99737

REPESENTING: Self X Organization

ORGANIZATION NAME AND ADDRESS:

COMMENT: The North Texas Range would be best site for US Army's new BAX and CACTF. Reasons are (1) no military rounds / live fire ammo would be aimed at new missile defense site on Alyeska Pump Station #9 (2) The wind at North Texas Range would carry noise away from Tanis Creek and downtown Delta Junction (3) There is a back drop - namely Donnelly Dome and ridge this is natures made back drop - protection. (4) Allen Army Air field landings and take offs would not be effected.

Location 46
USARAK appreciates your taking the time to comment on the draft EIS. USARAK acknowledges your concerns and is taking all concerns into account as part of the analysis of all potential range siting locations and the entire decision making process.

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