

QUESTION #11:

Well, you can see not too many people showed up. I think they pretty much expecting this, I guess, fast and gone. That's what you end up with...

COL. HEUPEL:

Well, that's part of what Col. Hassan's talking about, is in terms of trying to work ... I know that kind of started at Fort Yukon with the First Chief there in trying to get ... have some communication going with the different villages up here and with your tribal resource advisor so that it's not a fast in and gone.

#11A:

That's what most people saw, I think. (UNINTELLIGIBLE)

QUESTION #12:

Well, of course, if they've got comments they could always call here or come see us. After all, they know that we've got you here.

QUESTION #13:

Sneak that military device out of there.

COL. HASSAN:

Is that the deal you want?

#13A:

Do a little recon thing.

COL. HASSAN:

Thanks.

COL. HEUPEL:

Well, thank you very much.

(END OF TAPE)

CERTIFICATION PAGE

I, Diane A. Beaulieu, do certify that this transcript is an accurate record of the proceedings as recorded.

Dated: 11/1/94

Diane A. Beaulieu

Subscribed and sworn to
before me this day
of , 1994.

Sandra K. McKibbin
Notary Public
My Commission Expires: 8-1-97

Addendum:

The tape and transcript of the Venetie MOA DEIS hearing were reviewed beginning with Question #1 of the public questions and comments and continuing through the end of the hearing. Corrections were made accordingly to the electronic (disk) and hard copy versions.

Karen McKibbin
Spectrum Sciences and Software, Inc.
November 30, 1994

ALASKA MILITARY OPERATION AREAS

PUBLIC HEARING

ARCTIC VILLAGE, ALASKA

OCTOBER 6, 1994

COL. HEUPEL:

I'm Col. Jim Heupel. I'm a judge from down in the "lower 48" states and in the Air Force, we have judges come around and conduct hearings on environmental issues and that's why I'm here with you today.

Col. Rich Hassan is Commander of the 611th Air Operations Group down in Anchorage, at Elmendorf Air Force Base, and he's going to talk to you about the environmental process that we've been involved with.

Maj. Siter is an F-15 jet pilot. He's also the Chief of Fighter Operations down at Anchorage.

And then Mr. Bill Ham, in the back, he's got the sandwich, is a civilian. He works for a company called Spectrum Science and Software. They're a contractor that the Air Force hired to help with the study that it's doing.

We're going around conducting hearings and trying to get comments from the public, from the council, from anybody that could be affected and trying to have some communication to let you know what the Air Force is wanting to do and to get your input.

We've got a tape recorder going here. Part of the ... we're doing this under federal laws, and specifically, the National Environmental Policy Act. We need to make a record of it and this will all become a part of a final decision. So we've got a short Executive Summary and I think they gave you copies of the rather large environmental study that was done and I think it is here in your council office. But that summarizes the study that's been done and we're interested in taking any questions and in trying to answer any questions or take any comment today. And people still have until the 30th of November to send in any written comment. If you think of something later on or if anybody else here in Arctic Village or outlying areas has any comment that they want to give, they can send that comment in by ... as long as it's

received in Anchorage by the 30th of November, that will become a part of the record. And the Air Force, we need to try to answer the questions that are raised or address the issues that you raise.

Let me turn it over to Col. Hassan to explain further what it is the Air Force is proposing.

COL. HASSAN:

Thanks.

Well thanks Albert, for getting this together real quick. We had a little trouble with the weather and the airplane. You guys live with that all the time.

We're basically here as a follow up. We were here last year and met most of you folks and at that time we explained that what we were doing was, we were making a proposal, the Air Force, and we're trying to do things a little different. We're trying to let you know, up front, what we wanted to do, so that we could get some suggestions and issues and comments from you. What we're talking about is an airspace thing. Where we fly the airplanes to train. Not anything to do with the ground. But we do know that when we fly airplanes, that that could have an effect, the noise, could have an effect on people and it could have an effect on the animals subsistence and wildlife. So that's why we came last year. And we asked the questions, we said, where were your animals, where did you do your subsistence hunting. We remembered a map that several of you took us to and showed us, for example, the caribou, so we went back and this last year we worked with the CATG, we're going to continue to work with the CATG and ask the folks, locally, are there any effects on what our flying does.

But essentially, for your area here, while we know that the farthest north that we want to do our training is down here, it's about 50 miles from Venetie and about 125 miles here from Arctic Village. But we do know that there's a lot of you, you know, your caribou herds, you know, wander this whole area here. We know from the folks in Chalkyitsik that there's a lot of trapping that goes on in here. Moose hunting that goes on in here. So we took all that into account and our studies looked at that and one of the things that came out of, because of what we talked about with you folks, was that the lowest level that we can fly used to be, today, 2,000 feet and

we raised that another 1,000 feet. So the lowest we'll fly, or we would propose to fly in these areas here, is about 3,000 feet. Now, what does that mean. Well, what that means is, is at 3,000 feet the noise is a lot less than at 2,000 feet. And we have found, through some of the studies that have been conducted, that if an airplane makes less than 85 decibels of noise, which is just a noise level, if it makes less than that, then the animals don't seem to be upset or run or get concerned about that. So that's why we went ahead and changed our proposal here to reflect that. But in essence, these boxes are not on the ground, they're in the sky and they are where jet planes are allowed to train. And, you know, what we have found in trying to do business this way, is we have a need to do some training for our aircraft, but we also know that we have a responsibility to let everybody know in the communities what we're gonna do, what we'd like to do, listen to what their concerns are and we try to balance that. We try to balance the training we have to do with the concerns that people have. And we do that today. We do that on a daily basis today.

Down lower here in another map in the Circle Hot Springs/Central area, folks were concerned about the noise. We talked to them about it and we drew a 10-mile circle and 35,000 foot floor, or ceiling, so that we would have to fly over that. And we went back and talked to them and they're happy. They feel like the noise doesn't bother them anymore. So, that's the way we're trying to work today.

Another thing, you see these orange lines here up on the upper Porcupine. There were Peregrine falcon nests up there and we worked with the Alaska Department of Fish & Game and we put a two mile wide corridor across the river and 2,000 feet above and we won't fly anywhere near there. And if you just read in the newspaper yesterday, they said Alaska is taking the Peregrine falcon off the endangered species because this is the only place in the country that the Peregrine falcons are doing good. So, in a cooperative effort, we think we contributed to that because we listened to what folks had to say and we try to avoid flying in those particular areas.

So, again, my whole message here today for you is, even though you're up here, we wanted to come talk to you because, you know, we're not going to be flying over your village, but we know that many of your subsistence activities, the herds, you know, may go down into that area and we wanted to let you know that we're working,

we want to work with you about that and I think working together we can avoid any bad effects that might happen to the animals. Albert, did you have any specific questions or concerns we needed to answer?

MAJ. SITER:

You might want to point out to him, sir, that even though the floor is proposed at 3,000 feet, most of the activity that occurs in this area is aircraft that flies much higher than that. Like 20,000 feet or even higher. The reason is, is because this airspace is the furthest away from the bombing ranges and there are only three bombing ranges we have in the whole state and they're way down here. And so when aircraft come out of here and they're flying very high, only when they reach airspace down here, these other boxes, do they descend closer to the ground and go to the bombing ranges. So, activity out here will be very high most of the time.

Additionally, this airspace, unlike all the other airspaces down to the south this airspace won't even have published hours to this piece right here, Yukon 5. And that's because so few aircraft will fly in there that we don't need that many hours. For example, Yukon 2 has hours 8:00 in the morning to 6:00 at night, every Monday through Friday. This airspace will not have published hours. What we'll do when we need it, and which will be very infrequently, is we have to call the Federal Aviation Administration because they control all this airspace. In fact, this whole proposal has to be reviewed by the Federal Aviation Administration over a year from now, after a decision is made. So this is not just an Air Force decision, but the airspace people at FAA will make a decision as well.

We have to apply to them to open up the airspace. So we might, for example, open it up for one day, for a few hours on one day, bring a few aircraft in there that will fly and once the airplanes leave, the airspace is closed. Okay. So the average number of aircraft per day in this airspace is less than one airplane in a day, on the average. So again, a very low-use area and again, when it's used, more than likely the aircraft will be very high. When it's used in an exercise, also the aircraft are getting fuel from aero refueling planes that carry gas, that transfer the gas to other aircraft. That's all done. When I've done that in exercises it's done like 25,000 feet in the air. Well away from the ground. It's a unique airspace (UNINTELLIGIBLE). Limited

use, high altitude (UNINTELLIGIBLE).

COL. HASSAN:

And as I mentioned, we want to continue to keep a dialog going and so we're going to enter into more formal arrangements with the CATG to do monitoring studies so that we assure all of ourselves that we're not having any negative effect on the animals.

QUESTION #1:

My question is that, uh, CATG, what kind of agreement did they make with you all? Or did they make you any?

COL. HASSAN:

What they did was, we left Fort Yukon and both the First Chief Steve and, uh, Craig Fleener are going to put together a proposal to send to me as to how they would like to conduct this study. And they said that they would get with the resource folks in Chalkyitsik, Venetie, and Arctic Village and get your folks involved in that with them. And they would act as the focal point for the CATG. That was the proposal.

QUESTION #2:

Yeah. Okay. That is the plan that they made with you, right?

COL. HASSAN:

Right.

And also, independently, the Tanana Chief's Conference, George Yaska down at TCC, is also going to work with us to do some studies on caribou herds, which is separate than the CATG.

QUESTION #3:

These studies you're talking about. How long will it take to get it all finished?

COL. HASSAN:

It will probably be fairly long-term, I'd say. Because it's ... you know, you got to study the animals, I would imagine the behavior, over a couple of years at least.

#3 COMMENT:

Yeah, that's what I was thinking.

COL. HASSAN:

Yeah, I mean this is not something you can just go in and do, you know. They've got to monitor and watch how they move and go and if it affects how they eat or whatever.

MAJ. SITER:

How they migrate.

COL. HASSAN:

How they migrate.

So I would expect it'll be a fairly long-term thing.

QUESTION #4:

Yeah. That's the question. I didn't really hear if one of the people said we just can't let them in that way just right now. You know, they want to actually know what will happen to the animals before you come back with a study that says this is what's going to happen and this is what's not going to happen. Stuff like that.

COL. HASSAN:

Right. What we have today is, the studies that have been done so far says the higher you go with the airplanes, the less impact they'll have on the animals. What we'd like to do with the CATG is work and monitor, is that true. So it would make it a confirmed study that says, "Yes, in fact, we're not having any negative impact on the animals because of our high flying."

QUESTION #5:

What's uh CTA . . . CATG was proposing is that they want you to show them how the study is done and how it is going to affect and how it isn't. Everything.

COL. HASSAN:

Right. And we're gonna work with them. He has to ... the first thing we're gonna do is when I get done with the hearings, which will be next week, we're gonna get in contact back with Craig and he's the local guy there who knows how to put the proposals and the studies together. So, yeah, we're gonna work with them to make sure we help them put that together. And, in fact, we'll probably work that pretty heavily in the next couple of weeks.

QUESTION #6:

You don't have no proposal ... no airspace up any further north?

COL. HASSAN:

Right.

QUESTION #7:

Nothing?

COL. HASSAN:

Right.

QUESTION #8:

For about 20 years.

COL. HASSAN:

For about 20 years?

QUESTION #9:

Nothing?

COL. HASSAN:

We're looking out in the future right now and this is an Environmental Impact Statement that ... for the ... as far as we can see, this is the airspace we'll need.

COL. HEUPEL:

If they were to, want to do any other, uh, have any other areas up in here for military training, these military operating areas, then they would have to come back through and hold more hearings, go through the processing that to do the scoping, which is what was a year ago where they come out and say this is what we propose to do, get input, put the hearing together, or put the study together like they've done now, come around then and hold hearings. They would have to go through that entire process again if they wanted to establish some other kind of flying areas.

COL. HASSAN:

This is part of our ...

QUESTION #10:

This must be around Arctic Village area.

COL. HASSAN:

Right. No, we would not be proposing to do anything up there.

MAJ. SITER:

One of the things about the airspace--you raised an important question, the aircraft that we have in this state are based at Elmendorf, in the Anchorage area right here, and at Eielson Air Force Base here in the Fairbanks area. The distance the aircraft can fly with the gas that ... the fuel that it has on the plane, the aircraft can only fly this far out of Fairbanks and out of Anchorage they can fly out into this area like this and out here. None of our aircraft can reach these areas in training. That's too far. Okay. So given what we have in the state, we wouldn't be able to reach these areas without the refueling tankers and we don't have very many tankers in the state. So, again, that's one of the reasons why Yukon 5 is a lower use area, because it's a the maximum distance that our aircraft can fly and train, if we elect to train that far north.

COL. HASSAN:

So it's unlikely. I mean it's not just something we're telling you. It is very unlikely that we would ...

MAJ. SITER:

There are physical limitations on how far we can fly. Okay. And one of those is ... the most obvious one is the amount of fuel our airplanes can carry and how far they can fly. And we're not looking to create any new air bases. In fact, we've been closing some air bases throughout the country. In fact, we've pulled back aircraft we had at Galena and King Salmon. They're no longer there. They're back in Anchorage. So we've been pulling back because of budget restraints and, of course, the world situation, political situation, has changed with the end of the Cold War. And so, again, the airspace that we're looking up here is a low use airspace. And we can't reach these areas out here anyway. Because that was one of the things the public asked us, could we fly in other parts of the state. Our problem is, we can't get there. We can't get here either.

COL. HEUPEL:

Let me ask this question. This is all about specific training areas, as fighter or as bomber aircraft. Are there any navigational legs that would bring planes up in this area?

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MAJ. SITER:

No, they can't ... they're not accessible.

COL. HEUPEL:

There's other type of just straight flying that the pilots and navigators have to fly, just for training, on how to get to this point and this point. They have navigational lanes. And what they're saying is, that doesn't bring any of those planes up here. So I just wanted to make sure if you were seeing ... if there was any likelihood you'd see planes, make sure there's no question...

COL. HASSAN:

One of the things we heard loud and clear when we were here is, you know, a little bit of the trust issue. And that is, you know, can you trust what the government says. And we understand that. You know, what we'd like to do is, is that's why we're back this year, is to show that this effort, we are committed not only to let you know basically what's going on, what we would like to do, but to come back and follow up and say this is what we found, that we don't think there's going to be an effect up here, but we're not leaving it at that. We're going to keep the dialog going, which is what Albert and I were just talking about. We're going to enter into a longer term with the CATG to actually see, over time, does anything happen even though we don't believe that it will. So we'd like to keep that trust or build it up again.

QUESTION #11:

Is it possible that during training and possibly in the future, they're gonna use explosive in that area?

COL. HASSAN:

No. Absolutely not. There are only three places in the State of Alaska. They are all southeast of Fairbanks. Which are called our bombing ranges. They were created in the Second World War. Those are the only three places in the State of Alaska that we can release any sort of practice bomb, and we always use practice bombs which do have explosives on them, but they're not, you know, real live bombs, you know, war bombs kinda things. But that's the only place in the state that we can drop anything off that, you know, that's a bomb of any sort. Those three places. So there is absolutely no plans in this area to do that.

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QUESTION #12:

On the other part of this Yukon area, Yukon, down there...[looking at map]...Yukon 5?

COL. HASSAN:

Yeah, 5.

QUESTION #13:

Up north of Yukon 5, the question is, you're pretty close to Fort Yukon right there.

COL. HASSAN:

Yeah, this is about 15 miles. And this is about ... or is it 50 miles ...

QUESTION #14:

What's the chance of any accident involving that area right there? A plane.

MAJ. SITER:

As far as the plane having a problem over Fort Yukon?

QUESTION #15:

Yeah. Or in that Yukon 5.

MAJ. SITER:

Given the frequency of flying, I would say that this, probably of all the airspace in the entire state, with the exception of maybe the Galena MOA, has the least chance of an aircraft actually having a problem. Because not very many aircraft are going to be using this airspace. Certainly a lot less than what will be using Yukon 1 and 2 down here to the south. These are higher use areas. These average around 17 to 18 aircraft per day. Whereas this airspace is going to average less than one aircraft per day. Okay. So the potential for there being a problem with an airplane over this land is small by multiple factors. Much smaller. One or two percent is the chance of a problem here. Particularly given, it's also a high altitude airspace. The higher an aircraft flies if he has a problem, he has more time to turn the airplane and go to a safe place than he has at low, low altitude. So again, the frequency of flying, as well as the altitude the aircraft is flying, makes this an area that has less chance for there being a problem.

QUESTION #16:

How about the area Yukon 3 here there's people that we know live over there at Eagle Village.

COL. HASSAN:

Right.

QUESTION #17:

That's what's their concern there.

MAJ. SITER:

They have subsistence life style and we assess impact levels that are going to require or at least for us to consider mitigating, which is creating higher floors over in the Eagle area. One of the things about military operating areas is when pilots fly in these boxes, they must stay inside of those boxes. If they fly out of the boxes without getting permission, they get in trouble. They could lose their licenses for flying and get grounded. Eagle is very close to the ... you know, this is very close to the border of the airspace. What that means is, pilots tend to try to stay more toward the middle so that they won't fly out of the box and get in trouble. And I'm not saying that no one would ever fly over Eagle, but I can tell you now that this airspace along the border has less activity than you would find in the middle of the area.

COL. HASSAN:

But to answer your question, we went to Eagle. We were at Eagle last week, actually two weeks ago, and some of the issues that came up was, you know, did you consider the subsistence and we had and we identified, ourselves, that there could be some impact and so what Maj. Siter is saying, is when we see a place that there may be some impact, then we have to do something about it. And that's one of the things that we're looking at there is perhaps flying higher.

QUESTION #18:

Did they mention any impact? Was there any effect taken from aircraft. Anybody mention it?

COL. HASSAN:

Not the local. We mentioned it to them because we found it. Based on when we were there last year, like when we were here, we asked them what, you

know, where is your subsistence area and they showed us pretty much this is kind of the area. When we went in there and looked at that, our proposal in Yukon 3 was to fly lower than here and when we looked at that, we identified that the noise would be higher and that may affect the animals more, you know, and so we told them we've identified this. So, I think they appreciated the fact that we found it ourselves. And so now it's our responsibility to do something about that, which is called mitigation.

QUESTION #19:

I think even low flying like the 185 or 206, whatever that's flying up north from here, I think they're affecting animals around here, too.

MAJ. SITER:

Those are air carriers and civilians flying. Tours. Tour aircraft.

QUESTION #20:

There's a couple of times that we went out and we couldn't find any animals, you know. But there's too many small aircraft around here.

COL. HASSAN:

We'll, again, we don't propose to bring our planes up in this area.

QUESTION #21:

I hope not for another 100 years.

COL. HASSAN:

Other than the 130 that we want to come up at Christmas time. We'll bring that one up.

QUESTION #22:

Sir?

COL. HASSAN:

Yes sir.

QUESTION #23:

You know he says an airplane flying around will not (UNINTELLIGIBLE) no animal. I don't know who that (UNINTELLIGIBLE) through the air service and I see come around to the animal on the airplane. I tried. I tried. I just ... all the animals just keep away.

COL. HASSAN:

Right. Because those little planes ...

QUESTION #24:

(UNINTELLIGIBLE) it's just she fly low and, just, she played to the caribou. For the caribou, that just, uh, this is danger, you know. Just leaving to the, under brush, cry. (UNINTELLIGIBLE)... the airplane that bothered, she don't like the too much noise (UNINTELLIGIBLE) that one. That area that you guys doing training, yeah, right there, these (UNINTELLIGIBLE) training there, you fly around someplace and train (UNINTELLIGIBLE) and the plane go around, you guys you know (UNINTELLIGIBLE) how far up in the air, and uh, that you see the air more than the plane, I guess you don't bother it. (UNINTELLIGIBLE)

COL. HASSAN:

So, our planes won't come up here, they'll stay in here. And the ones that will stay in here, will stay up high. So not low like these little planes that are bothering these animals. High.

MAJ. SITER:

The aircraft you're talking about are civilian or are air carrier or tour aircraft and they're ... I don't know what activities they're doing, whether they're giving air tours to tourists or if they're looking for hunting animals, I don't know. But the bottom lines is military aircraft are not flying up here at low altitude. They can't reach up here. We don't have the fuel to come from our bases all the way up here.

COL. HASSAN:

But he's saying he knows that the little airplanes are low and they bother the animals.

MAJ. SITER:

Yeah. I just want to make sure he understands those are not military aircraft. Those are civilian aircraft that are flying at low altitude up in this area.

QUESTION #25:

And uh, when you're training, fly in this area, the animal, he don't bother (UNINTELLIGIBLE).

COL. HASSAN:

No, I don't ... we're not gonna ... we agree. But we won't come up here. We'll stay down here and stay high. Except the 130. We'll bring the 130 up here. DISCUSSION IN NATIVE LANGUAGE:

[not translated] 2,000 feet [not translated] 3,000 feet [not translated] 3,000 feet is [not translated]...

QUESTION/DISCUSSION #26A:

...2,000 not like 2,000 feet (UNINTELLIGIBLE) too close. 3,000 feet is good.

QUESTION/DISCUSSION #26B:

That's not what they're doing now. They're 3,000 feet high. Whatever concerns of the people in Yukon Flats is our concern, too, I guess. 'Cause we've been working with these people for I don't know how many years. One and the same people and whatever they propose, I guess we can be with them.

COL. HASSAN:

Yes. And they're expected to ... and I said, again, we're well aware that, you know, all of the activities, even though we're not going to come up here, the Yukon Flats area, we will be flying, but that's again ... part of the proposal is to go higher, and then, to keep the dialog going, we're gonna study the long-term, you know, to make sure that what we did was right. We're not just gonna go away.

QUESTION #27:

In the future, for sure they're gonna tell us any kind of operation they do, like in the Burnt Mountain, like that kind of situation.

COL. HASSAN:

Yeah. That wasn't mine, but I hope for sure they would do something like that, yes.

QUESTION #28:

But I understand that a lot of it has to be secret (UNINTELLIGIBLE).

QUESTION #29:

One more thing is this agreement and your trust, as you call it, put it down in writing, you know, send it to us. Then we'll have a trust. And if you don't do according to what you wrote down, broken treaty again.

COL. HASSAN:

Then you know who to come after, right.

QUESTION #30:

Yeah, the (UNINTELLIGIBLE).

COL. HASSAN:

Well, part of this process is when we get to the end, we'll present ... we'll have a document and there'll be a decision document and it'll say here's what we agree to and it'll be in there. But in the same, in the meantime, before that point, that's a year away, before that, we're gonna start working with the CATG and that will be a proposal in writing. Agreement. To work together.

COL. HEUPEL:

Once a final decision is done, then that's going to be what the Air Force would be limited to and it's got to be approved by the FAA and if they were to be flying elsewhere, then they would be in trouble. So it will be in writing after we take all the public hearings, all the comments that we've gotten, then it will be put into a final document, we may have to go back and if there are some things that have been raised that we will have to study further and that will become part of a final document which you will be sent a copy of and that's probably somewhere next summer I suspect, before you get that final document. It's only after that final document, and you'll have a chance to look at that and to comment on that also, but it's after that final document has been done and there has been a period where you can comment on it before a final decision has been made. But once that final decision is made, if they want to do something else somewhere else, they would have to go through this whole process all over. It's a pretty expensive process, so I think it's one of those things they try to make sure they're doing what they want to do right now.

Is there anybody ... ma'am, I know you want to make a statement. Do you have any questions?

QUESTION #31:

Yeah. Is this ... I just wanted to know if this was a hearing or not. If it's a hearing I'd like to say my full name and who I represent and where I live and what I do for a living, that would affect this ... if they're gonna go ahead with this military operations.

COL. HEUPEL:

It is a hearing and you'll have an opportunity to do that in just a minute. As much as anything, I'm trying to get questions right now and I'll take any statements then that people want to make so it's part of the record afterwards.

QUESTION #32:

I see that you listed Arctic Village and Venetie as a separate thing. We are on private land here, Native village of Venetie Tribal Government and it's operated and governed by the member of the two villages and we're self-government and we govern ourself. That's the recognized government that we have and that's the one we channel through and the Chief is Gideon James. So and then there's two villages own it. So the proper channel is to approach the tribal government and then you can have hearing within those two villages. Because we make one ... as one nation ... as one government, we made that decision that way. So I just want to clarify that we do ... you are on a tribal ... private land.

COL. HEUPEL:

We understand that. We have been to Venetie. We were at Venetie yesterday.

QUESTION #33:

Is that ... Venetie ... I see that you have Venetie Village, not the government for the whole 1.8 million acres of land that belong to these two villages. And we're enrolled to that and that's how we govern ourself. We take it to the whole ... and the tribal.

COL. HASSAN:

Would you like to make your statement at this time?

QUESTION #34:

Oh no. Go ahead.

COL. HASSAN:

Well, does anybody else have any questions? Okay. It doesn't look like it. Let me ask, first sir, do you have any statement you want to make?

QUESTION #35:

Yeah. A year ago when we had this meeting, somebody suggested that we go over to Fairbanks and took, uh first have a look at these airplanes and how they worked and stuff like that and it never came about. Why is that? That's my question. That somebody asked me to do that.

COL. HASSAN:

Yeah. We started that process. We flew ... Will Mayo got an airplane ride in an F-15 and we've had George Yaska down and I guess as we're going through the process we need to make sure that you're anxious that you are next on the list.

#35A:

Oh, I see, okay.

COL. HASSAN:

So we haven't forgot you, but we just sort of are working our way through. But we'll have ... we got Sandy ... Capt. Sandy Troeber here, who, we'll work with her and make sure that you get your turn.

QUESTION #36:

He won't be satisfied until he gets his airplane ride.

COL. HEUPEL:

Ma'am, would you like to make your statement and state your name. Why don't you come on over here. I want to make sure ... he's got the tape recorder ... I want to make sure he's close enough to hear what you had to say so that it's all part of the formal record. Everything we're saying here is, but I want to make sure he's got it.

QUESTION #37:

How long does it have to be?

COL. HEUPEL:

You go ahead.

QUESTION #38:

Okay. My name is Sara James and I'm a chairperson to the Gwich'in Steering Committee which covers northeast Alaska and northwest Yukon Territory and some of west territory. There's 17 villages that belongs to the Gwich'in Steering Committee. And I'm a chairperson to that. And I'm also a village council here, Arctic Village council, and member. And also I'm a member to the, just a member, I'm not on the committee or anything like that, to Boreal Forestry committee in Fairbanks. And I testify on this already in Fairbanks and I'm gonna testify here as a resident and a chairperson to the Gwich'in Steering Committee and also as a village council.

I had experience around where there's aerial military operation in Tucson, Arizona, for two weeks. And that aerial space there has been there for a long time and training is there, exists for a long time, and there's a big vast area, and it's a desert and it's a lot of open country. For I don't know how many years they've been having the (UNINTELLIGIBLE) on endangered species and this, and uh, they had ... it's in a large area to get the number back, but that haven't happened yet. And they said the animal get used to that noise, but what I saw down there, for miles I don't see any life, I don't see hardly anything out there. I was in five different places and out in the country where there's nobody there. We didn't find no life of anything. And the birds that every time a jet go overhead, they kind of shake off that wire or wherever they're sitting. They're not used to it. And I can imagine why ... I can imagine if they're in their nest, that big loud noise come around, they kind of shake there too and how many eggs it's breaking. So, I don't see any ... I don't have very good news about that area. I went down there for other reasons and I just stayed there observing that place and that's what I saw. And then I'm gonna go protect what Fort Yukon have decide... I just talked to somebody from Fort Yukon that you guys first approached Native village of Fort Yukon, not CATG. And then they made it clear to you that CATG covers a bigger area, just not the Fort Yukon area. So, and they also told me that you guys should go ahead and go look at other alternative area you have, that's at Tok area. And that's what I'm gonna have to ask, because at one-back in 1976 or something like that, one of the jet plane came through and they blasted this whole valley, and it doesn't take very much noise to carry out in these mountains and valleys.

Echoes in for miles, so, you know, even if it just blasts through one area, it'll carry out to many other ... it's just gonna go into a lot of other areas. That goes for, you know, the area 5 or area 4, all these places. And also I'd like to know what the Canadian are saying about this proposal, because, like I say, we have relatives all over the place. We're all same people, same language, so we gonna stand behind what they, what they saying. What's happening in their area. And I don't know why or I don't know what's going on, but there's about three or four kinds, there's a real low aircraft that came through here. It just shook everybody for a while. So I can't see myself or the animal that we barely, barely surviving and that we protecting here in this area, would take this noise and activities. So, we just now putting our foot down by protecting these areas or complaining about small aircraft and private airplanes is the biggest problem. And because they don't do any flight plan; and commercial flight, they do flight plans so we can control them pretty good. But then the private airplane, they don't make flight plan so we don't know what they're doing out there and just, just, we just had this BLM here this summer and this other aircraft fly around here kept the moose away and that's the results of it this summer. I mean we're the one that's lived here for thousand of years and we should at least know what we're talking about. And we do know what we're talking about because we live with it 24 hours a day for thousand of years and our relations, so something that study for last 50 years or so, I don't think that I can agree to that because ... I mean, Air Force, if they had that place around Tucson area, why do they have to go into new places? I know that there's some areas in McGrath that's been ... or the Fox 1 down that way. And that's been active with aircraft all the time and Eielson and all that area. Why do you have to get into a bigger place when there's already places existed and that's been using for military operation.

And plus, since the Cold War is over, the military activity's been slowed down and slowing down it means you have these places that you used before or ... I don't know why you have to get into a bigger place, a new place, while military operation has been cut down a lot since after the Cold War is over and, some is over. And another thing is that we're still dealing with that Burnt Mountain and that hasn't been resolved. There's three meetings, real important meetings, 'cause all the Chiefs

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within our area showed up and vote against it to get it out of there and put an alternative energy there. That happen—it's been three years now since we discover it or since we accidentally step over it and if it wasn't for that lit run—uh, lit forest fire, we probably wouldn't even know about it today. So those things have to be resolved and have to have some kind of trust before I can see any cooperation and I throw a lot of question, I throw a lot of anxiety about this whole thing. But then all together, I think it's better that you go and look at your alternative areas or where existed already.

Thank you.

COL. HEUPEL:

Thank you.

Does anyone else have a statement that they want to make?

Okay. Just a moment, we need to change a tape.

(END OF SIDE ONE, TAPE ONE)

(BEGINNING OF SIDE TWO, TAPE ONE)

COL. HEUPEL:

Does anyone else have a statement that they want to make for the record as opposed to asking ... to the questions that we did earlier?

QUESTION #39:

I don't think so.

COL. HEUPEL:

I don't think so. Well, ...

QUESTION #40:

Just remember to send your letter in so when the broken treaty come, we look you up.

COL. HEUPEL:

As I said before, the period to send any comments, if there's any additional comments, if there's something you find from looking through this summary, until the 30th of November, the Air Force will take your comments and it's gonna have to try to answer your questions in the final study that will come out next July. So, if there are further questions or if there's ... if you have concerns as you have pointed out, go ahead and send those in to us. We appreciate you very much meeting with us.

We're sorry that we've had to reschedule. I know we called yesterday about whether we could try to do this yesterday. The weather was bad and we're doing this early in the afternoon so that we were able to get in with the weather. It's much better up here than it is south, going through the river valley. But we appreciate your coming and meeting with us out of the schedule and ...

Yes sir.

QUESTION #41:

Could you send us the studies on those animals, too. The studies you make on the effect of the aircraft and all (UNINTELLIGIBLE)

BILL HAM:

We can send you some references and some extracts of studies that talk about affects of animals at different noise levels. We can do some of that, sir, the older studies that have been done. And then we can also ... in the back of the document, in the Volume III, there is some tables that show different noise levels of altitude flying ... aircraft flying at different altitude. You can kind of pick and choose in those tables what the noise level would be at different altitudes.

QUESTION #42:

Yeah, so we must use it for a reference.

BILL HAM:

Yeah and we'll try to get you some extracts of some of those studies of impacts on animals on noise.

COL. HEUPEL:

Thank you very much.

QUESTION #43:

Thank you.

CERTIFICATION PAGE

I, Diane A. Beaulieu, do certify that this transcript is an accurate record of the proceedings as recorded.

Dated: 11/1/94 Diane A. Beaulieu

Subscribed and sworn to before me this 1st day of November, 1994.

Sandra McKibbin
Notary Public
My Commission Expires: 3.1.97

Addendum:

The tape and transcript of the Arctic Village MOA DEIS hearing were reviewed beginning with Question #1 of the public questions and comments and continuing through the end of the hearing. Corrections were made accordingly to the electronic (disk) and hard copy versions.

Karen McKibbin
Spectrum Sciences and Software, Inc.
November 30, 1994

ALASKA MILITARY OPERATIONS AREA

PUBLIC HEARING

SLEETMUTE, ALASKA

OCTOBER 12, 1994

COL. HEUPEL:

Good evening. I want to thank you for coming out tonight. This is the public hearing on the Alaska military operations area Draft Environmental Impact Study. I'm Col. Jim Heupel. I'm a military judge in the Air Force for environmental hearings. We have judges come out to conduct the public hearing because I'm not connected with Alaska. This is the first time I've been to Alaska, I'm loving it, but I'm not connected with the people here in Alaska. I'm a little bit more detached since everything I'm doing is judging as opposed to flying or environmental work.

We do have some people here who are from Alaska and who are involved with the environmental aspect and the flying aspect. Col. Rich Hassan is a Commander down at Elmendorf Air Force Base at Anchorage. He's going to talk to you about the environmental process and some of the issues that have been involved.

And then Maj. Bob Siter is an F-15 pilot and he's the Chief of Tactical Operations down ... or Fighter Operations down at Anchorage, at Elmendorf. And he's going to talk to you in a little bit more detail on some of the issues and some of the things that came up at earlier hearings that were held everywhere but here at Sleetmute. I'll let Col. Hassan talk about what happened there.

But the purpose of the hearing ... there's been a very large Draft Environmental Impact Study issued by the Air Force, it's about that thick and I believe it's somewhere here at the school.

SUSAN HUBBARD:

It's in the library.

COL. HEUPEL:

It's in the library. You've got a copy of the Executive Summary and that's a brief summary of what's in that rather large study. But this hearing is opportunity for us to brief you on what that study says if you haven't had a chance to read it and

for you to ask questions to try to clarify what it is that the Air Force is proposing and to give you an opportunity to comment on what's in the study, comment upon what you hear tonight, what you think about it, what your concerns are, if there are some things that the Air Force has not taken into consideration, if there are some things that the Air Force hasn't gotten right, those are things we want to know about because it's important to this process. So it's really ... it's a two-way process tonight. It's the Air Force briefing you, but it's also getting your comment, getting your input so that the ultimate decision that's made will be the best possible decision. Best possible for you, as well as for the Air Force.

Now, we've got some microphones around. This hearing is being conducted under federal statutes. Something called the National Environmental Policy Act and we have a formal public hearing. Everything that's said tonight will be recorded, word-for-word. It will become a part of the final Environmental Impact Study and a copy of that will be sent, again, to the library. And the Air Force, as part of this hearing process, has to answer any issues that are raised. So that's why we want to make sure that we have the tape recording, so that we can get any issues that you have and you want raised, that you're concerned about. So that's why the microphones are out here.

In addition to the opportunity to comment tonight, you can also send in written comment, whether it's you or anybody else here in this area or anywhere, as far as that goes, whether it be in Alaska or in the "lower 48" or anywhere else. They can send in comments to the 11th Air Force people. There is an address on this letter that's inside the Draft Environmental Impact Study, Military Operations Area. There's an address down here, in the third paragraph, to send any comments. Originally, the comment period was going to end 31 October. That's been extended now to 30 November. So the Air Force just needs to receive any comments by the 30th of November, in order to take those into account. So, particularly, if you know some people that aren't here tonight that decide later on they'd like to make some comments, or if you decide that, we encourage you or them to do that.

Let me go ahead and turn it over to Col. Hassan to explain the environmental process.

COL. HASSAN:

Thanks.

Well, thanks for coming again, too.

Despite wanting to be in the desert, I like to be out in bush Alaska. If given a choice, I'd like to be here too.

ANDREW:

(UNINTELLIGIBLE)

COL. HASSAN:

Yeah. It's a lot safer.

Let me just answer a couple of basic questions for you and then I'm gonna ask Bob to talk a little bit about how we train and how that training, the need for the training translates into why we use airspace. 'Cause a lot of folks wonder why the Air Force, you know, flies in a lot of different places. So I'd like to spend a little time, and Bob can do that, being a pilot. But what I'd like to just take a few minutes and say, you know, why are we here. There's really two reasons. The first reason is, we're not expanding the airspace in Alaska. We're not asking for more airspace to fly in. We want to take the airspace that we use today and adjust it. Some places a little bit less use. Some places a little bit more use. But overall, the total amount's not gonna change. And the reason we want to adjust it, is basically because times have changed. The Cold War is over. We were focused on protecting North America from any foreign invaders and in that kind of training, we did a lot of air-to-air training. Which are planes training against other planes.

Shift focus and our friend in the Middle East, for example, Saddam Hussein. The force in Alaska is now training focused to pick up and deploy. And doing that, means we gotta do some more air-to-ground training. We gotta practice flying, evading and getting into targets. That kind of change in the way we train means, and you'll see this as we go through the proposal, a lot of the training that we did out in the western part of the state where you are, some of that has to focus up toward the other part of the state where the bombing ranges are. There are no bombing ranges out here. We've only got three in the State of Alaska. We're not planning to ask for more. We're just gonna keep those that we have. But that air-to-ground training

needs to be done near bombing ranges. So a lot of our training will be shifting our focus toward that part. That's the first reason we're here. And that is, we gotta adjust the airspace because of the time.

And the second reason we're here, which is just as important is, the Air Force is trying to build trust with the people of Alaska. And in doing that, we wanted to do an Environmental Impact Statement, which is what this process is, which allows us to propose an action, which is what we've done here. Go out, talk to folks. Unfortunately, with the weather last year, we had to do a telephone call out here, which was not our preferred approach, but at that time last year, we came out in a process called scoping, which is just basically, "hey, here's what we'd like to do." Well, we got a lot of input. We got a lot of folks who made comments. We made changes to our proposal based on the comments that we got from folks in different parts of the state. We've talked with Native groups. We've talked with municipal organizations. We've talked with civil aviation groups and the general public and got lots of information, lots of changes.

The last year, we produced the document that Col. Heupel mentioned. Unfortunately, it's a very, very thick document, but that's what you have to do. We looked at what impact our flying might have. How would that affect the animals? How could it possibly affect subsistence hunting? How could it affect air safety? There were a lot of issues that came out of that study. And we're gonna talk about them a little bit later, about this area specifically. We now come out with the study, this is public hearings, we'll listen to your comments again, we'll go back and do more study if it needs to be done, fix some things if that needs to happen and then, fundamentally, about this time next year is when a decision would be made. But that decision is based on what our need is. Here's what our need is to train, but here's the concerns. Here's the concerns of the public. Here's the impacts that we might have on wildlife and subsistence. And that decision maker, in our quest to find trust, has got to find a balance. We can't train to the exclusion of just running rough shod over people or the environment. What we've got to do is train, but we've got to be sensitive to our partnership, our ... what we feel like is a good neighbor policy that we want to get the Air Force a reputation for. So those are the two reasons we're here.

Yeah, here we go. Now we got a plane coming in.

NELSON OOKA:

Sounds like a bomber, huh.

COL. HASSAN:

Yeah.

MAJ. SITER:

World War II.

COL. HASSAN:

And the Environmental Impact Statement process is what we're in. Started last year, this year and then it will go through next year. So, that's a long story, but that's why we're here.

Now let's talk about ... let me ask Maj. Siter to talk about the training and then how we make this airspace and then he'll tell you about specifically Stony area, which is of most concern to you guys. Of course, we can talk about Naknek, too.

MAJ. SITER:

Thank you sir.

When you talk about training, for us it's kind of like competitive sports. The teams that win are the teams that base their learning on basic fundamental skills and use the building block approach. We do the same thing, even though it's complex training, we break it down, start with the more simple tasks and then we build ourselves up so we have a good team that can deploy over seas like the Colonel's mentioned. We don't deploy as individuals like in the old days before, up to Viet Nam. We actually deploy as complete units. That includes pilots, maintainers, civil engineers. The whole team goes together, because they train together. Okay. So that's what we're trying to do.

The way we start that is simply one-on-one drills. One airplane going against another aircraft. Two-on-two drills. The same thing. And then we build toward a thing that's called composite force training. A very technical term, but a very simple philosophy. We take F-15s, for example, that may be based out of Elmendorf and pair them up with F-16s out of Eielson. Put them together on the same team, let them train together. The benefit we get out of that is, that in peace time, F-15 pilots find out

what F-16 pilots have to do. What their strengths and limitations of their aircraft how do they coordinate missions, how do they work together. And same thing for F-16 pilots learning about F-15 pilots. It's our belief if you invest in that type of training in peace time, they won't be learning how to fly in war time where you can end up accentuating your losses.

The last thing we do that gets the units ready to go to war, is what's called major flying exercises. And this is where we do full out scrimmages. Again, it's the best simulated combat training the Air Force can provide its pilots. And they're formed into two teams. Called Red and Blue, if you want. Offense and Defense. And the arena, if you will, that we do that, is up here in the northeastern part of the state, with Fairbanks right here. And this airspace complex is where we do those major flying exercises.

We learned the hard way, prior to Viet Nam, about preparing our pilots for the modern air era aerial combat. Prior to Viet Nam, the pilots pretty much did one-on-one and two-on-two drills. And they were very proficient at that. But when they went to Viet Nam, the air defense that they were going up against was too sophisticated. We had a lot of losses. The pilots that got shot down, invariable were shot down the first 10 missions. Pilots who survived the first 10 missions actually survived to 100 mission tours and then came home, safe. So the idea was to put the pilots in a peacetime situation that closely replicated aerial combat, wartime combat, and get 10 missions under their belt. And so if they actually went to combat, they wouldn't be learning everything from scratch. Realizing you can't learn everything in peacetime. The idea here is try to give them a flavor. And so we've been doing that up here for the last couple of years. Again, in this airspace complex here.

So again, what you have is this building block approach, and realize, it's kind of like a football team where guys ... he can know all about the game, but he's still got to do the blocking and tackling (UNINTELLIGIBLE). So even though he may be involved in doing the major flying exercises, he still has to go back and do one-on-ones and two-on-tuos throughout his career. Okay. So the basics ... it's all tied together and we continue to do all that type of training year round.

Now how do we do that. We need airspace. Okay. We've had airspace for a long time in Alaska. Prior to 1976, the Air Force in Alaska, as well as the rest of the United States, could train anywhere it wanted. There were no charted areas to confine

the military. And so they would just take off and it might vary from day-to-day, take off at Elmendorf and they might train here one day, then over here one day and over here. The Federal Aviation Administration, in 1976, said enough of that. People don't know where you are, so we're gonna tell you where you're gonna be. Okay. And what they did, is they looked at the airspace out there and there's a lot of highways in the sky that the commercial aviation, and even the military, was using. And a lot of the areas were between these areas that they put the MOAs. The military operating areas. And they put them there so they wouldn't be in the way of the airways so there wouldn't be any interference between the two systems.

The airspaces that are depicted in green were the ones we created in 1976. And for all intensive purposes, they have not changed since then. But what has changed, is the tasking that Col. Hassan talked about. This was a good array of airspace for the Cold War, as we had our alert forces in Galena and down at King Salmon. These were nearby airspaces that those aircraft could go in and train if they didn't have an active scramble against an old Soviet bomber. Okay. Well, that's all changed. Okay. The three bombing ranges that Col. Hassan talked about are, and this is Fairbanks right here, are these three areas right here. Okay. So a lot of our exercise training, as well as routine training ... the air-to-ground aircraft don't go to the bombing ranges just during exercises, they need to practice their bombing defense everyday. And so that's why they do that.

The blue airspaces are temporary airspaces that we use whenever we activate them for an exercise. What we would like to do is have them charted, because what happens, is when the exercises occur, these airspaces are activated and then there's a "notice to airmen" system which is a teletype thing that the pilots in Alaska are supposed to look at before they go fly, because they're not charted on that, and so that makes the pilots aware of, hopefully aware of where the exercises are ongoing. When the exercises end, those airspaces go away. Okay. So anyway, the airspace proposal that the Air

Force has put to the public, and did last year, was essentially a couple of components. The first one was to change some operating hours and floors of some of the green or permanent airspace on this map.

Focusing out here, the Naknek 1 and 2 area, we had alert aircraft at King Salmon. Last year we pulled those aircraft back to Elmendorf. They're no longer there. They use this airspace on training missions. However, aircraft come out of Elmendorf over here, from the northeast, and they train here day-to-day. Well, the published hours for this airspace, since 1976, has been an 8:00 in the morning to 6:00 at night operation. We don't need 10 hours a day. So what we're cutting the hours back to is a 10:00 in the morning to 3:00 in the afternoon. So it's a 50% reduction in hours.

Up to Galena, same thing. Galena Air Force Station up here, those alert aircraft were brought back to Elmendorf as well. They were the primary users of Galena. The aircraft at Elmendorf do not routinely fly from Elmendorf and do training up here. So use here has gone way down. We want to make this a "notice to airmen" area only. Meaning that if we need it, and the reason why we do need it, is about once every three or four months, once a quarter, the aircraft go out from Elmendorf, both out to Galena and out to King Salmon, to reconstitute the runway out there and set up operation.

Now why do we do that. Well, the world situation, even though the Cold War is over, could change just like that. Okay. And so what we would like to do is make sure that our facilities are prepared to handle reactivation of those bases. And so we have to practice that. So we send men and women out in C-130s, put the aircraft back up on alert and we practice for two or three days. During that time, this airspace would be open and aircraft would fly in there. When the exercise is over, those few days later, the airspace gets closed back down and is returned back to the FAA. There is no hours of operation then.

In Stony, this area here is a special airspace. It has antennas on the ground that were placed out here several years ago. They are used to track aircraft that carry pods under their wing. These are special pods in that it broadcasts all the data of the airplane. Where it is in the area, it's position, the altitude it's flying at, the speed that

it's flying and the heading that it's going. And it's all beamed up off a satellite back down to Elmendorf and it's saved on a video tape. The tape sits and waits in a theater till the pilots fly back home, get on the ground and they go into the theater and they all sit down. And what it does for us, is that we're able to see exactly what all the aircraft did. Not just ... I kinda know what I did with my plane, but what did everyone else do. And who did what to whom first and who, you know, to help you learn. It's a learning tool. And you can look at it from God's eye-view and see the whole airspace and see all the aircraft maneuvering simultaneously or you can actually go into the cockpit of one aircraft and see what he's seeing out front of his plane. And all the data for the speeds and altitudes and how hard he's turning is all in a tabular form on another screen. And you can freeze the tape at any time when someone goes, "well, I'm confused. Stop the tape." You get a lot more learning that way. Anyway, this area here, again, it's the only one presently in the state that has that type of tracking system.

The floor in Stony is 100 feet above ground level. The floor in Stony B is 3,000 feet. Given the value of the airspace, the proposal looks at lowering the floor here to 100 feet above ground. Now, the question is, would we really train at 100 feet. Cause we have other airspaces around the state that are already 100 feet. I've already mentioned Stony A. Yukon 1, in fact, it's the ground. Yukon 2 it's 100 feet. So we have other airspace that's lower. But we've never used that at 100 feet. In fact, the F-15, (UNINTELLIGIBLE) very, very long time. I have never been allowed to train below 500 feet above ground level.

Additionally, we go back to the map here. The Federal Aviation Administration has regulations about flying over towns. Okay. For example, obviously there are several villages in the Stony B area. Just because the floor of the MOA is lowered, particularly where there's airports, the FAA will not let the MOA go down below 1500 feet above ground level. Okay. Because, again, that's a Federal Aviation Administration regulation. So lowering of the floor would not be in association with those particular areas. And the idea here, again, would be to match the two floors. The scoping inputs that we got. There were eight areas that were identified. The major four areas were aviation safety, and we recognized through this area here, through our analysis, that this is a high activity aviation area in the summer for hunting and

fishing, along the Iliamna and the Kuskokwim river area. Additionally, subsistence was a high emphasis item. Wildlife and recreation. Okay. And again, this area here, obviously identified as recreation and subsistence area as well.

COL. HASSAN:

Okay. Now, let's talk about those areas. Let's talk about what impacts we identified in this study which are highlighted, briefly, in those little pamphlets, but are in much more detail in the big one.

In this specific area, we became concerned about noise. Noise effects that could occur to the subsistence hunting, the recreation use and the aviation safety, in this particular area here. And in essence, as Maj. Siler said, clearly along the river here, and the towns, is an area of noise concern. It's also an area of safety concern. Aviation safety. Because a lot of the aircraft fly between the villages and down this way, through, down to Sparrevohn and Lime Village. Additionally, there's a lot of recreation use down on the river here, as it goes south. And what we found, generally is, is that the noise level that comes off of the airplane varies with how high the airplane is. That's probably not real surprising. The lower an airplane is, the louder it sounds to you. What the scientific studies have found in terms of noise effect on animals, is basically that around 85 decibels, which doesn't mean a lot to any of us. I don't really understand what that means either. But 85 is a number that if an animal hears, and it's been done on the large animals, the moose, caribou and also the large birds, the eagles and the Peregrine falcons, less than 85 decibels does not seem to get the animals more than perhaps just noticing the effect. The plane will go by and a moose might look up and look at it and then go back to doing what he's doing. Above that noise level, tends to make them skittish or take off or could potentially, over a long period of time, affect that animal species. So, what we look at is, back to that balance I talked about. If we can know where these areas are, for example, today, let me point out a few examples. Today, we know of areas that, working with the Native groups, working with Alaska Department of Fish & Game, U.S. Fish & Wildlife, we keep track of where the herds have their calving or lambing. In this case, up on the Yukon-Charley we are aware of where a lot of the Peregrine falcon nests are and we draw what we all mitigation boxes. So let's take this one at a time.

Up here in the Yukon-Charley area, we've got these orange lines that are on here. What they stand for is, we've drawn two miles across the river and 2,000 feet above. And we will not fly airplanes inside of those restrictions. Additionally, there are critical times of the year, just like the calving and the lambing down here, where the nesting takes place, where the egg hatching, etc., and those periods, we try to avoid the area totally. Similarly with the caribou, this is a lambing area, these are known calving areas and they change. They change. This is not something that stays the same every year. We keep track of, you know, where they're predicting these things are taking place each year.

So, the mitigation aspect is, if we know areas where there may be significant subsistence hunting take place, which we do, which is over here and we know areas where there's a lot of air traffic, which we've identified around this basin as well, then our idea is, that we would like to work to mitigate any potential effects that we might have with our airplanes. And then the idea would be, we would work with the communities, for example, to restrict overflight, say, down this river where the villages are, to some reasonable altitude above. Today it's 3,000 feet, for example.

Similarly, down the river here. We can draw those two-mile zones and put floors above those where we will not go below.

Additionally, during the prime subsistence hunting periods, since we cover such a large area up on the other side of the state, we have just agreed that during the period through the end of August, through the middle of September, we will not conduct any exercises during that period, for the basic early subsistence hunting that takes place. But all of those things have come about in negotiation with the local folks. And that's what we're about here. Is to do the same thing. So, we've identified some potential impacts in there. Again, in the areas of safety, subsistence and recreation in this general area. And if there's any others that we need to be aware of, we'd sure like to know.

But the bottom line for us is, again, we're here to hopefully carry on a long-term dialog. Not just to, you know, come in and go out. We'd like to have a commitment or make a commitment with you to monitor, you know, set up a program, monitor that program over time and make sure that we're not having any negative

effects. Because that's what we're about. We don't want that to happen.

MAJ. SITER:

Sir, if I could add one thing. When I discussed about the overall airspace picture here, one thing I neglected to talk about is on page 6 of the Executive Summary, gives a chart that talks about the air operations averages for these military operating areas. And you'll note for the Stony B area, that in today's flying environment, we average about nine sorties a day here. Monday through Friday. And that's an historical average. Okay. Under the proposed action, because again, I talked about how, because of the bombing ranges and more focus on air-to-ground, here's a case where, again, the restructure is dealing with handling of redistribution of training around the state. Here's a case where activity in the west will decrease and activity in the east will increase slightly. Okay. It's around a 25% decrease for Stony B and about a 20% decrease for Stony A. Okay.

COL. HASSAN:

What that translates to is if, Susan and I talked about this earlier. I mean you'll probably go with a period and not see any planes around here and then you'll go with a period and you'll see a bunch of days in a row. When he says today, on an average of nine, that's the average that happened, you know. You may see none and then you may see several days with a bunch. So it's an average of nine. But our proposal, if accepted, reduces the amount of flights that you'll see over here. So the average will go from nine to about seven. So that average will go down and that will be associating over time. So the total amount of flying that will occur in your area, after this proposal is, if it's accepted, would actually decrease in total.

So let me turn it back over to Col. Heupel.

COL. HEUPEL:

Let me ask whether anyone has any questions in terms of what's been presented and try to take it one step at a time.

Does anybody have any questions they'd like to ask?

Sir, if I could go with you first.

JESSE ANDREAHOFF, SR.:

I would like (UNINTELLIGIBLE) how high do you go, three thousand feet?

MAJ. SITER:

The floor of this area B is 3,000 feet above the ground.

JESSE:

How about on A?

MAJ. SITER:

Stony A, the floor is 100 feet above the ground.

JESSE:

I just got a call not too long ago that there were some windows that popped out.

MAJ. SITER:

At Stony River, sir. Yes.

JESSE:

Right there in the Village.

MAJ. SITER:

We have a team from Elmendorf going out there either, I think tomorrow or the next day, to handle that, sir, yes.

JESSE:

They're going to be a lot of complaints up there.

MAJ. SITER:

Yes sir.

Yeah. We had the pilot who lost--what we call situational awareness. It's the fighter pilot ... we are flying in a fast moving aircraft, we've got a lot of things going on in the airplane, the foremost thing in your mind is to make sure you know where you are and how high you're flying and how fast you're flying and that was an instance where we had a pilot who accidentally did not keep his awareness very high. And obviously, the Wing is going out to Stony River to talk straight with the people and settle claims and to, hopefully, apologize for what has happened out there.

COL. HASSAN:

There's no excuse for that. He made a mistake, he'll pay. He'll likely get in some serious trouble for that. We're not perfect, but there's no excuse. I mean, you know, we make some mistakes, you know. We fly, about, if you figure take off and landings in the State of Alaska, with all of the kinds of the airplanes, it's between 20 and 30,000 a year. To put it in perspective, we make some mistakes. So maybe on 4 or 5 or whatever, number of flights a year, some guy screws up, but we try to deal with it and the Wing Commander, as Major Siter said, is sending folks personally out there to deal with that. I mean, it doesn't make it better, it just is that we don't like that to happen.

MAJ. SITER:

And one thing what I mentioned, I mentioned early in the briefing, I don't know if you were in the room yet at that time sir. Although floor of a military operating area may be 100 feet--and we have several already, we've had them since 1976, at 100 feet--I mentioned Stony A has that floor, we have Yukon 1 that the floor is actually the ground and then Yukon 2 the floor is 100 feet--we don't train at that altitude. We train 500 feet or higher. Okay. Because that's as low as we need to train in peace time. Okay. And like I said before, I've got over 3,000 hours of flying in the Air Force. I've never been trained, or allowed to train, below 500 feet. And when we train at low altitude, the definition of low altitude training for the military, is training that's done between 5,000 feet above ground level and below. I.e., to that 500 foot floor. How much of my total training do I spend there? Well below 20%. So 80% of my training is really, really high. Okay. And there's technical reasons why, but low altitude training is done so that we can evade radars. In the modern era, if you're trying to get to a target, your air-to-ground aircraft, the higher you fly, the easier it is for somebody to see with a sensor. Whether it be a radar beam or some other sensing device out there and so we have to train, part of our time, at low altitude. We don't need to train all the time down there. Just enough so that we're safe and we won't do anything, you know, to lose our situational awareness by not being able to train, you know, a little bit at low altitude.

COL. HEUPEL:

Sir, you had a question.

ANDREW:

Yeah. How about these little aircraft going back and forth steady around here. I seen a couple, three jets about three or four days ago coming down. They just went over that hill over there. I didn't think they were even at 500 feet.

MAJ. SITER:

Aircraft, if they're fast moving aircraft and they're in Stony B, below 3,000 feet above ground level, I know it's hard to say, is an aircraft at 3,000 feet above ground level or is he below the military operating area, 2,000 feet. What we would like you to do is call us. And we've put in an 800 service this year, so that anyone can call and give us a heads-up, that they saw aircraft that they don't think they were supposed to be where they were supposed to be and then what we do, is we do an investigation. Okay. And what we can do, is take your information and go to the Wings and find out what aircraft were scheduled in these airspace and look at their tapes. Remember, I told you about ... we have certain recording devices. One of them is actually on board the aircraft and films parameters in the airplane. We can freeze those tapes and look at them and do a full investigation. The key for the public to help us is to try to call as soon as possible. And we recognize that a lot of times you're out subsistence hunting, you don't have a phone. It may take several days for you to call. Do not let that discourage yourself from not making the call. I would still make the call, but try to make it as soon as you can. All we need to know is the location, the day and the time. Nice extra information is the number of aircraft that you see. Okay. But realize, if you don't know ... I heard something, but I don't know what kind of airplane it is, I would still go ahead and call. If you think that because the effect that you heard was an aircraft that may or may not have been where it was supposed to be, we want to know about it. Particularly because it's a two-fold reason. If we've got somebody who's made a mistake out there, we want it corrected so that they won't do it again. Additionally, if the person was doing something that was right, we may not know there's an effect out there that maybe we can fix through mitigation.

The mitigation list has not been developed because of this project, but rather it's been done over years and years. We have 38 points around the state that we mitigate. Some for animals, some for people. Okay. For many different reasons. Your input may actually influence that list. Because again, we're trying to find that balance. The balance ... just because we find it on this project, may change in the future. And that's why we want to continue to monitor and we want the 800 number service to help us keep that balance.

COL. HASSAN:

You got the...?

COL. HEUPEL:

Yeah. The number is 1-800-538-6647. That phone number rings in Major Peck's office here. He's the public affairs officer for 11th Air Force. I'm told that he's only got two people in the office, so sometimes it'll be an answering machine. But he'll get back to you. If you just leave your name and phone number and some of the information, he'll get back to you.

Now does anybody else, or do either of you gentlemen have any more questions. We'll stay and answer the questions as long as people have got questions and then if anybody has any comments they want to make, I'll take the comments or statements people have.

Anybody else have any more questions?

COL. HASSAN:

One thing that we wanted to make clear too, is, we extended the written ... we've got forms here, that if you think of something later on or you have somebody else in town that would like to say something, we'll take those written comments till 30 November and they're equal. Written comments are equal to any comments that you make on the tape. So it's ...

COL. HEUPEL:

And that includes the people up at Stony River.

This comment period is for everybody. And this is the 15th location. We've been to, well, we started out in Anchorage and Fairbanks and Circle Hot Springs and Eagle. And then I came on the team and we've been to Tok and Delta Junction and

Glennallen and Talkeetna, Fort Yukon, Chalkyitsik, Venetie, Arctic Village, McGrath, Lime Village, and Sleetmule. So we've gotten ... tried to get around a good part of Alaska to try to cover all the different areas where people might have some effect. Either where they live or where they might be hunting, doing their subsistence or their recreation. Trying to make sure that we're able to get comments from people and to find out, are there some things that we're missing. Are there some subsistence ... we were talking earlier tonight in terms of some calving areas. The question was asked whether we were aware of some calving areas in the Stony, B area, I guess it actually was. And that's the kind of thing that we also need to know. If there are some ... whether it be calving, environmental, adverse problems, we need to know about it in order to make this decision making process better.

Sir, did you have another question?

JESSE:

Yeah. Like if you're going on Stony, Stony A, you'd be out in Stony B, too, huh? On that same training, right there, or you just go on just A and B, separate.

MAJ. SITER:

When they're scheduled, they're normally scheduled together.

JESSE:

All together. Right there.

MAJ. SITER:

So, when I've flown out to Stony, I usually get assigned Stony A and Stony B. Okay. Realizing, again, the floors are different and I have to comply with both of those different floors. But I can't ... realize, the reason why airspace is broken apart a little bit, you see that they're made into segments, is that sometimes traffic is vectored through by the Federal Aviation Administration and what it is, for example, if I was in Sto-Naknek is where it happens a lot. There's an airwave, sometimes high altitude jet traffic from Asia is brought over the top and it will sometimes cap, what we call cap and say stay at or below 30,000 feet, we've got an airliner coming through. And they'll maybe stay low until the jetliner gets through and they'll give us a higher altitude. Well, if this was all one big piece of airspace with no other borders, when they cap one part of the airspace, they've got to cap the whole thing. So that's why

sometimes it's broken into pieces. So they don't have to cap the whole thing when only part of it's affected. That's a Federal Aviation Administration way of handling the interaction between military operating areas and other transition traffic. Whether it be jelliners or other types of aviation.

COL. HEUPEL:

You said what you're normally assigned, it would be Stony A and B. Would you train in both A and B?

MAJ. SITER:

Yes.

Realize now, one of the things that when we were in scoping last year, I brought a slide presentation that we showed to the public and we've actually showed you a video tape. The video tape, if you remember, had circles around the bases. What that was, is see, all the planes have different levels of fuel. It's just like any other aircraft that comes out here and flies out here. It can only go so far. Well, the F-15s that fly out of Elmendorf can fly in an area that ... I mean it reaches all the MOA. Okay. But, because fuel is precious to us, it's just like anything else. Whether you're delivering mail or whatever, you don't want to waste fuel. So the tendency has been, what I do is when I've used (UNINTELLIGIBLE) myself and I'll speak for the F-15 committee, we tend to use the area over here more because it's wider and it's closer to Elmendorf. I don't have to ... it would cost me more fuel to come out here and train, than here. Also, the airspace is wider here. It's a lot less likely to fly out of the airspace. Like we talked about before, I don't want to make mistakes. I fly out of the airspace, now I've got the Federal Aviation Administration on my case. Okay. And that's not good. And so the tendency for most training is to do it over here. For economy, as well as, I'll say, safety or staying within the rules. Okay.

COL. HEUPEL:

We need to stop for just a moment to change the tape.

(END SIDE ONE, TAPE ONE)

(BEGINNING SIDE TWO, TAPE ONE)

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JESSE:

Okay, another thing on these villages. Like if you're gonna go in Stony A and Stony B, you're gonna do your training on that, like these villages should know before you guys come out I think that'd be better. You think?

MAJ. SITER:

I don't know if we have a way of doing that, but one of the things that we would look at, and we are looking at, is having higher altitudes over the villages. Okay. What we would do is take a look at creating "keep away" zones. Remember, we don't just do it for animals, we do it for people, too.

For example, we had a problem in the Yukon 2 area and the reason is, that the Central/Circle Hot Springs area, right in the middle of the area, remember I talked about forming on two teams. Two teams, one team starts here, one team starts here. Guess where they meet. Central/Circle Hot Springs area. So there was a lot of sonic booms. All high altitude, but sometimes the sonic boom, even though it's done high altitude, can still reach the ground. And so what we did is, we did a no supersonic operations for a 10-mile radius around those two towns so that the sonic booms would not reach those towns. And we did that back in August and when we showed up at Circle Hot Springs for one of those 15 meetings the judge talked about, they said we haven't heard anything. Okay. And so, we will entertain that if that's a problem in this area. I think that because of where you're located, that you're not in a central location like you are here in this type of airspace, again, where there's supersonic operations. But if there is a problem, that's why, again, we want to know about it. We'd like to take a look at it analysis-wise so that if we have to mitigate it, we can do that. But the bottom line is, the balance, again, it's a daily thing. Okay. Into the future. We'd like to stick with you all with the 800 number service and interact with you so that if we had to do that, we would entertain it.

COL. HEUPEL:

Any other questions?

Yes sir.

NELSON OOKA:

Could you kind of elaborate a little bit more about the sonic booms that you

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guys talked about? How high would a person hear it from? How far away would a person hear it? Take, for example, I taught in Stony last year and there was a lot of times that that sonic boom would scare me. I mean literally scare me. And I guess you guys fly a lot closer to Stony than you do here in Sleethmute. According to the map.

MAJ. SITER:

Yes sir. You're right. Exactly. Because again, as I pointed out, we tend to fly closer here, i.e., on the eastern side of the Stony River, than over here. And so there is a tendency for more sonic-supersonic events to occur here. Supersonic events are, should usually last within a few seconds to a few minutes as far as going fast. Why do aircraft go fast? There's two reasons. One's an offensive reason, one's a defensive reason. I'll talk the offense first. The air-to-air guys that carry the simulated air-to-air missiles, the faster you go and the higher you go, the further the missile will travel. Realizing in this airspace no one ever shoots a live missile. Nothing comes off the plane. It's all done by computer and the missiles time out and we do our training and we look at tapes when we get on the ground. Okay. Nothing comes off the airplane. But, the distance is that the computer calculates for when you can actually make the decision to shoot the missile, again simulated, it's all predicated on how high and fast you are. So if I am going against another airplane who can go supersonic, can fly high and fast, and wants to shoot me, it's kind of like a jousting match with men on horses with poles. They guy who's highest and fastest is going to win. And the guy who is lower and slower is going to lose. Okay. So tendency is for the ... and we're talking 30, 35, 40,000 feet is where these aircraft are, to try to accentuate the distance that the missiles can travel. Will that footprint, or that sonic wave from the airplane reach the ground? That depends. The higher you are, the less likely it is to reach the ground. But, a lot of it is dependent upon the atmosphere. The temperature of the air, the humidity of the air allows the wave to transmit through the air further if it's colder and usually if there's more humidity. It's kind of like a wave in the water. You throw a stone out and the wave goes out. But over time and distance, the wave dissipates. The same thing for the airplane. For example, you might do the same supersonic event on one day when the temperature's a certain level and the humidity's

at a certain level and at 15,000 feet the wave doesn't reach the ground. Then another day you're at 20,000 feet, but the atmosphere is different and that wave reaches the ground. I'm not saying there's no science here, it's just there's a lot of variables that the pilot doesn't have any control over. Okay. He is not aware that, necessarily, one altitude versus the other, the sonic boom is gonna reach the ground.

NELSON OOKA:

No general key, then.

MAJ. SITER:

No.

But again, the idea here is that we don't do low altitude supersonic events on purpose, because there is no, usually no tactical advantage gained by the pilot to do it at lower altitude. The gain is done at high altitude.

Another reason for going fast, I mentioned the offensive reason is the defensive reason. If I'm very high and fast and things aren't going my way, I can leave a fight a lot faster, being high and fast. Okay. Then I can being lower and slower. In trying to get away.

COL. HASSAN:

The wave comes off the nose of the airplane. So again, the rock analogy, you know, you go down to the river, you throw ... the point where the rock hits, is the point of the plane. So as the plane goes faster, as soon as it goes faster than sound, it's like the rock hits the water and the wave goes off the front of the airplane. So a guy who's pointed this way, the wave's gonna travel this way. A guy who's pointed this way, then the wave's gonna travel to the ground and be more intense. But also, the temperature and all those other conditions play into it.

Supersonic events. I guess the thing that I want to leave with you besides what the guy who does it said, from a practical standpoint, when you go supersonic, you're pushing that gas up and it's just like gunning a motor and that gas is emptying out of those tanks real fast. So it's not something, I mean, just from a common sense standpoint, these guys aren't out there gunning these things just to, you know, go fast and "boom", make sonic events, because they don't hear them. They don't have any sensation that they've gone past ... other than the speedometer goes past 1.0, which is

mach. When it gets to 1.01, he's now going faster than the speed of sound. He hears nothing, he feels nothing. So there's no thrill or sensation, and, he's using gas real fast. So if he's gonna do it, he better know what he's doing, because then he's got to pull back real quick. So it's just ... there's a lot of mystique, you know. Lots of folks who hear and think that these guys are out there just, you know, like a motorcycle gang terrorizing the neighborhood or something and that's not what they're doing.

NELSON OOKA:

I was just wondering, you know, just for, you know, they could possibly, you know, five miles away, if you could just move it five miles away from the village, would that change anything? I don't know.

MAJOR PECK:

Change their frequency.

COL. HASSAN:

Yeah. Everything that you do, the generalization is, the higher you go, the less you'll hear. I mean it's just ... the higher you go, regardless of the atmosphere, that wave is just gonna eventually burn out. Okay. So, higher is good and distance is good. So yes, generalizing, if you said, like we did, over Circle/Central Hot Springs, we said 35,000 feet. You will not go supersonic below 35,000, you got to be 35,000 or higher. They don't hear anything. So, higher is good and we did a 10-mile radius. So they're not hearing anything.

COL. HEUPEL:

You're indicating you were teaching at Stony River.

NELSON OOKA:

Correct.

COL. HASSAN:

Yeah.

COL. HEUPEL:

At the school there. And how frequently were you hearing the ... ?

NELSON OOKA:

Well, sometimes several times a day. And, you know, you can feel the building shake. The whole building would shake, and I would be scared in the sense

well, I don't know what's happening, you know. Be afraid. And sometimes I would feel my heart skip and I'm wondering about these older people in the village, you know. I mean like Nick (UNINTELLIGIBLE), you know, I mean. But maybe he's used to it, I don't know. But you know, it happens.

COL. HEUPEL:

Sometimes it's like a gunshot.

NELSON OOKA:

Exactly. It shakes the whole building and it, you know, it's ...

COL. HASSAN:

Well, it's a wave. It's a rock hitting the water and it's just going through just like if you were standing on the boat and a boat goes by and a wave hits your boat, you're gonna feel it. So that's what it is. It's an actual wave that, if done in the wrong way, can blow out a window. I mean it can be strong enough to do that. Now that's obviously not what we want and I think that's a good ... I mean, we've got that and we'll go back and take a look at, is there a way that we could perhaps move those activities a little bit further away to lower that effect.

MAJ. SITER:

The floor for supersonic operations around the state, because the supersonic areas are Stony, Susitna, and Yukon 2 here, is 5,000 feet above the ground or 10,000 feet above mean sea level. Whichever number is higher for that given terrain and

again, so again, the idea ... I just want to make sure that everyone understands that we're not doing supersonic events at below 5,000 feet. But that doesn't mean that you would not have an effect and obviously you're pointing those out to us.

COL. HASSAN:

Yeah. I think that's good. That's good information and we'll take that.

COL. HEUPEL:

Does anybody else have any questions?

SUSAN HUBBARD:

Yes. I want to clarify a point we were talking about earlier when we were talking about identifying where those cabins are up river. What's the process of going

through that and kind of making a limit around those or a clarification?

COL. HASSAN:

I think you basically ... I've got it here ... why don't you just describe this general area here.

SUSAN HUBBARD:

It's about seven miles south of the mouth of the Holitna-Hoholtna and it's a big bend.

COL. HASSAN:

I can—I see that on the map here, so I know what you're talking about. So that's ... we can measure that out.

COL. HEUPEL:

About how far does that area stretch?

SUSAN HUBBARD:

Well, there's, what? Three people that live up there full-time. It's just a couple of air miles. It's not gonna be very much air miles.

COL. HEUPEL:

Now you were also mentioning some calving areas.

SUSAN HUBBARD:

Not calving. I was asking earlier about the marten. If you'd had any research on the marten with that delayed implantation.

COL. HASSAN:

The trapping.

SUSAN HUBBARD:

Yeah.

COL. HASSAN:

And my ... just for the record, my response was that we had looked at ... when we were up in Fort Yukon and Chalkyitsik, we talked with a guy up there who has a 40-mile trap line. One of the longest ones on the Black River. And he's been trapping marten, red fox, lynx, otter, mink, beaver. He's got everything. And he's been up there forever. He's 57 years old and we've been flying up in that area and, in

fact, we were in there and saw his wares and he has seen no effect. And we've been flying in that area. Now that doesn't mean that we're not having effect, but that's simply what Susan and I talked about earlier. We haven't seen negative, you know, bad effects on the little animals because of our flying. What we had been concerned about is, you know, not to ignore the traffic, but the subsistence of the, you know, the moose and the caribou and the, of course, we don't think we affect the fish. Hopefully your friends on the other side of the fence do more to those guys than we do. We don't mess with the fish. So anyway, we've looked at the bigger animals and that's what I discussed earlier, that we think that keeping the noise level down around, not only the sensitive times, the calving and the lambing, but also keeping the noise down in general, away from them, just doesn't spook them, doesn't get them off their habit, doesn't put them in a situation. One of the things we looked at was what could happen to moose is, particularly if you get them startled and riled, they might run and put themselves in a predatory situation where they now are exposed to wolves or whatever, that they might not have been if they had been aware of what was going on. So we've been concerned about that, too.

COL. HEUPEL:

Any other questions?

Yes sir.

Let me see if I can move this back just a just a yeah, thank you.

??:

How 'bout if you're turning? That makes quite a bit of noise, too. If you're turning too fast, right?

MAJ. SITER:

What's the effect of the turning of the airplane?

MAJ. SITER:

When you turn, that's one of the things that when you were mentioning about supersonic operations, how long we go ahead and do that. I mentioned earlier about as we're running in and I showed you that we might be at supersonic speed, but when you reach a point where you want to turn, aircraft that are going supersonic can't turn very good. I'm not saying it takes the whole state of Utah to get turned

around, but it might take a turn radius that's probably five times wider than an aircraft who reaches another aircraft and is below supersonic speed. So whenever we're turning, we don't want to be supersonic. 'Cause that's gonna get you shot down in training and obviously, we all want to win. We all want to do well, we want to learn and so when we turn, we're not going supersonic. Okay. If we're attempting to engage another aircraft. Now as far as noise, it's no different than the noise of the aircraft going straight and level. Because it's simply engine noise coming out of either the inlet of the engine, the front part of the engine or the exhaust section of the engine. Okay. And so turning doesn't really affect that. Obviously the noise would be in a circle as opposed to a straight line. But it wouldn't be any louder and again, that would be altitude. Depending upon how much noise would reach the ground. As we mentioned earlier, the 3,000 foot above ground level being a key altitude if we're above that, not having effect of startle effect on larger animals.

COL. HASSAN:

One of the things that we talked about Stony having the, telemet--you know, like the TV camera kind of thing and it sends the information back. The real reason we have to have that is because fighter pilots lie. They never lose. If you talk to a fighter pilot and he comes back from a practice, he won. And the guy next to him says no, I won. The guy next to him says no. They all won. So we gotta have the pictures to prove no, no, no, no. This guy lost today.

Of course, he didn't like to lose either.

COL. HEUPEL:

Any other questions?

Does anybody have any comments or statements that they want to make as far as the public hearing goes? Because if you do, you're welcome to do that. It doesn't have to be formal or fancy or anything like that. But if you have any concerns or any comments that you want to make, you're welcome to make them at this time. Or you can send them in to us. If you want to do that, that's fine, too.

NICK:

Did I hear that you're gonna have Stony A and B to 100 feet?

COL. HASSAN:

We've assessed that...

MAJ. SITER:

Yes sir. That's an environmental assessment altitude. I mentioned earlier that the pilots in Alaska, and throughout the United States, we train at 500 feet or higher, predominantly. Okay. I've been flying for a very, very, long time and never been allowed to train below 500 feet above the ground. So realize the floor, okay, essentially, that way we know what the impact is. Realize, also, it drives more conservative estimations of impact in terms of ... even though we have no intention of flying at 100 feet, we have identified impacts at that altitude. Even though we're gonna fly at a higher altitude. So again, that's a conservative estimation. Okay. So the bottom line is, we're not flying at 100 feet, to answer your question.

COL. HEUPEL:

That's being done to match what Stony A is, is that right?

MAJ. SITER:

Yes sir.

COL. HASSAN:

And part of what we were saying here tonight is, we really—first of all, regardless of mitigation, the FAA says we could not fly down the river here below 1500 feet. And then what we've discussed tonight is, is to look at perhaps even higher. Three thousand feet makes sense. That's what we need to talk with you guys.

ANDREW:

The higher the better, you know. Sometime they come pretty low around here. I (UNINTELLIGIBLE) the other day. I didn't know what the hell happened up there. They were run out of their houses. Everybody was outdoors. Some of them without shoes. Something, something ... earthquake.

COL. HEUPEL:

Jet aircraft.

ANDREW:

Yeah. Three of 'em. I didn't even put on my shoes and I run out. But I didn't see nothing. Just the noise. I think it would be better, like in villages, keep 'em up.

COL. HEUPEL:

And that's one of the things about the 1-800 number that we were talking about earlier, too. If you have that happen, go ahead and call.

ANDREW:

Yeah. We like to see jet plane once in a while, but not that close.

COL. HASSAN:

Okay. Well, we know how to be good neighbors with you. Just don't make him run out without his shoes on. Nobody likes that.

ANDREW:

I like to see 'em once in a while, you know. They're good. But when they get down too low, it's tough on everybody.

COL. HASSAN:

Okay, we appreciate that.

COL. HEUPEL:

Anybody else have anything?

Well, we want to thank you very much for coming out tonight and for your questions and for listening and if you do have some comments after you have, perhaps, more time to look through this or to talk to other people about it, if you do have some comments that you want to make, please send them in to us, you know. It is your opportunity to have input into the process. And that's why, you know, the Air Force has paid for all of us to come and for me to come from the "lower 48", because we want to make sure that you have the opportunity, as the public, to comment on this and to have it put into the process. So that's why we're here.

So thank you very much and hope you have a good evening and I hope you have a good winter.

CERTIFICATION PAGE

I, Diane A. Beaulieu, do certify that this transcript is an accurate record of the proceedings as recorded.

Dated: 11/3/94
 Subscribed and sworn to
 before me this 3rd day
 of NOVEMBER, 1994.

Sandra M. Davis
 Notary Public
 My Commission Expires: 8-1-97

Diane A. Beaulieu

Addendum:

The tape and transcript of the Sleetmute MOA DEIS hearing were reviewed beginning with the questions and comments given by Mr. Jesse Andreahoff, Sr., and continuing through the end of the hearing. Corrections were made accordingly to the electronic (disk) and hard copy versions.

Karen McKibbin
 Spectrum Sciences and Software, Inc.
 November 30, 1994

ALASKA MILITARY OPERATIONS AREA
 PUBLIC HEARING

EAGLE, ALASKA
 SEPTEMBER 21, 1994

COL. MIKE MCSHANE:

There's a spiel I have to run through for the record, so I'll go ahead and do that. Welcome to the public hearing on the Draft Environmental Impact Statement for the Alaska military operations area. Thanks for coming tonight. I do solicit your comments and involvement in tonight's hearing. If you have not had an opportunity to review the draft statement, it will be summarized in just a few moments.

I'm Colonel Mike McShane and I do serve as the presiding officer for this public hearing. I am a military judge for the Air Force assigned at Randolph Air Force Base in Texas. I have not had any involvement in the development of the draft EIS and I am not here as any type of official adviser to anyone concerning this proposal. My role is limited to simply insuring that we have a fair, orderly hearing and that all who wish to be heard have a chance to speak.

I do need to introduce tonight's briefers. Col. Rich Hassan is from the 611th ASG down at Elmendorf Air Force Base, down in Anchorage. He will give you an overview of the environmental impact process and then later talk about mitigation action. Maj. Bob Siler will talk about the proposal and issues raised during the scoping process. And Mr. Bill Ham, from Spectrum Sciences, will describe the environmental consequences of the proposed action.

I do need to explain the public hearing process and the procedures that we will follow this evening. The Air Force has prepared a Draft Environmental Impact Statement, this large document here, in accordance with the National Environmental Policy Act and the Air Force implementing regulations. The purpose of the hearing is to summarize, for you, the results of the draft EIS and receive your comments on the draft statement.

Tonight's hearing will be in two parts. During the first part, the briefers will present information to you concerning an environmental impact analysis process

performed for the Alaska military operations areas. This briefing takes about 45 minutes and is required by law. The second part of the hearing is the public participation portion where you will have the opportunity to comment on the Draft Environmental Impact Statement.

This hearing is intended to provide a public forum for (UNINTELLIGIBLE) about the draft EIS with a view to improving the decision making process. Your inputs provide the decision makers with the benefit of your knowledge of the local area and any adverse environmental effect that you think may result from the proposed action or the alternatives to the action.

Keep in mind this hearing is not a debate nor is it a referendum, it's not a vote on the actions that have been analyzed in the draft EIS. The focus of the hearing is on the environmental impacts associated with the proposals being stated by the Air Force. Comments on non-environmental issues, such as national defense policies, should not be raised at this hearing. They do not add anything to the record and take away from your opportunity to comment on the draft statement.

When you came in tonight you were asked to indicate if you wished to speak. After the presentation by the briefers, I will call on anybody who wants to speak or to ask clarifying questions or both. If we have any elected public officials show up, we do allow them to go first. If you brought a prepared statement with you, you can read it out loud or just leave it with us and it will be attached to and become part of the record. If you don't want to make an oral statement tonight, but would like to provide your input, you can do so in writing, either tonight or anytime up to and including the 31st of October, '94. Oral comments and written comments are given equal consideration. And even if you do provide statements tonight, you can provide a supplemental statement up to the 31st of October. There will be an address on the materials that are available here that you can send that to and it will be up later on the slide, on the screen behind me. This is your opportunity to provide the Air Force with any information you have regarding environmental factors that are unknown to the Air Force and to have an input into the decision that the Air Force must make with regard to the proposed actions or the alternative actions.

Col. Hassan will now describe the environmental impact analysis process.

COL. HASSAN:

Hi. I recognize some of the faces from last year. (UNINTELLIGIBLE). And what we'd like to do is spend a few minutes here tonight and really, the intent of my presentation is to sort of bring you up to where we are. We were here last year and we went to 14 other locations around the state collecting comments, heard issues, concerns the folks had, including federal agencies and state agencies, about our specific proposal. And we had promised, at that time, to come back to all of the locations, regardless of the size and participation on the initial scoping, in order that we could then bring you back and hopefully show you that we had incorporated many of the issues, or all of the issues and comments that were addressed to us during the scoping process.

I'll give you a quick over-view of what all of this is about in terms of the National Environmental Policy Act. And then we'll talk about the proposal itself and how it specifically may or may not affect this area. And then we'll talk some of the environmental impacts or potential environmental impacts that were raised within our analysis.

Again, we'd like to stress several important points that were ... issues that came up during the scoping phase so that we all understand what it is we are doing and what it is we aren't doing.

First of all and foremost, that this is a proposal. And that is, we came forth last year and said this is what we would like to do. We were then given a bunch of issues and comments. We made some adjustments to that proposal. We added some alternatives to that proposal. And then, still, even though we are now a year later, we're still a year late from any decision. So there's plenty of time to continue to raise issues if there are more to be considered (UNINTELLIGIBLE).

The other important factor is, that this proposal itself does not indicate any potential increase or affect any potential increase in flying. The overall flying that's done in the State of Alaska. It is basically an adjustment of the airspace that we presently use within the State of Alaska to more effectively meet our training needs. And I'll talk about that a little bit further on.

The concept of military operations areas, which is what this proposal is all about. Military operations areas themselves are not meant, in any way, to exclude the public's right and access to airspace and it has nothing to do with the land. But it has everything to do with the air that we are allowed to train in. One of the misnomers that came out or misunderstandings that came out of the scoping process, were many of the civil aviators have been misunderstanding that a military operations area is like a fence and they can't fly through it. And that's not the case at all. The public has right and access to that airspace even when military training is going on in that airspace.

And finally, we hope that over time, folks begin to get a better feeling toward that we really are concerned and interested in what everybody has to say. So your input and your ideas are critical to make this proposal a reality if it's going to become one.

Basically, I have alluded to some of this and that is, why are we adjusting the airspace that we presently use in this state. And the reason is, is that the focus of the Alaska-based forces, throughout the Cold War, was basically air-to-air, air intercepts to protect the State of Alaska, the United States, from any foreign intervention. Since the end of the Cold War, the tasking for the Alaska based forces is now that they must be prepared to pick up and fly to places, hot spots, in the world. Many of them today, Korea, the Middle East, continue to remain concerns to the United States. As such, we have aircraft in the state whose mission is not air-to-air, but air-to-ground. And so, with that, we need to, more effectively, structure our airspace to allow that training to get accomplished as best as we can.

Improving flight safety is a concept where we have both military operations areas, which were created in 1976, and we have some temporary military operations areas, of which just north of here is a temporary military operation area, that gets activated only when we do major flying exercises. That temporary military operations airspace is not charted on maps because it is temporary in nature. We feel that if we can convert that to permanent military operations areas, that is, areas that we have access to, we can improve flight safety so that civil aviators know that we, from time to time, come into this area to train.

Additionally, saving tax dollars is associated directly with that. We have to apply for that temporary airspace repeatedly. And in that process, we spend tax dollars to do that. If we assess it and it is assessed in this document, one time, we feel like we can avoid that repeated cost to ask for the same airspace for the same reasons over time.

Of course, it's very important to us, again, to have an Environmental Impact Statement process. Up front, public participation. Which is what we've been involved in for a year in (UNINTELLIGIBLE).

And finally, as we draw the forces down in the United States Air Force and in the military itself, we've got fewer numbers of airplanes and so it's critical that we have those airplanes in places where we can deploy to anywhere in the world and Alaska provides a unique opportunity where our forces can deploy either to Europe or to the Far East equally as quickly. And the amount of forces that we have here in Alaska are basically the size that we're going to have, based on the future projections for the size of the military. So Alaska is a very, very important strategic location to the military and these forces need to train and we need this airspace we're gonna be training in. And now, what we'd like to do, is to seek a balance between the training that we have to accomplish and be sensitive to any potential impact that it may have on people or animals or the environment.

The process itself is a very orderly process that we are following. It started with scoping, which was a year ago. We took the issues and comments, we put them into a draft document here, that's the Draft Environmental Impact Statement, it took about a year to do that. We are back, now, to allow folks to see what we did and to further comment on that. That will then lead to another, about six to eight month period, where we will go back and refine the analysis, if it's necessary, do a new analysis if that's necessary, address any further issues that you feel were not adequately addressed in this document. At the end of that process, you will see that again and then we would look to have the decision makers in the Air Force make a decision on whether to proceed with this proposal or one of the alternatives about this time next year.

That rather awesome looking document there is ... well, about four or five inches thick, is really broken down into four distinct pieces. The first piece is the purpose and the why we need this airspace. Why we need the training. The second is, what is it that we're actually asking to do, including alternatives. The third part is, where does this affect throughout the state. And lastly is, the fourth part is, what impacts have we identified as potentially happening because of our actions.

Here's all the places that we're going, where we were last year and this is when we're doing it. It started on Monday night in Anchorage, we're here tonight and we'll go through the 12th of October. And as Col. McShane said, we'll have through the 31st of October, for folks, if they need more time, they need more clarification, they can provide written comments. Written comments are equally considered as any oral presentations or comments that are made. And they are all treated as part of the record. That's why we started off here rather formally. We don't want you to feel threatened by that. It's basically because this is an on-record and everything that is discussed will be included as part of a record that you can see.

What I'd like Maj. Siter to do now, is take you basically through the proposals itself so, again, you can orient yourself on what we're asking to do here. And then to highlight some of the major issues that were identified in scoping.

MAJ. SITER:

Col. Hassan alluded earlier about change. And that's the main reason we're here tonight is dealing with change. When you're looking at airspace structures and attempting to deal with looking at the reasonable alternatives for change, you have to start with certain structures you already have in place.

Probably one of the most critical ones is our location of our air bases. Both at Elmendorf in Anchorage and Eielson in the Fairbanks area. These are our two main bases in the state and they were created in the Second World War.

Additionally, our bombing ranges. We have three of them. They are all located in the southeast area, southeast of Fairbanks. Again, co-located in a fairly close area. Those were also created during the Second World War.

How far your aircraft can travel is based on the fuel capacity and it varies between the aircraft. And what it is, for example, I'll talk with the F-15C model here, aircraft based at Elmendorf. It's the distance they can go out to a military operating area to effect a training (UNINTELLIGIBLE) back to Elmendorf with a safe level of fuel. The other three aircraft, the Strike Eagle, the F-15 (UNINTELLIGIBLE) models, the OA-10s and the F-16 (UNINTELLIGIBLE) models, are all those air-to-ground aircraft that Col. Hassan said are now in the state and they need those bombing ranges to train. So not only do they take off from their home base and maybe go out to a military operating area, they also, almost 90% of the time, go to one of these three bombing ranges before they return home. And it establishes a relationship of what type of area do they need or what range they have to do those ... both of those types of events. Go into MOAs, go to the bombing range and fly a military training or both. Those type of things.

The civil airways that the FAA created in the 1930s and '40s throughout the United States were also (UNINTELLIGIBLE) in Alaska. And those highways in the sky, if you will, are important in their location that when the military operating areas were created in 1976, and they're here depicted in the green, in these green areas, they're located, to the extent possible, away from the airway structure so as to minimize interference between those two systems. What it provided for the military in Alaska over the nearly 20 years, is a good dispersement of airspace around the state. We all know that living in Alaska, that the weather in southwest Alaska can vary dramatically from the weather you might find in the interior. It gives the military a lot of good flexibility, particularly in the wintertime dealing with adverse weather, so that we can continue to train day-to-day like we need to. Now what it also allows us, an ability to disperse air operations activity so that we're not concentrating all our flying in one area of the state.

Temporary military operating areas are depicted here in blue. However, since 1976, we've used temporary operating areas throughout the state for various different types of exercises with different purposes and we've used these areas as well for exercises. Of particular note here is, that we try to locate these temporary MOAs away from those highways in the sky, those airways. Again, just to minimize interference.

The proposal. The first component of the proposal is to assess the environmental impact of making some changes and modifying the existing permanent MOAs. I'll start from southwest Alaska and work in a clockwise fashion. The first airspace is the Naknek 1 and Naknek 2 airspace. For decades, we've had alert aircraft located at King Salmon, which is right here. Those aircraft were brought back to Elmendorf. What has happened to the Naknek airspace is the amount of use has gone down. We, however, still access Naknek with our F-15 force out of Elmendorf day-to-day and do routine training out there. But numbers have decreased. What we're proposing in this action is to decrease the number of hours from a 10-hour day operation, down to a 5-hour a day operation. A 50% reduction.

Stony airspace located here. Stony A and Stony B. This is the only airspace in Alaska that's presently instrumented with electronic telemetry tracking. What we do, is we put pods on the aircraft that broadcast the altitude, heading, air speed, position of the aircraft through a satellite linked back to Elmendorf, to a theater where it's all video taped. The crews all fly the mission and when they're done, they go back, they land and they go into this theater and they watch the film. What do they see. They can see very different perspectives of the battle that they can't see in their own cockpit or see from their video tapes at the front of their airplane. God's eye-view of the whole battle, views from different cockpits, simultaneous pictures, parameters. The learning is accentuated to a very high degree. To the point where this is one of the most valuable airspaces in the state in terms of its ability for our pilots to learn and to improve. At the present time the floor of Stony A and B here, is 100 feet above ground level. But the floor of B, to the west, is 3,000 feet above level. Given the value of this airspace, our proposal is to lower the floor here to 100 feet above ground level.

Galena airspace in the interior also had alert aircraft in association with its use of the MOA. Galena Air Force Station located about right here, those alert aircraft, also last year, have been moved back to Elmendorf. Since Galena is not used as much, day-to-day, from Elmendorf for flying, its use has gone down quite a bit. To the point where we don't need regularly scheduled hours for that military operating area. And what we are going to do in the proposal is make it a "notice to airmen"

airspace. Meaning that when we need it, under limited circumstances, we contact the FAA, tell them the number of days that we need it and then they activate it so that the civilian pilots know that we'll be out there during those days and times.

Why do we go out there. The reason why we go out there, is every once in a while we want to reconstitute the bases out at both King and Galena to make sure that the runways are adequate. The support facilities are out there, adequate ... if we had to put aircraft on alert again, for whatever contingency, we'd have the ability to do it.

Again, once the exercise is over, the airspace is closed down. Again, it's returned to the FAA. The last area is Yukon 1. At the present time, the floor of Yukon 1 is literally the ground. We don't train at that altitude or anywhere near that altitude. Our proposal is to match the floor of Yukon 1 with Yukon 2. Which is 100 feet above ground level. So here's an instance where the floor is rising.

The second component is conversion of existing temporary MOAs to permanent MOAs. Again, what this would do, is would chart my maps and again, serve as an additional safety advisory for civil aviators flying in the area. The airspaces that we're gonna focus on are in three groups. This group here, obviously with Eagle located right here, Yukon 3, 4 and 5. Number 5 is (UNINTELLIGIBLE) sized airspace to conduct major flying exercises. The dilemma, if you try to accomplish a major flying exercise in just a permanent airspace alone, is that the number of aircraft we use in exercises, we try to replicate it to the best of our ability in peacetime, actual aerial combat requires a larger area. The equivalent of taking a football team and putting them on a basketball court and running your scrimmage to get ready for Saturday's game. It's our belief that you've got to have the right spacing between the various aircraft out there to truly learn the correct lessons and make sure you're not doing things that are gonna get you in trouble in the future.

Also, by having this airspace day-to-day, we don't have to focus and concentrate all of our activities day-to-day in this limited airspace. We would be allowed to disperse our activity so that we're not, again, concentrating all our activity in one location.

A second area is down here, called Fox MOA. And it's important in that when I show you the map with the circles from each of the bases, a circle around Eielson and a circle around Elmendorf, this is the only area in the entire State of Alaska that can be reached by both bases without aerial refueling. And as such, it's the one place that aircraft from Elmendorf could take off, meet aircraft taking out at Eielson and fight against each other. One of the drawbacks for Alaskan units is they have a tendency to have to fight against each other. F-15s vs. F-16s or F-16s vs. F-16s. It's unrealistic training that you're always trying to get the similar type of aircraft. Obviously, potential adversaries out in the world are flying different aircraft. The lessons that we've learned are we need to be able to train against different types of aircraft to learn what our advantages of our aircraft are versus others.

Additionally, if I can take off out of Elmendorf in an F-15, get out to Fox MOA and have F-16s or A-10s get out as well, get on the same team, practice protecting those F-16s in my F-15, I've learned how they communicate, are there special terminologies that they use, how do they plan their missions, what are their strengths and weaknesses. And he's learning the same thing from me. If we don't do that in peacetime, we'll find out about it later in combat and probably after some losses. So we want to lay the groundwork in our building block approach in learning and learn together.

The third component is this middle component. We call these the connecting MOAs and I expand the picture here. Here are those three and only three, bombing ranges here depicted in gray. Here's the green permanent airspace, as we're allowed to train in day-to-day and then these connecting MOAs here in blue.

At the present time, aircraft that are training with the intent of going to the bombing ranges, which is the primary focus of our training today, aircraft reach the southern border of Yukon and they cannot continue on to this tactical bombing range, that (UNINTELLIGIBLE) bombing range. They reach the border here and they have to stop their training, climb up, get some coordination done with the FAA and then they go to the bombing range at a much higher altitude. Imagine if you will, in a real combat situation, as you're approaching the target, you suddenly climb up, say here I am, you're not gonna do that. So it's a lot of negative training for our pilots. We want

to correct that by providing subsonic corridors ... again, look at the sizes of the airspace. Not near the size of these maneuvering MOAs here, in that these are not intended for aircraft to turn and engage each other, but rather strictly to, in a subsonic manner, get from here to there and then also to leave out of and get back to the permanent airspace. Again, this transition.

The proposal also assesses two new permanent MOAs. They are very small and they are in the immediate Eielson Air Force Base area. The first is Falcon MOA drawn here and then Clear Creek MOA here. I kind of superimposed or hash lined Yukon 1 (UNINTELLIGIBLE) permanent airspace exists today. What it permits, is aircraft to come through the MOA, to the Falcon MOA and reach Eielson Air Force Base in a safe manner. And why would we want to do that. Part of exercising Air Force units is not just the pilots, but rather it's the whole unit. The maintenance people, the medical people, civil engineers that repair runways. It's a whole team thing. So part of that is defending your air base, as well as reacting and handling airfield damage and casualties. And so it's all integrated together to perform a (UNINTELLIGIBLE) exercise. 'Cause they deploy just like the pilots do overseas. So this helps our readiness requirement.

The Clear Creek MOA provides an avenue for the aircraft to transition through the MOA and reach one of the three, and only three, bombing ranges (UNINTELLIGIBLE).

Authorize supersonic operations in five MOAs. The Air Force presently has authorized supersonic operations in Stony, Susitna and Yukon 2. In this proposal, it looks at supersonic operations in Fox, Yukon 1, 3, 4 and 5. They are set at or above 5,000 feet at present. Note, all the other areas I said that are authorized for supersonic, they are also at or above 5,000 feet. When we go supersonic, we normally do it just for a few seconds and upwards to a few minutes. What altitudes do we normally do it at. At very high altitudes. The faster and higher I go, the further air-to-air missiles that I might fire out of an F-15 or an F-16 can travel. So if I'm trying to attack an opposing aircraft, if I can get higher and faster than him, I will get the first shot off at him. That's very critical in terms of gaining the offensive advantage over another force.

Additionally, if I see an aircraft coming high and fast at me, if I am lower and slower, if I can't get up to him and match his parameters, I probably need to leave and react defensively. So the bottom line is, it's an offensive tactic as well as a defensive tactic.

Additionally, another reason for going high and fast is, if I need to leave a fight, that's the fastest way to get separation to leave a bad situation. So again, it's normally done at higher altitudes.

Conduct joint-combined training. Joint training is a training that we do with the Army, the Navy and the Marines. And our combined training is the training we do with our Allies. Such as the British who have come to Alaska and done some training. Training ... the Canadians come to Alaska, as well as America going to England, going to Canada, going to Australia and doing training with them as well, in their country. Now we have made investments in terms of operating together during these exercises. It's paid huge dividends when we formed a coalition Air Force during Desert Storm. Minimal time to get the coalition Air Force formed together and to operate effectively, with minimal coordination problems and practice (UNINTELLIGIBLE) killing our own aircraft. Friendly kills and that kind of thing, because of the investment we made for over 10 years. We think that's the wave of the future also. That's the way we believe we will operate. So we want to continue to train that way.

Conduct up to six major flying exercises per year. We're presently authorized to do six. We did three this year. We did four last year. Four was the maximum done in any year so far. We're proposed for three Cope Thunders next year. Again, this is valuable training for our young pilots. Those who go through this type of training have a better potential to survive a potential conflict. We learned that the hard way in Viet Nam where most of our losses were in the first 10 missions. We make the investment now, in peacetime, given some more kind of combat seasoning in a simulated environment, pays big dividends in initial losses in a conflict.

As a result of the scoping sessions we had around the state, some alternatives were offered. One of them was Alternative A. We put elimination of the Clear Creek MOA. Again, this is the MOA that are butted up against the Blair Lakes

(UNINTELLIGIBLE) and allowed access to the northeast quadrant into the bombing range. This particular bombing range, of the three bombing ranges in the state, is unique in that it is called a controlled range. There are two categories, controlled and tactical.

The controlled range is kind of a beginners' range. You can get on the range. It doesn't really matter which direction you get on, once you get in the range, you get on the racetrack pattern. You fly in a controlled pattern in a prescribed fashion with the idea of just practicing doing deliveries. Just to practice a bomb delivery.

A tactical range is you'd like to be able to come in from different avenues, different directions on a given day and attack like you would in combat. Be unpredictable. To be flexible. And so avenues of access are pretty important. You want to have some good choice.

So this is a controlled range. We don't necessarily need to be able to come in from every different direction. Therefore, we would like to take a look at do we really need this in (UNINTELLIGIBLE) and we've isolated it by this alternative.

A second alternative is looking at the place in Yukon 5, which is up here, it's up here in the proposal, and Yukon 4 here and replacing it with the Tanana MOA which is depicted right here. Eagle is right over here and here is the town of Tok, just outside of this airspace. It abuts up against the southern border of Yukon 3 right here, the southeast border of Buffalo and the eastern border of Fox. This, unlike the connecting MOAs here, which are transition MOAs, this is (UNINTELLIGIBLE) maneuvering MOA. Okay. And like these areas, these MOAs up here are proposed. And so we are assessing that equally in terms of its ability to meet our training need and its environmental impact.

This alternative B has, obviously, a larger portions of new airspace. The Tanana MOA, as well as an addition to the airspace in the proposed action.

Supersonic operations are assessed for Tanana because in the replacement of 4 and 5, these areas were also being assessed for supersonic operations.

The scoping issues that were identified by you, as well as the agencies, state and federal, are as follows on this list. The top item, airspace management and aviation safety was the number one identified issue around the state. However, wildlife,

recreation and subsistence were also topics that received significant numbers of input.

What I'll do now is turn it back over to Col. Hassan for the (UNINTELLIGIBLE).

COL. HASSAN:

All of these proposals carry with them some potential impact and so that's what I would like to focus in on now. And first, to start with, I would like to describe a little terminology to help you as you continue to review the documents and we'll show you this particular area and those things that we identified.

The first definition here is cumulative impacts. And what we did was, we know that we aren't the only activity that occurs in any of these given areas. So the analysis looks at a sum of all the different activities that go on within an area. So that when you look at what a potential impact could be, it's not just a jet flying around, if there are other things going on and you add that up and so the total effect is everything else that happens while you may be flying. So we looked at what's called cumulative impacts that way.

Additionally, we looked at any indirect effect that our activity may have caused. If we had things going here, would that necessarily affect something outside of those military operations areas. So those are indirect effects.

The base line that we looked at is today's statement, today's condition. How we fly today. Additionally, we even looked at standard methodologies of assessing impacts. The most precise way of measuring impacts is with noise. We've got lots of various studies that exist within, not only the Air Force, but within the other federal agencies, within the academic communities and we were able to utilize known kinds of noise effects. And so those you'll see reflected in there and they're referenced in the document.

On some of the other areas, like subsistence and wildlife and recreation, for example, many of the methodologies had to be developed. They were developed, again, in consultation with some of the other federal agencies, (UNINTELLIGIBLE) specifically. They were also developed during peer review with academic committees as well, to conduct some noise studies or to conduct some subsistence studies out here, to see how the birds may be affected, to see how nesting habitats may be affected.

So we developed those. We have got some feedback that says we probably were a little conservative in that. But that's the approach that we took. We would rather look at what we can envision as a possible worst impact as opposed to something that we may have subjected (UNINTELLIGIBLE). So that was something developed over time with other groups.

In each of these categories, and we'll get into them right now, you'll see Level I, Level II and Level III. Our definition of Level I is basically no impact or negligible impact. Level II is usually associated with a seasonal impact. That is, for example, in recreation. In the State of Alaska, predominantly starting in the month of June, through the month of September, is where most recreational activities occur. What you may find as an effect, say, in the Fortymile area in the middle of July would not be the same as you would find in the middle of February, because the number of people recreating is going to be significantly different. Similarly, in the wildlife area. When sheep lambing season, caribou calving season, specific times, bird migrations, those are seasonal effects. However, we recognize that there could be effects during those times and therefore, we would assign Level II in those particular areas.

Level III is where we have found, over time, repeated activity with aircraft may significantly alter either a wildlife habitat, may significantly alter a state of pristine recreation or wilderness experience. And those are kinds of Level III impacts reported most significant.

Out of the list that Maj. Siter showed you, we found potential Level II and III impacts in these four areas. So I'd like Mr. Ham, now, to show you a representative sample of what that might mean in this particular area.

BILL HAM:

As Col. Hassan told you that there ... in the four areas, airspace, recreational, wildlife and subsistence is where we saw the main potential for Level II and III impact.

In the airspace, in this particular region in the Yukon 3, in the southern, predominantly the southern portion of Yukon 4. You all in Eagle being in approximately this area. The high amount, potentially larger amounts of non-participating or civil air traffic predominantly during those summer months, the late

May, early June, into the September time frame. A lot of places that people would be going in here, near the Fortymile area or up into the Yukon-Charley area, a lot of undocumented landing locations and the potential now, with the lower MOA here versus the 3,000 foot MOA that you currently have, the (UNINTELLIGIBLE) MOA that you have above here today, we assess that at a Level II impact predominantly because of a large amount of uncontrolled airspace out here.

Several of the animal species were assessed at a Level III. Predominantly, it didn't affect this area, the Delta caribou herd which is predominately down in this region north of the Alaska Range. Being a herd, it's in the low numbers and decreasing.

Out in this area, your caribou are in a little better shape and they were assessed at a Level II impact.

Moose. The winter ranging areas on the moose are right in the edge of the Eagle area here and they were also assessed at a Level II. There were no Level III impacts identified for the moose calving area.

Recreation was another one that showed up high on the analysis for both Level II and Level III impacts. What we have here for Level III down in the lower portion of Yukon 3, the extensive Fortymile system. Also a Level II impact along the Taylor Highway, some of the campgrounds and the activities along that highway. And also pushing up all the way into the southern portion of Yukon 4, the whole entire Yukon-Charley systems were assessed at Level III impacts. To the Wild and Scenic River and the (UNINTELLIGIBLE).

Three communities in this area rely on subsistence. Eagle, Eagle Village and Chicken. Eagle Village was assessed at a Level III impact. A high Native population. A very high sensitivity to the subsistence lifestyle. The other two communities were assessed at Level II. That's all I got. Any questions?

22:

We can talk about it.

COL. HASSAN:

I just got a couple more (UNINTELLIGIBLE).

23:

Yenh.

COL. HASSAN:

Well, now that we've identified some impacts, what we'd like to talk about is how do we deal with that. Because, obviously, we have a responsibility to work not only with you, but with all of the agencies and see if there is a way to mitigate and that's the concept that we talked about. Mitigation is simply, we have a training requirement to satisfy and we also understand that the impacts can be potentially unbearable. So therefore, we look for some balance. And that is, we can do that in many different ways. For example, today, in place, we've got a noise sensitive list. And basically what that is, is we have known areas where either human habitats feel like there's too much noise generated by our aircraft, we have ... and therefore, what we do is we put "keep out" zones around those particular areas. Recently we have imposed, up in the Circle Hot Spring area, a 10-mile radius circle up to 35,000 feet where we will not conduct any supersonic operations. We also work with individual homeowners and log cabins that may be out in the wilderness and have exclusion zones where we draw circles on maps for pilots to avoid those areas. We work with the U.S. Fish & Wildlife on the Yukon-Charley River. We work with those folks and have 2,000 foot floors where we will not fly below that and two-mile "keep out" zones either side of the river. We work with the Alaska Fish & Game folks in terms of trying to keep track of where the course of the migration (UNINTELLIGIBLE) each year and moves a little bit, but where the critical sheep, lambing areas and calving areas are. We stay away from those areas during the critical times of the year. And hopefully, you get the idea that in consultation with both state and federal agencies, as well as the public, we mitigate today and we would hope, that with your cooperation in finding out where sensitive areas are that may be different from what we've defined here, we can mitigate those as well. And that's our intention. Just a representative sample there.

One other concept that I wanted to talk about, is while we are assessing the environmental impact of flying airplanes at 100 feet, we do not fly airplanes at 100 feet in Alaska nor anywhere else. The airplanes that we have are, the lowest that they are allowed to fly are 500 feet. And in addition to that, they cannot fly at 500 feet over these kinds exclusion zones. So, for example, I talked about the Yukon-Charley

area up here where the Peregrine falcons are, this would be a two-mile area here and a 2,000 foot over flight. So even if a pilot was flying at 500 feet, he would have to climb to avoid the river area and could not continue to fly 500 feet (UNINTELLIGIBLE) over that area.

Now one other point about low level flying. For all of our pilots, low level flying, if you took 100% of their time, of their training time, only roughly 20% of their time would be at low level. The majority of their time is spent training at higher levels.

And in sum, we hope over time, that we can continue to work with you, but we are committed, from the Air Force perspective, to try and achieve that balance. We understand our responsibility, we take it seriously. However, it's only with your cooperation and assistance will we be able to get any sort of balance in place.

So with that, I'll turn it over to Col. McShane. But we'll be more than happy to discuss it and answer any question that you have.

COL. MCSHANE:

Okay. We'll now move on to the public comment portion of the hearing. If you do wish to speak, but haven't signed up to do so, you can just let me know if you desire to talk. Don't be shy or hesitant about making a statement. I do want to insure that everyone who desires to speak will have a fair chance to be heard. We are recording this because we're required to record any comments made by the public and we have a recording machine.

Do you need to have the people go over by the microphone?

BRIAN HOEFLE:

I might be able to stretch them over here if that would suit you folks better.

COL. HASSAN:

If they want to make statement, they can do it there. But if they just want to ask questions ...

COL. MCSHANE:

They still need to be recorded.

COL. HASSAN:

Okay.

BRIAN HOEFLE:

Let me just run the cord over this way a little further.

COL. MCSHANE:

I think with our relatively small attendance here, I don't think I need to worry about giving you the ground rules I would normally do. Let me just ask, nobody signed up ... of the folks who are here, nobody signed up to speak. Is there anybody who has changed their mind and would like to make some comments tonight on the proposal.

DENNIS KNUCKLES:

I just have some questions regarding some of the stuff I've read and ...

COL. MCSHANE:

You're Mr. Knuckles.

DENNIS KNUCKLES:

Right. Yeah. My name's Dennis Knuckles and I live here in Eagle, as well as working with the National Park Service and general aviation pilot, agency pilot. And in terms of reading, you know, I got this kinda late and kinda dove through it the last couple nights and I noticed some ... well, some discrepancies. There are some things that I need some clarification on and unfortunately, you know, as I kinda poured through it I didn't necessarily put the stickies in the right spots. But through the course of what we've covered here tonight, yeah, I have some questions.

Twofold. I guess the one that kind of rings true here, I was wondering how we had the Level III impact on Eagle Village. Well, I guess on a racial bias, we're only two miles apart, we live similar lifestyles, some of them are better subsidized than we are here, you know, in terms of socio-economic factors and they're ...

BILL HAM:

There are three main factors, sir and I see your point. One of them was the percentage of the Native population that was involved. The percentage of the subsistence area that was under the MOA for the two of you is essentially the same. They're in the same area. And the third was essentially the economic situation. For example, like in Chicken where you've got a mine, you have a lot of people who are gonna be working. That type of thing. So, yeah, that would be the main discriminator

there would be the amount of Native population that were more dependent on the ... potentially more dependent on the subsistence lifestyle. Again, that's the methodology that was developed for this EIS. If there's a better way to do it you know we'll be glad to think about some suggestions or to look at suggestions if you can think of something.

DENNIS KNUCKLES:

Well, I just ... I think, I mean, we live similar lifestyles and ...

BILL HAM:

Would you say that you're both just as dependent on the subsistence lifestyle to put food in for the winter and ...

DENNIS KNUCKLES:

Yeah. Yeah. I'd say so. If you looked at the number of pickups cruising for moose, it's an equal deal.

BILL HAM:

That was the main discriminator in your all case. Would be the percentage of Native population and to determine the sensitivity realm.

DENNIS KNUCKLES:

Right. Yeah.

COL. HASSAN:

But we can take that.

BILL HAM:

Yeah, we can take that on as an action.

DENNIS KNUCKLES:

Yeah. I think it deserves a little more. In fact, I mean, you would ...

BILL HAM:

You're probably hunting ...

DENNIS KNUCKLES:

Yeah. If I were to yell that out the door, you guys would maybe get out with your scalp. Yeah, that's a pretty sensitive issue. You know, to divide it on that line.

The other question I had and I guess this is regarding an incident we had with flares in '91, June of '91. And in reading through the document here, I guess the

current policy is that flares will not be dispensed lower than 5,000 feet AGL and with the assurance that that allows for three-second drop time or after extinguished.

BILL HAM:

There's different altitudes depending on the fire seasons, sir, and the fire index conditions. And it can vary. In the summer, you know, that's the worst case. When it's hot and dry out here. And the higher altitudes would be imposed. And at other times of the year the potential ... even though the approved altitudes they have are two and three times above the minimum Air Force altitude and I can't ...

COL. HASSAN:

Which we have imposed here, locally and in the State of Alaska.

BILL HAM:

Self-imposed here, and I can remember exactly, is it 2500 feet? I can't remember, I'd have to look it up, but the 5,000 foot is in the summer in the very dry period. Other altitudes may apply in the winter or other seasons of the year.

DENNIS KNUCKLES:

Right. I think you need ... I don't know how well you've looked at what the green-up or when the fire season occurs here, but it starts fairly early.

BILL HAM:

Part of it is in consultation with the Fire Service and on their determination of fire indexes and some of that and I think that's one of the letters we actually have in the appendices back there about the procedures involved in determining these fire indexes and what you can and can't do during those fire index periods.

COL. HASSAN:

Since you brought ... I mean, you were one of the guys who brought that up last year.

DENNIS KNUCKLES:

Right.

COL. HASSAN:

We went ahead and since last summer, since last fall, entered into a cooperative agreement with BLM. Not only in terms of how we would react or interface with them during an actual fire, but that in consultation with them to become more in

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tuned in real time with when they're assessing the various fire dangers. And then we have imposed, in the State of Alaska, is it two or three times higher than the Air Force.

MAJ SITER:

It's between two and three. (UNINTELLIGIBLE).

COL. HASSAN:

Okay. We took the Air Force standard, which is you can ...

MAJ SITER:

Still safely have a flare burn out and then double, literally double, triple that altitude ...

COL. HASSAN:

And we literally doubled it in the State of Alaska based on the concern that we heard here. I guess nobody could ever say never. But we feel pretty comfortable that we are well beyond what the Air Force says is safe.

DENNIS KNUCKLES:

Yeah. I guess, you know, that's the assumption that No. 1) that the pilot, you know, who is training as he fights and fights as he trains, doesn't decide that, "Jeeze, I'm at 2,000 feet AGL, I'm locked on, my instinct would be to discharge this thing. Oop! I can't do that because I'm too low at this point." I mean, the real time, and not having been, I mean ... hell, I have enough time transitioning between 185s and Super Cubs, but to move up into a mach situation where this thing is happening real fast and you have these restrictions, I mean, it literally hamstring you guys. I can see that. And yet, from a reality standpoint, you know, shit happens. And to the extent that we can minimize the potential for an accidental discharge low during the high fire indices. And here again, it depends on, I don't know how hot these things are when they hit, whether they hit, you know, find fuel underneath or whether they land in something, you know, talus or scree or you know, there's just a lot of variables and ...

BILL HAM:

And that's why they've imposed these altitudes that are much higher. Even in the best case, they're still much higher than the Air Force minimum altitudes for these things.

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COL. HASSAN:

Yeah, I mean, I guess in some ... and there is one other thing we do and that is, at the, I'll be ignorant, I don't know what the levels are. I mean, I don't know what BLM terminology is, you know, 1 through 10 or whatever it is. But, at some point of significance, we have agreed to just not even do it.

DENNIS KNUCKLES:

Okay.

COL. HASSAN:

So we will just not, say, we don't even load them in the airplanes.

DENNIS KNUCKLES:

Yeah. Okay. I mean if it's tied to the fire indices or something like that.

COL. HASSAN:

Well, it is tied to it. I'm just ignorant on what that exactly is. I'm sorry. I don't know the term, but we have tied it to the fire indices and that's why I was saying we had the real-time-now interface with the BLM guys.

DENNIS KNUCKLES:

Okay. And one of the other concerns I brought up at the scoping meeting and from an agency standpoint, something I'd like to be able to do is, I'd like some real time input. I guess a day before, I'd like to be able to plan my management operations around your period. You know, your hot activities within the MOA and right, I mean, I tried running that through my agency who had contacts and it just kinda fell flat and I just didn't pursue it. But I guess I'd like to reiterate the fact that, you know, if I can call air ops at Eielson the day before and find out that, yeah, we're gonna schedule, you know, a major fight exercise between 12:00 and 2:00 or, you know, 9:00 and 11:00, then I can fly my wolves at 500 feet, you know, radio tracking before and after or late in the evening or something like that.

COL. HASSAN:

We already have a two-fold approach on that. Do you want to talk?

MAJ SITER:

Yes, sir.

HAZ-009

AIR-007

The fact that you'd like to be able to coordinate with the scheduling agencies, we can do that and that's easy. We can give you the schedule. One thing to realize, particularly in Alaska with weather changes, schedules are flexible and they adjust. A good thing, though, is when people are working in consultation with the FAA, is to provide real time, radar and communications exchange between civilian pilots and military pilots through a new radar system that we put in place and I brought these for your view. Particularly for the pilots, and uh ...

DENNIS KNUCKLES:

Yeah. I think that Yeah, that limited primarily there along the Alcan. 'Cause I work primarily farther over in ...

MAJ SITER:

One of the drawbacks for you out this far in Eagle is that the radar coverage does not reach out to Eagle below 2,000 feet. It does cover higher altitudes. But what it does do is provide information to the military pilot on military activity out here and if you're in radio range, you can get airborne and get high enough that you can probably get at least a radio report and get some real time information on what's going on in the entire MOA complex and then you can adjust your mission or make decisions on what you'd like to do for your mission.

DENNIS KNUCKLES:

See, I need to do that the day before.

COL. HASSAN:

Right.

MAJ SITER:

Right. But what I'm saying is also an addition to that, you can also get some real time information if things change.

COL. HASSAN:

Just in case.

MAJ SITER:

Because ...

DENNIS KNUCKLES:

I've raised range control on my way to and from Fairbanks.

MAJ SITER:

They are the control agency for the services.

DENNIS KNUCKLES:

Right. And it's like well, you've got four F-16s somewhere out in MOA 2. And it's like ...

COL. HASSAN:

I don't want to ... go ahead.

DENNIS KNUCKLES:

Okay. But, I mean, it's just, Okay. Yeah. I kinda figured that. And granted, there's no ATC control ... I mean there's no relative ... "Well, hey, they're over in the northeast corner."

MAJ SITER:

It's not positive control yet. It's an advisory service.

DENNIS KNUCKLES:

Yeah. It's not a positive control. It's not a matter of ... right ...

COL. HASSAN:

I don't want to speak for the agency.

BRIAN HOFFLER:

You need to talk one at a time. I'm having a hard time getting ... keeping track of all this.

COL. HASSAN:

The rule maker.

DENNIS KNUCKLES:

Yup.

COL. HASSAN:

I don't want to speak for the agencies, but last Thursday, I already referenced the meeting we had. The DOI rep' there, agreed to try to work a coordinated scheduling, long-term scheduling issue, in addition to your particular problem. And we'll work out a number that you can call for what you want. But also, if you know ahead of time that, for example, this summer Park Service was working some hazardous waste disposal stuff and for about ... where was it?

MAJ SITER:

Coal Creek.

DENNIS KNUCKLES:

Coal Creek. Right.

COL. HASSAN:

For about two weeks that they needed to do some continuous ferrying operations. Well, we coordinated that with them. And so what we're trying to set up is a permanent, where BLM, NPS, USF&W, if they have any issues, can go to one point and say "Hey, we know, you know, the first two weeks of October, the first two weeks of July, or whatever it is, we're gonna have this operation going, as well as your real time stuff that you've got to deal with." And then that will focus through these guys back at Elmendorf and we'll work that out. So we'll work as a central clearing house with your folks for any long-term known projected projects, in addition to the daily stuff that you might deal with.

DENNIS KNUCKLES:

Yeah. It just gives me an opportunity ... I mean, I can avoid the time. I can add the flexibility that you guys don't have and I can provide that safety to my people.

COL. HASSAN:

We can deal with that, that's easy. In fact, we'll leave a number with, you know, we'll work with you specifically.

DENNIS KNUCKLES:

Yeah. 'Cause what I've had to do in the past here is call up on the morning and call Anchorage, you know, Center. "Oh, yeah. It's active and it's active during this time." Well, by then ...

MAJ. SITER:

You already know ...

DENNIS KNUCKLES:

Yeah. It's like ... and I know the MOA's hot Monday through Friday, you know, 8:00 to 6:00 or something like that and except on certain weekends.

MAJ SITER:

You see, one of the reasons why they've been giving you that answer for

years, is because they didn't have the low altitude radar picture and so what they do is they assume worse cases ... if they can't see at altitude, there may be aircraft low. They give you the conservative answer which is the MOAs are hot and there could be somebody in there. Now that we have the radar picture out there, trying again, we're trying to tie it all together so that there's more real time, control and real time information on the MOAs so that you can get it from the FAA as well.

DENNIS KNUCKLES:

Yeah. Yeah. That would work out fine. And I just ... I don't know if there's some way you can incorporate, you know, just transponder if that would enhance, you know, the ability for your guys and the 16s and 15s. I mean, granted, I keep mine up, but I don't know what technology is really available to help ...

MAJ. SITER:

We've been encouraging and we've been on RATNET trying to push this service in particular, but more than that, just the fact that we need to operate together. We need to do it wisely. And one of the obvious messages to the civilian pilots we'd like, is them to squawk VFR 1200 whenever they possibly can, 'cause we do have some airborne platforms that can interrogate those type of squawks.

DENNIS KNUCKLES:

Right. Okay.

The other thing I noticed, you can kind of drop Ben Creek. I mean that's a defunct mining strip. But Coal Creek does need to be substituted for that. So in your EIS they, you know, Coal Creek is a public airstrip and it's listed in the airport air directory. But you can drop Ben Creek. Yeah, it's, ... I mean, in essence you're not moving things more than a half mile, but that will be a fairly active area either for commercial, as well as recreational type flights for drop-offs in the future. There will be public use cabins in there that are open to the public and there's more activity, you know, for recreational mining and hunting and those types of things.

BILL HAM:

That's why we've been putting the radius and (UNINTELLIGIBLE).

COL. HASSAN:

The FAA (UNINTELLIGIBLE).

AIR-021

DENNIS KNUCKLES:

Right. Yeah. That's a standard ...

BILL HAM:

Excuse me. That can be written into the description of the MOA as part of an exclusion. Just part of the MOA description.

DENNIS KNUCKLES:

Yeah.

The other question I guess I have, I wonder why the Wild and Scenic River over in the Gulkana area has a higher ceiling than say a similar Wild and Scenic River such as ours here in ...

BILL HAM:

The MOA was proposed at 3,000 feet over there.

DENNIS KNUCKLES:

Okay. I thought I saw 5,000 over certain portions of the Gulkana.

BILL HAM:

There's a temporary exclusion area over certain portions of the Gulkana during the, I think it's the Fourth of July week. That's one of the existing exclusion areas that's in place today...

COL. HASSAN:

The noise sensitive ...

BILL HAM:

And in the Fox MOA. And all those existing exclusion areas carry over to this proposal. And there may be new ones that come out of this proposal. Seasonal type exclusions that may apply at Fortymile or up in the Yukon-Charley, up in the

Yukon corridors. Those are the kind of things that would be worked out between you all and the Air Force.

COL. HASSAN:

And that's what we're, you know, again, like I was telling you earlier, hopefully, you know, when you guys get together and take a look at that, you may want to jot down some, "Hey, we know this part of the Fortymile area is ...

BILL HAM:

Certain tributary or whatever, you know.

COL. HASSAN:

Certain tributaries are more traveled or utilized or whatever. That kind of information would help us focus in on, you know, maybe during periods of time which we don't want to be there, we want to raise the floors or whatever it is.

DENNIS KNUCKLES:

Yeah, cause... Yeah, I was looking in here and you guys had a suggestion in terms of maybe a general floor, you know, like a 3,000 foot AGL. You don't deal with ... it's just like an MSL type value and just say, "Hey, let's keep it" ... I mean the general ground service, say is at 2,000 on average here.

BILL HAM:

It could be defined either way, I think sir. I mean we look at an AGL in terms of noise impacts...

MAJ. SITER:

A lot of it depends upon the type of terrain. A lot of varying terrain, it's easier and more ... particularly if you're talking an effect, impact, is to try to use an AGL where you have a uniform terrain level then an MSL, often times I think it is more simplistic for the pilot.

BILL HAM:

It is, yeah ...

DENNIS KNUCKLES:

Right. Yeah. I was thinking in terms of having, you know, cause my on-the-ground experience there in the Charley drainage in terms of watching, you know, F-15s and 16s and 18s and 14s and Tornados and the like, in terms of them coming down a particular drainage like the Copper and maybe maintaining a thousand or whatever and then trying to hit up and do the thing over the Charley, it just doesn't happen. You blow through. I mean that's what I've seen, visually. It just ... I don't know how your pilots, I mean, at least from my GPS I can say, "Hey, I'm approaching this area." And I don't know how your pilots recognize these abrupt changes.

MAJ. SITER:

A lot of the aircraft have the ability, with radar, altimeter and have the calibration within the cockpit to give them an idea of how far they are away. But you're right, if you're just eye-balling it, with experience you can start to get a good comfortable feel for that, but yes, it's still ... that's an art form, but we do have some signs within the cockpit.

DENNIS KNUCKLES:

And I know your guys that train locally out of Eielson, I mean, they're familiar with the area and yet you get the Brits or over on a Cope Thunder thing and it's going "Woops, I guess we just blew that one," And, ah, ...

COL. HASSAN:

There's that potential.

MAJ. SITER:

Realize though, that when we do host them just because the British have been here for years, doesn't mean that their pilots, a lot of times they have new guys, just like we send new guys, they all go through the same indoctrination with a dedicated staff, Cope Thunder staff, that their sole purpose in Alaska is to be the host. And they have a responsibility to indoctrinate, educate, supervise, I'll say supervising monitor and then enforce the rules. And so they do the whole spectrum of things so that these things, if they do occur, they're detected and they're dealt with appropriately.

DENNIS KNUCKLES:

I just see that, you know, there's more of a chance for visiting pilots (UNINTELLIGIBLE).

COL. HASSAN:

You're right. There is a potential for that. The Brits come once a year for one of the Cope Thunders. So during that period we have learned, frankly, that we've got to be extra ...

DENNIS KNUCKLES:

I mean it doesn't matter. He could be from Texas, I mean, just, maybe just not based out of Elmendorf or Eielson. It doesn't matter what nationality, it's just familiarity with the terrain.

MAJ. SITER:

We have dedicated the assets as well as the focus, to try to deal with that and I think we've gotten better as the years have gone by. That's what we've heard from people who are concerned about our activities in the state and major flying exercises.

DENNIS KNUCKLES:

I guess my other large general concern is and I don't know how to get a feel ... how significant are the conversion of the temporary MOAs, like 3, 4 and 5 to your required training needs? Okay, how important are the major flying exercises versus the routine training? 'Cause what I see is a significant amount of use dispersed ... in other words, you can save the bucks if its just a matter of being able to have the additional space for major flight exercises and incorporating large numbers of aircraft, realism, pilots, life saving type thing versus dispersing, where there is already concentrated use in established 1 and 2, Yukon 1 and 2, and then moving them out into areas that haven't seen this use, plus you throw a supersonic 240 days a year potentially...

COL. HASSAN:

That's good, I mean it's a good question. And the answer, from my perspective is, if you look at the analysis, if you get into it, what we're looking at is, we've assessed it up to six sorties, so you're not really looking at a gray cloud coming in here every day. You're looking at maybe five or six aircraft, potentially, a day, which wouldn't happen in practical matter. I mean even in Yukon 1 and 2 where we have to concentrate our activity today, on a routine basis. We were there last night and the guys in Circle say, you know, we see you up here once a week, twice a week kinda thing. So, I mean, there's no guarantee of anything in life other than we've only assessed it up to about six sorties a day, which in practical terms, would not mean everyday. So for the added advantage of saving the bucks and having a little bit more ability to disperse routine training to 3, 4 and 5, rather than having it all in 1 and 2, you're not looking at a major increase in traffic around here. You'll see some, so your observation's correct, but I don't think you'll see, you know, it's not major flying exercise size and it's not everyday. But we're just trying to take advantage, in

our view, of, you know, while we're saving the bucks, to have this stuff available to us for major flying exercises. On a routine basis, we can, you know, get guys out away from 1 and 2 and I don't think it will be a significant amount. Again, the assessments only says, and this Yukon 3...

BILL HAM:

... we're looking at about six sorties a day...

COL. HASSAN:

... six sorties a day...so we've impacted it based on that. But again, in practical terms, that's not everyday.

DENNIS KNUCKLES:

Yeah.

And the other question. I realize that 20% of your sorties are at 500 feet or give or take ... I guess ...

MAJ. SITER:

What we were trying to say is that if you look at the sum of it now, time that we fly, a pilot flies in a given year. We'll say that about 20% of it involves flying in a low altitude structure below 5,000 feet above ground level. But, in fact, it's not 20% of the sorties. Realize that each sortie you do certain types of activities as we try to get a full spectrum of activity to build a mission. You don't just do one thing on a mission. Like okay, all day today I'm gonna be at low altitude. It's more a combination of things, because if you plan a scenario, it will involve high altitude flying, mid-level flying as well as low altitude flying. So it's not really 20% of all ... 20% of the missions, but rather 20% of the time. That's kind of an upward, upper limit.

DENNIS KNUCKLES:

Okay. And that's anywhere sandwiched between 5,000 AGL and 500?

MAJ. SITER:

The military defines a low altitude structure from at or below 5,000 feet above ground level and we have certain rules we comply with when we're in that region and then there are different rules above that altitude as far as what we can do as far as maneuvering the aircraft. Certain rules, what we call rules of engagement, etc.

COL. HASSAN:

Obviously more conservative below 5,000 feet.

MAJ. SITER:

It's a safety govern. Rules of engagement, regardless of the altitude, whether it's high altitude or low altitude, are safety driven and situational awareness driven so that we do the right things. We've learned the right things and we do it in a safe manner.

DENNIS KNUCKLES:

I guess the other thing is, I was just overwhelmed, I mean, it's not like I ever wanted to become a sound engineer, but, you know, I have attended enough air shows and heard enough afterburners and kick-in and whatnot and, of course, people focus on the sonic booms as a single event. And to me, I guess I'm more concerned about how much jet noise, either subsonic with afterburner, which really isn't really ... I didn't find it addressed ... not that you can quantify, you know, how much time is spent at 120 decibels, you know, just cranking up, kind of reaching supersonic.

BILL HAM:

Back in the appendices sir, we actually have single event metrics in a tabular format in the Appendix—I can't remember—D or E and it's buried back in there. Otherwise, the analysis of the MOAs themselves looked at the average noise, as a monthly average noise metric that's used by the Air Force. But the single event numbers are in there and maybe ... we've had other suggestions that maybe we should pull up some of those into the body of the document and discuss some of them at that point. And we're gonna look at that. Not just bury them back there, but talk about them up further in the document.

DENNIS KNUCKLES:

Yeah, cause I'm sure as you go to these bush communities, I mean these folks ... Let's do the logarithmic, and it's like ya, right.

COL. HASSAN:

Right.

Well, the double-edge ... I mean, you work for the federal agency. The double-edge sword you have is, I mean if it was up to you or me, I think we'd write

066

this in plain English, but we've tried to make it as user friendly as we can, but you've got to address all that stuff according to law and I mean, so you got to do it that way. But on the other hand, that's why we're out here talking, because we found that it's best just to interact and we did ... you know, I really would appreciate if you can work your way through the Executive Summary and give me some feedback on that. 'Cause we really tried to make that as easy as ...

MAJ. SITER:

For the public, we distributed over 700 copies of the Executive Summary for the very points that you've raised because certain populace, that's what they want to see. And then obviously, the full document for the NEPA requirements and anyone who really wants to delve into it. And we've cross-indexed the Executive Summary to the full documents and as you read the Executive Summary, you want to go to the library or you have the full copy, you can very easily interchange between the two.

COL. HASSAN:

It's a challenge.

DENNIS KNUCKLES:

Yeah. Yeah. No doubt.

I guess that's really about it for me. I have to wade through this and probably do some written stuff.

COL. HASSAN:

Well, that's good. I mean we look forward to hearing from you.

DENNIS KNUCKLES:

Yeah. I've got some concerns really about, you know, how do you assess recreational impact, adverse and what-not. I mean, the EIS definitely addresses, you know, it's an individual preference. Each one of us here, you know, would have a different feel for, you know, our tolerances and, you know, whether or not you make it a once in a lifetime trip to float a particular river and you have a multiple event occur that might last longer than just six seconds.

066

COL. HASSAN:

One thing, BLM folks, another BLM input along the way has been to allow them to post, far enough ahead of time, at the beginning of the season, when the major flying exercises are going to occur.

DENNIS KNUCKLES:

Yeah, I'd begin...

COL. HASSAN:

And we're gonna do that.

DENNIS KNUCKLES:

...telling people to avoid those areas.

COL. HASSAN:

I mean, that these things will occur during these three two-week periods. It doesn't stop it, but it certainly gives folks at least an awareness.

DENNIS KNUCKLES:

Yeah, at least they're attuned. It's like yeah, there's a potential for jet noise and we just gotta do it.

COL. HASSAN:

So we're gonna do that. I mean that was their suggestion. And we're gonna incorporate that.

DENNIS KNUCKLES:

That's it for me then.

COL. MCSHANE:

Okay. Thank you.

Anybody else?

Ma'am?

No. Okay.

Sir?

JAN DICK:

One question and then one comment that I had.

You mentioned that ...

BRIAN HOEFLE:

Can you say your name for the record, please?

JAN DICK:

Oh, I'm sorry. I'm Jan Dick. I'm with the National Park Service here in Eagle. Yukon-Charley Rivers.

You mentioned we had ... under the analysis proposal there would only be six major flight exercises per year maximum.

MAJ. SITER:

Up to that number.

JAN DICK:

Has that changed at all? 'Cause I understood that that was the number to begin with.

MAJ. SITER:

That's the current level. We have an environmental assessment that was completed in early 1993, that did assess up to six major flying exercises per year. And those are the present rules we operate under. What I was trying to say is even though we have that maximum level, we've never done more than four, which we did last year. We're doing three this year, three Cope Thunders, and three are scheduled for next year.

JAN DICK:

I see. So the number hasn't changed.

MAJ. SITER:

No sir.

JAN DICK:

And then the one, talking about mitigation. If there would be something that the Air Force could put out, you know, maybe dispense to the BLM and the National Park Service and we can pass them out at our Visitor Center, because we do get some comments, you know, not necessarily even complaints, just a matter of, you know, what's the jet activity and just a little folder that if somebody walks in our Visitor Center, you know, you're likely to run into some military aircraft out there.

MIT-028

COL. HASSAN:

This is what they're doing.

JAN DICK:

And this is what they're doing. Have a nice day. We can mail it to the public.

COL. HASSAN:

And we could put a comment sheet ...

JAN DICK:

Yeah. And I think that would go a long way to educate the people. This intrusion is ...

COL. HASSAN:

We will design a package and, in fact, if you will help me, I'll send you a draft of it and I would like your comments on it.

JAN DICK:

That would be fine.

COL. HASSAN:

You know we can even maybe put on the back page, you know, if you have any comments about it, here's ...

JAN DICK:

You bet.

That's all I had.

MIKE MCSHANE:

Okay.

Anything else at all from anybody?

Okay. I do remind you that you do have until the 31st of October to submit any written materials to be included in your transcript of the hearing and those written statements are fully considered and addressed in the final impact statement. And they do get equal weight with any oral comments.

We do appreciate your efforts to come out tonight and contribute your views to the public hearing. Be assured that the Air Force decision makers will carefully consider your viewpoints and consider them in deciding on the ultimate course of action.

This public hearing is adjourned.

CERTIFICATION PAGE

I, Diane A. Beaulieu, do certify that this transcript is an accurate record of the proceedings as recorded

Dated: 11/4/94

Subscribed and sworn to before me this 4 day of November, 1994.

Sandra V. Madsen
Notary Public
My Commission Expires: 3-1-97

Diane A. Beaulieu

Addendum:

The tape and transcript of the Eagle MOA DEIS hearing were reviewed beginning with the public questions and comments given by Mr. Dennis Knuckles and continuing through the end of the hearing. Corrections were made accordingly to the electronic (disk) and hard copy versions.

Karen McKibbin
Spectrum Sciences and Software, Inc.
November 29, 1994

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF LAND

WALTER J. MOORE, GOVERNOR

ALASKA DEPARTMENT OF NATURAL RESOURCES
DIVISION OF LAND
1000 EAST 14TH AVENUE, SUITE 100
ANCHORAGE, ALASKA 99501-4000
PHONE: (907) 497-2700

November 21, 1994

611 ASQ/LGV
3800 G Street, Suite 203
Birmingham AFB, AK 99506-2150

Dear Sir:

In the future, before sending such a lengthy document, please consider asking us whether we are interested in reviewing the document. With our limited staff, we do not have the time to review this Draft Environmental Impact Statement.

Sincerely,

R. Smith
Roderick Rasmussen Smith

enclosure

November 25, 1994

611 ASU/LGV
5800 G St Ste 203
Elmendorf AFB AK 99506-2150

I would like to offer the following comments in regard to the Draft Environmental Impact Statement Alaska Military Operations Areas:

I have read through the Executive Summary dated September 1994.

This proposed plan to change the MDA areas to reflect increased Air Force control of air space and to handle increase training needs should not be allowed to occur.

I have lived in Alaska since 1969 and hold a private pilot's license. Arctic Village Alaska is my part time home. My background in the upper Yukon area includes spending several thousand hours tracking the Porcupine Caribou herd through its migrations from Alaska to Canada. These air borne studies also included moose counts and a limited amount of study on the reaction of calving animals to man made noise, specifically gas line compressor stations.

The Air Force says, "This action is proposed because the existing MDA structure limits airspace training opportunities and training scenario realism and inhibits the ability of the 11th Air Force units to fully develop their combat capabilities. Over the next decade, the Air Force must channel its resources to areas where the training environment is efficient, flexible and cost effective." I believe the Air Force has a need to training its pilots and air crews however it must do so in a manner consistent with land use and in consideration of other uses of Alaskan airspace. The flexibility must be on the part of the Air force to operate within guidelines not to change them. Cost effectiveness is a relative term and must be balanced with the needs of the people of Alaska who live and use the areas proposed to be changed.

The report says, "The existing MDA structure falls to fully support the Air Force's commitment to conduct MTEs and joint/combined training." The Air Force may not have an ideal situation with the present MDA structure but they should be using more of the "flexibility" they say is needed to operate within the present structure.

The report says, "As a short term solution, a number of Temporary MDAs (TMDAs) were environmentally assessed and negotiated with the FAA and are now established and activated as required for each MTE. However this process requires a minimum of four months lead time to complete - a budgetary and planning concern." I am sure planning other aspects of an MTE is also a time consuming process. If four months is too time consuming, then the Air force needs to look at its planning process and improve it. They can negotiate expedited procedures with the FAA for implementing the TMDAs.

ALT-003

"Use of TMDAs for recurring MTEs also conflicts with the FAA's intended use of this type of airspace-a procedural concern." A procedural concern not warranting the radical solution being proposed. Joint use of airspace under civilian control does work.

ALT-003

"Furthermore, as TMDAs are rarely charted on civilian or DoD aviation charts, public awareness of the airspace and the activities that may occur in it is hampered-a safety concern." Negotiate with the FAA to print Alaska charts with the TMDAs and let the NOTAMS work as they are supposed to, notifying pilots when MTEs are occurring. Making the TMDA's into MDA's affects civilian air transport routing in Alaska and should NOT be allowed to occur.

In discussing the positive aspects of the plan, the Air Force says they, "include raising the floor of the YUKON 1 MDA from the surface to 100 feet above ground level, raising the floor of the YUKON 4 MDA from 2,000 feet above ground level to 3,000 feet above ground level,..." This is reaching for the ridiculous. A jet aircraft flying 500 miles per hour effectively has the same sonic impact at 100 feet AGL as it does lower. The same holds true for the YUKON 4 change. This is NOT a positive aspect.

The negative aspects are even more alarming, making the YUKON 1, YUKON 3, YUKON 4 and YUKON 5 MDA's super-sonic operations down to 5,000 feet above ground level during routine and MTE flying training. "Converting the TMDAs to permanent MDAs would make them available for routine flying training year-around." This is the crux of the problem. The Air Force wants complete control over that airspace to the exclusion of other uses during much of the year. This is simply preposterous and should NOT be allowed to occur.

AIR-008

In discussing the Biological Resources (Sections 3.5 and 4.5), the Air Force defines Level II impacts as "Impacts that may help cause or maintain minor reduction or displacement of local, regional or entire wildlife populations." The Air Force's use to the word "minor" is interesting. They don't define what they mean. It may be minor to the pilots flying the missions but to those people living off the animals it is certainly NOT minor. The Porcupine Caribou herd is an internationally managed herd of over 100,000 animals and it provides subsistence food for most of the villages in the upper Yukon valley as well as Old Crow villages in the northern Yukon Territory. My experience has shown the caribou can be VERY much impacted by high noise levels. Low level 500 mph passes are not insignificant noise levels.

BIO-007

The Level III and Level II impacts on the Recreational areas are listed and apparently felt to be acceptable by the Air Force. The increasing tourism in Alaska is certainly not based upon wilderness experiences marred by sonic booms and low level high speed passes. Again the Air Force should not have unrestricted access to the airspace. They should have to negotiate the MDA use so civilian input can be provided on an ongoing basis.

REC-003

The section called Subsistence Resources (Sections 3.7 and 4.7) is a classic example of a report written by people with NO understanding of the subject. It is interesting that no villages not located directly under an MDA are listed. Ft Yukon, Birch Creek, Canyon Village, Old Crow and Chalkyitsik are conspicuously absent. I guess the Air Force is not aware how far people must go to hunt for food. They also don't seem to understand how changing a migration path can affect other villages like Arctic Village, Venetie or Christian Village in determining whether animals pass near them or not. It is

SUB-005

very evident the Air Force is not competent to write this section of the report.

The Air Force goes to great lengths to "feature" the maximum potential economic input but then downgrades the figures later in a couple of sentences saying a more realistic prediction is 25% of the maximum figure. This is a shameful attempt to misrepresent the impact and reflects on the credibility of the entire report.

Potential Mitigation Measures for the various resources show a bias designed to address concerns of "white" Alaska at the expense of natives and other people living off the land. Mitigation measures are not directly tied to these proposals but are to be left until after the Record of Decision is issued. This is bad policy and should be changed.

PRO-013

Airspace Management, Aircraft Operations and Aviation Safety (Section 4.2) Raising the floor of the YUKON 3 and 4 MOAs during peak use of civilian aircraft June 15 through September 15 does nothing for the safety of air carriers who service the area through the year. This is not positive control airspace there is not radar service available in the Yukon flats except on an emergency basis out of Ft Yukon. Again the Air force should not be given control over this airspace at the expense of others using it.

AIR-007
AIR-008
SAF-005

Biological Resources (Section 4.6) It is significant to note here that the Air Force doesn't mention consulting with native governments on impact. They admit little can be done to eliminate significant impacts except limit times of flights. This is a red flag issue and deserves very close scrutiny.

Recreational Resources (Section 4.6) Identifying a two week period around the fourth of July and the first two weeks of September is an attempt to adjust for the Air Force's apparent thought there is increased "white" Alaskan use of the areas in question again ignoring the fact that natives use the areas year around. A 500 mph high speed pass at 3,000 feet is still significant even if the Air Force tries to down grade its impact.

OTH-014

Once again the Air Force leaves out village governments from the formal liaison list of agencies to be contacted.

Subsistence (Section 4.6) Here the Air Force finally gets around to saying it will consulting with representatives of affected communities. It "graciously" says it will raise the floor of the YUKON 3 MOA during August and September again ignoring the fact that those affected communities use the land year around. It has selected August and September to appease "white" hunting seasons.

Land Use (Section 4.9) Once the Air Force get permanent NCA status there is little incentive to pay much attention to complaints. Trying to identify the tail number of an Air Force jet moving at 500 mph is virtually impossible, so complaints will be rejected.

OTH-011

AIR-017 In the Comparison of Alternatives the Air Force says there is no significant Adverse Impact on Aircraft Operations and Aviation Safety. It never defines what that might be. It does admit there would be adverse impact on interaction with civilian aircraft.

The proposal to change the airspace management to accommodate the Air Force should be rejected. The adverse impacts in all areas discussed in the EIS are significant and should not be discounted. The Air Force should spend its time becoming more flexible in designing its training and streamlining administrative procedures for dealing with creation of temporary MOAs. An attitude that it's mission takes precedence over the rights of Alaskans to live and access their lands without undue interference should be rejected. Control over airspace should remain with the civilian FAA agency. the Air Force should not be given priority control over large sections of Alaska.

Respectfully,



Peter Stern
Box 60285
Fairbanks AK 99706

Gretchen Walker
RC 72 Box 924
Tok, AK 99780

The Honorable Bruce Babbitt
US Dept of the Interior
1849 C St NW 5555
Washington, DC 20240

Dear Sir:

As a 27 year resident of Alaska I am shocked and appalled that the US Air Force is proposing to "upgrade" and expand the areas in which it can litter with metallic chaff, disrupt nesting/lambing grounds for species such as falcons, eagles, Dall sheep and myriad other species. Son's boom and low-level jet runs are certainly not an "upgrade" in the quantity of wilderness or survival of the wildlife living here.

I have worked several summers in the Kantishna area of Denali National Park, guiding visitors from all over the world. We were frequently blasted with the deafening noise of fighter jets flying low over the ridges where we were hiking. The visitors were NOT impressed. If this is what they do in a national park what do they plan for non-designated wilderness when it becomes their exclusive MOA? Don't forget, there are thousands of us Alaskans who LIVE in this wilderness, derive our food and shelter from it and will be immensely angry to have it damaged any further by airborne assault.

If I may point out the military's track record in Alaska, May 2 remind you of the radioactive waste buried at Cape Thompson and ensuing cancer in a staggering proportion of the Eskimo population? May I point out the massive chemical warfare, biological warfare material dumping at Fort Greely for the deliberate release of Anthrax bacteria into the wildlife at Fort Greely in the late 1960's? The list goes on and on and these charges can be substantiated.

The Air Force proposals include an increase in the amount of radar and other assorted microwave transmissions to which we human and animal and plant residents will be subjected. Many of these microwave frequencies have been implicated in various cancers, stress diseases, impaired immunity diseases, abnormal births and deformities to name a few of the evils in the Pandora's box. All of the foregoing have been documented in proper scientific study and documentation is available, although space does not permit here in this letter.

I am absolutely opposed to giving the Air Force more "air space" to play in since they evince no real concern for what damage they do in the land below that airspace and the inhabitants who have to live with the short and long term effects of turning more and more of America's wilderness into a playground for the technocrats.

Sincerely,
cc: Federal Aviation Ad.
Major G. Virgil Hanson

Gretchen Walker



November 7, 1994

Major G. Virgil Hanson
Chief Environmental Management
U.S. Air Force
611 ASOIGV, 5800 G Street, Suite 203
Eldorado AFB, AK 99506-2150

Dear Major Hanson:

We, the residents and property owners of the Lake Louise area, as well as the Copper River Valley Chamber of Commerce, have decided to go on record as -

- being against the Air Force's attempt to make a Permanent Military Flight Training Area (MOA) north of Lake Louise, and
- supporting the "No Action Alternative" to keep the area as a Temporary (TMOA).

*We conducted a survey in early November and received 98% support from local residents for the "No Action Alternative" and 130 responses to date from other property owners throughout the State of Alaska.

This decision has come in response to a proposal by the Air Force to make a large area north of Lake Louise into a permanent training area, called FOX 1. The new boundaries of FOX 1 incorporate much of the Copper River Valley that is home to large numbers of wildlife habitat. (1) The trumpeter swans have many nesting sites in this area and their nesting period extends from April 1 through August 31 - they could be permanently disturbed by the increased noise levels and supersonic boom. (2) The Nelchina and the Delta Caribou herds migrate through the area and spend much time year-round grazing. We are worried about the effects of increased maneuvers and the use of supersonic fighter planes, engaged in mock combat, would have on our quality of life, impact on private pilots and commercial operators in this area, and most of all, impact on the wildlife habitat.

At the public hearing held in Glenallen on September 28, 1994, the company responsible for the Environmental Impact Studies acknowledged that they had neither obtained comprehensive nor conclusive information on private property and cabins within FOX 1, nor are they familiar with the extent of recreational use by private citizens and commercial operators in this area. They also failed to acknowledge the importance of the Nelchina Caribou herd which is the third largest herd in Alaska.

The Air Force is being quoted as saying it would not use the area for two weeks during hunting season, please note that the hunting season actually stretches from the 10th of August through the 20th of September, and for the winter hunt from the 1st of January through the 31st of March.

Although we are sympathetic to the Air Force's needs for training, we oppose any MOA over this immediate area, but find the present temporary training area of FOX 1 tolerable. A change to an unregulated permanent status might have tedious biological, physiological and economic consequences for the Lake Louise area and the entire Copper River Basin.

Sincerely,

Virgil Hanson
The Lake Louise Community

BIO-009

REC-004

LAN-003

BIO-009

REC-004

LAN-003

OTH-014

HAZ-007

OTH-014

071

EXPLORING ALASKA AND THE WORLD

BOUTINOK

P.O. Box 1622 Umanak, AK 99245

November 22, 1994

BIS TEAM, Major C. Virgil Hanson
 Chief, Environmental Management
 611 ASG/LGV
 5800 G Street, Suite 203
 Elmendorf AFB, AK 99506

Dear Major Hanson and BIS Team:

I have been operating a wilderness tourism business in Alaska since 1986 and I conduct backpacking, river running, sliding, sea kayaking and wildlife photography tours throughout wilderness areas in Alaska, primarily on National Public Interest Lands. The people whom are attracted to my tours are generally folks from out of state who come to Alaska to observe wildlife in its natural habitat and wish to experience wilderness -- its vastness, solitude and silence -- on a scale that is impossible to find anywhere else. They come to observe and photograph birds and wildlife, and in particular, they are interested in the migrations and natural habits of Dall sheep, wolves, caribou, brown and grizzly bear, moose, muskox, wolverine, and the incredible shorebirds, waterfowl and birds of prey. I've had clients that have gone on a particular canoe or rafting trip merely to see a peregrine falcon, yellow-billed loon, or caribou in the wild.

We consider the airspace part of our wilderness experience, and anything that undermines that, such as the low-level overflights and sonic booms proposed by the military in certain areas of Alaska, would destroy the qualities which visitors seek, that is the silence and solitude. I do not believe Alaska should be treated any differently than anywhere else in the U.S. with respect for military training activities. Low-level overflights and sonic booms, and an increase in military debris across Alaska is unacceptable. All of us in Alaska live daily with the radioactive, toxic, carcinogenic and unaltered dregs of military activities throughout Alaska. The Northern coast, including the coast of the Arctic National Wildlife Refuge is littered with barrels, DEW stations, radio towers, old heavy equipment and buildings. And now you're saying you want to litter the airspace of nearly 13 million acres of Alaska.

I operate river trips on wild and scenic rivers in Alaska (please refer to my book, entitled *The Alaska River Guide: Canoeing, Kayaking and Rafting in the Last Frontier*, published by Alaska Northwest Books. The Fortymile, Gulkana, Yukon, Chukchee, Delta, Nabesna/Tanana, and the Wood River Lakes System are all vitally important as wildlife corridors and wilderness recreation rivers. All of these are described in my book and they



071

OTH-014

are used by fishers, hunters and recreational boaters. Supersonic jet training exercises would destroy the remote experiences people seek; they would also severely impact the activities of wildlife. Finally, the people living in the communities in these proposed areas would suffer a loss in the quality of their remote, rural lives, and there would be a risk of electromagnetic radiation, should relay sites and military installations be constructed.

PRO-001

When is the military going to clean up its existing messes throughout Alaska? No further damage should be inflicted upon our state, just because there exists the perception that few people live here. Military activities as proposed will impact those humans and wildlife that do live here, as well as those who visit to experience the unique wilderness resource we cherish here.

AIR-015

At the very least, FAA should conduct public hearings before deciding on any course of action. And ideally, they will discontinue pursuit of this activity, which will have serious environmental, social and economic consequences.

Sincerely,


 Karen Jettmar
 Director

cc: Honorable Bruce Babbitt, Secretary of the Interior
 Paul Gallant, FAA

ALASKA CENTER for the ENVIRONMENT

519 West 8th Avenue, Suite 201, Anchorage, Alaska 99501.
(907) 744-8231 • Fax: 744-8723.



November 20, 1994

EIS Team
Major C. Virgil Hanson, Chief
Environmental Management
611 ASG/LGV
5800 P Street, #203
Eliendorf AFB, AK 99506

Re: Draft Alaska Military Operations Areas EIS

Dear Virgil:

This brief letter supplements the two sets of comments submitted on behalf of several organizations by Tom Miller of the Wilderness Society and by Doug Bailey of the Sierra Club (Legal Defense Fund). It WCE's name was inadvertently left out of either of those comments; we hereby incorporate them by reference into this letter.

We have also met with Grace Sukovskiy of the Rural Alliance for Military Accountability and have read many materials prepared by that organization. We very much appreciate receiving the benefit of their far greater experience with these issues, and we wish to express our general support of their satiric comments as well.

There is very little that we could add to the three above sets of detailed comments. We will therefore only reiterate one point which has always been the focus of our comments: (Not because other lands are not equally important, but because this one is somewhat suboptimal, and if it is likely to be strongly argued by the agencies)

Alaska is a very special place. It is special because there are still vast open spaces, wilderness, sparse human populations, and sizeable wildlife populations. The opportunities provided for solitude, quiet, wildlife viewing, enjoying scenic beauty, and wilderness recreation are what attract residents and visitors alike. Primarily because of the noise, these increasingly scarce low-level and supersonic rights, these increasingly scarce resources and uses would be seriously degraded, if not destroyed, if the activities proposed in the draft EIS were to be implemented. Residents of both areas, remote cabin owners, wilderness recreationalists, birders, recreational hunters, fishermen, subsistence users, pilots, and others would be adversely affected.

Consequently, we oppose the EIS proposals (as well as the activities allegedly authorized, illegally we believe, by recent EIS) and recommend instead, especially in light of this and of the Cold War and reductions in military spending, that existing overflights be dramatically curtailed rather than increased.

Sincerely,

Cliff Eames

Cliff Eames
Issues Director

OTH-014

5935 Chula Vista Way #108
Los Angeles, CA 90068

November 21, 1994

EIS Team
Major C. Virgil Hanson, Chief
Environmental Management
611 ASG/LGV
5800 G Street, Suite 203
Eliendorf AFB, AK 99506

Dear EIS Team:

I write concerning the Draft ALASKA MILITARY OPERATIONS AREAS Environmental Impact Statement.

I am opposed to the proposal for 19,500 supersonic flights with sonic booms over this huge supersonic operations area (nearly 13 million acres!) every summer.

The effect on animals, particularly caribou and peregrine falcon, will be adverse. The effect on human quality of life through the constant destruction of quietude and suddenness of the booms will be devastating.

Other negative impacts will be associated with chaff and flares and fuel jettisoning.

I am opposed to the noxious effects of all this NOISE on recreational resources, especially the Tetlin National Wildlife Refuge; the Forty Mile, Gulkana, and Delta Wild and Scenic Rivers; the Tanana Valley State Forest.

Quietude is an essential attribute and resource for recreational enjoyment of such areas. They were established first; they should be protected in accord with the purposes for their establishment.

As I understand it, this proposed activity is precedent-setting. The proposed areas are far too large, the flight levels too low, and the sonic booms too frequent.

I myself have had the horrendous experience of low-level military jet overflights in Joshua Tree National Park (April, 1989; complaints on file with the Park Service and with members of Congress). The experience was utterly overwhelming: approximately 110-120 decibels with less than a second of build-up from ambient (quiet) noise levels. That means "fright and flight", and in fact was the most vivid memory I have, five years

NOI-002

HAZ-003
- 009/- 010

OTH-014

REC-003

LAN-002

073

later, about my experience of visiting Joshua Tree National Park.

PAN-001 We need additional documentation to justify these training activities. Alaska is too much a jewel and too special an ecology to make it a national sacrifice area for national and international military training.

PRO-014 We also need additional studies to clarify impacts to tourism, recreation, local subsistence and other human activities.

PRO-003 I additionally request an extension of time for public comment.

Most sincerely,

Dick Hinson

Dick Hinson

cc: Bruce Babbitt (DOI)
Paul Gallant (FAA)
Dianne Feinstein, U.S. Senator
Barbara Boxer, U.S. Senator
Rep. Henry Waxman

074

JACK HANSEN

HC 01, Box 1709, Glennallen, AK 99588 TEL: 907-822-3250
FAX: 907-822-3250

November 28, 1994

Major G. Virgil Hanson
Chief Environmental Management
U.S. Air Force
611 ASG/LOV, 5800 G Street, Suite 203
Ellmendorf AFB, AK 99506-2150

Dear Major Hanson:

Through a survey we have found that over 98% of those who responded (residents and property owners of the Lake Louise area), as well as the Copper River Valley Chamber of Commerce, have decided to go on record as -

- being against the Air Force's attempt to make a Permanent Military Flight Training Area (MOA) north of Lake Louise, and
- supporting the "No Action Alternative" to keep the area as a Temporary (TMOA).

This decision has come in response to a proposal by the Air Force to make a large area north of Lake Louise into a permanent training area, called FOX 1. The new boundaries of FOX 1 incorporate an area of the Copper River Valley that is home to large numbers of animals and birds. (1) The trumpeter swans have nesting sites throughout this area and their nesting period extends from April 1 into September - they will be permanently disturbed by the increased noise levels and supersonic booms. (2) The Nelchina and the Delta Caribou herds migrate through the area and spend much time year-round grazing. (3) Many small businesses use that area for commercial recreational business activities, such as flightseeing, flying to remote cabins, flying in hunters and so on. There have been a number of close "encounters" in the basin during the past years. Increasing the number of flights so drastically will most likely result in a physical encounter at some point in time.

I, as well as most other community residents and property owners are very concerned about the effects of increased maneuvers and the use of supersonic fighter planes, engaged in mock combat, would have on our quality of life, impact on private pilots and commercial operators in this area, and most of all, impact on the wildlife habitats.

During the public hearing held in Glennallen on September 28, 1994, the company responsible for the Environmental Impact Studies acknowledged that they had neither obtained comprehensive nor conclusive information on private property and cabins within FOX 1, nor are they familiar with the extent of recreational use by private citizens and commercial operators in this area. They also failed to acknowledge the importance of the Nelchina Caribou herd which is the third largest herd in Alaska. It's pretty obvious that the Air Force has not taken into account the impact of this latest proposal. You have hired a business which is composed of ex-air force personnel who are sympathetic to the cause of the Air Force. That makes most of us wonder about the validity of their findings.

Although the Air Force has said it would not use the area for two weeks during hunting season, please note that the hunting season actually stretches from the 10th of August through the 20th of September and for the winter hunt from the 1st of January through the 31st of March. In any case while the hunting

BIO-009

REC-004

LAN-003

OTH-014

season is certainly important the calving season and subsequent growth of young caribou and moose is much more important and that lasts from early May through October. There simply is not a reasonable time in which you could use the area in the way you propose, which would not disturb the animals and birds who live, nest and raise their young in the area.

OTH-014

I was in the Air Force in a Fighter Squadron and I understand the need for practice, however there are other considerations that are just as important. Namely the wildlife of the area. I know you have your toys and want to have a larger playing field, but you do not need this one. Your pilots are violating the altitude restrictions which are currently in effect with regularity and will no doubt continue to do so. To give them carte blanche permission to fly this area at the altitudes outlined is to make the area so dangerous that private individuals and Air Taxi operators will no longer be able to use it safely. I have a cabin on Clarence Lake which provides a good part of my summer income plus being a place where I go to enjoy the serenity of the area, and to hunt. If this becomes a Permanent MOA my cabin income and the enjoyment I find there will be essentially destroyed. I will not allow that to happen.

AIR-016

AIR-008

One of the persons who responded to our questionnaire reported and Incident on Sept. 14, 1994 when several F-15's passed over him at approximately 200 feet altitude. I have seen F-15 or 16 fighters at altitudes of less than 300 ft on several occasions. If that keeps up sooner or later someone will be killed. It's pretty exciting to be in my Casna 180 and have a jet fighter pass within 1/2 mile at my altitude. In the paper a few days ago there was an article of two close calls in the lower 48. One glider lost some wing and another plane landed with structural damage and minor pilot injuries by a near miss.

To believe that close calls and eventual physical contact between a fighter and a small plane in this area, which has as much small plane traffic, and the fighter traffic it will have if it becomes permanent is to ignore the obvious. I know you have been give information about close calls between fighters and small planes in this general area. I don't see how you can ignore that. The fact is that your fighter pilots, just like when I was in the AF, want to play and they do it, sometimes, in ways that is dangerous to general aviation. You can deny it all you want but we both know it happens. We have seen it up here many times, and it will happen again. Please don't give them license to do this regularly in this area.

Although we are sympathetic to the Air Force's needs, the present system of FOX 1 as a temporary training area is at least tolerable to us. A change to an unregulated permanent status will have serious biological, physiological and economic consequences for the Lake Louise area and the entire Copper River Basin.

Sincerely,

Jack Hansen

Evergreen Lodge



MATANUSKA-SUSITNA BOROUGH

PLANNING DEPARTMENT

350 East Dahlia Avenue, Palmer, Alaska 99645-6488
Phone 745-4801 • Fax 745-9878

November 29, 1994

Major G. Virgil Hanson
611 ABG/LGV
5800 G. Street, Ste. 203
Alondorf AFB, AK 99506-2150

RE: Draft Environmental Impact Statement, Alaska Military Operations Areas

Dear Sir:

Enclosed please find a copy of Matanuska-Susitna Borough Resolution Serial No. 93-128 requesting consideration of various concerns in the subject environmental impact statement (EIS) and a copy of a letter from the Lake Louise Community to the Borough Planning Director expressing grave concerns at the prospects of converting the FOX 1 Temporary Military Operations Area (TMOA) to a permanent status.

Our review of the subject EIS leaves us with the following questions:

1. No effects on the Melchiana Caribou Herd are noted for the proposed action, while Level III impacts are indicated as possible on the Delta Herd. We understand that the Melchiana Herd is larger than the Delta Herd and that the former's range/habitat is very definitely under the proposed FOX MOA. Why would the Delta Herd be significantly adversely affected and the Melchiana Herd not at all?
2. The analyses of potential impacts on recreational resources did not seem to note the importance of the Lakes Louise/Tyone/Susitna vicinity as a recreational area. Besides the Lake Louise State Recreation Area, there are four commercially operated lodges and some 297 cabins or residences around the lakes (mostly around Lake Louise) that are predominantly used for recreational purposes. There is also a permanent population of 50 persons in the area. The lakes and upland areas in their vicinity are used recreationally year-round - with fishing, hunting, boating, and snowmachining being significant activities.

These concerns are reflected in the enclosed letter to our Planning Department from the Lake Louise Community. In that letter, the community expresses concerns for quality of life, impacts on private pilots and commercial operators, and impacts on wildlife. The Community objects to the FOX 1 temporary MOA becoming a permanent MOA - preferring the no action alternative under which the FOX MOA would remain the FOX 1 TMOA.

BIO-009

REC-004

We would request that effects on the Nelchina Caribou Herd be addressed more specifically and that your consultant be queried as to whether they were aware of the number of lodges and recreational cabins in the Lake Louise area, and if effects on them were evaluated. Also, was the Lake Louise State Recreation Area noted?

REC-004

The Lake Louise Community has the following additional concerns regarding potential effects of aircraft operations on wildlife:

BIO-014

1. The EIS recognizes that level III impacts on trumpeter swans and Ball sheep under the FOX MOA are possible. The Community expresses concern that trumpeter swan nesting could be disturbed during the period - April 1 through August 31.
2. The Community also notes two hunting periods - one between August 10 and September 20 and a winter hunt from January 1 through March 31.

OTH-014

We would encourage mitigating effects on recreational resources by not conducting Major Flying Exercises (MFE's) within FOX MOA during the week before and after the Fourth of July as described in the EIS, but we would also request that the Lake Louise community be consulted as to other peak recreational use periods or scheduled events that should be respected by cessation of MFE's.

The Susitna MOA affects the majority of the Trapper Creek Census Designated place (CDP) which had a permanent population of 296 persons living in 110 dwellings according to the 1990 U.S. Census. Another 57 housing units were used seasonally, recreationally, or occasionally according to the Census. Other cabins under the MOA but outside of the Trapper Creek CDP would also be affected.

In addition to the Lake Louise Community, please also continue to involve the community councils of Sutton, Chickaloon, Glacier View, Trapper Creek, (possibly Talkeetna), and Skwentna as you complete the EIS and plan for mitigation. We can supply you with contact names and addresses.

Based upon the subject Draft Environmental Impact Statement, we must oppose the conversion of the FOX 1 Temporary Military Operations Area to the permanent FOX Military Operations Area.

Thank you for the opportunity to comment on the Draft, Environmental Impact Statement, Alaska Military Operations Areas.

Sincerely,

John Duffy

John Duffy
Planning Director

MATANUSKA-SUSITNA BOROUGH
RESOLUTION SERIAL NO. 93-129

A RESOLUTION OF THE MATANUSKA-SUSITNA BOROUGH ASSEMBLY MAKING REQUESTS FOR CONSIDERATION DURING THE SCOPING PORTION OF THE DEVELOPMENT OF AN ENVIRONMENTAL IMPACT STATEMENT CONCERNING PROPOSED IMPROVEMENTS TO MILITARY OPERATIONS AREAS IN ALASKA

WHEREAS, the U.S. Air Force is proposing changes to its Military Operations Areas (MOA's) in Alaska; and

WHEREAS, some of those changes would affect areas and communities within the Matanuska-Susitna Borough; and

WHEREAS, the Air Force has invited participation in the identification of issues to be addressed in an environmental impact statement to be developed as part of the process;

NOW, THEREFORE, BE IT RESOLVED that the Matanuska-Susitna Borough Assembly requests that the following concerns be addressed in the environmental impact statement for the proposed improvements to Military Operations Areas in Alaska (1993):

AIR-014

1. Noise and its effects on lifestyles, peaceful enjoyment of residence and on wildlife - particularly within sensitive areas and seasons involving breeding and birthing. The Susitna MOA is particularly noted for potential conflicts associated with noise.
2. Contribution to the creation of avalanches.
3. Incendiary products that might cause fires on the ground.
4. Conflicts with civilian aviation.

NOI-004

HAZ-009

AIR-008SAF-005

BE IT FURTHER RESOLVED that the Air Force be requested to involve the communities of Sutton, Chickaloon, Glacier View, Lake Louise, Talkeetna, Trapper Creek, and Skwentna in the development of the proposal.

ADOPTED by the Matanuska-Susitna Borough Assembly, this day of October 1993.

ATTEST:

Linda A. Dahl
LINDA A. DAHL, Borough Clerk
(SEAL)

Ernest W. Brannon
ERNEST W. BRANNON, Borough Mayor

LAKE LOUISE, SUSITNA & TYONE LAKES

Lake Louise Community

November 5, 1994

John Duffy
Director, Planning Commission
Mat-Su Borough
350 E. Dahlia Avenue
Palmer, AK 99645

Dear John:

In our last meeting you offered to help and support us regarding our concern that the Air Force consider changing the TMOA "FOX 1" from a temporary to a permanent status. We'd like to ask you to use all of your influence through the Borough to back us up in our efforts to stop that change. Maybe write an official letter to the Air Force with copies to key State officials, U.S. representatives and to the local newspapers. Following is an outline of our concerns and our official statement from the Lake Louise community:

Many of the residents and property owners of the Lake Louise area, as well as the Copper River Valley Chamber of Commerce, have decided to go on record as -

- being against the Air Force's attempt to make a Permanent Military Flight Training Area (MOA) north of Lake Louise, and
- supporting the "No Action Alternatives" to keep the area as a Temporary Training Area (TMOA).

This decision has come in response to a proposal by the Air Force to make a large area north of Lake Louise into a permanent training area, called FOX 1. The majority of FOX 1 overlies the Mat-Su Borough. The boundaries are rough: in the south from Tyone Lake to north of the Alaska Range, in the west from the Talkeetna mountains west of Wetena Lake, and in the east from north of Crosswind Lake up to Domesley.

The military wants to change FOX 1's training status to "permanent" so they can conduct fighter training on a regular basis without notifying or filing plans in advance with any government agencies. The change in status would allow many more flights (an average of 15.8 sorties daily or approximately 316 sorties per month) than under the current "temporary" system. In addition, the permanent status would authorize super sonic operations at altitudes of 5,000 feet AGL.

Supersonic operations are not authorized under FOX 1's temporary status which is in effect now. Community residents and property owners are worried about the effects of increased maneuvers and the use of super sonic fighter planes, engaged in mock combat, would have on our quality of life, impact on private pilots and commercial operators, and most of all, impact on the wildlife habitats in this area. In particular, the trumpeter swans nesting sites and the Nelchina and Delta caribou herds.

As the public hearing held in Glenallen on September 28, 1994, the company responsible for the Environmental Impact Studies acknowledged that they had not obtained comprehensive information on private property and cabins within FOX 1, or that they know the extent of

recreational use by private citizens and commercial operators. They also failed to acknowledge the importance of the Nelchina Caribou herd, concentrating their research efforts on the smaller Delta Caribou herd.

Although the Air Force has said it would not use the area for two weeks during hunting season, we note that the hunting season actually stretches from the 10th of August through the 20th of September and for the winter hunt from the 1st of January through the 31st of March.

Also, the trumpeter swan nesting period, from April 1 through August 31, could be permanently disturbed by the increased noise levels and supersonic booms.

Although we are sympathetic to the Air Force's needs, the present system of FOX 1 as a temporary training area seems to be working. A change to an unregulated permanent status might have serious biological, physiological and economic consequences for the Lake Louise area and the entire Copper River Basin.

Our comments must be submitted to the Air Force prior to November 30, 1994 to the following address:

611 ASG/LGV, 5800 G Street, Suite 203
Edwards AFB, AK 99506-2150

If you have any questions, please contact

- 1 Chief Environmental Management Major G. Virgil Hanson
(Air Force) 907-552-1807
- 2 Regarding citizen's concerns: Patti Billman
907-522-3566

Thanks for your help.

Sincerely,

Patti Billman

Patti Billman
for Lake Louise Community

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PQ Box 202045
Anchorage, AK 99520
November 29, 1994

Major G. Virgil Hanson
611 ASG/LGV
5800 G Street, Suite 203
Elmendorf AFB, AK 99506

Re: Draft Environmental Impact Statement
Alaska Military Operations Areas

Major Hanson,

I appreciate this opportunity to comment and offer the following brief comments on this Draft EIS:

Now that the Cold War is over and a scaling down of military budgets is underway, why is such a huge expansion being proposed? Low-level training routes were justified as necessary to penetrate heavily defended Soviet airspace with single aircraft on nuclear delivery missions. That justification no longer exists. As early as Vietnam, and most recently in Desert Storm, the vulnerability of low flying aircraft has been demonstrated. There remains a serious question of peacetime flight safety generated by sustained periods of low level flights. Statistically, low level operations are more dangerous; a brief moment of inattention can produce a catastrophic accident. Low level flight training may be exhilarating for pilots and a budget builder for the USAF, but it cannot be justified as necessary for combat readiness.

USAF controls 25% of the airspace over the United States already; coupled with other Services, the Department of Defense controls approximately 50% of our airspace. Why are alternatives outside of Alaska dismissed? Although not clearly stated, it seems that "allied air forces" would also come to Alaska to join these proposed exercises, perhaps even from NATO or other international forces as well as other state air guards. These proposed training activities are not unlike those already underway in other airspace, with the possible exception of the proposed numbers and levels of supersonic flights. The presence of sophisticated aircraft/weapons systems presently based in Alaska is not adequate justification for expanded training areas.

Given these factors, all requests for additional funds, facilities and uses of public resources must be viewed with considerable skepticism. In terms of the heavy costs to the quality of life and well-being of Alaskan residents and visitors, USAF has not provided adequate justification for this expansion.

Most importantly, this expansion proposes to use Alaskans, visitors, our flora and fauna, our cultural resources - our state as unwilling and unknowing guinea pigs in experiments with sonic booms and all the other impacts proposed. In 1972, the Federal Aviation Administration ruled that civil

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aircraft could not fly supersonic over the U.S. The first EIS for supersonic flight training, the Oceana SOA off the coast of North Carolina, 1974, concluded that such flights could not be conducted overland due to impacts to people, wildlife and civil aviation. Despite this finding, the Department of Defense has since moved to conduct such flights over rural areas, apparently believing that sparsely populated areas of the West are expendable.

It is ironic that USAF is proposing such impacts at a time when the Department of Energy has declassified documents, finally informing Native Alaskans, among other "special populations", of their participation in secret experiments and of the burial of nuclear and other military hazards and wastes in areas used for subsistence. USAF needs to explain how these proposed actions fit with Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*.

Sonic booms, along with subsonic overflights, trigger an involuntary startle reaction in most living organisms. People do not habituate; both long and short-term detrimental effects result. Long-term effects are undocumented as scientists feel it unethical to expose unwilling people to the types of impacts proposed that Alaskans receive. Studies do indicate that people will not tolerate long term (measured in months) exposure to sonic booms generated by air combat training below 30,000 MSL. 2 PSF is the upper limit of tolerance for people; proposed impacts exceed this limit. The Navy, in 1983, created property destroying booms, exceeding 20 PSF in a test over Dixie Valley, NV with an aircraft just over Mach 1 at 10,000 AGL.

How is it possible to string together Environmental Assessments for an EIS? While a reasonable effort was made to "permit the widest participation by the people of Alaska (1-4)", what about those not currently residing here but still taxpayers, voters, and possible residents and visitors? These proposed operations are a major federal action; stakeholders are more than those living nearby. What efforts were made to allow for broad public participation?

This document suffers from disorganization; use of terms that do not relate to real world experiences challenge the best reader to translate single impacts into everyday events; separation of wildlife impacts from subsistence and recreation confuse; lack of detail throughout offers little upon which to make an informed decision; maps are confusing, requiring the reader to put together several maps, along with text, to figure out where supersonic flights will be over denning bears, for example. Proposed mitigation is temporal and spatial avoidance, coupled with coordination and monitoring with the notation that the potential for important (significant?) impacts cannot be dismissed on the basis of current knowledge given the lack of documented long-term impacts (4-106). Such an approach means a resource needs to be 'in trouble' before mitigation and/or monitoring is undertaken.

Throughout this EIS, statements with theme "it is impossible to predict the number ... adversely affected because the number of overflights cannot be meaningfully calculated.... (2-73)" mean the USAF has not provided data for how many aircraft, flying where and when. How is it possible to meet NEPA requirements of providing analyses of specific alternatives with specific impacts from which to make an informed decision? Even a worst case scenario is missing. This EIS however does provide the need for many, many more studies, some of which are outlined in *Effects of Aircraft Noise and Sonic*

Booms on Fish and Wildlife: A Research Needs Workshop.

How is it possible that USAF need not comply with Section 810, of the Alaska National Interest Lands Conservation Act that addresses subsistence? How is it that USAF need not consult with the Alaska Board of Game? How is it that USAF need not address the Migratory Bird Treaty and the Migratory Salmon Treaty? With the Canadian border as one of the training boundaries, how is that USAF need not consult with the U.S. State Department and Canadian national and provincial governments? In other states, the Bureau of Land Management has not approved low level training flights nor the use of chaff and flares over BLM administered lands. How is it that allowing Level III or II impacts to the BLM recreation areas (2-77) fits with BLM's mission "to sustain the health, diversity and productivity of the public lands for the use and enjoyment of present and future generations?"

PRO-005

How is it that a determination of No Adverse Effect on cultural resources has already been made without analyses of a specific review of those cultural resources within all the proposed areas and all the proposed overflights activities? How is it possible, given the impacts of noise from sonic and subsonic flights or flares, to state "there would be no ground disturbance associated with this Proposal, (i.e. no ... alteration of existing buildings or facilities)" (L-11) It is just as reasonable to conclude that these proposed activities would destroy historic structures and/or alter the landscape (historical context), irreplaceably destroying our past.

CUL-001

How is that weather and climatic conditions are not discussed when the arctic/subarctic climate effects technology in ways seldom predicted since most technology is built for temperate climates? The air quality section presents no data about growth. Cumulative impacts are difficult to predict when no accurate data is presented about how many sorties, how many additional ground vehicles, etc. will be introduced.

AIQ-001

The prevailing opinion may be interpreted that chaff does not present a significant environmental impact because independent studies have not been performed, particularly in an arctic environment. How much of these fiberglass monofilaments will litter the landscape? Given the environmental conditions, how fast will the aluminum oxidize? USAF's unofficial probability of 1 in 100,000 for the potential of an unburned flare actually reaching the ground accounted for a costly fire in Yukon-Charley Rivers National Preserve.

**HAZ-003
HAZ-009**

The Socioeconomics Section is also inadequate. These extra personnel will generate public service costs as local experiences with training exercises such as Brin Frost have demonstrated. These personnel will be unattached, with no community ties and no supervision beyond the bases. Damages to apartments have been costly; roadways with resulting increases in assaults has required increased public health and safety measures.

SOC-001

Tourism is considered Alaska's growth industry. This industry depends upon wilderness values, wildlife and ecosystem diversity, scenery, solitude - much of which no longer exists elsewhere in the U.S. and the developed world. Yet, this EIS dismisses impacts to recreation (the closest to tourism since tourism is not addressed) by "calculating the actual number of individuals disturbed by aircraft overflights is not possible because 1) it is impossible to accurately predict the actual number of overflights of any given area beneath

REC-001

a MOA, 2) it is impossible to gauge the extent of disturbance of any given overflight, 3) the number of overflights of an area would vary from day to day...." (4-115) Associated costs and impacts to the tourism industry need addressed. Flying for many people in the proposed areas is not a hobby. People use small planes much the same way urbanites use vehicles - they jump in and go. Public safety and health services are often a flight away. Associated costs and impacts to civil aviation are missing.

AIR-008

Associated costs and impacts to subsistence are not quantified. Mitigation measures address only hunting, not trapping and gathering activities, nor community and spiritual values. What studies did USAF review to conclude there are no foreseen or conceivable impacts resulting from aircraft overflights that would adversely affect fish resources? (3-266)

SUB-001

As a resident of Government Hill, I am amazed at the lack of discussion about the Port of Anchorage facilities as flights will be landing and taking off over part of that area. This area is extremely congested ("most heavily used airspace in the state" (3-47)) with four high-volume airports within 12 miles of each other. Costs associated with increased USAF flights to commercial aviation are missing. Since "statistics show that 70 to 75 percent of all major accidents on or within 5 miles of a runway" (3-60), USAF needs to address emergency response and preparedness measures and their costs with all appropriate surrounding governmental and other agencies. It is not clear if similar measures and associated costs are addressed for Eielson AFB and its neighbors. Having been 'buzzed' by low flying aircraft, I do not look forward to increased noise in my neighborhood. USAF does not address the possibility of diminished property values either.

SOC-002

SAF-003

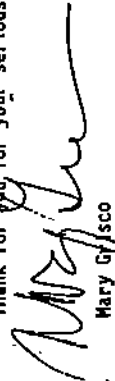
LAN-008

Finally, the permanent approval for supersonic operations in Yukon 1 and 2 that permits supersonic operations below FL 300 requires renewal approval April, 1996. The timeline for these proposed operations areas lists implementation in spring, 1996. Am I to assume that this EIS also includes renewal approval?

AIR-013

In conclusion, I support the No Action Alternative, with the concern that even current operations merit revisiting. This EIS fails to justify the need for such an expansion and fails to provide data and information for judging alternatives and their associated impacts. The environmental consequences of all alternatives have not been analyzed and presented. USAF's 'announce-and-defend - and trust us' approach is not acceptable given the heavy costs and probable losses proposed for our well-being and quality of life. The proposed operations are 'too many, too low and too loud'.

Thank you for your serious consideration of my comments.



Mary G. Isco

cc: Governor-Elect Tony Knowles
Senator Ted Stevens
Secretary Bruce Babbitt
Paul Gallant, FAA

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RESPONSE TO MOA "IMPROVEMENT" DEIS
8 NOV 94

FROM: JIM ANTISDEL
5308 SHORECREST DR
ANCHORAGE, AK 99515

TO: 611 ASG/LGW



Dear Data Collectors,

Thanks for keeping me plugged into the MOA expansion plan. I think you folks are attempting to do a good job of soliciting input from the community and I just hoped to give you one other perspective. I am a USAP Academy grad and flew HERKs out of Yokota and Rhein-Main for six years prior to separating in 1985. I am currently a Captain with Alaska Airlines flying 737's up here and have been doing more than a little volunteer work with the Airline Pilots Association (ALPA) and the FAA. Having spent more than a couple of hours training in the global airspace myself, there is no doubt in my mind that our fliers and support personnel need the experience that large-package exercises provide. I also fully understand the big chunks of sky that these missions require and am aware of the closure of former overseas free-fly areas such as Clark AB/Cope Thunder ranges. On the other hand, the training areas up here are greater by far than any others that I ever had the pleasure of viewing. While this is nevertheless the "Great Land", there are more than a couple of entities attempting to utilize the airspace as you are no doubt aware. While I am concerned about repeated same track low-level "Bush-Bat" disturbances, my primary interest here is in minimizing negative impacts on the commercial segment of aviation up here.

As you are probably aware, airplanes have played a vital role up here since long before the military ever set up airbases. The lack of roads, numerous small spread out communities and great distances have made the state very dependent upon the old skybus. Most of the folks and goods that move between our various "burbs" do so by air and hence things here are a little different than they are in Nevada. I would like to thank the Air Force for helping out in creating a routing that permits airliners to take passengers on the tour around Mount McKinley. The Denali viewing is real high on most visitors list of things to do and the experience is fantastic for all on a nice day. This is the crown jewel of the Last Frontier and should remain accessible to as many folks as possible.



077

There has long been a false perception among military flight planners that the larger the plane, the longer they can loiter or the farther they can divert from their original route or altitude. More than a couple times, I recall a stack of "trash-haulers" coasting in from a long haul anxiously waiting a chance to land as a stream of fighters cruise into the pattern to do a bunch of touch and goes. This still happens to me occasionally while flying the jet back from Adak/Sheepa and trying to get into the Elmendorf traffic pattern during surges. More than a couple of our birds have received extensive off-course vectors and/or very low/high altitude assignments during military operations for as long as I can remember. In reality, we do not pack that much fuel onboard since that seems in many times we will be bumping passengers/cargo (PAYload) to comply with maximum takeoff or landing weight restrictions. It is not at all uncommon in this business to turn around or head to your painful alternate long before you even have a chance to start down and shoot an approach and see what the airport looks like. This inflight decision could be due to greater than anticipated headwinds/fuel burn, alternate field weather degradation, less than optimal routing/flight level restrictions or any other number of reasons. Likewise a widebody (ie. longhaul 747/DC10/L1011) usually does not have lots of fuel to play with as they enter Alaska.

Hence, I think it is real important to keep the long established airways open up here for the non-military sector. The Wlens and many other early aviators were flying from Anchorage to Kotzebue, Nome, Barrow and all the other remote strips that exist in this neck of the woods well before the arrival of the large MOAs that currently exist. Alaska has a great deal of airspace and I think that the military operations can easily be accommodated in sectors that do not penalize civilian users. This should really be emphasized on the upper altitude airways as these are the ones that bring large amounts of folks/cargo/revenue into the state. The volcanic dispersal that emptied the international terminal here in Anchorage demonstrates that jets go elsewhere whenever an alternate route is the easiest thing to do.

In summary, I think that the long established highways in the sky (especially Jet Route Airways) should remain unimpeded by military training exercises and the arrival priorities should not be skewed in favor of a couple of single seat aircraft when there are several hundred tons of metal/passengers trying to enter the "it" the same time. If you have any questions at all, please call me at (907)248-4007/FAX-2283. Once again I have flown in both systems and think all parties can gain from getting together and making this program happen. Don't be shy and keep up the good work.

Thanks,



SOC-002

OTH-014

AIR-008

JUL 26, 1994

EIS TEAM

Major C. Virginia Hanson, CHIEF

Environmental Management

611 ASG/LGU.

580 G ST., #203

EUREKA, CA 95506

DATE: Major Hanson,

I would like to take this opportunity to comment on the proposals to expand fighter training flights over Alaska lands. I am Resident of Tokovik, own a Chin near Denali State Park and operate a wilderness therapy, mountaineering and rafting guide business which runs trips in the Salmon Valley, Denali State Park and Denali National Park and Preserve.

I am opposed to Alaska military operations areas near Denali State Park and Denali National Park and Preserve and over the western portions of the Salmon Valley and the Alaska Range. The noise produced by these training flights is unacceptable. I oppose on wilderness areas for a variety of reasons. My client has come to Alaska for its unique wilderness opportunities. Most of Alaska's tourists are tourists to Alaska for this wilderness quality. Jet noise and sonic booms will seriously detract from the enjoyment

(2)

of a trip that is in otherwise pristine country.

Alaska training flights are nearly impacting trips that we offer in the upper Salmon Valley and Denali State Park. I commonly hear sonic booms and see dog fights from my cabin near Denali State Park. The sonic booms startle me and understandably there are reports on newspaper columns, Louie's and others, grizzly, black bear, moose and other bears and animals in the area. I am not aware where my cabin is or in my objections to the training flights. Many people own homes and in area and are there in part to enjoy the peace and quiet Alaska wilderness can offer.

Wilderness is a finite resource in this state. A resource that is quickly being eliminated world wide. Alaska has some of the largest wilderness areas left in the world.

Preserve wilderness the military operation areas with civilian thought to the military who have no place else to go. The people who live there for many have chosen a quieter life and for the tourist who wants to experience wilderness areas.

Sincerely,

Brian O'Connell

Director, Alaska-Denali Gateway, Inc.

P.O. Box 566

Tahleah, AK 99676

PAUL TODD ENTERPRISES
P.O. Box 106058, Anchorage AK 99510-5058
Voice (907) 277-7719 Fax (907) 277-7806

Paralegal Services
Attn: Mr. Ua #127072
65 R017-03-0128



November 26, 1994

EIS Team

Maj C Virgil Hanson

Chief, Environmental Management

611 ASG/LGV

5800 G Street, Suite 203

Elmendorf AFB, AK 99506

Re: Proposed Military Operations Area expansions/upgrades

Dear Sir:

Training is essential for military preparedness. The best training simulates to the closest extent possible the actual conditions under which combat will occur. I take this into account in considering the Air Force proposals for use of parts of Alaska for military aircraft training operations.

My personal schedule does not permit extensive review of the Environmental Impact text, so I am attaching the Sierra Club flyer which brought this issue to my attention. The real impact is in the details of training exercises, which most likely are classified and make meaningful evaluation of this proposal impossible.

Overall, after examining the map I think the proposed areas are too large, the impact on wildlife too great, and the probability of adverse impact on native people too likely. Litigation would most likely be the result of proceeding with this plan. You need to whittle it down through strict application of the rule of reason and the political principle of incrementalism.

Please accept my best wishes for a most pleasant holiday season.

Sincerely,

Paul Todd



Sierra Club, Alaska Chapter
P.O. Box 103441
Anchorage, Alaska 99510-3441

ALBERT ALBERT ALBERT

The United States Air Force wants to designate and upgrade 71,650 square miles of our airspace that will impact nearly 13 million acres of Alaska

Extreme environmental, social and economic consequences will affect hunters, pilots, recreationists, Native communities and their subsistence activities, trappers, tourists, miners and neighborhoods

We will experience
- increased areas with noisy low-level jet overflights and sonic booms
- impacts associated with chaff and flares
- electro-magnetic radiation hazards associated with military installations and relay-sites

Impacted resources will include

- Delta and Mulchatna caribou herds
- Dall sheep populations in Tanana Hills and Alaska range
- American peregrine falcons, golden eagles, trumpeter swans

Recreational resources expected to receive impacts include

- Forty Mile (wild and scenic) River
- Yukon-Charley Rivers National Preserve
- Iditarod Trail
- Tanana Valley State Forest
- Delta (wild and scenic) River
- Wood River-Tikchik State Park

Native and Bush communities in the proposed areas include Koliqanek, Kuparukut, Sleetmaita, Ialiktoot, Line Village, Eagle Village, Dot Lake, Paxton, Chicken, Nealy Lake and Circle Village.

Commercial and private pilots can expect increased risks of mid-air collisions and costs associated with Special Use Airspace.

NOWHERE ELSE in the United States has the US Air Force proposed supersonic jet training exercises at 5,000 feet above ground. About 15,500 supersonic flights are expected with accompanying sonic booms; most training will occur during the summers. Scientific studies show that humans will not tolerate long term exposure to sonic booms generated by air combat training below 30,000 feet. Caribou and peregrine falcon studies indicate these species will experience severe impacts from sonic booms.

What you can do:

Comments on the Draft ALASKA MILITARY OPERATIONS AREAS Environmental Impact Statement (EIS) are due November 30, 1994. Copies are available in town libraries or call and request one from the Air Force.

Write a brief letter to EIS Team

Major C. Virgil Hanson
Chief, Environmental Management
611 ASG/LSW
5800 E Street, Suite 203
Elmendorf AFB, AK 99506
(907) 552-1807

with copies to

Honorable Bruce Babbitt, Secretary
Department of the Interior
1849 C Street, NW, Room 5555 and
Washington, DC 20240
and
Paul Gallant
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

You may want to emphasize

• Personal experiences and uses in these areas that will be impacted.
• Personal experiences with sonic booms and other activities related to air combat training.

• This proposed activity is precedent-setting. The proposed areas are too large, the flight levels too low and the numbers of sonic booms too many.

• Alaska is not a national sacrifice area for national and international military training. This kind of proposal would not fly in the lower 48 as no one would consider getting away with such activities over national parks, refuges and state parks. No one would consider such activities near or over towns and cities!

• Additional documentation is needed to justify these training activities.

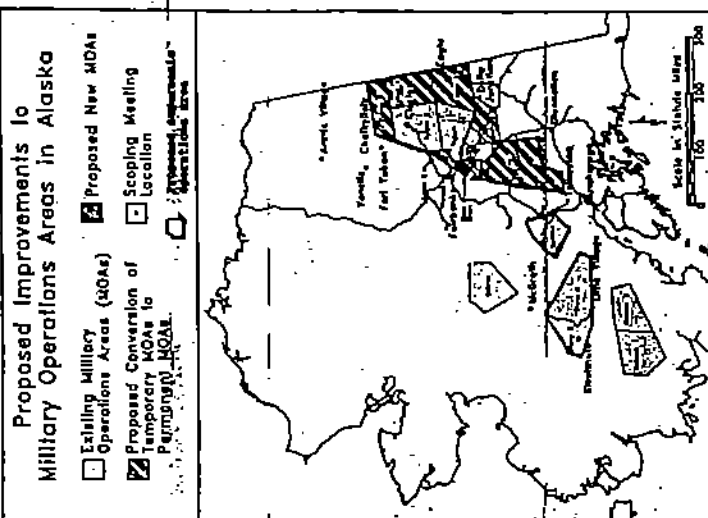
• Additional studies are needed to clarify impacts to tourism, recreation, subsistence and other human activities.

Ask that the Air Force extend the comment period.

Ask the FAA to conduct public hearings.

Further details: Attend the Public Forum in Fairbanks on November 14th, 6:30-9:00pm in the Main Library auditorium

Contact: Mary Grisco Sierra Club Military Committee, 256-1896
Grace Bukowski, Rural Alliance for Military Accountability 702-677-7001



Sierra Club, Alaska Chapter
P.O. Box 103441
Anchorage, Alaska 99510-3441

New Profile Org.
U.S. Air Force
PAID
Permit No. 919
Anchorage, AK

0 PFJ086

2498234 2303

PAUL TODD
PO BOX 198055
ANCHORAGE

AK 99510-5955



ALASKA AVIATION SAFETY FOUNDATION

Wednesday, November 30, 1994

611 ASG/LGV

Attn: Col. Siter

5800 G St. Ste 203

Eldorado AFB, AK 99506-2150

Dear Col. Siter:

Attached is a position paper developed by the Alaska Aviation Safety Foundation in response to the Draft Environmental Impact Statement, Alaska Military Operations Areas (September 1994). This position paper was developed based on inputs from public meetings held in Fairbanks along with the study of Air Force proposals and discussions with Air Force staff. Our concern, and one of the major issues addressed in the Draft EIS is with aviation safety. The focus of our document is on the areas north, east and south of Fairbanks, as we perceive the greatest changes and potential for use conflicts to be concentrated in these areas. We have attempted to identify the issues and offer thirteen constructive recommendations that would help increase safety for all users of the airspace.

Thank you for this opportunity to comment on this matter.

Sincerely,

Tom George

Regional Representative

cc:

Marty Shuey, AOPA, Govt. and Technical Affairs

Ray Costello, AOPA Northwest Regional Representative

Carl Siebe, Alaska Dept. of Transportation & Public Facilities, Statewide Aviation

Derril Bergt, FAA Alaska Region

Dick Harding, Alaska Air Carriers Association

 TOM GEORGE P.O. BOX 83750 FAIRBANKS, AK 99708

907-455-9000 (HOME PHONE AND FAX) 907-474-7621 (WORK PHONE)

INTERNET: 71171.1114@COMPUSERVE.COM



ALASKA AVIATION SAFETY FOUNDATION

Position Paper on the

Draft Environmental Impact Statement Alaska Military Operations Areas

Introduction

The Air Force has proposed major restructuring of their Special Use Airspace in Alaska. A Draft Environmental Impact Statement (EIS) has been produced which describes the proposed changes. One of the major issues identified in the document is a concern for aviation safety. The potential hazards of mixing high speed military aircraft operations with slower speed civil aircraft is a concern to pilots (military and civilian) and the traveling public. This position paper identifies issues and constructive recommendations aimed at minimizing conflicts, while attempting to accommodate the needs of all users of the airspace.

The principal concern of the aviation community is the increased risk of mid-air collision resulting from (1) routine training exercises of Alaska based military aircraft which occurs on a year-round basis and (2) the greatly increased activity which occurs during Major Flying Exercises (MFE's). High-speed military aircraft, often flying at low level and close to terrain to avoid detection, are a definite threat to small aircraft operating in the same area. While some military aircraft are equipped with sensors to help locate "threats," experience indicates that the pilots who are flying in formation and/or engaged in realistic combat exercises may be focusing on details other than looking constantly for small aircraft which are not participating in the exercise.

Civil users of the airspace under consideration includes airline and air taxi operators, private business aircraft, guides, hunters, recreational users, biologists conducting game surveys, air ambulance services, people engaged in resource exploration or land management, pipeline patrol activities, etc. This area, like most of Alaska, has no or very few roads. Consequently the use of aircraft is required for a wide variety of purposes—more than is apparent from a casual look at a map of the region. The frequency and nature of these activities are what must be compared to the military training activities to evaluate risks to aviation safety.

Input for the positions presented in the document was gathered from (1) study of Air Force proposals, (2) discussions with Air Force personnel and (3) comments recorded from public pilot meetings held in Fairbanks earlier this year. The geographic areas evaluated are those immediately south, east and north of Fairbanks. While the scope of the overall proposals cover other areas across the state, we perceive the greatest impact in these areas. This is not to say that there aren't potential problems in other

areas which need to be evaluated. They were beyond the scope of our ability to evaluate at this time.

We would like to acknowledge that the Air Force has supported public meetings and made themselves available to provide information concerning their mission, training techniques, and equipment used. This has been immensely helpful to understand the nature of their operations, and to evaluate potential conflicts with civil aviation uses. We hope the recommendations identified will lead to improved safety for all users of the airspace.

Recommendations are grouped under four major headings: (a) corridors for IFR and VFR operations; (b) seasonal timing of military exercises (c) communications between military and civil users and (d) overall coordination.

Corridors for IFR and VFR operations

There are significant amounts of travel along identifiable high traffic routes in the proposal areas. Several commercial operators conduct scheduled flights between Fairbanks, Eagle, Tok, Delta Junction, Chicken, Boundary, Northway, Tetlin, Chisana, Healy Lake, and Dawson City, Yukon. The commercial operators have expressed concerns about the impact the proposed special use airspace will have on their ability to continue to provide service to the communities located inside or adjacent to the MOAs. Corridors to protect this use, in addition to other private traffic along and between these areas must be considered. We will address IFR and VFR needs separately.

IFR Corridors

Recommendation (1) The existing Victor 444 airway which connects Fairbanks, Delta Junction, Northway and extends on to Whitehorse, must remain intact and protected, ensuring IFR routing between Fairbanks and points east. This airway not only connects these communities, it also is a major air route used by traffic between Alaska and the rest of the continental US.

Recommendation (2) While there is no currently approved airway between Fairbanks and Eagle or Dawson, it is clear that rapidly evolving GPS technology and better radar coverage will probably make this a possibility in the near future. The FAA and the Air Force should immediately start to develop an airway route from Fairbanks direct to Eagle for future use with GPS area navigation. This route should then be established as a no fly corridor for military aircraft, except those flying that route. The floor of the corridor would be the Minimum Enroute Altitude established for such an airway. Other dimensions would be identical to any standard Victor Airway. This route would also provide protection to VFR traffic travelling from Fairbanks to Eagle or Dawson, at least during good weather. A corridor along this route would provide a significant degree of safety for both military and civilian flyers.

Recommendation (3) The prospect of future GPS approaches to other airports in the area is a significant development. The impact of these MOA's on future IFR operations

should be carefully considered to avoid precluding access to these areas. Air Traffic Control clearances for IFR approaches could perhaps be sequenced in-between Air Force traffic. The majority of civil users would most likely be passengers of commuter aircraft, not individual pilot owners.

MIT-018

VFR Corridors

In contrast to instrument operations, the majority of civil users fly under visual flight rules. Unlike IFR traffic which is flying at altitude to avoid terrain, VFR traffic tends to concentrate much closer to the surface along valleys and low routes through high terrain. During times of low cloud conditions or poor visibility, traffic tends to concentrate along selected routes such as the rivers or highways that run in the valley bottoms. The major route in this region runs from Fairbanks along the Richardson and Alaska Highways to Northway, and on into Canada. This route is used by local traffic year around, and receives heavy use in the summer by pilots flying to Alaska from Canada and the US, and therefore not familiar with the area. The route is also heavily used by student pilots on solo cross country training flights.

Recommendation (4) A major VFR route exists between Fairbanks and the Canadian Border (via Big Delta and Northway), and from Big Delta through the Alaska Range along the Richardson Highway. A low level VFR corridor should be established along the Richardson and Alaska Highways along these routes. Military aircraft should not be permitted in this corridor. The corridor should be five miles wide, with the Richardson Highway as its north and east boundary. The corridor should extend from the surface to 2,000 feet above ground. This would allow safe VFR transit of general aviation aircraft during inclement weather conditions without the potential for conflicts with military aircraft.

MIT-019

Recommendation (5) Additional routes run from Fairbanks to Central and Circle City along the Steese Highway, between Circle City to Eagle and Dawson along the Yukon River, and from Northway to Chisana (south) and Chicken, Eagle and Boundary (north). Corridors, or floors above ground level along these routes should also be considered to protect VFR operations.

MIT-020

Recommendation (6) The Trans-Alaska Pipeline is routed through the proposed special use airspace. Alyeska Pipeline Service Company uses helicopters for surveillance and inspections of the pipeline year round. Most of the flights are conducted at low level altitudes, which can make "See and Avoid" more difficult. Helicopter pilots reported experiencing near miss situations with military aircraft while conducting inspections and other operations along the pipeline. The Trans-Alaska Pipeline should be protected by a low level VFR corridor three miles wide, centered on the oil line, starting at the surface and extending to 1500 feet above the surface. This would provide a safe operating environment for both pipeline related helicopter traffic and general aviation traffic using the pipeline as a visual reference in marginal weather. Again, military aircraft should be excluded from this corridor.

MIT-021

Seasonal Timing of Military Operations

During certain times of the year, general aviation traffic increases dramatically across large portions of the Interior. Corridors aren't appropriate due to the disbursed nature of these operations. Fortunately, there is a time dependency which makes these activities both predictable and avoidable. The major uses are:

Hunting Seasons: Beginning approximately two days prior to the opening of Dall Sheep season until approximately two days after the close of moose season there is a significant increase in general aviation traffic. Most of this increase in traffic will be due to Air Taxi operators and private pilots flying to and from hunting camps located in the Forty Mile area (Yukon MOA's) and the Alaska Range. Currently, sheep season opens around August 10th and many moose and caribou seasons close around September 30th in the Interior. Due to the nature of hunting operations, many of the aircraft participating in these activities will be conducting off-airport operations (landing on and taking off from lakes, rivers and gravel bars). The combination of increased traffic, difficulty in "See and Avoid", off airport operations, and fall weather conditions results in a significant increase in the accident threat level.

Fish & Game Surveys: State and federal agencies such as Alaska Department of Fish & Game, US, Fish and Wildlife and the National Park Service use aircraft in the proposed airspace to conduct game surveys and law enforcement surveillance. These game survey operations are more concentrated during the May through September time period.

Recreational Flying: During the week around July 4th, there is a peak in general aviation recreational flying. At this time people are vacationing and traveling by aircraft all across the state, many transiting portions of the proposed areas. Also during this period, there is an increase in tourist traffic flying along the Alaska and Richardson Highways, and between Dawson and Fairbanks. Recreational users from other parts of Alaska and visitors from outside the state are generally not familiar with specific corridors, time and space phasing which may be in place, increasing the opportunity for them to inadvertently wander into high risk situations.

Recommendation (7) Potential conflicts between military and civilian aircraft were identified within specific time windows. The military should make every effort to avoid overflights, particularly low level overflights, during these time windows.

It is recommended that no Major Flying Exercises (MFE's) be scheduled between August 8 and September 30 annually. This would provide temporal separation between large scale military operations and general aviation aircraft operations during the hunting seasons. Since Dall Sheep hunting season currently opens on August 10 this would offer a two day window of protection during which most hunters would be flying to and from their hunting areas. The September 30 date would cover most of the current moose and caribou seasons.

In addition, the Air Force should restrict all routine flying to no lower than 3,000 feet AGL during the hunting seasons listed above.

The Air Force should not conduct any MFE's during the time period one week before and one week after the July 4th holiday. This period would largely deconflict Air Force activities with the high levels of recreational and tourist aviation traffic which occurs in this time period.

Taking these seasonal constraints into account along with the winter months that are not conducive to large scale Air Force operations, it appears that four Major Flying Exercises could be accommodated each year. Levels of activity above this number should result in further measures to mitigate conflicts with civil users of the airspace.

Communications Between Military and Civil Users

While the areas of special use airspace requested by the Air Force for training are vast, the areas actually occupied by groups of aircraft at any one time is relatively small. If knowledge of the location and direction of travel of military aircraft can be communicated to civil users, this would go a long way toward allowing effective use of the airspace by civil and military users concurrently. We recognize and applaud the Air Force for their efforts to install VHF communication outlets and radar facilities which provide some coverage of the corridor between Fairbanks and Big Delta last summer. Those that tried using the service reported variable results.

Recommendation (8) The Air Force should aggressively pursue improvement of their VHF communications capability throughout the proposed Military Operations Areas (MOA's). This should include Remote Communications Outlets (RCO's) disbursed throughout the MOA's to ensure adequate year round coverage, and a coordinated and well informed Range Control capability, which can provide specific, real-time information on the location and direction of flight of military aircraft at any given time. In addition, tape recorded messages broadcast on separate frequencies alerting pilots to military traffic concentrations along major air traffic corridors could be available to pilots as soon as they become airborne from remote areas. The FAA should also examine its procedures to disperse more detailed information about military traffic to the civilian users via tape recorded broadcasts over navigation aides and through the use of commercial radio and television news programs.

Recommendation (9) The Air Force should provide access to Range Control personnel via a toll-free telephone number so that civilian users can obtain information about military activity schedules. This will enable civilian aviators to plan their operations around the highest levels of military activity. The level of detail available should include timing and location of planned activity, which would allow the maximum flexibility for civil users to accomplish their missions while minimizing exposure to encounters with military aircraft.

Recommendation (10) The possibility of using AWACS aircraft to provide both enhanced radar coverage and VHF communications capability during Major Flying Exercises (MFE's) should be explored. This capability if feasible, should be implemented. This coverage would only be available during MFE's, but since these are the times when military activity will be highest, the AWACS capabilities could conceivably provide significant enhancements to safety.

AIR-007

MIT-023

MIT-024

Coordination

It was apparent at the meetings held in Fairbanks that a majority of general aviation pilots are not well informed of the Air Force's training operations. By the same token, it was also clear that the Air Force is continuing to gain new insights into the nature and magnitude of general aviation activity which occurs in Interior Alaska. Channels for communication and continued dialog between the Air Force and the civilian aviation communities need to be enhanced and maintained, even after permanent changes are made to the airspace.

Recommendation (11) The Air Force should immediately establish and facilitate an aviation advisory committee to provide coordination and communication between the general aviation and military aviation communities. The FAA and an aviation user group should be requested to assist in the selection of individuals to represent general aviation interests. This committee should include a representative from the following groups: a scheduled air carrier who flies routes between Fairbanks and Eagle/Dawson; an air taxi operator who conducts on-demand air charter operations in the MOA's; a resource pilot who conducts wildlife inventory and surveillance flights; a flight instructor who trains primary students in the area; a member-at-large, who represents helicopter operations in and near the MOAs and a member-at-large, who represents recreational and other aviation interests.

This committee should meet periodically to assess aviation safety issues and to make recommendations to both the Air Force and the FAA which are intended to improve aviation safety within military air space. Committee recommendations would be non-binding but would serve to enhance communications and coordination between the civilian and military communities. The committee members would serve as an additional point of contact for aviators who have had problems with, or wish to make suggestions to the military.

Recommendation (12) The Air Force should maintain an "open door" policy with the aviation community. Activities such as site visits, open houses and tours of facilities should be conducted to help maintain open lines of communications and educate the aviation community to the nature of military flight operations. The open house at Eielson AFB last summer was an impressive first step in this direction.

Recommendation (13) The Air Force has implemented a toll-free number to receive input from civilians. We compliment the Air Force's efforts in this regard. This service should be made permanent and all input should be documented, given appropriate consideration and response.

Summary

The mixture of military and civil uses of the airspace under consideration in the Draft EIS creates a significant challenge to planners and regulators in both camps. It is our hope that with careful consideration of the needs of all users we can adopt operational procedures which will provide the safest possible operating environment and the ability to accomplish everyone's purposes.

MIT-025

MIT-025

MIT-026

EIS Team

Major C. Virgil Hanson, Chief, Environmental Management
611 ASG/LGV
5800 G Street, #203
Eielson AFB, AK 99506

Sir:

As a former member of Alaska's Army National Guard, I would like you to consider my remarks regarding the Air Force's proposal to convert temporary MOA's to permanent MOA's in the Fairbanks/Eagle region. In short, I oppose the conversion. I oppose the creation of new MOA's and I oppose any expansion of low-altitude air operations. I do so on the grounds that the disruption caused by the aircraft has too great an impact on the human environment. Further, the bitter ill will generated against the military as a whole, erodes the standing of the military in our civil society.

During the Operation Polar Strike exercises of the 1980's, I endured the take off of F-4 Phantom trainers at Eielson AFB. While in a firecamp south of Lake Minchumina, I endured mock air to ground attack by A-10's. Buddies and co-workers have told me of low-level supersonic training over German towns when the Germans still allowed the US to do this. I have experienced the hideous noise and revolting invasiveness of the aircraft.

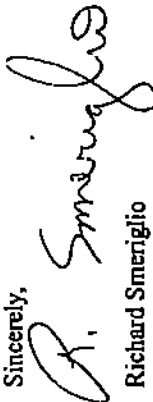
As a former enlisted man, I know that the military must train. As a civilian I know that the military must never abuse the citizenry. Low-level operations over National Parks, Preserves, Wildlife Refuges, and Scenic Rivers or State Parks, Forests and Recreation Areas constitute abuse. Military subordination to civilian authority remains a cornerstone in the edifice of our democracy. The Department of Defense must abide by the wishes of the US Department of the Interior and the Alaskan Departments of Fish and Game and Natural Resources regarding this matter.

OTH-014

081

Last winter I skied some of the lonely country near Yukon Charlie Rivers National Preserve. The Air Force proposes to expand operations in that area. I hope that neither I nor any one else suffers an overflight in that area. If I ever do, I will with profound regret cease to support the military presence in Alaska.

Sincerely,



Richard Smeriglio
Honorably Discharged
A Co., 5th Bn. 297th Infantry (scout)
Alaska Army National Guard

HCR 64 Box 565
Seward, AK 99664

082



Clearwater Outdoor Services

Peter R. Slight - Registered Outdoor Outfitter P.O. Box 71461 - Fairbanks, Alaska 99707 (907) 457-7146

November 23, 1994

EIS Team

Major C. Virgil Hanson
Chief, Environmental Management
611 ASP/EGV
5800 G Street, Suite 203
Elmendorf AFB, AK 99506

Dear Major Hanson:

RE: Draft Alaska Military Operations Area EIS

Thank you for the opportunity to comment on the Draft EIS.

The Draft EIS and Executive Summary appear to have been designed to impress the citizenry by their weight and size. As a hunter, trapper and guide who has had too much experience with the military attitude toward wildlife and those of us who live and work in the bush, I remain unimpressed. The EIS is superfluous in its treatment of quality of life issues, affects on wildlife, and safety of private pilots and aircraft.

The reassurances that the proposed activities will be of minimal inconvenience are patronizing. We have been lied to before in this regard. These promises sound like others we've heard on earlier, smaller, proposals. I have been lied to and threatened too many times by military personnel to believe this latest round. I cite two examples.

One August I was being picked up at a remote airstrip south of Fairbanks on the West Fork of the Little Delta. We transmitted our takeoff plans in the blind and taxied downwind. The wind shifted as we pivoted to takeoff position, so we waited a minute or two. At that time, two military aircraft came down the valley right over us at less than 200 feet AGL. If we had taken off as scheduled, the result would most likely have been a serious accident. When I returned to town I called the Air Force, only to be told that no military aircraft had been in that area. This was either a lie or the AF has no real idea of where their aircraft are flying.

One May I watched several military flights thundering down the Johnson Glacier. The planes scared many newborn Dall sheep lambs. I again called to complain and again was told that no aircraft had been in that area. When I mentioned that I had videotaped the incident, the individual informed me that I should not be filming military operations. The irony of being accused of photographing an aircraft that "wasn't there" was lost on this



individual.

OTH-014
Air safety, affects on wildlife and the general nuisance of the proposed activities are reason enough for this idea to be scrapped until the military is willing to at least try and be a good neighbor. Too much land and air space is already negatively impacted.

Thank you for considering my comments.

Sincerely,



Pete Buist



The National Outdoor Leadership School
P.O. Box 911, Palmer, Alaska 99445
(907) 743-6617

Don Ford
Alaska Branch Director

November 27 1994

Major C. Virgil Hansen
611 ASG/LGV
5800 G St. #203
Elmendorf AFB, AK 99506-2150

Re: Draft Environmental Impact Statement for Alaska Military Operations

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for Alaska Military Operation Areas. I am continuing with the proposed action from the perspective of the National Outdoor Leadership School (NOLS) which has been operating wilderness skills courses in Alaska since 1971. NOLS is a non-profit educational institution that operates in the state of Alaska with certification from the Commission on Post Secondary Education. Our specific concerns relate to the potential impact of military training exercises and supersonic operations on the experience of our courses and students in the Fox MOA.

The Draft Environmental Impact Statement (hereinafter referred to as the DEIS) acknowledges significant adverse impacts on existing recreation use and wilderness values but the discussion of the effects is limited in scope. Furthermore, where impacts are acknowledged, the outcomes are detrimental to the future of the NOLS program in the Talkeetna and Alaska mountains ranges.

083

National Outdoor Leadership School

Page 2

Impacts on Wilderness Values Quiet and stillness are essential characteristics of the arctic wilderness; they afford the sense of solitude and peace our students seek in the backcountry of Alaska. Our students can find almost anywhere in North America to learn the outdoor skills, leadership and natural history taught on a NOLS course but they choose Alaska because of the unique wilderness qualities of the state. A vital component of that experience involves nonconsumptive wildlife viewing.

The DEIS list of adversely affected wildlife includes a diverse number of species: peregrine falcons, trumpeter swans, waterfowl, raptors, caribou, moose, dall sheep, brown bears, black bears and wolves. The noise, pollution and subsequent disruption generated by the estimated 7,680 yearly flights through the Fox MOA will irreparably harm the ecosystem and consequently harm the wilderness experience for our students.

Socio-Economic Impacts Recreation is a vital segment of Alaska's economy. The DEIS fails to recognize the importance of commercial recreation in local economies by limiting the economic analysis to Etahoon and Elmendorf Air Force Bases. NOLS operates commercial activities and derives revenue from the wilderness qualities of the Fox MOA. A significant portion of the \$1,468,000 1994 NOLS Alaska operating revenue is a result of courses offered in the Fox MOA.

REC-001

Due to the uninviting winter conditions in Alaska, the majority of the state's tourism occurs in the summer months. Nevertheless, in the DEIS the Air Force schedules the bulk of the military operations for these same months. Eliminating overflights during the fourth of July and Labor Day holidays will not mitigate the damage to recreation resources from the scheduled 60 days of major flying exercises and 240 days of routine training. Our course are supported by the delivery of food by airplane approximately once a week for a typical one month course. Restrictions on these activities would have significant impacts on our operations and the air taxi operator's operation. Furthermore, there has been no effort to research with businesses and recreationists as to where they might relocate to avoid the damages incurred from the proposed action, the cost of relocation, and whether the expenses and wilderness values would be comparable.

MIT-028

MIT-028

Conclusion Even without the proposed expansion of military operations, our courses in the Taseetna and Alaska mountain ranges already experience the negative impacts of military training exercises. There is no question that the forecasted increase in military flying exercises and supersonic operations will compromise our ability to operate in the state.

In a statement written for the U.S. House of Representatives on June 11 of this year, the Director of the Center for Defense Information, Rear Admiral Eugene J. Carroll, questioned the need for low level flight training with the absence of a national needs assessment coupled with the Air Force's existing control of 25% of the U.S. air space.

"As recently as Desert Storm the vulnerability of low flying aircraft was once again demonstrated....Low level flight training is undeniably enjoyable for pilots. It is also a budget builder for the Air Force since it is very expensive. But it no longer can be justified as necessary for combat readiness of air crews."

NOLS opposes the proposed action based on the inherent damages to the natural resources of Alaska and the outfilter/guides dependent on those resources.

Thank you for your time and reconsideration of this important issue.

Sincerely,

Don A Ford

Don Ford

Director NOLS Alaska

Chris Seeley
P.O. Box 61661
Fairbanks, Alaska 99706

November 23, 1994

Frank Murkowski
U.S. Senate
706 Hart Building
Washington, D.C. 20510-0202

Dear Frank,

Enclosed please find petitions signed by a number of fellow Fairbanks residents who are adamantly opposed to the expansion of MOA's in Alaska. I could bend your ear for an hour on this subject, but suffice it to say we are opposed.

Sincerely,

Chris Seeley
Chris Seeley

OTH-014

Chris Seeley
P.O. Box 61661
Fairbanks, Alaska 99706

November 23, 1994

Frank Murkowski
U.S. Senate
706 Hart Building
Washington, D.C. 20510-0202

Dear Frank,

This letter is from me and in it I am not speaking for the people who signed the enclosed petitions.

This entire process of public hearings concerning the MOA expansion is a joke. When I spoke with the FAA before the meeting at Alaska Land it was clear that the FAA had already accepted the Air Force's request for the expansion. When we attended the meeting, it became clear after an hour and a half that this "dog & pony show" was arranged in such a manner as to eliminate any chance for meaningful public input or criticism.

I have reviewed the EIS and it doesn't consider the NEGATIVE economic impact to the Interior nor the aviation community of the Interior. And it is blatantly biased towards the Air Force.

It is quite clear to me that we have no voice in what the FEDs do to our state and the Air Force and FAA have nothing but contempt for the citizens of Alaska.

Therefore, I must insist that you do everything possible to cut the budget of the Air Force and the budget of the FAA. I am fed up with rogue government agencies allowing regulations and restrictions down my throat. Start the Budget cutting with these two bureaucracies.

Sincerely,

Chris Seeley
Chris Seeley

NOVEMBER 8, 1994

PETITION TO HALT ALASKA MOA EXPANSIONS

We, the undersigned, strongly object to expanding MOA's in Alaska. We do not believe that the Air Force must have such large, permanent MOA's which would severely impact civil aviation not only with respect to safety, but also economically.

In addition, the environmental impact statement does not address the obvious negative economic impact to Interior Alaska.

PRINT NAME	ADDRESS	SIGN NAME
Matt Callahan	Box 749241 Fairbanks, AK	McCallahan
Shane Kline	Box 61317 Fairbanks, AK	Shane Kline
Sharon Price	Box 81101 Fairbanks, AK	Sharon Price
Derek Soren	Box 61328 Fairbanks, AK	Derek Soren
Brad Scott	1151 GALT RD FAIRBANKS, AK	Brad Scott
Ray Richards	1170 VICKILAN RD.	Ray Richards
Jason Huffman	935 Aurora	Jason R. Huffman
Heidi McArthur	P.O. Box 750410 Fairbanks, AK 99775	Heidi McArthur
Robert Rago	Box 750413 Fairbanks, AK 99775	Robert M. Rago
Erik Brunner	1027 Sutton #2	Erik Brunner
CHRIS SEELEY	P.O. BOX 61661	Chris Seeley
PEGGY SEELEY	FAIRBANKS AK	Peggy Seeley

NOVEMBER 8, 1994

PETITION TO HALT ALASKA MOA EXPANSIONS

We, the undersigned, strongly object to expanding MOA's in Alaska. We do not believe that the Air Force must have such large, permanent MOA's which would severely impact civil aviation not only with respect to safety, but also economically.

In addition, the environmental impact statement does not address the obvious negative economic impact to Interior Alaska.

PRINT NAME	ADDRESS	SIGN NAME
Victoria Donke	PO 47 Ester AK	Victoria Donke
John V Patrick	499 Wilkerson Trail	John V Patrick

NOVEMBER 8, 1994

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PRINT NAME	ADDRESS	SIGN NAME
Dan Dickson	PO Box 16095 Fairbanks AK 99716	Dan Dickson
Mark A. Hopper	6057 E. 11th St. Fairbanks AK 99712	Mark A. Hopper
Tom McInerney	PO Box 72471 Fairbanks AK 99707	Tom McInerney
Don McInerney	Box 80000 Fairbanks, AK 99708	Don McInerney
Dale Hummer	Box 601256 Fairbanks, AK 99706	Dale Hummer
Robert D. R. Ald	Box 4312 Fairbanks, AK 99710	Robert D. R. Ald

NOVEMBER 8, 1994

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PRINT NAME	ADDRESS	SIGN NAME
LARRY CHENAILE	PO Box 349 Fairbanks	Larry Chenaile
James P. Moore	P.O. Box 81347 Fairbanks	James P. Moore
Daniel C. Fargnoli	PO Box 61000 Fairbanks	Daniel C. Fargnoli
Ronald A. Lanni	2881 Chen Fairbanks	Ronald A. Lanni
Edward N. Nelson	Box 972 Ruby, AK	Edward N. Nelson
Michael A. Kana	P.O. Box 83990 Fairbanks AK 99708	Michael A. Kana
Ken Tully	1200 Windsor Apt 2 Fairbanks AK	Ken Tully
Larry Chenaile Jr.	1933 Reed Dr, Fairbanks AK	Larry Chenaile Jr.

NOVEMBER 8, 1994

PETITION TO HALT ALASKA MOA EXPANSIONS

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FRONTNAME	ADDRESS	SIGNATURE
Eric Weiss	107 7th AVE Fairbanks AK	Eric Weiss
Howard Haredee	P.O. Box 6002 Fair AK 99701	Howard Haredee
Matthew Stone	1581 Jones Rd, Fair	Matthew Stone
Peter Z. Williams	691 Main Mullen Fair AK	Peter Z. Williams
John Wing	2015 Bridgeway	John Wing
Jeff Edwards	5242 Dale Rd, Fair AK	Jeff Edwards
Terri T. Avery	1231 26th Ave, Fair AK	Terri T. Avery
Don Varnes	1297 Arctic Drive	Don Varnes
Ray Brown	1116 Charlotte St	Ray Brown
Clay Brown	North Ave, Fair AK 99705	Clay Brown
Les Buma	9285 60th St, Fair AK	Les Buma
Mary Ann	1953 Kirtland Ave, Fair AK	Mary Ann
Don Clasen	2615 Boulder Ave, N. pole	Don Clasen
Wes Tretter	2044 Airport Way, Fair AK 99705	Wes Tretter
Jim Bartson	2080 Charlotte St, Fair AK 99705	Jim Bartson
C. R. Everts	2106 Airport St, Fair AK 99705	C. R. Everts

NOVEMBER 8, 1994

PETITION TO HALT ALASKA MOA EXPANSIONS

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In addition, the environmental impact statement does not address the obvious negative economic impact to Interior Alaska.

FRONTNAME	ADDRESS	SIGNATURE
Michael J. Osborne	1248 Carter Rd, Fair AK 99702	Michael J. Osborne
Alex Karvelis	P.O. Box 8708, Fair AK 99708	Alex Karvelis
Daniel Clasen	Ft. 99708	Daniel Clasen
Michael T. Pop	2615 Boulder Ave, Fair AK	Michael T. Pop
Charlotte Saxon	403 W. Edwards St, Fair AK	Charlotte Saxon
Kevin Wing	2530 E. 1st St, Fair AK	Kevin Wing
Timothy M. Whinnis	2015 Bridgeway, Fair AK	Timothy M. Whinnis
Francis X. Daniels	1321 Karpis St, Fair AK 99701	Francis X. Daniels
Robert S. Alford	P.O. Box 57, Fair AK 99705	Robert S. Alford



OROFACIAL DIAGNOSTIC ASSOCIATES, LTD.

Helsinki, Alaska, Fairbanks and International Decision

ROBERT L. TALLEY, D.D.S.
LAURA B. OUSLEY, D.D.S.

November 21, 1984

Major C. Virgil Hanson, Chief, Environmental Management
611 ASG/LGV
5800 G Street, Suite 203
Elmendorf AFB, AK 99506

Dear Major Hanson:

As a hunter and outdoorsman, I am extremely concerned over the proposed U.S. Air Force use of massive areas of the Alaskan wilderness for supersonic flights and other associated air space utilization. The potential for horrible impact on the wildlife of the region, as well as the human occupants of the area, stimulates great concern.

It has long been understood that loud noise and the repeated frightening of wildlife alters their behavioral patterns and reproductive cycles. It would be a tragedy to see the wonderful regions in Alaska altered forever for military expediency.

I am certainly in support of all of our military activities, but we have come this far with our incredibly high-tech military without needing this type of testing. The question then arises; why should we now need to run such tests? The areas are too large, the flight levels proposed are too low and the number of sonic booms that will be generated is unprecedented.

The state of Alaska is one of our last true frontiers. It would be incredibly unfortunate to sacrifice the quality of that frontier for the expediency of military testing that certainly could be carried out in some other manner without such environmental impact.

I respectfully request that you decline to support any measures allowing the Air Force to conduct this increased activity.

Sincerely yours,

Robert L. Talley
Robert L. Talley, D.D.S.
RLT/76

Orfacial Associates of America, Inc.
Orfacial Associates of America, Inc.
Orfacial Associates of America, Inc.
Orfacial Associates of America, Inc.

448 201st Avenue, N.W. Suite 103, Norman, OK 73072 Telephone 405/321-8030 FAX 405/321-2106

BIO-007

PAN-001
NOI-002

OTH-014

3120 38th Ave. E.
Bradenton, FL 34208
November 22, 1994

EIS Team
Major C. Virgil Hanson, Chief
Environmental Management
611 ASG/LGV
5800 G Street, Suite 203
Elmendorf AFB, AK 99506

Dear Major Hanson.

In 1993 I was among the privileged to visit Alaska. I was in Fairbanks and in the area marked Fox as well as close to Sustina. If I were to come again after this proposed intense supersonic training exercises, I would not enjoy it as much.

In the 50's while teaching second grade in Salinas, CA we were disturbed by a number of craft breaking the sound barrier. I believe that humans and animals will be hurt by the increased noise, the petroleum fall out, and the electro-magnetic radiation hazards that go with military bases.

Please consider a training program that will not have such serious impacts on humans and wildlife.

Sincerely,

Mary Sheppard
Mary Sheppard

MOA/EIS
611 ASG/LGZ
5800 "G" Street
Attn: James Hostman
E.A.F.B.
Anchorage, Alaska 99506-2150

Dear Sir:

I would like to go on record as protesting the expansion of Military Training Routs and Military Operations Areas within Interior Alaska. The noise level and safety concerns associated with *ANY* expansion is totally unacceptable.

I have personally witnessed some of the problems from my recreational property on the Salcha River (I spend about 150 days a year here). During the Cope Thunder exercises the past three years I have seen and heard the following:

- Mantles on propane lights fall off due to sonic "booms". This could be a real problem if lit.
- Noise levels so loud that two people can not converse without shouting. You can even hear the jet noise over an outboard motor noise when they fly the river so low.
- Aircraft flying so low over the river that you can see the pilot and can almost count the rivets in the plane.
- The lie from the Air Force that there would be no low level flying during hunting season. Last season (94) I witnessed this activity above Caribou Creek daily from September 14 thru the 20th.

My primary residence is in North Pole, Alaska near Eielson Air Force Base. I fully expect to hear aircraft noise here because of the location. I do not expect to hear nor do I want to hear such noise in an area that I have invested in to be for relaxation. My point is that the training should be done somewhere else! The Air Force has zero credibility and can not be trusted to make good their promises. This started with Col. Flemming and continues today. The Air Force talks about being "good neighbors" but has not showed this to be the case by their actions.

Sincerely,
John Gillen
John Gillen
P.O.Box 55986
North Pole, Ak 99705

Jeff Scholtz
P.O. Box 61310
Fairbanks, AK 99708-1310
(907) 457-4308

November 19, 1994

Major C. Virgil Hanson
Chief, Environmental Management
EIS Team
611 ASG/LGV
5800 G Street, Suite 203
Elmendorf AFB, AK 99506

RE: Comments on the draft Alaska Military Operations Areas EIS

Dear Major Hanson,

The unfavorable environmental consequences of the proposed USAF designation and upgrade of 71,580 square miles of Alaskan airspace is unacceptable. Potential severe impacts on Alaska's wildlife, including: caribou, moose, sheep, peregrine falcons, golden eagles, and trumpeter swans; cannot be justified. The proposed impact area is simply too large.

OTH-014

Recreational areas, including the many preserves and refuges, as well as several wild and scenic designated rivers should NEVER be subjected to routine, repeated low flying aircraft. Sonic booms are simply unacceptable at any time in any of these areas. I moved to Alaska to get away from industrial noises, pollution, and intrusion. Air space cannot be exempt from preservation.

As with all such issues, benefits and costs must be balanced. Alaskan airspace is not to be given up without very significant benefit to Alaska, her people and her natural resources.

I would encourage the withdrawal of the USAF low altitude airspace expansion proposal.

Sincerely,

Jeff Scholtz
Jeff Scholtz

copies to: Honorable Bruce Babbitt
Secretary of the Interior

Paul Gallant
Federal Aviation Administration

224 E. Manor Ave.
Anchorage, AK 99501
November 28, 1994

Major C. Virgil Hanson
Chief, Environmental Management
611 ASG/LGV
5800 G St. Suite 203
Elmendorf AFB, AK 99506

Dear Maj. Hanson,

I am writing to you to comment on the "Alaska Military Operations Area, Draft Environmental Impact Statement".

I am in opposition to the Air Force's (AF) "proposed alternative". I would request the AF implement the "No Action" alternative.

I do not want to see an increase in military over flights taking place in Alaska. I do not want to see supersonic operations conducted at 5,000 feet above ground surface in Alaska, particularly since these types of flights do not occur this low any where else in the U.S. I do not want to see increases in the numbers of flights and resulting increases in noise over Alaska communities, Alaska State Park land, U.S. National Park & Preserve land, and U.S. Wild and Scenic Rivers. I do not want to see commercial and private pilots in small planes subjected to increased chances of mid-air collisions and increased costs associated with Special Use Airspace. The "proposed alternative" would result in disruption of subsistence and recreational activities in Alaska.

The Cold War is over and the U.S. won it. The Defense Department budget is declining. I see no reason for the AF to designate over 71,000 square miles of air space in Alaska as permanent, new MOA.

Once again, I request the AF implement the "No Action" alternative that will maintain the status quo.


Paul Laverty

PAN-001
LAN-004

OTH-014

PUBLIC COMMENT FOR MOA/EIS DATE: 29 NOV 94 1120 HRS
Rec'd by SSgt Anne Proctor

Mrs Jane Stammen
4205 Hayes St
Anchorage AK 99503
563-7703

Against AF taking advantage of public's generosity. Disagree with the policy to double in size the military over flights in Alaska. Yes were 'large state, but fact with animals and birds, etc. its great disturbance to them also to us who recreate and live on the lands. This is quite an imposing effort. The Air Force is doing yourselves and future generations a disservice. Note: Took 4 phone calls to get to right office to make comment. (Got a recording, then operator 16 -- the 3 WG/PA, then ALCOM/PA).

OTH-014

NOTE: Notified Operator 3 that any calls concerning public comment on MOA/EIS, or, in layman's terms an "airspace project" to forward calls to 552-2341/7567 or 1-800-538-6647. I explained to the closing date on the EIS for 30 Nov.

Al Near
PO Box 80847
Fairbanks AK 99708

November 23, 1994



611 ASG/LGV
5800 G St Ste 203
Elmendorf AFB, AK 99506-2150

Subject: Proposed Improvements to Military Operations Areas in Alaska

I have reviewed the proposed MOA changes, listened to testimony at public hearings noted opinions in the Fairbanks News-Miner and conversed with other pilots and individuals who have observed flights in the temporary MOAs. The only favorable responses to the proposed changes have come from the military. I heard reports of "near misses" and concerns regarding IFR flight through the proposed areas from pilots and citizen complaints of repeated low passes over cabins, supersonic shock waves and other maneuvers that could be characterized as harassment.

No MOAs should overlie recreation areas such as Harding and Birch Lakes, highways such as the Richardson and Alaska, or communities like Big Delta, Eagle and Circle. Neither should MOAs be collocated with Victor airways or heavily used VFR routes. Vast reaches of Alaska are roadless and thinly populated. Keep MOAs away from developed areas.

Sincerely,

Al Near
Al Near

OTH-014

MIT-028

M. Sturrock
G. Dineen
8110 McKenna Rd.
Hollandale, WI 53044

Nov. 21, 1994

Major C V Hanson
611 ASG/LGV
5800 G St Suite 203
Elmendorf AFB AK 99506-2150

Dear Major Hanson:

I write in opposition to the USAF proposed designation and upgrade of 71,650 mi² of military airspace. If approved, this would impact nearly 13 million acres across Alaska.

Though I now teach high school science in Wisconsin, I was a graduate student at U Alaska Fairbanks for 3 years, and I am a former US Navy Lieutenant (O3).

I fear Alaska will experience more noise, flare and chaff "fallout" and jettisoned fuel. I am concerned about the Delta Caribou herd, Dall sheep populations, and Peregrine falcon nest sites. There will also be impacts on native communities' subsistence resources.

In Alaska, our nation has its last pristine wilderness. I urge you to maintain your operations within present prescribed limits. Thank you.

Very respectfully,

Mark Sturrock { LT USN 1981-1977
MS Geology USAF 1984-1981 }

LAN-004

HAZ-009/
-003/-010

BIO-007
SUB-001

YORRABIL INSTITUTE
213 Westmoreland Court
Georgetown, KY 403204
(502-868-9074 voice and fax)

November 24, 1994

EIS Team
Major C. Virgil Hanson, Chief, Environmental Management
611 ASG/LGV
5800 G St Suite 203
Elmendorf AFB, AK 99506

Dear EIS Team:

I am shocked to learn that the US Air Force has proposed designating 71,650 square miles of Alaskan air space for low-level (5000 feet above ground) supersonic jet training flights. The flights will have disastrous effects on wildlife (caribou, dall sheep, trumpeter swans, among others) and native peoples. It will also ruin the experience of visitors to the area.

Canada has subjected the Inuit to overflights. I thought that our own country would not stoop to such activities over wild northern lands. Please show that the US military does want to conserve our natural and cultural heritage. The supersonic flights should not take place.

Sincerely,
Mary Byrd Davis
Director

OTH-014

Nov. 28, 1994

George Matz
14345 Cody Circle
Anchorage, AK 99516

Major C. Virgil Hanson
Chief, Environmental Management
611 ASG/LGV
5800 G St
Elmendorf AFB, AK 99506

Dear Major Hanson:

The purpose of this letter is to comment on the Alaska Military Operation Area EIS.

There is considerable discussion these days about "takings" by government agencies and benefit/cost analysis of regulations.

I consider the Military Operations Areas proposed by the Air Force for jet fighter training over substantial areas of Alaska to be a very significant "taking". It should be more than obvious to the Air Force that private land owners and tourist operations in remote areas are going to lose some of the peace and tranquility that they seek for themselves or their clients. If the Air Force continues with this proposal, it should be prepared to offer these private land owners and privately owned tourist operations with long-term compensation.

PRO-007

Since the proposed Air Force flights would be taking a public resource, it should also be prepared to offer compensation to the public-at-large for depriving it of the opportunity to enjoy these wilderness areas for recreational purposes. The Exxon Valdez settlement legally established the use of contingent valuation methodology to determine costs to the public for nonmarket values. In order to have an adequate EIS, the Air Force should undertake a contingent valuation study regarding the impacts of the MOA's.

After the Air Force determines the amount of direct compensation it needs to pay private land owners and businesses and the cost to the public for its use of a public resource, it needs to incorporate this data into a benefit/cost analysis.

I look forward to seeing your economic analysis of your proposed plans.

Sincerely,

George Matz
George Matz

cc Senator Stevens
Senator Murkowski
Congressman Young

095

Dan and Patti Billman

HC 01, Box 1706, Glennallen, AK 99588
 TEL: 907-822-5566
 FAX: 907-822-3250

November 20, 1994

Major G. Virgil Hanson
 Chief Environmental Management
 U.S. Air Force
 611 ASG/LGV, 5800 G Street, Suite 203
 Elmendorf AFB, AK 99506-2150

Dear Major Hanson:

Many of the residents and property owners of the Lake Louise area, as well as the Copper River Valley Chamber of Commerce, have decided to go on record as -

- being against the Air Force's attempt to make a Permanent Military Flight Training Area (MOA) north of Lake Louise, and
- supporting the "No Action Alternatives" to keep the area as a Temporary (TMOA).

This decision has come in response to a proposal by the Air Force to make a large area north of Lake Louise into a permanent training area, called FOX 1. The new boundaries of FOX 1 incorporate much of the Copper River Valley that is home to large numbers of wildlife habitat. (1) The trumpeter swans have many nesting sites in this area and their nesting period extends from April 1 through August 31 - they could be permanently disturbed by the increased noise levels and supersonic booms. (2) The Nelchina and the Delta Caribou herds migrate through the area and spend much time year-round grazing.

Community residents and property owners are worried about the effects of increased maneuvers and the use of supersonic fighter planes, engaged in mock combat, would have on our quality of life, impact on private pilots and commercial operators in this area, and most of all, impact on the wildlife habitat.

At the public hearing held in Glennallen on September 28, 1994, the company responsible for the Environmental Impact Studies acknowledged that they had neither obtained comprehensive nor conclusive information on private property and cabins within FOX 1, nor are they familiar with the extent of recreational use by private citizens and commercial operators in this area. They also failed to acknowledge the importance of the Nelchina Caribou herd which is the third largest herd in Alaska.

Although the Air Force has said it would not use the area for two weeks during hunting season, please note that the hunting season actually stretches from the 10th of August through the 20th of September and for the winter hunt from the 1st of January through the 31st of March.

Although we are sympathetic to the Air Force's needs, the present system of FOX 1 as a temporary training area seems to be working. A change to an unregulated permanent status might have serious biological, physiological and economic consequences for the Lake Louise area and the entire Copper River Basin.

Sincerely,

Dan Billman
 Dan Billman

096

FROM THE DESK OF RICHARD & NANCY DEBUSMAN
 830 LANARK ST.
 WASILLA, ALASKA 99654

Ph. # 376-5538

11/19/94

EIS Team

Major C. Virgil Hanson, Chief
 Environmental Management
 611 ASG/LGV

5800 G Street, #203
 Elmendorf AFB, AK 99506

Dear Sir:

As long time Alaskans who spend a great deal of time in Alaska's wilderness, we find your proposal totally intolerable. We moved here 27 years ago to work and live in an environment without intrusive activities such as you are proposing.

Specifically low flying aircraft causing loud, objectionable, invasive noises can not and should not be tolerated over national parks, state parks, wild life refuges and rural communities. We spend a great deal of our summers in a state park to avoid the very activity you are proposing.

The Susitna Valley is becoming a significant playground for both Anchorage and Mat-Su residents. Many of us have cabins in areas you propose to overfly. Fishing & wilderness lodges exist in these areas because the environment is quiet and pristine. We have personally heard the story of a military aircraft that started a large fire as it overflew and dropped flares in the Yukon-Charley Rivers National Preserve and was only discovered because this same person reported the situation. Your credibility is not good in this regard and we DO NOT want to see increased activities on your part.

Thank you for the opportunity to speak on this matter.

Sincerely,

Richard DeBusman
 Richard & Nancy DeBusman

Richard & Nancy DeBusman

BIO-009

REC-004

LAN-003

OTH-014

HAZ-009

Cerald L. Bloomer
311 South Central Street
Burlington, Iowa 52601-5523

November 19, 1994

EIS Team
Major C. Virgil Hanson, Chief, Environmental Management
611 ASG/LGV
5800 G Street, Suite 203
Elmendorf AFB, AK 99506
re Draft ALASKA MILITARY OPERATIONS Environmental Impact Statement (EIS)

Dear Sir,

LAN-004

I want to protest in the strongest terms the Air Force proposal to upgrade 71,650 square miles of airspace that will have an impact on 13 million acres in Alaska. Nowhere else in our country has the Air Force proposed supersonic jet training at 5,000 feet altitude. This kind of proposal would not be tolerated in the 48 contiguous states since no one would consider setting away with such activities over national parks, refuges and state parks. No one would consider such practices over towns or over our towns and cities.

This proposed activity is precedent setting. The proposed areas are too large, the flight levels are too low and the number of sonic booms is too many. Alaska is not a national sacrifice area for national and international military training. Additional studies are needed to clarify impacts on tourism, recreation, subsistence hunting and other human activities, to say nothing about the impacts on wild life.

OTH-014 Please do not contaminate some of our last true wilderness areas with the environmental, social and economic consequences this military activity.

Sincerely



cc: Honorable Bruce Babbitt, Department of the Interior
Paul Gallant, Federal Aviation Administration
Charles Grassley, United States Senate
Jim Lightfoot, US House of Representatives

2627 Cottonwood Street
Anchorage, Alaska 99508-3980
November 22, 1994

EIS Team
Major C. Virgil Hanson
Chief, Environmental Management
611 ASG/LGV
5800 G Street, Suite 203
Elmendorf AFB, Alaska 99506

Dear Sir:

Two summers ago I encountered my worst experience with military jet flyovers. On a float down Birch Creek near Fairbanks and Circle, where no other person was seen, my small group was bombarded by several loud, low overflights on five days. Apparently this region is an existing military operations area. Alaska's wilderness experiences will be negatively impacted many times over by an increase in such overflights. The proposed extension of training airspace will also ruin my frequent trips in the Forty Mile, Gulkana and Delta River valleys, not to mention my long-planned visit to Wood-Tikchik State Park. Additional studies should be made of other training and simulator options that can substitute for ruining thousands of Alaskans' and tourists' outdoor experiences.

ALT-002

OTH-014

Very truly yours,



John S. Rodignon
cc: Bruce Babbitt

Frank Smith
Box 1199
Barrow, AK 99723
(907) 852-4983 (h) 852-3397 (w)
November 19, 1994

EIS Team
Major C. Virgil Hanson
Chief, Environmental Management
611 ABG/LGV
5800 G Street, Suite 203
Eielson AFB, AK 99506

Dear Sirs:

PRO-003 I would like to comment on the draft EIS concerning "Alaska Military Operations Areas." I don't believe that a copy is available in the Barrow library, and I have only just become aware of the prospective use of Alaskan Airspace.

I am a veteran with two honorable discharges and spent two years in Vietnam.

I used to live in an area that was subjected to overflights by combat aircraft from Edwards and George AFB, and China Lake NWC, as well as from southern San Joaquin Valley bases. I have been startled by maneuvers held at an extremely low altitude, and have watched that happen to wildlife. A canyon I frequent had regular low flights, and a fighter, stealth it was assumed, once went down and had scores of military personnel combing the underbrush for the top secret parts it scattered.

SUB-001 I also used to live in Tok from 1990 through 1992. I know how scarce the game available to local subsistence hunters is, and feel sonic booms in these areas can adversely affect caribou herds, and the moose population. The affected game represents an indispensable cultural resource to the Athabascans in these regions. The cash economy is so marginal in the upper Tanana and Yukon basins that much of the populace simply cannot live healthy lives without available wildlife resources. I have heard from locals in these areas about fuel dumping, mostly from flights originating from Eielson AFB.

HAZ-010 In a time of long overdue contraction of military budgets, I simply cannot see the reason for such expansion and exploitation in Alaska.

Sincerely,

Frank Smith

2405 Ctes Court
Edgewater, CO 805214
November 18, 1994

LAN-004 EIS Team.
Major C. Virgil Hanson, Chief Environmental Management
611458/LGX
6800 G Street, Suite 203
Eielson AFB, AK 99506 19,500
Re: The U.S. Air Force proposed sonic jet training
operations at 5,000 feet above ground over 11,650 square
miles of airspace in Alaska.

Dear Sirs:

NOI-003 Scientific studies show that humans cannot tolerate long-term exposure to sonic booms generated by air combat training below 30,000 feet. These proposed 13 million acres are home to many Native communities with their subsistence activities as well as to the other Alaskans who make their living there and to the tourists who come to the recreation areas.

Considering only the humans the effects of this proposal would be devastating but the wildlife would be impacted even more seriously. Alaska is a great natural resource, not a sacrifice area.

PRO-014 I was once one of those tourists! Please see that more studies are done to identify the impacts on humans and wildlife. Nothing allowed to be attempted over Alaska which wouldn't "fly" over the lower 48! Make the areas smaller, the flights much higher and the sonic booms less frequent.

Sincerely yours,
Frank Smith

Copies to:

Honorable Bruce Babbitt
Department of the Interior
The Honorable Dianne Feinstein
United States Senate

Honorable Paul H. Douglas
Federal Aviation Administration
The Honorable Barbara Boxer
United States Senate
The Honorable Ronald V. Dellums
U.S. House of Representatives

Mary Ellen Shea
15301 Elmora Road
Anchorage Alaska 99516
345-1248(h)

EIS Team
Major C. Virgil Hanson
Chief, Environmental Management
611 ASG/LOV
58000 G Street, Suite 203
Einhendorf AFB, AK 99506

Dear Sir,

I am writing to you as a 19 year resident of Alaska who is very concerned and upset about the proposed low-level supersonic overflights that are being proposed for Air Force jet training. Scientific studies have documented the effects of long term exposure to sonic booms on both human and wildlife. It is beyond logic that the US Air Force would suggest that the areas proposed were suitable for jet training. First, because they occur over areas that are designated as National Preserves for Wildlife and Wilderness Recreation areas (Forty Mile, Yukon-Charley Rivers, Gulkana River, Delta River, Tellin National Wildlife Refuge, Tanana Valley State Forest and Wood River-Tikchik State Park). This designation by the federal government and the state of Alaska is for the purpose of preserving and maintaining the natural ecosystem and wildlife population (caribou, moose, sheep, peregrine falcons, golden eagle and trumpeters, just to name a few). Secondly, because I have personally taken several wilderness trips to these areas either as a dog musher in the winter or as a canoeist in the summer and know how unique and pristine these valuable areas are to both the people who live there and to the visitors who want to have a true wilderness experience there.

NOI-003

LAN-012

19,500 supersonic flights with the accompanying sonic booms is not a compatible use of these areas by any stretch of the imagination. Caribou and peregrine falcon studies have shown that these two species suffer severe impacts from sonic booms not to mention the impact on those who live and recreate in these areas. Even in the most pragmatic view, these overflights will devalue the recreational/wildlife opportunities that Alaskans depend upon for our economy and quality of life. Recent surveys suggest that our economy will depend on tourism more and more. Jet training in these sensitive wildlife areas just doesn't make good common sense for the previous reason mentioned, as well as, the problems that go with the increased risks of mid-air collisions with commercial and private pilots.

NOI-002

REC-003

BIO-007

SAF-005

I understand that there is comment posted on the EIS and I wish to go on record as a frequent user of these areas as very opposed to the proposed Air Force jet training exercises. Please feel free to call me about my trips and observations in these areas. No one who has ever spent time in these areas who ever support such activities. Let's not make Alaska a place to do things that would never be done over parks, towns and cities in the lower 48. The areas identified have already been set aside because the wilderness qualities they possess, let's remember and respect those who worked for maintaining Alaska's beauty and life style!

Sincerely,

Mary Ellen Shea

Mary Ellen Shea, Iditarod Finisher '92
West Anchorage High School Counselor

acknowledable Bruce Babbitt and
Paul Gallant

November 21, 1994

611 ASG/LVG
5800 G Street, Suite 203
Einhendorf AFB, AK 99506-2150

Re: Improvements to Military Operating Areas EIS

To Whom It May Concern:

My wife & I, Lloyd E. & Phyllis M. Welty, own and have cabins at 30 mile Salcha River and also own property in Salcha near Harding Lake.

Both areas have a very high recreational use year round and especially in the summertime. We feel that these areas will be very, very adversely affected by noise and damage (pictures knocked from walls, dishes from cupboards) not to mention getting the very devil scared out of us when sonic booms occur from the F16 overflights.

We are a retired couple and the Salcha River area is our summertime home.

Because of the very high summertime use and to accommodate both the public and the A.F. we recommend and highly suggest the following:

1. That the proposed Clear Creek M.O.A. be eliminated;

2. That the high noise and shock corridors up the Salcha River and along the Richardson Highway be set at a minimum 5 to 10 miles wide and an altitude of 8,000 Ft. A.G.L.

Sincerely,

Lloyd E. Welty
Lloyd E. Welty

Phyllis M. Welty
Phyllis M. Welty

Dan and Patti Billman TEL: 907-822-5566
 HC 01, Box 1706, Glennallen, AK 99588 FAX: 907-822-3250

November 20, 1994

Major G. Virgil Hanson
 Chief Environmental Management
 U.S. Air Force
 611 ASG/LGV, 5800 G Street, Suite 203
 Elmendorf AFB, AK 99506-2150

Dear Major Hanson:

Many of the residents and property owners of the Lake Louise area, as well as the Copper River Valley Chamber of Commerce, have decided to go on record as -
 - being against the Air Force's attempt to make a Permanent Military Flight Training Area (MOA) north of Lake Louise, and
 - supporting the "No Action Alternatives" to keep the area as a Temporary (TMOA).

This decision has come in response to a proposal by the Air Force to make a large area north of Lake Louise into a permanent training area, called FOX 1. The new boundaries of FOX 1 incorporate much of the Copper River Valley that is home to large numbers of wildlife habitat. (1) The instructor areas have many nesting sites in this area and their nesting period extends from April 1 through August 31 - they could be permanently disturbed by the increased noise levels and supersonic booms. (2) The Nelchina and the Delta Caribou herds migrate through the area and spend much time year-round grazing. Community residents and property owners are worried about the effects of increased maneuvers and the use of supersonic fighter planes, engaged in mock combat, would have on our quality of life, impact on private pilots and commercial operators in this area, and most of all, impact on the wildlife habitats.

At the public hearing held in Glennallen on September 28, 1994, the company responsible for the Environmental Impact Studies acknowledged that they had neither obtained comprehensive nor conclusive information on private property and cabins within FOX 1, nor are they familiar with the extent of recreational use by private citizens and commercial operators in this area. They also failed to acknowledge the importance of the Nelchina Caribou herd which is the third largest herd in Alaska.

Although the Air Force has said it would not use the area for two weeks during hunting season, please note that the hunting season actually stretches from the 10th of August through the 20th of September and for the winter hunt from the 1st of January through the 31st of March.

Although we are sympathetic to the Air Force's needs, the present system of FOX 1 as a temporary training area seems to be working. A change to an unregulated permanent status might have serious biological, physiological and economic consequences for the Lake Louise area and the entire Copper River Basin.

Sincerely,

Patti Billman

Patti Billman

Michael Holden
 5556 Quaker Neck Landing
 Chestertown, MD 21620
 410/778-3368

NOVEMBER 18, 1994

E19 Team
 Major C. Virgil Hanson, Chief
 Environmental Management
 611 ASG/LGV
 5800 G Street, Suite 203
 Elmendorf AFB, AK 99506

Dear Major Hanson:

RE: ALASKA MILITARY OPERATIONS ARRAS

I am writing to oppose the use of the above referenced areas by the Air Force for supersonic jet training flights.

As a someone living in close range of the Aberdeen Proving Ground (APG) in Aberdeen, Maryland, I can attest to the intrusiveness and noise pollution caused by the testing at APG. I cannot imagine what thousands of supersonic jet training flights would be like if they occurred overhead, but I know the combined effect would not be positive or pleasant.

In addition to the noise issue, I am concerned about the potential negative effects on the environment and on the wildlife of fuel jettisoning, as well as the negative impacts on some of flares, chaffs, and related materials.

For these reasons, I urge you to conduct public hearings concerning possible environmental effects in the affected areas of Alaska and I urge you to conduct additional studies to clarify the impact of the proposed military areas on tourism, wildlife, recreation, and subsistence activities.

Sincerely,

Michael Holden

cc: Honorable Bruce Babbitt
 Mr. Paul Gallant, FAA
 Senator Paul Sarbanes
 Senator Barbara Mikulski
 Congressman Wayne Gilchrest

HAZ-003
 HAZ-009
 HAZ-010

OTH-014

November 22, 1994

Dear Major V. Ranson,

I am writing to you with regard to the proposals to increase and make permanent military overflights in the State of Alaska. I, as a resident of Alaska, strongly oppose such action.

Alaska, as a state in general is a rare "commodity" -- although I hate to refer to it as that. But the truth of the matter is that many Alaskans, including myself make a financial living selling that rare commodity. Our financial livelihood is based on Alaska's wilderness and wildlife, its QUIET AND SOLITUDE, its feeling of remoteness -- the sensation of being far away from the developed civilized world Alaska's visitors come from. Your proposal to increase permanent MOA's in Alaska jeopardizes this and more AND IT IS NOT ACCEPTABLE!!

Nowhere else in the U.S. have I ever heard or seen of supersonic jet training exercises as low as 5,000 feet above the ground. Why here?? Why at all?? I can't believe that any community, in Alaska or in the lower 48 would tolerate such actions -- low level flights, as many as 19,500 per year (though mostly in the summer I presume) with accompanying sonic booms -- absurd!! And we WON'T!!

I urge you to reconsider your proposal for the MOA's. There is a lot more at stake here than more training for the Airforce! The citizen's of this country have placed their values in a post-cold war era -- peace -- and quiet -- in the last of our remaining lands that can offer that -- ALASKA.

Sincerely Yours,

Dori S. McDannold
Palmer, Alaska



Valley Alaska Center for the Environment

Lakeview Professional Bldg, Room 203

Mailing Address: P.O. 876161, Wasilla, Alaska 99687 Phone: 376-4223

November 20, 1994

EIS Team

Major Ranson, Chief Environmental Mgmt

511 NAG/LOV

5800 G Street, #203

Elmendorf AFB, AK 99506

Dear Major Ranson,

Having recently reviewed the Draft Alaska Military Operations Areas Environmental Impact Statement, I have a few comments to offer on behalf of the Valley Alaska Center for the Environment.

First, the proposal to increase the MOA's and resulting increase in military low-level overflights and hence sonic booms, fails to take considerable regard to the values Alaskans hold for their remote lands and wildlife. Your plan for the increases will affect wildlife adversely and impact greatly areas which have been preserved in one form or another, for their natural integrity. These areas include but not limited to Tanana Valley State Forest, Goodrich State Park, Tetlin National Wildlife Refuge, Oulkena, Delta and Forty Mile Wild and Scenic Rivers and the Yukon-Charley Rivers National Preserve.

Numerous and noisy overflights, fuel jettisoning and the impacts from chaff and flares not only put at risk the viability and health of our state and public lands, but they also put at risk the multimillion dollar tourist industry and the subsistence lifestyle many Alaskans rely on for their livelihood.

We urge you to listen to Alaskans, and take heed to their respectful livelihoods. Nowhere else in this country would you consider such an absurd and damaging amount of overflights, to the level you have proposed here. So we ask: why Alaska? Why now, when our government budget and deficit needs to decrease its spending?

There is no convincing argument. Just say no to the increase in Military Operations Areas.

Respectfully Yours,

Dori McDannold
Valley Coordinator
Valley Alaska Center for the Environment

REC-003

LAN-002

LAN-012

OTH-014

NOX-002

809 W. Northgate Drive
Irving, TX 75062

November 20, 1994

EIS Team

Major C. Virgil Hanson, Chief, Environmental Management
611 ASB/LGV
5800 8 Street, Suite 203
Elmendorf AFB, AK 99506

Dear Major Hanson,

Last summer I spent a delightfully peaceful month in Alaska. It felt like a real escape from my mundane life and an inspiring opportunity to reconnect with those things which are truly important in life -- nature as created by God and without all the artificiality which comes with humanity and man's desire for comfort, luxury, and power. Although I have travelled extensively (all 50 states and around the entire world), I have never found another place where I can find such peace. I feel strengthened and renewed after spending time in the natural serenity of Alaska.

Unfortunately, I understand that this peace and serenity are now in jeopardy -- and that you are involved in that decision process. The thought of large portions of Alaska being used for supersonic jet training is appalling to me. In addition to the obvious concerns for safety to the general aviation so necessary for day to day life, the economic impact to tourism (especially in the summer), and the disruption to natives (both human and animals) -- this would also be a severe impact on folks like me who see Alaska as the last refuge where we can be strengthened and renewed. Please don't eliminate my last refuge! Thank you.

Sincerely,

M. Kathryn Miller

M. Kathryn Miller

cc: Honorable Bruce Babbitt, Dept. of Interior
Mr. Paul Gallant, Federal Aviation Administration
Honorable Kay Bailey Hutchinson, U.S. Senate
Honorable Martin Frost, U.S. House of Representatives

OTH-014

HC80 Box 306T
Copper Center, AK 99573
November 21, 1994

EIS Team

Major C. Virgil Hanson, Chief
Environmental Management
611 ASB/LGV
5800 G Street, #203
Elmendorf AFB, AK 99506

Gentlemen:

We live in the Copper River Basin and use parts of the proposed "Fox" Military Operations Area (MOA). Specifically, we use lands bordering both sides of the Denali Highway. We fish, pick berries, watch birds, hike, canoe and hunt caribou, moose and ptarmigan. Our concerns about your proposed operations are:

--Noise. (We treasure the peace that can be obtained by canoeing or hiking several miles back from the highway.)

--Frightening and scattering of game animals.

--Disruption of birds when they are breeding or feeding.

--Contamination of berries, fish and game meat by jetted oil fuel. (The bulk of our protein comes from the Denali Highway area.)

Even though most of our use of the area is from May through September, many of the animals and all of the plants are there year-round and would be impacted regardless of the seasons you might pick for overflights.

We urge you not to use this area for your proposed operations.

Sincerely,

Edward T. McHenry
Ruth McHenry

Edward T. & Ruth McHenry

OTH-014

HAZ-010

226 N. Marlborough
Dallas, TX 75208
November 21, 1994

EIS Team
Major C. Virgil Hanson, Chief
Environmental Management
611 ASG/LGV
5800 G St., Suite 203
Elmendorf AFB, AK 99506

Dear Major Hanson,

I oppose the proposed supersonic jet training exercises on the grounds that they will disturb the local villagers and wildlife, as well as the peace I feel in Alaska's unspoiled wilderness during my annual vacations.

The training areas are too large and the 5,000 foot flight level is too low. Drastically reduce the training areas and fly at over 30,000 feet, if supersonic flight training needs to occur at all in Alaska. I am particularly concerned about the proposed training areas near Talkeetna. The supersonic booms might set off avalanches during the season most climbers assault Denali. Also, Talkeetna is easily accessible from Anchorage by car and train, so it is easy for tourists such as myself to visit. Keep it unspoiled!

Major Hanson, please change the training proposal so that much less land in designated for supersonic jet training flights, and that flights must be flown at 30,000 feet or above.

Sincerely,

Clarisse Noel

Clarisse Noel

cc: Honorable Bruce Babbitt, Dept. of Interior
Mr. Paul Gallant, Federal Aviation Administration
Honorable Kay Bailey Hutchinson, U.S. Senate
Honorable Martin Frost, U.S. House of Representatives

NOI-004
PAN-002
LAN-013
AIR-014



Alaska Retreat

The Honorable Thomas R. Pickens, Alaska
State's Chief, Environment & Forestry

24 November 1994

Major Virgil Hanson, EIS Team
Chief, Environmental Management
611 ASG/LGV
5800 G Street, Suite 203
Elmendorf AFB, Alaska 99506

Re: Draft MOA

Dear Major Hanson:

It is discouraging to see that your MOA proposals don't match up with the program put on by your team that came through Talkeetna during the public comment solicitation period. At that time your team expressed a seemingly sincere desire to not cause any disruption to our recreational and tourist economy here. Not to speak of the environment that supports this economy.

I'm a 30 year resident of Talkeetna, and a business owner here. Your proposals provide for considerable disruption as follows:

1. Proposed flight levels are TOO LOW, and the areas of your activity are TOO LARGE.
2. The risk of conflict with commercial aviation is too high.
3. Overall disturbance caused by your activity is detrimental to our wilderness-based economy.

Further, I request that your EIS include information that identifies how many commercial recreation providers, services, and clients are in these areas. Also that the EIS include an economic analysis of the negative impacts on commercial recreation and tourist-based activities.

As a business owner, I have grave concerns about your proposals, and will work actively to see that our economy is not sacrificed for unreasonable military activity. And your draft proposals are unreasonable.

Sincerely,
Roberta Sheldon

Roberta Sheldon

Box 192, Talkeetna, Alaska 99576 (907) 738-5414

REC-001

111

FIS Team
Major C. Virgil Hansen, Chief, Environmental Management
611 ASG/LW
5800 G Street, Suite 203
Elmendorf, AFB, AK 99506

Dear Major,

I understand there is a proposal to ~~have~~ have training exercises at 5000 feet ~~which~~ which will result in some booms over ~~the~~ many areas in Alaska which include State Parks, wild & scenic rivers, preserves and wildlife refuges. I think the use of air space so close to these habitats would disturb the people & animals living in this area. I have personally been disturbed with some flights over the Nanaa River and near Shikellum Band in NL. It is very scary if you don't expect a sonic boom when you are enjoying the peace & quiet of nature. Over my travel dreams is to go to Alaska and enjoy the wilderness. I'd hate to go & be blasted with sonic booms. Please reconsider these activities in these pristine areas in Alaska. Perhaps the flight height could be adjusted to above the level where sonic booms occur. I would like to learn more about this. Can there be a public hearing?

Sincerely,
Katherine Conner
3918 Pullington Court
Raleigh, NC 27613

PRO-003

OTH-014

112

From: Patricia Jackson King
3680 Alton Rd
Fairbanks, AK 99709

Chief, Operations Division
11th Air Force
ATTN: Major Siter
5800 G Street, Suite 102
Elmendorf, AFB, AK 99506-2130

Comments regarding proposed Alaska Military Operations Areas:

Proposed Eulachon B MDA has a high level of civilian air traffic especially from Eulachon -- 22 September -- to avoid conflict with civilian aircraft this period of use should be avoided or least on the foothills of the distribution area. There is also a major sandhill crane migration area the northern foothills of the Alutian Range. Even 1 September -- 22 September there is also a major crane feeding area between the Eulachon and Alutian Range foothills. Birds also feed for the level of feeding during the period 22 September to 22 September.

Please send copies to:
FAA System Management Branch
Attn: Dennis Berg, AAL-535
700 E. 7th Ave.
Anchorage, AK 99513-7587

Alaska Aviation Safety Foundation
PO Box 83750
Fairbanks, AK 99708

Fairbanks Flight Train
P.O. Box 64408
Fairbanks, Alaska
99706



Dennis Ward
FAIFSDO

Dennis, Please read into the record my objections to the MOA expansion over most of interior Alaska. I will be unable to attend the meeting.

As the Accident Prevention Counselor, You know that "continued visual flight into instrument conditions" is the leading cause of General Aviation accidents.

With over 32 years of Alaskan Flying experience, I have NEVER been able to obtain an instrument Clearance within an MOA.

An MOA removes this valuable option from the safety of flight and until an instrument clearance can be obtained in an MOA with the same ease as in other class E airspace, I must, for the safety of us all, object most strenuously to this plan.

Thank You, Chris Catalone (ATP, CFII, MEI, AGI)

cc: Alaska Congressional Delegation
Aircraft Owners and Pilots Association

AIR-007

To: Chief of Operations Division: November 19, 1994

This letter is being written for concern of the change in and the additional proposal of Military Operations Areas in Alaska. Having lived in Alaska for almost 10 years I appreciate the economic impact that the military brings to Alaska and also the fact that I believe Alaska to be a superb training ground for the purpose of keeping our troops in top shape.

It is of great concern to me though with the new proposals out for the operations areas, particularly those that are along the Alaska Highway between Fairbanks and the border. I have a tourism related business and have seen the huge influx of tourists to Alaska. I am also a pilot who owns her own airplane and flies between 100 and 200 hours each year. Many tourists are even flying to Alaska in their own planes. In fact, one tour company out of Fairbanks offers "guided" flights from the lower 48 all the way to Fairbanks. They mostly follow the Alaska Highway. This type of trip is just in its infancy and I have talked to many pilots from the states that have stayed here who have the dream to fly to Alaska from their home down south! This is going to increase the traffic along the highway more than it already is. There is a much greater potential for accidents when you have a fighter plane flying in such the same area and at much greater speeds than the civilian pilot is even legally allowed to fly. Also, flight seeing will increase with the additional tourists and much of this will be done within a 100 mile radius of the interior towns. This will extend all the way to Delta Junction and north over the White Mountains to around Circle and Central which are currently MOA's.

Please consider the impact of turning the temporary MOA's into permanent ones and extending areas of training. I agree that the military must train but find it unfortunate that the feeling exists to broaden areas where the impact will be felt by a great number of people. Towns and villages will be affected along many of the routes and the Salcha area residents already deal with the diminishment of their solitude because of the training. Please consider all of the aspects before making this into law.

Thank you.

cc:FAA
Dept. of Interior
Ted Stevens

Carol Kleckner

CAROL KLECKNER
BIRCH HAVEN INN
233 FAIRHILL RD
FAIRBANKS, AK

99712

OTH-014

SAF-005
AIR-008

Susan Hills
P. O. Box 151
Ester, AK 99725
19 November 1994

Major Siter
Chief, Ops. Division
11th Air Force
5800 G Street, Suite 102
Eldendorf AFB, AK 99506-2130

Dear Major Siter,

I am writing concerning the draft EIS for the MOAs in Alaska. I do not think it adequately addresses many of the very real concerns of myself and other citizens of this area such as detrimental effects of the noise and sonic booms on wildlife and humans, safety of commercial and private pilots using the area, and a realistic and adequate range of alternatives. The PRESENT situation is already a problem now that F-16s are used more than A-10s, but none of the alternatives gives any hope of making the situation less intolerable - they are just scenarios of bad, horrible, or worse.

I understand that the military may need air space in which to train not only our pilots but those from other countries. However YOU need to understand that "national security" does not mean you can or should proceed with no regard as to the wishes of the rest of society. WE are not the enemy, nor are we to be treated with the cynical arrogance that has so often characterized interactions with the military in the past. Please treat our concerns with courtesy and respect and rewrite the EIS to reflect a real attempt at workable solutions for all concerned.

Sincerely,

Susan Hills
Susan Hills

cc: Derril Bergt, PMA
Deborah Williams, USDI

bcc: N.A.A. Environmental Center

ALT-002
BIO-007
NOI-003
SAF-005

OTH-014

7806 Linda Lane
Anchorage, AK 99518
Nov. 23, 1994

EIS Team
Major C. Virgil Hanson
Chief, Environmental Management
611 ASG/LCV
5800 G Street, Suite 203
Eldendorf AFB, AK 99506

Dear Sir:

I am writing to express my OPPOSITION to your proposals to expand and make permanent the MOAs over vast areas of eastern and central Alaska. I offer the following concerns:

- 1) These areas are far too large, flights too low and allow too many sonic booms.
- 2) A number of native and bush communities will be impacted, as well as subsistence users and recreationists.

- 3) I am concerned about impacts on caribou herds, sheep and birds and other wildlife. Many of these areas are national parks and wildlife refuges.

I sometimes canoe in the proposed areas. Many people use these proposed areas for recreational purposes, especially in the summer. Noise from military training would be very disruptive. I strongly urge you to conduct additional studies to clarify impact on human activities in these areas and consider shrinking these areas considerably.

Thank you for your consideration in this matter.

Sincerely,
William M. Cox

William M Cox

cc. Bruce Rabbit, Secretary
Dept. of the Interior

Ken Zafren, MD
10181 Curvi St.
Anchorage, AK 99516 USA

23 Nov 1994

EIS Team
Major C. Virgil Hanson
Chief, Environmental Management
811 ASG/LGV
5800 G Street, Suite 203
Eldorado AFB, AK 99506

Dear Major Hanson:

This is a comment on the Draft Alaska Military Operations Areas Environmental Impact Statement.

I am very concerned about the potential negative impacts of the proposed expanded MOAs, particularly supersonic training at 5,000 feet over large areas of our state. The Air Force has not proposed similar exercises in any other state because no other state would allow them. I am old enough to remember sonic booms from military training flights. They were extremely disruptive and were properly banned over land areas years ago. Effects on wildlife as well as humans would be unacceptable.

Our family has a cabin in Talkeetna where we expect to experience peace and quiet, not sonic booms. The village of Talkeetna is in the proposed expansion as are many other communities and prime recreation areas. People and wildlife in these areas have a right to limits on noise pollution.

While I support military training, the sacrifice of vast areas to these activities has not been appropriately justified. The negative impacts on vital activities in Alaska, including subsistence, tourism and general aviation would likely be severe.

AIR-015 I urge you to withdraw this proposal to be replaced by a much smaller one. I would also urge you to extend the comment period. I will urge the FAA to conduct public hearings.

Sincerely,



Ken Zafren, MD

P.S. Please include this letter in the hearing record.

cc
Hon. Bruce Babbitt
Paul Gallant

EIS Team
Major C. Virgil Hanson, Chief
Environmental Management
611 ASG/LGV
5800 G Street #203
Eldorado AFB, AK 99506

Dear Major Hanson

Please accept these comments regarding the proposed military overflight increase. As you know, when you go out in the country there are few dependable things. You can't depend on the weather ^{and you} depend on the will of the gods. But there is one thing you should be able to depend on and that's finding some peace and quiet. I fail to understand why we have this sudden increase in the need to destroy the peace of ~~the~~ so many areas which I hold dear. Please limit your use of overflights. The country may look empty to you, but it is full of peace and quiet. Thank you.

Sincerely,

Sgt. Pilgrim
3240 Place
Anchorage, AK 99503

OTH-014

cc: Honorable Bruce Babbitt, Secretary, Dept. of Interior
Paul Gallant, Federal Aviation Administration

11-18-94

Dear Major Hanson,

re: AK military operations areas EIS

As an Alaskan resident, I have strong concerns & objections about the proposed super sonic jet training exercises at 5,000' scientific studies of both humans & animals (Caribou, Fulgon) show that long term exposure to sonic boom by air combat training below 30,000' have severe health consequences.

Additional study is needed of possible impact on tourism, recreation & subsistence, & documentation of the need over so long an area is important.

Please extend the comment period & consider working the proposed space, frequency & altitudes. Thanks, P. Adler

NOI-003

PRO-014

PRO-003

Dear Major Hanson:

11/18/94

I oppose making permanent MOAs and new MOAs, including super sonic ops areas. I fly in the Kvichikan River area & also conduct soft traps on Stoney River, Tolagwan River, Tolachuk River, Guben River in your proposed super sonic areas. The proposed activity would have a heavy detrimental, conflicting impact on the people and young animals and animals in these areas. I suggest you eliminate many of your current ops areas, rather than expand them.

Thank you,
Mike Benson

OTH-014

Dear Major Hanson: Please STOP

The Air Force project to impact 13 million Alaska acres with super sonic flights and sonic booms a year.

A MYE to bush pilots to native and bush residents, to

ETIA Oleario Court Adis.
Wilmington, NC 28403
BETTY STONE

OTH-014

Shap, Caribou, eagles and to
essential Alaska tourism.
WHY? THIS OUTRAGE?

HAVE pity- Stacey Stone Nick
28 NOV 94

124

6901 Calverton Dr., Nyattsville, Md. 20782
 Dear Major Hanson, Nov. 16, 1994

The proposed area for ~~supersonic jet~~ training are too large, ~~the flight levels too low~~ and the number of sonic booms too many. We feel additional documentation is needed to justify these training activities. Additional studies are needed to clarify impacts to tourism, recreation, subsistence and other human activities. Respectfully yours,

Ruth W. Zeller, Robert Q. Zeller

PAN-001

PRO-014

126

Nov. 18, 1994

Dear Major Hanson:

I strongly object to the proposals in the Draft Alaska Military Operations Enn. Impact Statement that would substantially increase noisy, low-level training overflights in Alaska.

We need to preserve the quiet and solitude so attractive to visitors and residents alike.

Wildlife such as caribou herds, dall sheep, swans, falcons, golden eagles will be adversely affected. Don't allow these overflights!

Sincerely,
 Joyce Bauer

OTH-014

125

Nov. 17

Dear Major Hanson,

My husband and I have flown and landed over Cassia many times between Talmadge and Arco. I can't imagine planes screaming through that area at low altitude. If you're going to expand the NWS or make some permanent status we need more chance for public input. I thought we were downsizing everything?

PRO-003

PAN-001

Paul & El Hemmingson, Oregon



Copper River Native Association
(AITNA T'ARNE NENE)
Mile 104 Richardson Highway
Drews Fork - Copper Center, Alaska 99573 • Phone (907) 822-5241

AD091

Major G. Virgil Hanson
Chief, Environmental Management
611 ASG/LGV
5800 G Street, Suite 203
Eldendorf, AFB, AK 99506

Dear Major Hanson:

Copper River Native Association would like to go on record as opposing the military training exercises proposed by US Air Force in the Copper River Basin.

Copper River Native Association opposes the military training exercises for the following reasons:

The military training exercises proposed by the Air Force may be detrimental to the health of the 3,000 residents of the Copper River Basin. The long term exposure to the "supersonic booms" by the military flight training may cause irreversible damage to the hearing, nervous system, and heart.

The subsistence lifestyle of the residents of the Copper River Basin will be adversely impacted. The subsistence users within the Copper River Basin area hunt moose, caribou, fowl, and other wild game to complement their commercially purchased foods. The proposed military training exercises will have an adverse impact on the wild game and fowl. The "supersonic booms" will create shock waves which may damage the hearing, nervous system, and heart rate of the wild game, and will create havoc on the migratory patterns, and populations of the wild game.

Additionally, more research studies are needed to clarify impacts to the fowl, wildlife, subsistence and human activities of the people within the Copper River Basin Region. Copper River Native Association would want to participate in the research studies, through either receiving funds to conduct a research study or to assist in the environmental impact study.

Sincerely,

Ken Johns
Ken Johns, Executive Director

NOI-003

SUB-001

BIO-001

PRO-014

OTH-014

GERALD R. BROOKMAN
715 HUIR AVENUE
KEVU, ALASKA 99611
November 22, 1994

NO, KIR Team

Attention: Major C. Virgil Hanson
Chief, Environmental Management
611 ASG/LGV
5800 G Street, #203
Eldendorf AFB, Alaska 99506

The following are my comments on the Draft Military Operations Areas Environmental Statement. Please enter them in the official hearing record, and take them into consideration in making your final decision on this matter.

I believe that I have a good appreciation of the need for not only adequate, but the best possible military preparation. I'm a life member of the Marine Corps Association, and spent my first year in Alaska (Aug. 57 - Aug. 58) as a "Tech Rep" with the 82nd A.C., 8th Squadron at Cape Romanof. I'm a retired F.A.A. Radar Technician (GS-12).

I can readily understand the attraction of Interior Alaska, with its relatively low population density, to the Air Force for the type of activities which are proposed. Nevertheless, I strongly oppose this proposal. I believe that it is totally incompatible with the management and welfare of wildlife in these areas, and no amount of "fine tuning" can make it compatible. If such activities aren't acceptable in more densely populated areas in the "Lower 48", they aren't acceptable in Alaska, either, in my opinion. Please dump the whole idea, and don't waste any more of your time and the taxpayers' money on trying to improve it. I do have one suggestion, which you have probably already considered and rejected, but which I think might possibly be acceptable. Have you considered MOAs that are entirely over-water, with operations based at Kodiak or Adak? While ground-based radars to control such operations may not be available or even possible, control by AWACS should be, and such training might be more realistic, as operations in a "real world" combat situation would probably be under such control, in any event.

I urge you to give the above your full and serious consideration, and to totally reject the proposal, on the basis of unacceptable adverse environmental effects.

Sincerely,

Gerald R. Brookman

Judith Anderson and David Pello
P.O. Box 1472
Palmer, Alaska 99645

November 18, 1994

EIS Team
Major G. Yirgill Hanson
Chief, Environmental Management
611 ASG/LGV
6000 O Street, #203
Elmendorf AFB, Alaska 99506

Dear Major Hanson:

We are extremely concerned about the impact of the proposed Air Force supersonic jet training exercises on Alaska. We feel that more research and hearings need to be held before such a decision to do such testing is approved.

Even though large portions of Alaska are not populated by people, it does not mean that both people and wildlife will not be adversely impacted by such testing.

The problems that could occur include:

1. Impacting wildlife - caribou, sheep, swans, falcons, and eagles
2. affecting wilderness recreational opportunities in numerous national and state preserves
3. increasing risks of midair collisions with commercial and private pilots in the area of the proposed testing
4. infringing on the lives of people in the impacted area

Just because people do not live on every acre of Alaskan land does not mean that we will not be impacted by the scale of such testing and that it is okay to effect the quality of our lives.

We have lived here most of our lives. The quality of the wilderness experience in the proposed testing area is irreplaceable. The unique wilderness which is proposed for use in sonic testing will never be the same for residents, visitors, or wildlife should the proposed testing go forward. We must take steps in this era of technological growth and demands to protect the unique and special qualities of what little wilderness remains on our planet and in our country.

Please do not go forward with the proposed military overflight schedules.

Sincerely,

*Judith Anderson
David Pello*



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

In Reply Refer To:
ER 94/732

Colonel Richard B. Hassan
Eleventh Air Force
611 ASG/LGV
5800 G St Ste 203
Elmendorf AFB, Alaska 99506-2150

Dear Colonel Hassan:

The Department of the Interior (DOI) appreciates the opportunity to review the September 1994 Draft Environmental Impact Statement (DEIS) for Improvements to Military Operations Areas (MOAs) in Alaska. We appreciate the cooperative approach you have taken and are hopeful we can resolve the remaining issues to the benefit of both your training mission and the resources we charged to manage. Based upon the Department's Congressional mandates to protect, enhance, and manage natural resources including the Alaska National Interest Lands Conservation Act (ANILCA), Endangered Species Act, and other legislation so as to minimize adverse impacts on lands and resources within our jurisdiction, we offer the following comments.

GENERAL COMMENTS

Mitigation

The Eleventh Air Force (USAF) is proposing to increase the amount of permanent restricted airspace and low-level aircraft operations over established conservation system units in Alaska. We are concerned about the impacts associated with this precedent-setting action. Low-level military overflight operations can seriously conflict with the values for which the conservation system units were established. Nevertheless, we are pleased, that as a part of the EIS process, this Department and USAF are cooperatively developing specific mitigative measures to enhance the protection of DOI resources. This cooperative effort is consistent with the goals and practices recommended by the Interagency Airspace/Natural Resource Management Working Group and could be a model for resolving military overflight conflicts elsewhere. Only through such cooperation can USAF and DOI expect to achieve the respective defense and resource management missions that Congress has entrusted to DOI and the Department of the Air Force.

Our strategy with regard to mitigation is relatively simple. We believe current flight training levels are having impacts on wildlife and resource users in Alaska, particularly in the Yukon MOAs, but we have little data to quantify these impacts.

Therefore, we propose USAR limit the number and timing of MFEs per year, limit the level of routine flying to approximately 1990 levels, and make other special and temporal adjustments to its proposal while agencies monitor and assess impacts over the next five years. The USAR would gain additional permanent airspace in Alaska, while moderating its activity until a reasonable amount of on-the-ground data can be collected.

The following project mitigation measures are designed with this in mind and are proposed by DOI:

1. Allocate one-half percent of the cost of conducting Military Flying Exercises (MFEs) and routine training in Alaska for monitoring and assessing the effects of overflights. Monitoring is necessary because of the changes in the environment that have come about over the last four years with the introduction of new aircraft, expanded Military Training Routes (MTRs), and the commencement of MFEs. In addition, basic resource inventories for many species in Alaska have not been completed. The impacts of these USAR innovations on Alaskan resources has not been adequately analyzed. These impacts need to be understood so that USAR can conduct its training consistent with mandates. We statutory believe it is necessary that USAR, DOI agencies, and other interested parties cooperatively fashion a monitoring strategy that can be incorporated as part of the proposed action in the Final Environmental Impact Statement (FEIS).

2. Modify the following MOA boundaries:

- Trim Story A and Naknek 2 MOAs so they do not overlay Lake Clark National Park and Preserve;
- Eliminate the northern half of Susitna MOA that overlays Denali National Park and Preserve; and
- Trim the southeastern corner of Fox MOA so it does not overlay portions of the Gulkana and Delta Wild and Scenic Rivers (WRSs) and associated campgrounds, and high density swan nesting habitat.

3. Routine training would not be permitted in Yukon 4 and Yukon 5 MOAs.

4. Allow at least two weeks between the end of one MFE and the beginning of another.

5. Conduct no MFEs during the periods April 15 to June 15 (prime lambing, calving and nesting period) and take specific measures to avoid the fall subsistence and sport hunting seasons.

MIT-001

MIT-002

MIT-003

MIT-004

MIT-005

MIT-006

6. Conduct no more than three MFEs per year. To limit impacts on recreationists and wildlife, conduct no more than two MFEs between June 16 and August 31.

MIT-007

7. Conduct no training--MFE, routine, Military Training Route, or slow speed--within five miles (either side) of selected portions of components of the National Wild and Scenic River System from May 15 to July 15. The portions include all of Birch Creek and the Novitna River, the Charley River below Gelvin's Landing, and the Fortymile River and its South and Mesquite Forks below the village of Chicken.

MIT-008

8. When snow is not on the ground, do not release flares if the relative humidity is less than 40 percent or if the National Fire Preparedness Level is at level IV or V. In addition, USAR must shoulder its responsibilities for the cost of fire suppression. In determining who is responsible for paying fire fighting expenses, there should be a rebuttable presumption that a fire, ignited at a time and in a MOA in which USAR used flares, occurred as a result of USAR activity.

MIT-009

9. No chaff release over conservation system units.

MIT-010

10. Restrict supersonic operations to altitude levels consistent with such practices over comparable DOI lands in the other forty-nine states. It is our understanding that supersonic flight is not allowed below 10,000 feet Above Ground Level (AGL) on DOI lands located elsewhere. (The proposed action would allow for supersonic speeds as low as 5,000 feet AGL over public lands, including WRSs, designated wilderness, national parks/preserves, and national wildlife refuges.)

MIT-011

11. Do not exceed approximate 1990 levels of routine flight training, with particular regard to combat aircraft. The USAR will not request higher levels of flight training until five years of the proposed monitoring program have been completed.

MIT-012

12. Insert into the FEIS a "sunsetting" provision. This would state that after a specified number of years--we suggest 15 years--USAR would be able to retain the MOAs only after completing an amendment to the MOA EIS. This amendment will reexamine whether the MOAs and the associated mitigation measures are still appropriate.

MIT-013

13. Raise the floor of the Galena MOA to 3,000 feet AGL to enhance the protection of wildlife and recreation values associated with the Novitna National Wildlife Refuge and Novitna WSR.

MIT-014

Cumulative Impacts

CUM-001

The level of analysis of cumulative impacts is inadequate. The cumulative impact analysis is extremely important for this EIS, given the lack of comprehensive analysis contained in USAF's MTR and MTR Environmental Assessments. We recommend the analysis include the potential for cumulative impacts associated with: 1) military aircraft operations where the location of MOAs and MTRs overlap (see discussion of noise measurements under Specific Comments), 2) slow-speed training within MOAs, and 3) military aircraft operations in combination with civilian aircraft operations and activities that occur on the ground beneath the MOAs and MTRs.

Analysis of Impacts to Congressionally Designated Areas

LAN-002

The FEIS should ensure that the potential for adverse impact to each of the conservation system unit values and DOI's associated Congressional mandates for management of these values has been adequately addressed. See, e.g., National Park Service, Report to Congress, Report on Effects of Aircraft Overflights on the National Park System (September 1994) (Although the report excluded Alaska park areas, much of the information and approach is relevant). For example, according to the DEIS, military aircraft use levels in the Susitna MOA would be reduced while those in the nearby Fox MOA would increase. The FEIS should directly address how the proposed changes would affect the values for which Denali National Park and Preserve and the Gulkana and Delta WABRs were established.

Inconsistency in Impact Level Assessment

The DEIS is inconsistent in how it rates the impacts of USAF activities. This is particularly apparent in discussions of aircraft safety and recreational impacts on Yukon 1 and 2 MOAs on the one hand and Yukon 3 and 4 MOAs on the other.

The DEIS (page 2-48) states that the proposed action's impacts on Airspace Management and Safety in Yukon 1 and 2 MOAs would be Level I (No/Negligible Impact) but in Yukon 3 and 4 MOAs it would be Level II. All of these MOAs would have 100 ft AGL floors and the DEIS at chapter 3.2.2 indicates that Yukon 1 and 2 MOAs will have greater amounts of military and civilian air traffic than Yukon 3 or 4 MOAs.

We find it hard to accept that military jets flying as low as 100 ft AGL in Yukon 1 and 2 MOAs will impact aircraft operations and aviation safety at a negligible level. The USAF's classification of these MOAs is at odds with its own statement characterizing impact levels. On pages 4-3 - 4-4, the DEIS indicates that Level II impacts to aircraft operations and aviation safety would occur in those areas with MOA floors below 3,000 feet AGL "in existing

or converted airspace." Military use of these two MOAs under the proposed action will be particularly heavy. There will be three times as many routine flights per day in Yukon 1 than in Yukon 3 and six times as many as in Yukon 4. Yukon 2 will have twice as many and four times as many such flights as Yukon 3 and 4, respectively. Yukon 1 and Yukon 2 have by far the largest number of MTR operations per day of all the MOAs. In addition, these two MOAs have more overlying MTRs and more civilian flight activity than other MOAs.

In addition, we cannot accept the rationale offered on pages 4-115 - 4-116 for lowering the impact levels of medium and highly sensitive recreation areas if the area is under an "existing overlying MOA with a configuration and use similar to that proposed." This evidently is the rationale for indicating that the impact on recreational resources under Yukon 1 and Yukon 2 will be at Level II while those under Yukon 3 and Yukon 4 are in some cases correctly noted as Level III. This rationale is adopted even though Yukon 1 and Yukon 2, the areas with the heaviest routine, MTR, and MTR military flight use can better be characterized as "areas subject to regular, repeated, or continuous exposure to noise levels inconsistent with the area's recreation opportunity setting" (the standard for Level III impacts) than as "areas subject to frequent, but irregular short-term exposure to aircraft noise levels inconsistent with the area's recreation opportunity setting" (the standard for Level II impacts).

CUM-001

The impact of jets flying as low as 100 feet over the headwater of the Charley Wild River can hardly be said to be less disruptive than a jet flying at the same elevation over the lower part of that river. Nevertheless, if one is to believe the EIS, the recreational experience on the Charley Wild River will be less impacted in its headwaters under Yukon 1 and 2, than it will be in Yukon 3 and 4, even though there will be more USAF flights in the former than in the latter pair of MOAs. The rationale the USAF offers can only be accepted if it can show that substantial numbers of users of recreational facilities under the Yukon 1 and 2 MOAs have become accustomed to and reconciled to the impacts from USAF activity. We do not believe that this is the case. Finally and significantly, the violation of the primitive, non-motorized mandate of Wild Rivers is just as complete regardless of the expectations of river users. At the very least, we urge USAF to rate impacts to all recreation resources with high sensitivity at Level III.

Neotropical Migratory Birds and Hearing Impairment of Wildlife

In Chapters 2 and 4 there is no discussion of neotropical migratory birds. Alaska's interior provides the major nesting habitats for some of these species. Damage to the highly sensitive hearing required by many of these species to establish

BIO-001

breeding territories, to exhibit successful courtship behavior, and to, as juveniles, learn effective vocalization while in Alaska are of high concern. Physical hearing loss from jet aircraft could threaten reproductive success and could cause long-term cumulative declines in breeding populations over large regions of select species' breeding ranges. Current ongoing declines in some species' populations are believed to be caused by the loss of winter and migratory habitats. Additional stress on reproductive habitats in Alaska, however, could exacerbate these declines. Species of particular concern are the northern goshawk, olive-sided flycatcher, merlin, peregrine falcon, gray-cheeked thrush, and yellow-rumped warbler. The FEIS should describe the habitat of neotropical birds in Alaska and assess the potential impacts of USAF activities on them. In addition, the FEIS should address the question of aircraft noise on the hearing of other species, and whether any resultant hearing damage could predispose any species to predation or other mortality factors.

Executive Order 12898

The FEIS should address the extent to which the proposed action may disproportionately adversely affect human health and the environment among minority populations and low income populations, as directed by Executive Order 12898, dated February 11, 1994.

PRO-010

Advanced Aircraft Technologies

The DOI is encouraged by the development of advanced aircraft technologies related to reducing the noise of combat aircraft. Much of the impact of combat flight training is noise related. If advanced aircraft technologies improves an aircraft's ability to survive a conflict and also reduces the aircraft's noise signature, we all benefit. These improvements could result in higher levels of flight training being tolerated by wildlife and people.

Improving Range Control

We encourage USAF to accelerate adoption of technologies that will better enable it to monitor aircraft in MOAs. The USAF should install the radio repeater equipment necessary to communicate throughout the proposed MOA structure. In addition, a toll-free telephone number should be installed and manned by Range Control. Range Control could then serve as a clearing house for information on where military aircraft are in a real time context, as well as advise military pilots of known potential conflicts with civilian aircraft. This would allow civilian pilots to at least have the opportunity to communicate their position and learn of the location of military assets.

AIR-007

We believe the USAF should implement a toll-free telephone line to monitor environmental complaints and concerns. Each call should be documented, researched, and reported on. The telephone number should be well-publicized.

SPECIFIC COMMENTS

ALT-003 Page 1-2: The FEIS should clarify why it is not practical to identify Temporary MOAs on the aviation charts.

HAZ-012 Page 2-3: The assumption is made here that "routine and MFZ training would include the use of chaff and flares..." This is in conflict with stated Eleventh Air Force Policy, stated on page 3-79, that the use of flares are currently prohibited for MFZs. Does USAF intend to reverse its present policy?

NOI-001 Page 2-3: Joint, combined and MFZ training is discussed throughout the DEIS, but foreign aircraft are not assessed with regard to noise levels. This data needs to be included in the FEIS' appendix.

CUM-002 Pages 2-41 and 2-42: The DEIS does not provide a convenient means to compare overall flight training activity from 1990 to current and proposed levels of flying. It is difficult to envision how cumulative impacts of multiple actions can be assessed in this document without such information. In addition, it will be difficult for people living or visiting the area to compare the use they have experienced with what they might experience if the proposed action is adopted. We recommend including additional annual mission or sorties data to the FEIS' appendices and summarizing this information in the body of the text by illustrating combat training missions per year or hours flown for specific aircraft per year. Average daily operations information as provided in Tables 2-5 and 2-6, is also helpful, however, it is not easy to follow how these figures were derived from the data provided in the Appendix. We recommend that this process be clarified and operations per MOA compared across years (1990 to present and to the maximum allowable under the proposed action).

PAN-002 Page 2-43: There are no clear reasons given for the proposed 5,000 feet AGL floor for supersonic operations. The rationale should be included in the FEIS. On page 2-43, there is an apparent conflict regarding the normal ceiling for supersonic flying. It is stated that MOA restrictions mandate a ceiling of 17,999 feet Mean Sea Level (MSL), but the paragraph goes on to state that operations usually occur at higher elevations (e.g. above 20,000 feet MSL). This entire discussion needs clarification.

Page 2-44: The text states that the Noise/Flight Sensitive Area List maintained by the Eleventh Air Force is voluntary and is updated as required. The FEIS should clarify what is required for an area to be added or deleted from the list.

OTH-008

Page 2-66: Trumpeter swans (*Cygnus buccinator*) are recognized in the literature as being sensitive to human disturbance, particularly during nesting (Henson and Grant 1991). Recommended mitigation (page 2-66) for Level III impacts on swans are not adequate. A floor of 5,000 feet AGL is needed to significantly reduce noise levels and associated impacts.

MIT-015

Page 2-46: The potential for mid-air collision between civilian and military aircraft in the vicinity of Denali National Park and Preserve appears to be downplayed by the DEIS even though it is stated that this is the most heavily used airspace in the state. Flightseeing tours around Mount McKinley and mountainair air taxi traffic into the Kahiltna Glacier have increased dramatically since the establishment of the Susitna MOA. Flightseeing tours start in May and end in late August, while the air taxi service coincides with the climbing season of April-July. We recommend the FEIS reevaluate the analysis and provide a description of the mitigation measures that will minimize the possibility of a collision of military and civilian aircraft.

SAF-006

Page 3-85: Rare plant species, some of which may occur at arctic steppe sites along the Yukon River are of concern. Though no systematic studies have been done, we believe that fire at such sites could eliminate entire populations and should, therefore, be addressed in the FEIS.

BIO-002

Page 3-161: The DEIS does not indicate the presence of raptor nests in the northern half of the Susitna MOA. A late season raptor survey was conducted by National Park Service (NPS) staff in Denali National Park and Preserve under the Susitna MOA on August 5, 1989. Three occupied golden eagle nests and nine unoccupied nests were found. It is suspected that the nine unoccupied nests had been active and the golden eagles had already migrated out of the area for warmer climates. Presence of the species should be acknowledged in the FEIS.

BIO-003

Page 4-57 to 4-65: It is clear from the DEIS's discussion of noise that science is still in search of the proper measure of noise and the response of humans and animals to it. In the Air Force's discussions of noise and of the cumulative effects associated with NTRs it has used L_{max} as a measure for subsonic flight in the MOAs and L_{dn} as a measure in supersonic flight the MOAs. These can leave people with the impression that because the Environmental Protection Agency noted 55 dB as the maximum outdoor level to avoid any interference with outdoor activities (as cited in U.S. DOD 1978, which is not cited in bibliography) and because these measures would remain under 55 dB

in all of the MOAs, that noise is not a major concern for outdoor human activities. The DEIS's discussion of noise ends after it states that the L_{dn} and L_{dn} are under 55 dB under the MOAs.

Noise is an issue of greater importance than these figures demonstrate. These measures are average noise levels over a day or month and were developed primarily for measuring noise in urban areas where background noise is far more prevalent than in wilderness areas and people live with different expectations of the sound environment. The DEIS acknowledges the shortcomings of these measures when it notes that, "along with the prediction of an energy averaged noise metric such as DNL and L_{dn} , any analysis of low-altitude aircraft flight operations should also consider supplemental single event metrics such as L_{max} and SEL" (page 4-62). The DEIS should have done so.

The DEIS does provide information on L_{max} and SEL, but only in the appendix. Moreover, it does not analyze and summarize this data in the text. By failing to do so, readers who do not study the appendix will probably not understand, for example, that under this plan there could be approximately 5,267 F-16 air-to-ground missions a year, that on average the pilots of these missions spend 5 percent of their flying time as low as 100 ft. AGL, and that an F-16 when flying at 100 ft. and 500 knots produces at ground level a SEL of 113.4 dB and a L_{max} of 118.2 dB. The tables in the appendix are useful and should remain, but the public deserves a way to more easily comprehend the single event noise levels USAF is discussing. Such statistics should also be applied in the analysis of the cumulative impacts associated with use of the NTRs.

NOI-001

A discussion of noise that would better inform the public of what impacts they will experience would include estimates of the cumulative amount of time that various noise ranges measured in L_{max} would occur somewhere in each MOA. This would total the amount of time that each aircraft flying in a MOA (or NTR) would be producing certain levels of noise on the ground based on estimates of elevations AGL and speed. Such an analysis might produce a table something like the following:

	Cumulative Hours/Day			
	Routine Training Day		MFE Day	
L_{max}	MTRs inactive	MTRs active	MTRs inactive	MTRs active
> 100				
91-100				
81-90				
71-80				
61-70				
<61				

This table certainly should be prefaced by the comment that these are the levels of noise for the area directly under the flight paths and that noise would be less at either side of the flight paths. The DEIS should also indicate that this noise level would only occur for a brief period in any one place.

NOI-001

HAZ-003 | Page 4-81: Deployment of chaff has the potential to litter the landscape and adversely affect wildlife. The FEIS needs to fully address these issues.

SAF-001 | Page 4-84: The FEIS should address the potential impacts and mitigation associated with a military aircraft that has crashed on DOI lands.

BIO-004 | Page 4-102: The importance of the Fortymile caribou herd for hunters has been minimized by the DEIS and needs to be reevaluated. The impact level for the herd should be described as Level III under the Proposed Action. Virtually the entire herd would reside under the MOAs. The herd is already of concern to many biologists, land managers and the public, because of its lack of growth. The added stress of overflights combined with other identified factors may serve to depress the population. Harvest has been low due to the population status of the herd, not due to inaccessibility or lack of interest. Should the herd reach the state's target of 60,000 animals, hunter use will significantly increase.

The potential for wolf management by the state is closely tied to the health of the Fortymile caribou herd. Cumulative impacts on the herd could result in intensive management of wolves for longer periods of time than would otherwise be proposed by the state.

BIO-005 | Page 4-103: Without mitigation, we suggest that Level III impacts are applicable for Dall sheep within Yukon MOAs 1-4. This is due to the low quality habitat and a low density population compared to others in the state. The population also includes the rare Fannin color phase.

In addition, the DEIS fails to acknowledge that the Dall sheep populations under the Suietna MOA may be stressed by other human activities (sport hunting) and that overflights may further contribute to stress on those populations.

NOI-002 | Page 4-107: The comparison of the effect of sonic booms to thunder should be re-evaluated, especially since it is stated (pages ES-9,10) that supersonic operations alone can cause a Level II impact to several wildlife species. It is our opinion that the effect of a sudden, loud sonic boom with pressure wave is far different from that associated with the approaching and increasing rumble generally occurring with thunder (which would tend to "habituate" wildlife). The statement that sonic booms are extremely rare should also be clarified as page 2-43 indicates that approximately 50% of all training sorties (and 35% during MFEs) will involve supersonic operations. Estimates of the number of sonic booms occurring per month per MOA should be included in the FEIS.

The risk of supersonic operations triggering avalanches within the Mount McKinley area, where approximately 1,000 mountaineers climb annually during April - July, and measures to be taken to minimize their occurrence, should be addressed by the FEIS.

NOI-004

Page 4-113 to 4-114: The evidence presented in the DEIS from very recent NPS and U. S. Forest Service (FS) studies indicates that most recreationists in wilderness areas in the Lower 48 are not annoyed by aircraft and that the noisiest aircraft (which include low-flying military jet aircraft) were the most annoying. But relatively few of the recreationists in these non-Alaskan studies experienced low-flying military aircraft overflights, and the published studies do not directly address the question of how annoying low-flying military aircraft really are. Moreover, the studies do not address wilderness in Alaska which, in at least some cases, may be substantially different than those the NPS and FS studied (degree of remoteness, wildness, and level of use). This may be important because, as Fidell, et al. stated in *Short Term Effects of Aircraft Overflights on Outdoor Recreationists in Three Wilderness* (1992; page 49), their practice of "interviewing in wilderness with relatively high visitor use might have led to underestimation of overflight impacts." As a consequence, it is very uncertain what relevance the summaries of the Lower 48 studies have to the Alaskan situation. All characterizations of the percent of people who would be annoyed based on this inadequate data should be deleted from the FEIS.

More relevant data might be garnered from the Lower 48 studies. The National Park Service recently transmitted to Congress a "Report on Effects of Aircraft Overflights on the National Park System," exclusive of Alaska, prepared pursuant to Public Law No. 100-91 (copy enclosed). This report examines, among other things, the effects of overflights on the natural, historical, and cultural resources for which national parks were established, as well as the enjoyment and safety of park visitors. The report concludes that--

Aircraft overflights can cause impacts to park resources and values. For certain visitors, for visitors engaging in certain activities, and for certain areas, there is a very real potential for overflights to impact parks' natural and cultural resources, visitor experiences, and solitude and tranquility--the very fabric of many national parks....The NPS needs the assistance of FAA and the Department of Defense so that the scarce resources of natural quiet and airspace can be most effectively conserved for the common good and benefit of the American public, while also preserving the benefits provided by aviation.

We urge the USAF to include in the FEIS all of this report's findings and conclusions that could have relevance for Alaska conservation system units.

REC-003

We further suggest that USAF contact BBN Systems and Technologies, the author of these studies, to obtain data on the annoyance levels of that portion of the recreationists who experienced low-flying military aircraft use in the wilderness studies. These studies are not perfect, since, for one thing, we do not know how low "low-flying" might be. Nevertheless, such information would be a step closer to useful information than what the DEIS provides.

An examination of the raw data collected by BBN on one of the wildernesses suggest that the relatively benign impact of aircraft overflights portrayed in the published studies is misleading if applied to military aircraft specifically. The U. S. Navy jets are allowed to fly at 200 feet AGL over the Glacier Peak Wilderness managed by the FS in Washington state. Thirteen people responded that they noticed military aircraft, and only military aircraft, on their visit to the wilderness. Of the 11 respondents from whom BBN obtained a response to the question, "In what way was your visit affected by noticing aircraft?", one respondent stated that it "made it more pleasurable." Other comments ranged from the a simple response of "noise" or "pretty loud"; to the more elaborate and philosophical "reminded me how messed up society can be some times," "sort of disturbed the peace," and "attention was diverted from nature to technology"; to the clearly greatly annoyed: "very disturbing," "very low and loud and obnoxious," and "hanging on a rock cliff I almost fell when startled by low fighter jet." With the one exception who found the military aircraft pleasurable, all 11 comments exhibited some level of annoyance. Respondents who witnessed other aircraft in addition to military jets also were clearly annoyed by the low-flying Navy aircraft.

SUB-001

Pages 4-125 to 4-126: The text should clarify the distinction between the Level II and Level III impacts to subsistence resources located under the Yukon 1 - 5 MOAs. For example, the DEIS states that there are Level III impacts only in the Yukon 3 MOA and during HPSs. It should be clarified why the Yukon 1, 2, 4 and 5 MOAs would not be similarly affected and why there would be Level III impacts only during HPSs. It is not clear that the subsistence users of the Yukon 1 - 3 MOAs outside Eagle, including the people on the rivers, have been adequately considered, or that heavy subsistence use along the Black River has been assessed.

It is our opinion that Level III impacts would apply to Eagle City, Eagle Village and the Black River drainage. The USAR should strive to reduce the impact level to I for all subsistence users, including those living along the river (who are not affiliated with a community, but are probably the most sensitive of all).

Denali National Park and Preserve is mandated under ANILCA (1980) sections 202(3)(a) and 801(4) to "provide the opportunity for continued subsistence uses on the public lands...by rural residents on those lands added to the former Mount McKinley National Park. Page 4-132 indicates that a Level I impact is anticipated for subsistence activities under the Susitna MOA. We recommend that this determination be reevaluated. There are several subsistence hunters who utilize moose and caribou in sections of the Susitna MOA between the Tokositna and Yentna drainages from August 10 - October 31 and December 1 - February 28 of each year. Aircraft travelling at subsonic and supersonic airspeeds can frighten or startle wildlife, making the subsistence hunters' opportunities for harvesting wildlife more difficult.

The FEIS should address: 1) whether subsistence hunters are likely to move to areas unaffected by military overflight and thus increase competition there for subsistence resources, and 2) whether USAR activities would impact customary and traditional harvest periods (seasons) or means and methods for taking subsistence resources.

Page 4-157 - 4-158:

We recommend the DEIS analyze the impacts of its actions on recreational and tourism income. For example, what percentage of potential recreational users will decide not to hike, camp, float, hunt, fish, or otherwise use lands under the MOAs? How will this impact purchase of sports equipment, the hiring of guides and outfitters, and other expenditures such as fuel and housing associated with recreating in Alaska? While these costs would not outweigh the dollars that visits by flyers and crews from outside Alaska would bring to the state, they could be of some local significance in rural Alaskan communities with few employment alternatives.

SUB-003 Appendix J: The "Village Subsistence Profiles" should be updated to provide current data on subsistence harvest and use levels.

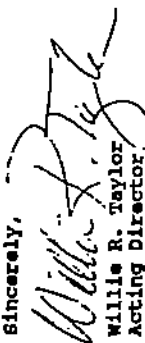
SUB-001 In addition, maps should be provided that identify subsistence use areas that are overlaid by the MOAs and MTRs.

OTH-009

Chapter 3: The FEIS distribution list should be expanded, as necessary, to include federal subsistence management organizations, such as: the Federal Subsistence Board, Regional Southcentral Regional Council, Bristol Bay Regional Council, Western Interior Regional Council, Eastern Interior Regional Council, Denali National Park Subsistence Resource Commission, and Lake Clark National Park Subsistence Resource Commission.

We appreciate the opportunity to provide these comments. We look forward to your continued cooperation in resolving military overflight issues in Alaska.

Sincerely,



Willie R. Taylor
Acting Director
Office of Environmental Policy and Compliance

Enclosure



U.S. Department
of Transportation
Federal Aviation
Administration

Office of the Regional Administrator
Alaskan Region

222 W. 7th Avenue #14
Anchorage, AK 99515-7687
Phone: (907) 271-6645
FAC: (907) 271-6113

Major Virgil Hanson
Chief of Environmental Management
611 ASG/LGV
5800 G Street, Suite 203
Elmendorf AFB, Alaska 99506-2150

Dear Major Hanson:

The Federal Aviation Administration (FAA) is both a Cooperating Agency, under the National Environmental Policy Act (NEPA) definition and an interested observer during your preparation of an Environmental Impact Statement (EIS) for the revision of Alaska Military Operations Areas (MOA's). Our involvement in the NEPA process has enabled us to gain valuable information about civil aircraft operator concerns regarding the United States Air Force (USAF) airspace proposal.

Assuming a formal airspace proposal is submitted by the USAF to the FAA, we are required to make an independent evaluation of that proposal to determine whether we will approve or disapprove it in part or in total. Those areas of aeronautical concern that have already been studied under the NEPA process will help us in listening to the concerns of other users of the nations airspace in Alaska.

As promised in earlier discussions between the USAF and the FAA, we are evaluating the information received thus far in the NEPA process and have some initial impressions regarding the Draft Environmental Impact Statement (DEIS). The purpose of the comments here and in the attachment are to provide some FAA input to your study of aeronautical issues in the DEIS which may help you in the preparation of the final EIS.

General comments and recommendations are presented below. Specific comments to the DEIS are presented in the attachment.

1. Mitigation.

a. Several of the MOA's proposed in the DEIS have received significant public concern regarding USAF flight proximity to civil aviation operating under Visual Flight Rules (VFR). We suggest that these areas so noted receive attention to provide as much latitude for the public to operate outside (corridors, strict times of use, public

MIT-034(Cont)

information, etc.) of Special Use Airspace (SUA) as is possible, thus reducing safety concerns.

b. The FAA is actively working to establish Global Position Navigation (GPS) routes direct to villages under or near proposed SUA. Instrument Flight Rule (IFR) access to the airports serving these villages will need to be ensured by some mitigation method. Close consideration of USAF needs balanced against civil traffic requirements will have to be accomplished.

c. The established airway system generally reflects the most heavily used IFR routes in the area of USAF proposed MOA's. Access to these airways, except where airways are no longer used, is essential to the commerce between communities in Alaska. Any USAF proposal limiting access to these routes will receive close FAA inspection and may be serious enough to warrant action on the airspace proposal along that route.

d. The Special Use Airspace Information System (SUNIS) is a system with great potential to reduce risks associated with non participants flying through MOA's. This system will be unique to SUA, and the USAF is to be commended for the establishment of the service. However, in order for SUNIS to be effective, it needs to provide consistent, reliable information to pilots when they request it. Anything short of that reduces its value and will affect pilot decision making as to whether even to attempt to use the service.

2. Coordination.

a. In the course of its coordination of airspace actions, the FAA considers the advice of a number of user groups. These include, but are not limited to the Alaska Airman's Association, the Alaska Aviation Safety Foundation, and the Alaska Air Carrier's Association. These groups can provide specific data not available through the FAA or the State Department of Transportation/Public Facilities (DOT/PF), especially on uncharted civil operating areas.

b. The locations that the DEIS was made available and the locations of the public hearings were not in the cities that many of the Air Taxi operators are based. For example, to assess the impacts of lowering the floor of the STONY B MOA to 100 feet AGL, input from the Air Taxi operators based in Aniak and Bethel would be needed to verify the flyways that are the most commonly used as well as the potential for GPS direct IFR flight within the proposed airspace.

c. Ensuring that the concerns of the civilian user groups are addressed would seem to be desirable in the NEPA process. This would be consistent with the Federal Aviation Act of 1958 that requires the FAA to safely manage all airspace over the United States and to give full

MIT-034

PRO-003

consideration to the requirements of national defense and of commercial and general aviation, and to the public right of freedom of transit through the navigable airspace. The FAA will need to assess this airspace action to comply with the above mandate. The evaluation could be shortened if the NEPA process has already separately addressed those concerns.

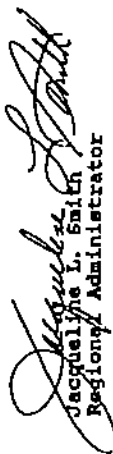
PRO-003
(Cont.)

3. Future Airspace Revision. The FAA will require that a mechanism exists to add airspace needed for new and relocated public use airports to the description of flight avoidance areas within the MOA's.

AIR-021

As you are aware, the degree of public awareness and interest in your NEPA process is increasing. Recent newspaper articles and aviation interest have demonstrated that the aviation community is looking closely at your proposal. We hope the comments provided by the FAA at this time may help produce a proposal that supports civil aviation's commercial and recreational requirements as well as the USAF mission within the commonly used airspace.

Sincerely,


Jacqueline L. Smith
Regional Administrator

Enclosure
DEIS Comments

FAA COMMENTS TO USAF/AK MOA/DEIS
DATE: 11/23/94

1. Chapter 2.1.3, Page 2-2- The DEIS text makes reference to "two Controlled Firing Areas (R2202 and the Blyng Sound Warning Area)." The reference is incorrect because R2202 is a Restricted Area and WA612 (Blyng Sound Warning Area) is a separate type of Special Use Airspace called a Warning Area. There are numerous Controlled Firing Areas in Alaska including both civil and military and US Coast Guard. A complete listing of Controlled Firing Areas is available from the FAA, Alaska Region, Air Traffic Division, System Management Branch.

AIR-023

2. Figure 2-2, Page 2-9- The depiction of the current eastern boundary of the BUFLO MOA is incorrect. The same boundary as is depicted in Figure 2-3, page 2-11 should be used.

AIR-023

3. Chapter 2.4.2.1, Page 2-19- The description of the BUFFALO and FOX MOA (Chapter 2.4.3.1) make no mention of an overlap in airspace, however the depictions in Figures 2-1, 2-3, 4-4, and 4-7 all suggest that the BUFFALO and FOX MOA proposal would create some airspace on the northeast corner of the FOX MOA that would be common to both MOA's. As was discussed in previous coordination regarding this airspace proposal, a dual designation of airspace will be unacceptable. One solution suggested earlier was to layer the airspace giving low altitudes to BUFFALO and higher altitudes to FOX in the corner where this situation exists.

AIR-023

AIR-022

4. Chapter 2.4.2.2- The document talks about the existing EIELSON A TMOA. This verbiage appears in numerous places in the DEIS. It is worth mentioning that all TMOA airspace exists only for the periods for which it has been approved after public and FAA consideration of each individual airspace request. It does not exist beyond that time and public input must be solicited prior to further re-creation of the same airspace.

AIR-020

Also, the EIELSON A TMOA has been approved to a floor of 500 feet AGL for the past two seasons due to flight activity along the pipeline below 500 feet. This activity still exists and the commercial operator concerned with lowering this altitude was vocal in the recent meeting with the USAF at the Alaska Aviation Safety Foundation meeting held in Fairbanks on November 9, 1994. It is somewhat misleading to say that the "...altitudes of the MOA would continue to be 100 feet AGL to..." In fact, the airspace activated by each airspace action for the past two years has not existed below 500 feet.

5. Chapter 2.4.4.2, Page 2-27- A change has been initiated to make the NAKNEK 1 and 2 MOA floor uniform at 3,000 feet AGL. After this change is effective in FAA Handbook 7400.8, the airspace description in the DEIS will need to be changed for the EIS.

AIR-022

6. Table 2-4, Page 2-40- The Times of Use of the Galena MOA are published in FAA Handbook 7400.8 and on aeronautical charts as "intermittent, 0800-1800 Monday-Friday, as advertised by NOTAM." The table on page 2-40 states this condition wrong.

AIR-023

AIR-023 7. Chapter 3.2.2, Page 3-15- The first full paragraph of this section makes reference to "Air Traffic Controlled Assigned Airspace (ATCAA)." There is a small error in this reference. It should be "Air Traffic Control Assigned Airspace (ATCAA)."

AIR-007 8. Chapter 3.2.2, Page 3-18- The last paragraph of this section states "...a Special Use Airspace Information Service. This program is currently undergoing a 90-day test period..." Several lines later the SUAIS is again referred to as a "test" program. This service is now permanently established via Letter of Agreement.

AIR-023 9. Chapter 3.2.2.4, Page 3-24- The statement that "No more than 15 IFR-controlled jet aircraft make daily use of the air routes adjacent to YUKON 1; up to 12 IFR-controlled jet aircraft per day use air routes adjacent to YUKON 2" needs a clearer definition. There are many air routes near the airspace referenced that are used by many more than the 27 flights referenced. The intent of this paragraph may have been to chronicle the traffic on the low altitude airways that exist in the area. If that is the case, it should be stated clearly.

AIR-007 10. Chapter 3.2.3, Page 3-27- The last paragraph makes reference to the 90 day test period for the Special Use Airspace Information Service. As stated above, this service is now permanently established via Letter of Agreement.

AIR-023 11. Chapter 3.2.3.4, Page 3-37- The last sentence of the first paragraph of this section states that "Aircraft proceeding to/from the Delta Junction area to/from any of the numerous airfields located along the George Parks Highway to the west most likely transition over EIELSON A..." The data to support this assumption probably does not exist. We believe it is more likely that aircraft transition through the EIELSON A TMOA. This assumption is based on our observation that most VFR flight is done at low altitudes throughout the state.

MIT-034 12. Chapter 4.2.2.1.6- Another item for consideration in this section is the public's need to accommodate IFR traffic (air taxi, air carrier, and general aviation) on GPS routes between villages that underlay or lay near MOA airspace where the public would be greatly inconvenienced by restrictions to IFR flight. Suggested mitigation may be High/Low MOA's or time restrictions for MOA activation at low altitudes. The use of the YUKON 3 and 4 MOA's for routine training is low, only 7.79 sorties per day (Technical Appendices, Page E-14).

MIT-028 13. Chapter 4.2.2.1.6- Procedural mitigation makes the point that "These exclusion areas would provide sufficient area for transition into and out of these airfields by civil aviation." **MIT-034** The Flight Avoidance Areas meet the standards set down in FAA Handbook 7400.2; however, they do not provide for flight between begin and end points. Aircraft that now transit freely between villages and cities will be obligated to consider the impact of high-speed military aircraft when they fly routes more than three miles from villages. This adds a further burden on the public that does not now exist. As was heard in scoping and DEIS

hearings, there is a significant amount of aviation activity in the YUKON 3 and 4 MOA areas that is not participating in military training (This would be true also for the STONY B MOA.)

This section contains a reference to the military using altitudes at 1,000 AGL and above to provide other aviation segments a means of flying low to avoid MOA airspace during the busiest flying season from June 15 through September 15 yearly. A higher altitude should be considered for this type of mitigation. In the area lying under the YUKON 3 and 4 MOA's, there is likely much more non-military traffic using the airspace on USAF routine training days than there is military. If this traffic were to compress into a 1,000 foot altitude buffer, there could be the potential created for more near-miss type incidents. An altitude of 2,000 feet - 2,500 feet AGL would be a better benchmark for operating altitudes below MOA floors.

Since Major Flying Exercise (MFE) traffic is much greater within the YUKON 3 and 4 MOA's (up to 320 sorties per day), consideration to mitigation that would suggest lower floors for longer periods might be given to MFE days. This action would presume that adequate notice to the public could be given through media and aviation publication means to acquaint non-participating pilots with the possibility of increased USAF activity during MFE periods. The greater the predictability there is about these times, the better informed the civil pilots will be.

SUAIS currently generates much uncertainty. This service is much talked about by civil pilots. They have pointed out that they often receive uncertain answers from SUAIS operators, that they often receive no answer when they attempt to make contact, and that the availability of the service is limited when operating at low altitudes, particularly in valleys where VHF communication may be limited.

In order to gain and maintain public confidence in SUAIS, the USAF should consider expanding the service so that times of operation can be published that include all times of MOA use. A thorough frequency coverage study should be made to determine where coverage is limited so that this information can be passed to pilots. Additionally, training for operators should be thorough enough to ensure that a professional response is given to pilot inquiries. If this is accomplished, the confidence of the flying public in the service can be increased and maintained to a level that would be beneficial to future relations between civil and military operators. Maximum participation by the public will maximize safety of operation by all parties.

14. Chapter 4.2.2.2, Page 4-14- The CLEAR CREEK MOA altitudes of 3,000 feet to 5,000 feet will interfere with IFR traffic vector patterns currently used by Fairbanks Approach Control. IFR and VFR aircraft executing approaches to runway 31 at Eielson AFB are vectored southeast of the airport at 3,000 - 4,000 feet to access the final approach course. These altitudes are selected to ensure adequate terrain clearance and radar coverage. The activation of the CLEAR CREEK MOA will restrict the ability of

MIT-028
(Cont.)

ATC to run traffic to Eielson arriving runway 31 or departing runway 13. The ceiling altitude of the CLEAR CREEK MOA interferes with the MEA of V444 in this area.

15. Chapter 4.2.2.2, Page 4-19- The last paragraph of this section states that "access, entry, and exit from the airspace [Southern Interior Region MOAs] is controlled by an air traffic control agency." This statement needs revision to state the case that USAF aircraft choosing to enter the MOA's under Visual Flight Rules (VFR) do not obtain clearance from an air traffic control agency. On daily routine training, this is the case most frequently with aircraft departing Eielson AFB since there is no requirement to do otherwise.

AIR-023

16. Chapter 4.2.2.2.6, Page 4-22- The mitigation suggested of establishing a minimum crossing altitude within 1 mile of the Richardson Highway in the BIRCH and BUFFALO MOA's and the Alaska Highway in the BUFFALO MOA during periods of routine training may not provide enough altitude for civil traffic to operate clear of the MOA if they choose to do so. Suggested further mitigation may be to raise the floors higher for both routine and MFE training, restrict times of usage of MOA's by USAF aircraft to more accurately reflect the actual time that USAF aircraft will be in the airspace, adjust airspace usage times seasonally, expand SUAIS as discussed above to provide a more reliable and accurate service.

MIT-028

17. Chapter 4.2.2.3.1, Page 4-23- The FAA Anchorage Air Route Traffic Control Center (ARTCC) is concerned that the simultaneous operation of the FOX and SUSITNA MOA's and higher ATCAA's may interfere with their ability to provide separation along the north-south air routes between these two MOA's. These concerns are slightly lower now that the southern portion of the FOX MOA is no longer part of the proposal.

AIR-024

18. Chapter 4.2.2.3.3, Page 4-29- The DEIS states that "It is not anticipated that civilian air operations in the Southcentral Region would be impacted by the Proposed Action due to the high floors of both the SUSITNA and FOX MOAs..." There is no information to contradict this statement as regards the SUSITNA MOA; however there have been discussions regarding the availability of FOX airspace for IFR direct routings by civil aircraft. This would indicate that perhaps more study is needed, especially with the advent of GPS direct routings becoming available to the civil fleet appropriately equipped in the near future.

MIT-028

19. Chapter 4.2.2.4, Page 4-37- The DEIS again claims that "entry, and exit from the airspace is controlled by an air traffic control agency." There is no agreement stipulating this restriction, and while it is true that most of the traffic operating in the Western Region MOA's enters the airspace in Instrument Flight Rules (IFR), and under ATC control, there are flights that choose to enter and exit Western Region airspace under VFR without contacting an ATC agency.

AIR-023

20. Chapter 4.2.2.4.6, Page 4-39- As has been mentioned before, the DEIS does not make mention of coordination that may have been accomplished with the Air Taxi

PRO-003

operators that serve the area under STONY B MOA. These operators operate out of the hubs in western Alaska and may be able to provide insight as to airspace use in this area. Also, this area has several small villages with airports. If more airports were established, it should be understood that more exclusion areas will need to be established around these new areas. Due to the civil activity in the STONY B MOA area, consideration to further mitigation measures should be given. As has previously been mentioned, there is a presumption that GPS direct airways and IFR operations may be contemplated for airports under the STONY B MOA.

PRO-003
(Cont.)

21. Chapter 4.2.4.3, Page 4-52- The same comment applies here as with other airspace mentioned above. The last paragraph again makes reference that "access, entry, and exit from the airspace is controlled by an air traffic control agency." There is no requirement to this effect, and it would be expected that USAF aircraft could and would enter the areas VFR.

AIR-023

The last sentence of this section has a word or phrase missing. This comment is of a strictly editorial nature.

22. Chapter 4.2.4.3.6, Page 4-55- As a minimum, access to the low altitude airways will be required within the TANANA MOA. Future GPS direct routings and airways will also be considered by the FAA when evaluating the airspace proposal.

MIT-028

23. Technical Appendices, Page E-10- One editorial comment is offered; the first line of text uses the word "them", it should be edited to say "them".



National Parks
and Conservation Association



November 30, 1994

Major G. Virgil Hanson
611 ASG/LGV
5800 G Street, Suite 203
Elmendorf AFB, Alaska 99506

Re. Comments on the Draft Environmental Impact Statement
for Alaska Military Operations Areas

Dear Major Hanson:

The National Parks and Conservation Association (NPCA) hereby submits to the Department of the Air Force the following comments in response to the Draft Environmental Impact Statement for Alaska Military Operations Areas. These comments are submitted on behalf of NPCA's more than 450,000 citizen members concerned with the preservation and protection of America's national parks and the park experience for today's visitors and for future generations.

The National Environmental Policy Act of 1970 (NEPA, 42 U.S.C.A. § 4321 et seq.) states that "it is the continuing responsibility of the Federal Government to use all practicable means... to improve and coordinate Federal plans, functions, programs and resources to the end that the nation may... preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity and variety of individual choices." In proposing the expansion of Air Force activity in Alaska with new Alaska Military Operations Areas (MOAs) imposing significant impacts on Yukon Charley Rivers National Preserve and other units of the National Park System and other conservation units, the Department of the Air Force has clearly violated the intent of NEPA. The Department of the Air Force's plans for new Alaska MOAs must be revised in a manner which recognizes the special nature of units of the National Park System and honors the higher level of environmental protection accorded those units by Congress.

Background

America's national parks were designated by Congress to serve as oases from the commotion of daily life. Philosophers, historians, ethicists and politicians have all written of the need for open spaces to serve the need for mankind to find quiet, solitude, and spiritual renewal. For most Americans, the National Park System provides this.

The National Park Service Organic Act of 1916 specifies that parks are to receive the highest

1776 Massachusetts Avenue, N.W., Washington, D.C. 20036-1904
Telephone (202) 223-NP/CA(6722) • Fax (202) 659-0650



PRO-001

LAN-002

PRO-005

level of protection, so as to "conserve the scenery and the natural and historic objects and the wild life therein... in such manner and by such means as will leave them unimpaired for the enjoyment of future generations" (emphasis added).¹ Aircraft flying over national park areas severely compromise the experience of solitude and natural quiet - Integral components of the national park experience for many visitors. Low-flying aircraft intrude on the natural, aesthetic, scenic and cultural values for which the park areas were established. Low-flying military aircraft engaged in tactical maneuvers at transonic and supersonic speeds intrude on these values at a level several orders of magnitude more severe than other airborne activities. As stated in the DEIS, the proposed Alaska MOA is expected to severely impact nesting patterns, migratory habits and use of habitat of a variety of species of interest in Yukon Charley Rivers National Preserve.

The National Park Service formally recognizes the difference between military and non-military use of park resources (and implicitly the degradation which results from military use) in Special Directive 83-4, recommending: "Military activities, in general, should not be allowed in park areas with the exception of those that relate to usual and normal park activities, such as search and rescue, outdoor survival, and events not simulating conditions encountered in combat situations." Specific to Yukon Charley, contained in portions of the Yukon 1,2,3, and 4 MOAs, the DEIS states that the operations will have, by the DOD's own criteria, "significant adverse impacts" on the recreation resources in 54 percent of the park, and "adverse impacts" on the remaining 46 percent. Clearly, the proposed military use of this park unit would cause disruption of the resources and values in 100 percent of the park, in clear contravention to the purpose for which the park unit was established:

To maintain the environmental integrity of the entire Charley River basin, including streams, lakes and other natural features, in its undeveloped natural condition for public benefit and scientific study; to protect habitat for, and populations of, fish and wildlife, including but not limited to the peregrine falcons and other raptorial birds, caribou, moose, Dall sheep, grizzly bears, and wolves...[P.L. 96-487, December 2, 1980, emphasis added]

Authority to Restrict Aircraft Overflights to Protect Park Values

The authority of the National Park Service to safeguard the values and resources for which the National Park System was created is clear in both the Organic Act and NPS regulations, and must be reconciled by the Air Force proposal. The specific authorities provided to the National Park Service by a variety of additional statutes, however, bear repeating:

¹ National Park Service Organic Act of 1916, 16 USC §1.

The National Park Service Organic Act and Regulatory Interpretations. The National Park Service Organic Act and subsequent regulations provide the National Park Service with the primary and overarching direction to protect park resources. Regulations and policies promulgated by NPS demonstrate a consistent interpretation of the Organic Act's mandate to first protect the resources and then to provide for public use. Authors of the Vail Agenda confirmed this direction, recommending that the "primary responsibility of the National Park Service must be the protection of park resources."² This philosophical direction is confirmed by NPS management policies and extended to provide direction to park managers to protect park resources from potential threats, as well:

It is NPS policy to treat potential impairments in the same manner as known impairments. When there is thought to be a potential for resource impairment, actions will be based on strategies that retain the resource in an unimpaired condition until such time as doubts are resolved. For example, if a development might impair a park resource, the development will be postponed or reconfigured until it can be established whether 'might' is 'will' or 'will not,' within reasonable limits of certainty. Absent that assurance, the action will not be taken.³

The Department of the Air Force proposal for the Yukon 1,2,3, and 4 MOAs leave no doubt as to the certainty and severity of the threat to the resources of Yukon Charley Rivers National Preserve.

The Wilderness Act. The Wilderness Act prohibits development of any kind and severely limits human intrusion on lands designated as wilderness for the specific purpose of preserving the "primeval nature" of land "where the imprint of man's work is unnoted."⁴ In accordance with National Park Service recommendations pursuant to section 1317 of P.L. 96-487, Yukon Charley Rivers National Preserve's over 2.2 million acres is actively managed as wilderness, awaiting formal designation. Of all of the legislative authorities, the intent of the Wilderness Act and the philosophical underpinnings of the Act are most clear. NPS cannot physically be in compliance with the Wilderness Act if it allows uses of the land that degrade its primeval character. Military overflights of wilderness degrade the primeval character of that land, leaving the imprint of human work obvious to all creatures on the ground. The Department of the Air Force must reconcile its proposal for the use of Yukon Charley with the requirements of the Wilderness Act.

² *National Parks for the 21st Century*, ("The Vail Agenda"), National Park Service Document No D-726, p. 5.

³ *Management Policies*. U.S. Department of the Interior, National Park Service (1988), p. 1-4.

⁴ *The Wilderness Act of 1964*, 16 USC §221.

The Endangered Species Act. The ESA specifically prohibits federal agencies from authorizing, funding, or carrying out actions that would jeopardize the existence of endangered species.⁵ The courts have interpreted this mandate to mean that agencies must pursue a policy of institutional caution where endangered species are concerned.⁶ National parks are repositories of endangered species. The Park Service has documented that populations of endangered peregrine falcons rely on Yukon Charley for their primary habitat. The Department of the Air Force proposal for Yukon 1,2,3, and 4 MOAs would very clearly violate both the letter and the intent of the protections provided by the Endangered Species Act.

EAA Authorities. In addition to the legal protections described above, substantial legal basis for the protection of park values and resources from overflights is also established by § 4(f) of the Transportation Act, specific to the Federal Aviation Administration. Though the Federal Aviation Administration is not the agency proposing the action, it does have formal review and approval responsibilities for military airspace designations and withdrawal plans. The regulatory structure imposed by Section 4(f) should therefore apply.

Section 4(f) specifies that the Secretary "may approve a transportation plan or project requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfront refuge of national, state, or local significance ... only if 1) there is no prudent and feasible alternative to using that land, and 2) the program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfront refuge, or historic site resulting from the use."⁷

"Feasible alternatives" to the proposed MOAs which do not adversely affect the resources of Yukon Charley clearly exist. Therefore, § 4(f) effectively mandates substantial limitations on aircraft overflights wherever such overflights would have any significant effect on park resources. The Air Force's description of the impacts expected to result from the MOAs remove any question as to the level of significance of impacts on Yukon Charley.

Specific Weaknesses in the DEIS

Beyond the implicit and explicit violations of the Wilderness Act, the Endangered Species Act, and the National Park Service Organic Act which would result from the execution of the Air Force's proposal, the Draft EIS includes a variety of misstatements and subtleties

⁵ 16 USC §1531 et seq.

⁶ See, for example, *Sierra Club v. Munn*, 816 F.2d 1376 (9th Cir.) 1987.

⁷ 49 USC §303 (c).

which must be specifically addressed by the Department of the Air Force. They include the following:

Segmentation of the Environmental Impact Statement

The DEIS fails to adequately address the cumulative and inter-related impacts of connected actions (military training areas) which are covered under a series of NEPA documents listed in Chapter 1 (pg 1-9). In segmenting the environmental review process, the Air Force makes such potential cumulative and interrelated impacts from public view. Compliance with the intent of NEPA requires that a full and integrated review be made of other activities which may influence the impacts which will result from the designation of additional Alaska MOAs.

PRO-001

CUM-001

Similarly, the Department of the Air Force fails to reveal the Military Training Routes (MTRs) which would be used to access the various MOAs. This is a critical piece of information for determining the impact on Yukon Charley as well as other units of the Park System in Alaska. On a cursory inspection, it appears that Lake Clark National park and Preserve may be significantly impacted by any MTR which would be used to access either Nabesek 1 or Nabesek 2 MOAs. In addition, it appears that Denali National Park and Preserve may be impacted by likely MTRs used en route to the Galena MOA.

PRO-001

AIR-009

Failure to Adequately Address Applicable Regulatory Requirements

The DEIS fails to consider the complete range of regulations which would potentially be involved as a result of the impacts caused by expanded military airspace operations. As mentioned earlier, the DEIS pointedly fails to discuss the implications of the expanded military operations for the NPS Organic Act, the Wilderness Act, the Federal Land Management Policy Act, the Migratory Bird Treaty Act, and the Alaska National Interest Land Conservation Act. Review and disclosure of the interrelationships of these public laws to the use of conservation lands as proposed by the Department of the Air Force will reveal serious and potentially irreconcilable conflicts which have clear consequences for the area actually "available" for such expanded military use.

PRO-005

Failure to Systematically Conduct "Worst Case" Analyses

Without exception, the DEIS conducts what could best be described as "best case" analyses, in clear violation of NEPA regulations. Those regulations require that, particularly in cases where potential effects are unknown or substantially hypothetical, "worst case" analyses of the potential impacts must be conducted. Other examples are outlined below (see comments on Biological Resource Impacts), but the point is demonstrated by an early statement in the DEIS, "Deployed aircraft may include all types in the DOD inventory, as well as similar

PRO-004

allied aircraft" (page 1-3). However, although the totality of the DOD inventory may have noise and other impacts of substantially higher magnitude, the noise impacts throughout the DEIS is calculated using the specifications of the F-15 and F-16 type aircraft only. The worst case analysis must be applied to all of the sections and potential impacts within the EIS.

PRO-004

Distance of a True No Action Alternative

In order to comply with NEPA, the DEIS must present a "no action" alternative. NPCA applauds the Department of the Air Force in presenting such an alternative, although it differs in opinion as to what such an alternative should reflect. The Air Force states that "[t]he No Action Alternative would maintain the status quo" (pg. ES-19). However, as NPCA made abundantly clear in comments during the scoping process, all alternatives must be based on a clear assessment of the DOD's needs in a post Cold War era, and must therefore include the true "no option" alternative of removal of the recently designated TMOAs from military withdrawn airspace.

ALT-001

Failure to Adequately Map Supersonic Operations Areas

Although DEIS makes clear that supersonic training is proposed to take place within some of the MOAs, the Air Force has failed to specify where these operations will take place. To the extent that carpet and focused sonic booms grossly exaggerate the adverse impacts on the ground beneath and around them, any assessment of impacts is incomplete without a full discussion and mapping to the proposed supersonic operations areas (SOAs).

NOI-002

Inadequacy of Noise Analyses

Throughout the DEIS, the Department of the Air Force indicates that Supersonic operations will occur to 5,000 feet AGL. The DEIS fails to provide noise analysis which corresponds to the proposal, providing instead analyses for supersonic operations at five times the altitude, at 20,000 feet AGL.

NOI-001

NOI-002

In addition, noise analyses are provided for single planes only. The DEIS makes clear that sorties will be flown in formation or in groups with multiple or dozens of aircraft participating, especially during Major Flying Exercises (MFEs). So called "strike force" analyses must be carried out to adequately determine and evaluate the potential impacts of the operations. Similarly, noise level calculations are useless when averaged over a year, or any period which is similarly designed to mask the impact of the "dose" received at a specific time, from a specific event.

Failure to Detail Wildlife Mitigation Measures

The DEIS proposes no mitigation measures, stating "existing employment procedures are designated to prevent any increased risk of wildland fires or other environmental degradation (level 1 impacts)." The intent of this statement and the Air Force plan is unclear. The DEIS analysis is clearly deficient in this regard because its wildlife management policies have not proven effective in an Alaskan setting. Several years ago, during military training exercises over Yukon Charley, nearly 35,000 acres of park land were set afire. With a heightened level of military activity, increased wildfires are a significantly increased threat to the park and all biological resources therein. It is unacceptable to dislodge the increased risk for Yukon Charley and elsewhere by stating that standing mitigation procedures will be sufficient to suppress a fire. Adequate response to the increased risk requires that the DEIS directly address the potential for wildfires resulting (separately) from increased use of avoidance flares and fuel jettisoning tactics. In addition, specific mitigation plans must be proposed and discussed for each of these possible wildfire sources.

HAZ-009

Failure to Discuss the Impact of Chaff

The DEIS omits discussion of the use of Chaff on federal lands. Where the DEIS leaves the impression that Chaff dispersal is a minor concern, in fact the use of Chaff will be routine and is likely to have widespread effects on the lands beneath the MOAs, and the wildlife which utilize that habitat. In Yukon Charley Rivers National Preserve, this alone is an unacceptable derogation of the park resources, which risks rendering the entire park area a wasteland of accumulating debris, and which will exact a heavy toll on wildlife utilizing the park.

HAZ-003

Failure to Adequately Address Impacts to Biological Resources

The DEIS fails to completely address the effects of the proposed increases and cumulative effects of existing flight training activities to the biological resources of Yukon Charley Rivers National Preserve and other conservation units affected by the designation. The DEIS states, on page 4-88:

BIO-007

Insufficient evidence exists to make conclusive statements regarding the effects of aircraft noise and sonic booms on populations of wild animals associated with any military [flight training activities]. Relationships between aircraft noise and wild animal responses have been observed (e.g. startle, short-term behavior change); however, the character of this relationship has only recently begun to be documented with scientifically designated studies. Responses of various animal species may be covert and unnoticeable based on observations, and still be detectable on a physiological basis.

NPCA concurs with this conclusion, but would like to point out that, absent conclusive determinations of the potential impacts of an action, NEPA requires the responsible agency to carry out a "worst case" analysis. However, the DEIS fails to fully outline mitigation measures which adequately address temporal and spatial avoidance programs, stating that, "In light of the magnitude of the biological resources involved, completing such a program is beyond the scope of this analysis" (pg.4-106). The conclusion, in section 4.5.4.1, that "Implementation of the Proposed Action or an Alternative Action could hasten [the impact on] wildlife populations and the natural systems of which they are a part" (pg.4-111), shifts away from the "worst case" analysis required by the law.

PRO-004

More egregious an omission, however, is the lack of analysis of the biological impacts of sonic booms. Sonic boom events elicit an extremely high "startle reaction" among many of the animals in this habitat. The implication that, since sonic booms are a minor factor in the total of aircraft generated noise, their impacts are also minor, and analogous to those of "thunder" is simply a "shell game" using the Ldn "average" noise dosage which does not adequately address the substantially undocumented effects of large, focused doses of noise and overpressure. As in the previous example, this analysis fails to undertake the required "worst case" analysis, in light of the unknown. The biological impacts of sonic boom events must be adequately addressed in the EIS.

BIO-007
PRO-004

Failure to Adequately Address the Economic Impacts and Impacts on Recreation Resources

NPCA has made it clear elsewhere in this document that visual and noise impacts of military overflights on recreational users are fundamentally incompatible with the National Park Service mission with respect to the Yukon Charley Rivers National Preserve (to preserve unimpaired), and the *de facto* wilderness condition of that unit. The expectations of the recreating public is that fundamentally unimpaired, *de facto* wilderness areas are a "given" experience in Alaska. When informed of, or confronted with the impairment associated with the Proposed Action, those potential recreationists are likely to change their visitation plans.

REC-001

The use of the conclusions of the 1992 U.S. Forest Service Report to Congress: *Potential Impacts of Aircraft Overflights of National Forest System Wilderness Areas*, in the DEIS is misleading. As noted in the DEIS, that report specifically avoided analyzing the impacts of overflights on wilderness users in Alaska. Moreover, whereas the DEIS stresses (and exaggerates -- at \$60 per day) the economic benefits to be generated by pilots and support personnel, it wholly neglects to analyze the potential negative effects of the operations on potential recreators (who are likely to spend significantly more than \$60 per day).

* The number of visitors to Yukon Charley Rivers N Preserve alone (2,000), overshadows the 1,337 military personnel who are anticipated to spend money. Recreation visitors to Alaska return much more than the military's best case scenario of \$60.00 per day.

Conclusion

America's national parks hold a central and sacred place in the nation's psyche. With the urban environment expanding ever outward, it is ever more critical that we preserve the opportunity of the American people to experience the parks, as "wilderness" environments and as respectful reserves of our cultural heritage.

The Draft Environmental Impact Statement provided by the Department of the Air Force is clearly inadequate in that it fails to address a variety of potentially critical impacts of expanded military use of the airspace above Yukon Charley Rivers National Preserve, Lake Clark National Park and Preserve, and Denali National Park and Preserve. In order to be responsive to the right of the public to review impacts which may result from the Air Force proposal, considerably more work is needed. Special emphasis must be placed on the impacts of the proposal on the Endangered Species Act, the Wilderness Act, The National Park Service Organic Act, and the direct and indirect environmental impacts on the parks themselves. I fully expect that such a complete and responsive review will reveal that such an expansion of military operations over national park lands is inappropriate, and clearly contrary to the public interest.

Sincerely,


Philip H. Moorhous
Washington Representative



P.O. Box 33553
Valdez, AK 99686
Phone: 907 432-4500
Fax: 907 835-8678

November 25, 1994

Major C. Virgil Hansen
611 ASG/LGV
5800 G St. #203
Elmendorf AFB, AK 99506-2150

Re: Draft Environmental Impact Statement for Alaska Military Operations

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for Alaska Military Operations. I am commenting on the proposed action from the perspective of the Alaska Wilderness Recreation and Tourism Association. AWRTA is a non-profit organization which promotes the recognition and protection of Alaska's recreation and tourism resources including scenic qualities, wildlife, fisheries, wilderness, wetlands and rivers. Our specific concerns relate to the proposed action for the Fox MOA and the Yukon MOAs 3, 4, 5.

The Draft Environmental Impact Statement (hereinafter referred to as the DEIS) acknowledges significant adverse impacts on existing recreation uses and wilderness values but the discussion of the effects is limited in scope. Furthermore, where impacts are acknowledged, the outcomes are detrimental to the future operations of our 230 business members as well as to our 71 individual members.

The adventure travel segment of the tourism industry is the fastest growing portion at about 20% annually. Among the state's basic industries, tourism is the state's second largest employer in the private sector and the third largest in terms of payroll. As a legitimate commercial activity, recreation businesses have commodity interests that exist on Alaska's wildlands. The DEIS fails to recognize the importance of commercial recreation in local economies by limiting the economic analysis to Eielson and Elmendorf Air Force Bases. These facts alone demand a more careful recreation and tourism analysis by the Air Force. A level of analysis for recreation that is commensurate to the level the agency pursues for is sorely needed and legally required by NEPA. The DEIS should include information on the number of commercial recreation providers in an area by type of activity or service provided, number of clients by type of provider, and commercial recreation rates.

REC-001

The tourism industry in Alaska often depends upon wildlands that are managed as federal parks or refuges. Much of the area in the Fox MCOA is owned by the state. The DEIS recreation sensitivity rating does not accurately reflect the importance of these areas to wilderness base tourism. Furthermore, eliminating overflights during the Fourth of July and Labor Day holidays will not mitigate the damage to recreation resources from the scheduled 60 days of major flying exercises and 240 days of routine training. Where will people relocate? What will be the cost of relocation? Does the new area provide a valuable experience?

MIT-008

Closure of the Clark Force Air Force Base in the Philippines is given as the reason for expanding military flight training in Alaska. However, in the Philippines the training was primarily over the ocean. The EIS does not consider the alternative of conducting training in the Gulf of Alaska. This question still remains with no national needs assessment in this expansion warranted?

ALT-002
PAN-001

AWRTA opposes the proposed action based on the inherent damages to the natural resources of Alaska and the outfilter/guides dependent on those resources.

Thank you for your time and reconsideration of this important issue.

Sincerely,
Nancy R. Lethcoe
Nancy R. Lethcoe

Dennis Knuckles
PO Box 151
Eagle, AK 99738

November 27, 1994

Chief Operations Division
11th Air Force

ATTN: Colonel Hassan
5800 G Street, Suite 203
Elmendorf, AFB, AK 99508-2150

COMMENTS REGARDING DRAFT EIS FOR ALASKA MILITARY OPERATIONS AREAS

I've spent the past month reading the EIS and its associated documentation, attending USAF meetings and talking with others about Air Force flight exercises. I'm basing my comments on personal experiences (living, working and flying (400+ hours/year) in the Yukon MOAs (1,2,3) over the past seven years), EIS written materials and some deductive reasoning. I moved to Interior Alaska for a lifestyle change (rural/remotely/peace and quiet) and an opportunity to use my general aviation skills to earn a living flying. These proposals compromise or at least degrade what I value most in life (aside from family): my lifestyle, Alaska wilderness values, aviation opportunities and safety.

In light of the proposed alternative and alternative actions put forth in the EIS I am endorsing the *No Action Alternative* with specific suggestions for mitigating problems not fully addressed in the draft EIS analysis/process.

Here are some assumptions that I have made about Air Force activities/training:

- Training should be as realistic as possible so that a pilot will "train as they fight and fight as they've trained".
- The Air Force desires to fly faster, lower and during night or inclement weather to provide an element of safety for our pilots and success for the mission.
- The Air Force seems to "accept" a certain level of loss (bird strikes/mid-air accidents) as the "cost of doing business".
- Most of your pilots are professional and strictly disciplined, others less so. These individuals occasionally violate SOPs, Interagency agreements, strafe boats and wildlife on the ground and fly intercepts towards civilian aircraft. A degree of "unpredictability" in a pilot's flying behavior equates to "survival" in a real conflict situation. You're not "Top Guns", however there are a few "cowboys" out there.
- During MFEs, pilots engaged in "attacking or defending" are preoccupied with the exercise: using their equipment (radar) for specific tasks (weapons, target acquisition), thinking strategy and probably not focused on "see and avoid" for general aviation aircraft during these maneuvers that are task heavy for the pilot.
- The Air Force, not unlike other agencies, has a hard time holding their people accountable for their actions when reported by the public.

AIRSPACE MANAGEMENT, AIRCRAFT OPERATIONS and AVIATION SAFETY: I'd like to see the Alaska Aviation Safety Foundation's position paper recommendations incorporated into ANY proposal/alternative adopted. In addition I'd like to propose the following mitigating measures be adopted as well:

MIT-031

- Replace the AGL values with geographic MSL values so that there is no confusion on what the "floor" is for military activity in a given area.

For example in lieu of a 2000 AGL "floor" that would vary widely within Yukon-Charley Rivers National Preserve from 2700 MSL at its lowest, to 8400 MSL over its highest peak. Why not set an overall MSL value, similar to the tiered airspace floors and ceilings used in FAA Class B, C and D airspace, in various portions of the MOAs? AGLs set military pilots up to violate agreements and restrictions, that others agree to on paper, but in real life are busted in the course of training; not intentionally, but busted none the-less. MSLs would simplify the workload for all pilots in an area. It's easier to relate to an altimeter setting, avoids busting AGL restrictions (sensitive areas) that "suddenly occur" in 100 AGL areas during the course of their exercise at 400+ knots and allows them to focus on their responses to training threats, instead of artificially imposed restrictions. An MSL military floor also provides general aviation traffic alternatives to select VFR routes that have "ceilings" above them in which military activity is limited to. The military currently employs this type of separation (air-to-air training above, while conducting air-to-ground underneath) to fully utilize the airspace during routine training. Truly evaluate the areas critical to "terrain masking" (Yukon 1& 2?) practice and weapons delivery and establish lower floors for those areas. Keep the floors higher in all other areas.

MIT-026

- Flight Service Centers should know the day before, from Flight Ops, the anticipated times the MOAs are to be HOT for flight planning purposes.

If given the proposed times (not dates) scheduled military activity within any MOA is to take place a day ahead of time I would try to rearrange my flying activity to avoid conflict.

CHAFF and FLARES: because mistakes happen in the simulated "heat of battle", fuels and fire indices vary widely across the course of a jet's training mission and flares are discharged as a reaction to a threat, regardless of AGL in real life: In addition to current USAF restrictions on flare usage I'd propose as a further mitigation measure to all alternatives that:

HAZ-009

- Flares NOT be loaded on aircraft conducting air-to-air training, restrict usage to air-to-ground sorties destined for impact areas and simulated surface-to-air missile threats, during times of HIGH fire danger in the areas their flight activities are to be conducted.

As a result of military flight activity and flare discharges in June of 1991, a 32,000 acre fire was started in Yukon-Charley Rivers National Preserve. These types of impacts have to be stopped.

WILDLIFE: There are far too many unknowns with various wildlife populations through out the area. ADFG doesn't even have accurate population or trend data for game species, let alone the other "less important" species that drive the ecosystem. Aside from the harassment of wildlife on the ground by low level flights, I'm especially concerned about sonic booms. To say a sonic boom is no different than thunder and equate its effects to all species as benign is presumptuous at best. I wonder if the focused booms (associated with dogfights/maneuvering) will have no impact? Lets not mix wildlife, low level jet noises and supersonic flights. What ever alternative is adopted I'd like to see the following considered as mitigation measures in an attempt to protect wildlife from further disturbance:

MIT-028

- Keep supersonic flight activity above 20000' MSL
- Avoid abrupt maneuvers coupled with afterburner engagement below 2000 AGL.
- Employ seasonal avoidance areas with wildlife concentrations: No Fly Zones

RECREATION, LAND USE and SUBSISTENCE: The degradation of these values with the proposed expansion of "routine training" into additional areas, in essence year-round, is undeniably an unwanted impact to those using/living in these areas. Seeing one or two jets occasionally (say twice a year) instills a sense of patriotism. Hearing the "Sounds of Freedom" on a weekly basis destroys the natural essence of Alaska (its wildness) and makes a mockery of those legislated conservation areas underlying the MOAs. The impact is not transitory (as you would lead one to believe), but cumulative in nature to those using the areas. One only has to look to the lower 48 to see the upwelling of opposition to long established MOAs in the western states; people are fed-up with the noise and activity occurring above, below and around them.

MIT-032

- Adopt MSL floors over conservation areas (say 4000 MSL)
- Avoid recreation concentrations during their busy times (hunting seasons, fish harvests, subsistence activities).
- Adopt MSL floors over towns/Villages (say 10000 MSL) AND No supersonic flight below 30000 MSL
- Keep supersonic flights as few and as high as possible in those areas where it is not CRITICAL to the training mission.
- Ensure that there is a written response indicating the outcome/action taken as a result of complaints voiced by the public through Public Affairs' 800 number.

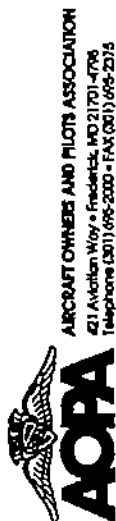
MIT-033

During the scoping meeting held in Eagle last year we were told this process was necessary to save money (annual recurring planning costs), improve airspace safety by converting TMOAs to permanent MOAs (by showing them on sectional) and supply the needed space for MFEAs that allow pilots the "10 combat sorties" to increase their survivability. Buried in the volumes of data and analysis are the expansion of routine flights beyond Yukon 1& 2 and to year-round activity (MFEAs are primarily summer events) and supersonic flights down to 5000 AGL. Into previously non-supersonic areas. This smacks of not being "up-front" until NEPA requires it. I've watched the "neighborhood" go from A-10s to squadrons of F-16s, to MFEAs of 70+ aircraft and now this expansion proposal. Until we can answer the questions concerning the numerous impacts of the proposed alternative let's stay with the NO ACTION ALTERNATIVE and see if we can't find some cost saving measures with the budgetary and pleasing procedures, then the TMOAs and still provide for MFEAs and combat experience with out subjecting the rest of us to a "military conflict".

ALT-003

Thanks for the opportunity to comment

Thomas Kurwik



November 29, 1994

Department of the Air Force
511 ASG/IGV
5800 G Street Suite 203
Elmendorf AFB, AK 99506-2150

RE: Draft Environmental Impact Statement
Alaska Military Operations Areas

Gentlemen:

This letter is in response to the Air Force proposal to establish new Military Operations Areas (MOAs) in Alaska. The Aircraft Owners and Pilots Association (AOPA) representing 330,000 members nationwide and 4,000 aircraft owners and pilots in Alaska views this proposal as having the potential to create significant hazards to general aviation aircraft in the state.

The primary concern of the aviation community is the increased risk of mid-air collision. Routine training exercises of military aircraft on a daily basis and the increase in activity during Major Flying Exercises (MFEs), as well as high speed military aircraft flying at low level are definite threats to civilian aircraft.

The area underlying the proposed MOAs has very few roads. As a result the residents of the area rely on civilian aviation as a major means of transportation and support. The frequency and nature of these activities must be examined and mechanisms must be put in place to accommodate civilian aviation needs. While some military aircraft are equipped with radar, pilots flying in simulated combat are not likely to focus on seeing and avoiding non-participating aircraft.

AOPA supports the recommendations of the Alaska Air Safety Foundation, which include corridors for IFR and VFR operations; seasonal timing of military exercises; communications between military and civil users, and overall coordination.

Member of International Council of Aircraft Owners and Pilot Associations

3-313

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Corridors for IFR and VFR Operations

Because of the significant numbers of aircraft that travel high traffic routes through the proposed MOAs, concern has been expressed by commercial operators who conduct scheduled flights between Fairbanks, Eagle, Tok, Delta Junction, Chicken, Boundary, Northway, Tetlin, Chisana, Healy Lake, and Dawson City, Yukon. Corridors to protect these operators and other civilian air traffic should be established.

IFR Corridors: The existing Victor 444 airway connecting Fairbanks, Delta Junction, Northway and extending onto Whitehorse must remain intact and protected to ensure IFR routing between Fairbanks and points east. This airway not only connects these communities, it is also a major air route used by traffic between Alaska and the rest of the continental US.

There is currently no federally approved airway between Fairbanks and Eagle or Dawson, but rapidly developing global positioning system (GPS) technology and better radar coverage will make this a likely route in the near future. The Federal Aviation Administration (FAA) and the Air Force should develop an airway route from Fairbanks direct to Eagle. This route should then be established as a no fly corridor for military aircraft, except those flying that route. A corridor along this route would provide a significant degree of safety for both military and civilian flyers. The impact of the proposed MOAs on future IFR GPS approaches to airports in the affected area should be considered.

VFR Corridors: The majority of civil traffic in Alaska operates under visual flight rules. Unlike IFR traffic which is flying at altitude to avoid terrain, VFR traffic often flies closer to the surface along valleys and low routes through high terrain, especially during times of low cloud cover and reduced visibility. A significant VFR route runs from Fairbanks along the Richardson and Alaska Highways to Northway and into Canada. This route is used year around. A low level VFR corridor should be established along the Richardson and Alaska Highways along these routes. This would allow safe VFR transit of civilian aircraft, especially during times of low cloud cover and reduced visibility when the potential for conflicts with military are heightened.

MIT-016

MIT-017

MIT-019
MIT-020

SAF-005

OTH-014

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Additional routes from Fairbanks to Central and Circle City along the State Highway, between Circle City to Eagle and Dawson, along the Yukon River, and from Northway to Chisana and Chicken, Eagle, and Boundary should also be considered to protect VFR traffic.

The Trans-Alaska Pipeline underlies the proposed MOAs. Alaska Pipeline Service Company uses helicopters for surveillance and inspection of the pipeline year around. Most of the flights are conducted at low level altitudes, which makes see and avoid more difficult. Helicopter pilots have already reported near-miss situations with military aircraft while conducting operations along the pipeline. The Trans-Alaska Pipeline should be protected by a low level VFR corridor. This would provide a safe operating environment for both pipeline related helicopter traffic and general aviation traffic using the pipeline as a visual reference.

MIT-021

Seasonal Timing of Military Operations

During certain times of the year, general aviation traffic increases dramatically across the state. Corridors are not appropriate due to the random nature of these operations. There is, however a time dependency which makes these aerial activities both predictable and avoidable. The major uses are:

Hunting Seasons: Beginning approximately two days prior to the opening of Dall Sheep season until approximately two days after the close of moose season there is a significant increase in general aviation traffic. Most of this increase in traffic is due to air taxi operators and private pilots flying to and from hunting camps located in the forty mile area (Yukon MOAs) and the Alaska Range. Currently, sheep season opens around August 10th and many moose and caribou seasons close around September 30th. Due to the nature of hunting operations, many of the aircraft participating in these activities will be conducting off-airport operations. The combination of increased traffic, difficulty in off airport operations, and fall weather conditions results in a significant increase in the potential for accidents.

MIT-022

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Fish and Game Surveys: State and federal agencies use aircraft in the proposed airspace to conduct game surveys and law enforcement surveillance. These game survey operations are more concentrated during the May through September time period.

Recreational Flying: During the week of July 4, there is a peak in general aviation recreational flying. People vacationing and traveling by aircraft and the increase in tourist traffic flying along the Alaska and Richardson Highways, and between Dawson and Fairbanks accounts for much of this traffic. Recreational users from other parts of Alaska and out of state are generally not familiar with the local airspace increasing the potential for conflict with military aircraft.

MIT-022

Potential conflicts between military and civilian aircraft were identified within specific time windows. The military should avoid overflights, particularly low level, during these times.

We also recommend that no MFEs be scheduled between August 8 and September 30 annually. This would provide separation between large scale military operations and general aviation aircraft operations during the hunting seasons. In addition, the Air Force should restrict all routine flying to no lower than 3,000' AGL during the same time period.

The Air Force should not conduct any MFEs during the time period one week before through one week after the July 4 holiday. This would largely deconflict Air Force activities with the high levels of recreational and tourist aviation traffic which occurs in this time period.

Communication Between Military and Civil Users

While the areas of special use airspace (SUA) requested by the Air Force for training are vast, the areas actually occupied by aircraft at any one time is relatively small. If knowledge of the location and direction of travel of military aircraft can be communicated to civil users, this would go a long way towards allowing effective use of airspace by civil and military users concurrently.

AIR-007

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The Air Force must improve their VHF communications capability throughout the proposed MOAs. This should include Remote Communications Outlets (RCOs), coordinated Range Control capability to provide real time notification of military activity, and ATIS type messages broadcast of separate frequencies alerting pilots to military traffic. The FAA should also examine its procedures to disperse more detailed information about military traffic to civilian users.

The Air Force should provide a toll free telephone number so that pilots can obtain information about military activities and schedules. This will enable pilots to plan flights to avoid conflict with military aircraft.

During MFBs the Air Force should utilize AWACS aircraft to provide both enhanced radar coverage and VHF communications capability. This coverage would enhance safety during times when military activity is high.

Coordination

The Air Force should establish and facilitate an aviation advisory committee to provide coordination and communication between the general aviation and military aviation communities. This committee should meet periodically to assess aviation safety issues and make recommendations to both the Air Force and the FAA. Committee recommendations would be non-binding but would serve to enhance communications and coordination.

The Air Force should continue to maintain a toll free number to receive input from civilians. This input should be documented and given appropriate consideration and response.

airspace above the US is a finite and diminishing natural resource and many aviation interests have legitimate need for the use of airspace. However, for these interests to coexist peacefully, each must understand the others' requirements and be flexible enough to accommodate them. It is our desire to reach a compromise with the Air Force that will provide a safe operating environment for the pilots flying in Alaska.

Sincerely,

Melissa K. Bailey
Associate Director
Technical Services



Sam C. Munbollen, President
Oklahoma Station-Safari Club International
2024 Cornwell Place
Oklahoma City, Oklahoma 73120-4300

November 22, 1994

EIS TEAM
POLJOR C VIRGIL HANSON
CHIEF - ENVIRONMENTAL MANAGEMENT
611ASG/LGV
1800 G ST SUITE 201
EASTWINDORF AFB AK 99506

Deaf Major Hanson:

I would like to draw your attention to a matter of utmost importance to the sporting and conservationist community. I am endorsing a native from the Sierra Club, Alaska Chapter, in which it is being reported a plan by the US Air Force to establish supersonic jet training exercises at 9,000 feet above the ground, in central Alaska. The impact of this to the serious sportsmen is devastating. The impact to the permanent resident in these areas is even more traumatic.

We still remember the impact of "Sonic Booms" when they made their advent in Oklahoma years ago. Their impact in Oklahoma City resulted in legislation being enacted to protect the citizenry from the after effects.

As a sportsman hunter, I can't understand why I am willing to sacrifice the entire recreational value of the land for the sake of exercising that should be able to be conducted in a way that is not so populated or quite so bountiful.

As a leader concerned with environmental management I urge you to contact the powers to be in the Air Force and dissuade them from further action on this project. I will watch these developments most closely and will expect you as a concerned employee of the taxpayer to make these concerns known.

I appreciate your consideration of this matter and wish you much success. Please contact me if I can offer any support in this mission.

Sincerely,

James Marshall

SAM C. MURKIN, President
OKLAHOMA STATION, Safari Club International



Office Phone (405) 841-3980 • Toll Free (800) 735-7877 • Home Phone (405) 848-8731
FAX (405) 843-6143 • Mobile Phone (405) 842-4443



ALERT

The United States Air Force wants to designate and upgrade 21,650 square miles of airspace that will impact nearly 13 million acres in Alaska.

Nowhere else in our country has the US Air Force presented supersonic jet training exercises at 5,000 feet above ground. About 19,500 supersonic flights are expected with accompanying sonic booms. Most training will occur during summer months.

Extreme environmental, social and economic consequences will affect hunters, pilots, fishermen and recreationists, Native communities and their subsistence activities, trappers, tourists, miners and neighborhoods from

- miners and neighborhood fires
- increased areas with noisy low-level jet overflights and sonic booms
- incidents associated with chaff and flares
- five-jettisoning

- impacts associated with chaff and flares
- electro-magnetic radiation hazards associated with military installations and relay-sites
- aerial-jettisoning
- Commercial and private pilots can expect increased risks of mid-air collisions and costs associated with Special Use Airspace. Many residents of Bush Alaska use small planes for local transportation, much the same way cars are used in urban areas.

This kind of proposal would not fly in the Congress as no one would consider getting away with such activities over national parks, refuges and state parks. No one would consider such practice war games near or over towns and cities.

Native and Bush communities in the proposed areas include Kotiganeh, Kupaikul, Silemala, Maheana, Line Village, Eagle Village, Chicken, Dot Lake, Paxton, Healy Lake and Circle Village.

Scientific studies show that humans will not tolerate long term exposure to sonic booms generated by air combat training below 30,000 feet. Caribou and peregrine falcon studies indicate these species experience several [effects] from sonic booms.

pected natural resources will include moose, caribou and Aleutian caribou herds, Dall sheep populations in the Alaska Range and Tanana Hills, American peregrine falcons, golden eagles, Ptarmigan, and muskrat.

recreational resources expected to receive impacts include Syukon-Mile (wild and scenic) River, Syukon-National Wildlife Refuge, Syukon-Charley Rivers National Preserve, "Iditarod Trail," Tanana Valley State Forest, Kotana (wild and scenic) River, Tanana River-Tikchik State Park, Delta (wild and scenic) River, Hood River-Tikchik State Park.

HOW YOU CAN HELP

Consents on the Draft ALASKA MILITARY OPERATIONS AREAS (Environmental) Impact Statement (EIS) are due November 30, 1994. Copies of the EIS are available only in Alaska, at the Pentagon and at Brooks Air Force Base, Texas. Call and request a copy from the Air Force.

Write a letter with your comments to
DJ Stephens

15 years
John F. von
Chief, [environmental] Management

611 556/764

Elmendorf AFB, AK 99506
(907) 552-1807

any and copies to
Honorable Bruce Babbitt

Department of the Interior
1849 C Street, NW Room 5555
200 Independence Avenue, SW

התאריך: 20.01.2020

**and to your Congressional Members
The Honorable**

United States Senate
Washington, DC 20514

THE

any personal experiences in the proposed area.

Training Energy/1984

While proposed activity is precedent-setting, the proposed areas of activity are too low and the numbers of sonic booms too many.

THE UNIVERSITY OF CHICAGO

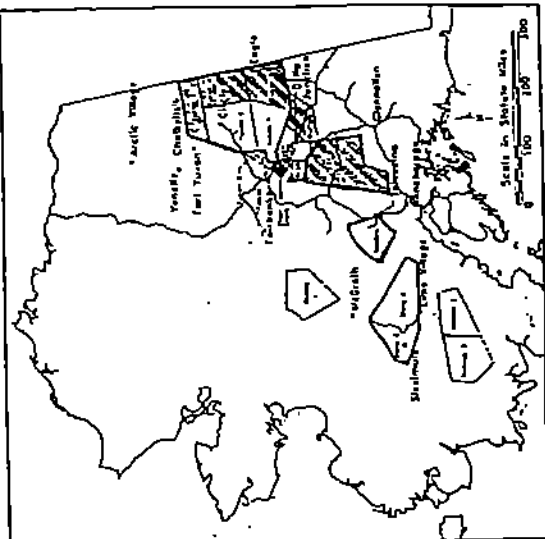
Additional studies are needed to clarify impacts to tourism, particularly human activities.

Ask that the Air Force extend the comment period and ask for public hearings in your area.
Ask the FAA to conduct public hearings.

More details: Mary Grisco, Alaska Chapter Military Committee, (907) 258-1896
Grace Rutowski, Rural Alliance for Military Accountability, (702) 677-7001

Proposed Improvements to Military Operations Areas in Alaska

- | | | | |
|-------------------------------------|---|-------------------------------------|--|
| ☐ | Existing Military Operations Areas (MOAs) | ☒ | Proposed New MOAs |
| ☒ | Proposed Conversion of Temporary MOAs to Permanent MOAs | ☐ | Scoping Meeting Location |
| | | ☐ | Proposed environmental operations area |



OKLAHOMA STATION
SAFARI CLUB INTERNATIONAL
2924 CORNWALL PLACE
OKLAHOMA CITY OK
73126-4306



Alaska Friends of the Earth

326 West 11th Avenue • Anchorage, Alaska 99501



30 November, 1994
via facsimile

11th Air Force
EIS Team
3800 G Street, Suite 203
Elmendorf AFB, Alaska 99506-2150

Dear Sirs:

Alaska Friends of the Earth opposes the expansion of any military flight training areas in Alaska, as well as any attempt to convert temporary flight training areas to permanent ones.

Current Air Force violations of regulations are well known to any Alaskans spending time in the Upper Yukon, the Charley or Middle Yukon river basins. Low level flights are alarming and disruptive to humans and animals. Fires have been started by the Air Force in the Charley River basin.

These violations are often denied by USAF. The FAA has not enforced flight levels, area restrictions, or seasonal restrictions.

We encourage the USAF and the FAA to respect and adhere to regulations that minimize the effects of flight training over Alaska.

Thank you for the opportunity to address these important issues.

Sincerely,

Mike Holloway
Mike Holloway
Chair

cc: Federal Aviation Administration

OTH-014

COMMENT #137
IS A DUPLICATE OF COMMENT #94,
SEE COMMENT #94 FOR RESPONSES

139

November 29, 1994
PO Box 68
Talkeetna, AK 99576

EIS Team
Major C. Virgil Hanson
Chief, Environmental Management
811 ASGLGV
5900 G Street, Suite 203
Elmendorf AFB, AK 99506

Dear Major Hanson,

This letter is in opposition to proposals to enlarge military operation areas in Alaska. I have experienced sonic booms at my residence to north of Talkeetna and had interference from three low flying military aircraft while hunting in the Oshetna River country north of Eureka. They were not pleasant, and they are not now necessary, and certainly not in increased numbers.

Keep in mind two concepts. 1) The United States has no substantial military enemies any longer; 2) Alaska is not a playground for the military, any other government agency or industry. I ask that you reduce the already existing operations areas and not add any more. The Talkeetna region largely depends on tourism and military operations in the Svalina zone are not compatible with the uses that people require. I'm sure the military wouldn't do this over Yellowstone National Park during the summer!

PAN-001

AIR-014

Having been in both broadcast and general communications for 30 years now, I am concerned about frequency conflicts, interference with civil aviation and 27Mhz band users. I don't know if tin foil strips are still being dropped, but we're not interested in chart, flares or fuel being dropped in our region. Collisions are another concern in our region, where military jets and pilots have already been lost on training missions.

HAZ-003

HAZ-010

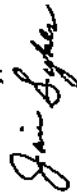
SAF-005

I request that the public comment period be extended in order to incorporate more specific information in all regions, and I would also request public hearings from the FAA and FCC. Both of these agencies ought to have serious concerns about your proposal.

AIR-015

I understand that Alaska is getting lots of Air Force personnel from all over the Pacific, and while the personnel are welcome, such expanded operations are not. If it means downsizing our bases here so that people can practice near other military installations so be it. I'm tired of Alaska being the outpost where all the unwanted military projects get dumped because we are perceived as being supportive of the military and have few people to object to the military's operations. In summary, these are not responsible proposals.

Most sincerely,



Jim Sykes

140

COMMENT #140
IS A DUPLICATE OF COMMENT #174,

SEE COMMENT #174 FOR RESPONSES

141

COMMENT #141
IS A DUPLICATE OF COMMENT #174,

SEE COMMENT #174 FOR RESPONSES

ALASKA CENTER FOR THE ENVIRONMENT
ALASKA WILDLIFE ALLIANCE
NATIONAL AUDUBON SOCIETY
NORTHERN ALASKA ENVIRONMENTAL CENTER
SIERRA CLUB
THE WILDERNESS SOCIETY

November 30, 1994

Major C. Virgil Hanson
Chief, Environmental Management
611 ASG/LGV
5900 G Street, Suite 203
Elmendorf, AFB, AK 99506

Re: Draft EIS on Proposed Improvements to
Military Operations Areas in Alaska

Dear Major Hanson:

We have reviewed the massive expansion of permanent Special Use Airspace in Alaska proposed by the U.S. Air Force in the draft environmental impact statement (EIS) "Improvements to Military Operating Areas in Alaska." We are submitting these comments on behalf of six national and Alaska regional conservation organizations, and wish these to supplement the comments submitted on our behalf by the Sierra Club Legal Defense Fund.

We are very concerned about the unprecedented proposal for designation of Special Use Airspace and Military Training Routes in Alaska and the effects to wilderness and wildlife values unique to Alaska. Subsistence and recreational users of public lands in Alaska and rural and urban residents and visitors in vast regions throughout the state will be subjected to unprecedented high levels of noise that belie Alaska's wilderness reputation.

Our organizations have major concerns about the continued failure of the Air Force to satisfy the requirements of the National Environmental Policy Act (NEPA) and to ensure that proposed activities are compatible with the conservation goals of the Alaska National Interest Lands Conservation Act (ANILCA) and the requirements of the Federal Land Policy and Management Act (FLPMA). The NEPA process has been fundamentally flawed, there is not true "no action" alternative nor basis for impact analysis, and an adequate range of alternatives has not been proposed. In order to comply with NEPA and other laws, and to address our concerns about the impacts to wildlife, wilderness, and the federal and state conservation systems in Alaska, substantial changes will have to be made in the final EIS.

PRO-001

ALT-001

3-319

Extensive general and specific comments follow. We appreciate this opportunity to comment.

Sincerely,

Pamela A. Miller

Pamela A. Miller
Alaska Program Director
The Wilderness Society
900 -17th St NW
Washington, DC 20006

Dave Cline

Dave Cline
Alaska-Hawaii Regional Director
National Audubon Society
308 G. St, Suite 217
Anchorage, AK 99501

Cliff Barnes

Cliff Barnes
Issues Director
Alaska Center for the Environment
519 W. 8th Ave, Suite 201
Anchorage, AK 99501

Sylvia Ward

Sylvia Ward
Executive Director
Northern Alaska Environmental Center
218 Driveway St.
Fairbanks, AK 99701

Stephen E. Wells

Stephen E. Wells
Acting Executive Director
Alaska Wildlife Alliance
P.O. Box 202022
Anchorage, AK 99520

Jim Young

Jim Young
Alaska Issues Specialist
Sierra Club
241 E. 5th Ave. #205
Anchorage, AK 99501

General Comments:

MORE INFORMATION IS NEEDED BY PUBLIC - The DEIS has failed to provide adequate information--and present it in a form that is meaningful to the public--about the major short and long-term effects from noise, startle effects, and pollution due to low-elevation flights, high elevation combat training maneuvers, and associated sonic booms on wilderness and wildlife, harm and the pursuit of subsistence and recreation activities, and degradation to integrity of the conservation system in Alaska.

Although we appreciate the efforts of the Air Force to hold additional public meetings in Alaskan communities, we were very disappointed that the public did not have adequate time to review the DEIS prior to public hearings. The time period between release of the EIS and the hearings was extremely short, especially in light of the fact that the EIS was virtually only available in the public libraries prior to the hearings. This problem of lack of availability of the EIS made it difficult for the public adequately address the issues in the EIS at the hearing.

We also were very disappointed that the full EIS was not sent to any environmental or non-government citizen's group representatives or to interested individuals who had provided extensive scoping comments, until after a request was made to the Air Force. That action belied the Air Force's stated intention to be responsive to public concerns. Furthermore, the DEIS does not make specific reference to those non-governmental groups or individuals that did provide extensive scoping comments to indicate that there has been public interest in the process.

UNPRECEDENTED EXPANSION OF MILITARY OVERFLIGHTS AREAS - The sheer acreage of permanent Military Operating Areas (MOAs) proposed, in combination with designated low-elevation Military Training Routes (MTRs) will place unparalleled conflicts with ANILCA conservation system units. There will be especially intense pressures on national parks, refuges, wild and scenic rivers, and national conservation and recreation areas in the Northern Interior region.

Vast increases in airspace used for low-elevation overflights and major flying exercises have already occurred since the late 1980's and early 1990's. While the DEIS states, "since December 1990, the number of fighter aircraft assigned to Alaska has increase approximately 33%, with 33% increase in annual sorties" (p.1-2), the Air Force fails to provide adequate information about the effects of these incremental increases. This DEIS discusses conversions of areas from intermittent use for Major Flying Exercises (MFEs) to permanently designated MOA airspace used for both low-elevation routine training and MFEs. Expansions in geographic scope, changes from winter to year-round operations, and increases in particular types of training and aircraft employed are all involved.

We are not aware of anywhere else in the U.S. where the Air Force has proposed supersonic jet training exercises at 5,000 feet above ground-- a major change from the existing conditions in Alaska. The issue of sonic boom harm to people, wildlife, and cultural resources deserves far more attention in the EIS. The DEIS states that about 19,500 supersonic flights with accompanying booms are expected, with 50% of all sorties for routine training and 35% for MFE involving some air-to-air tactical training that could result in supersonic booms. Airspace approved for use of chaff and flares would increase by about 62%, and a 33% increase in the number of MFE sorties could increase emergency fuel jettisoning, according to the DEIS.

NOI-002

These increased percentages of activity do not include the overflights and associated sonic booms that have already been added for MFE under temporary MOA designations in 1993. The TMOA designations in 1993 associated with MFE had already increased operations in the permanent Yukon 1 & 2 MOAs from averages of 24 to approximately 300 per day for 60 days per year, and there was a 50% increase in operations over 1992 levels for TMOAs (average daily increase during MFE operations from 50 to 140 operations in Yukon 3,4,1A; EIELSON, BUFLO, and FOX TMOAs) (see p.12-1, MFE EA). And even so, those figures on substantial increases did not take into account the true baseline of flights prior to beddown of the noisier F-15/F-16 squadrons, nor do they give a good picture of the maximum number of flights on a given day. What is the maximum number of "sorties"/operations per MOA per day, and maximum number of aircraft involved in an exercise in a single day?

CUM-001

It should be made clearer how much airspace in the entire state of Alaska and over ANILCA conservation system units has already been permanently designated as Special Use Airspace and MTRs by the military. Permanent designation of 71,650 square miles (45,865,000 million acres) of additional MOA Special Use Airspace is proposed in the MOA EIS. Temporary MOAs were recently designated for 33,155 square miles, or 21,219,210 acres according to the 1993 MFE EA. Therefore, this acreage in TMOAs should not be considered as the existing, baseline conditions, but should be included in determinations of increased noise impact area.

LAN-004

About 78,962 sorties annually are planned for the MOAs, with 67,800 "sorties" of these taking place during MFEs, according to information provided in the earlier EA on MFE's. In the YUKON 1-4 MOAs alone, 41,539 sorties would occur annually. The MOAs DEIS does not provide such data on annual airspace total sorties upon which to make comparisons with the no action or proposed action data in the earlier MFE EA. The cumulative effects of noise and other consequences of overflights in MOAs along with the additional low-elevation overflights taking place in 2,400 miles of Military Training Areas covering over 16,000,000 acres are inadequately evaluated in the MOA DEIS. The peak numbers of daily overflights in the MTRs, and total annual number of sorties are not provided in the DEIS, nor in the earlier EA.

CUM-002

MAJOR HARM TO CONSERVATION SYSTEM -- At least 10 conservation system units and 5 Wild and Scenic Rivers will be affected by the permanent MOAs and MTRs (see Table 1). Based on the information available to us, we believe that the proposed low-level overflights, sonic booms, military helicopter landings, ground troop exercises, and other training exercises are incompatible with the conservation purposes of ANILCA conservation units and that these proposals should be re-evaluated so that such areas are not used.

The DEIS fails to provide a comprehensive analysis of the impairment and degradation of wildlife, wilderness, subsistence, and other Congressionally-mandated purposes for conservation system units established by ANILCA. For example, the DEIS separately discusses harm to wildlife and recreation values within each conservation unit. Furthermore, it completely neglects to conduct an analysis of impacts to subsistence uses on federal lands as required under Title 8 of ANILCA. The Air Force must make a findings under Section 810 of ANILCA, and has failed to adequately comply with this requirement in the prior Eas on MTRs and MFEs.

Yukon-Charley Rivers National Preserve will be 100% covered by permanent MOAs. We are concerned about all temporary and permanent MOAs and MTRs over state and federal conservation system units, but the intensity of impacts to Yukon-Charley is so egregious that we feel it is important to highlight our concerns about this area. There are already inordinate impacts to Yukon Charley Rivers National Preserve, where 100% of the area will be included under the MOAs in the proposed action. The solitude of Yukon-Charley has already been transformed from a remote defacto-wilderness set aside by the Alaska National Interest Lands Conservation Act specifically to protect habitat of endangered peregrine falcons along the river cliffs to a land filled with thundering F-16 jets. Visitors' experiences of wilderness have also been significantly degraded.

Although some modifications to the training flights were made as the result of Endangered Species Act consultations, such as buffers and altitude restrictions around concentrated areas of peregrine falcon nesting, take of peregrine falcons has occurred. In May 1993, violations were documented by the Fish and Wildlife Service on video of the stipulations concerning restrictions on low-elevation flights over falcon nests. Furthermore, the wilderness values of a unit of the national park system have not been upheld, nor has all peregrine habitat in the preserve been protected.

PRO-005

BIO-006

Table 1. Federal Conservation System Units and State Recreation Areas Overlown by Proposed MOAs/ MFE's and Military Training Routes.

Conservation System Units:	
♦	Yukon-Charley Rivers National Preserve
♦	Denali National Park & Preserve
♦	Lake Clark National Park & Preserve
♦	Yukon Flats National Wildlife Refuge
♦	Nowina National Wildlife Refuge
♦	Innoko National Wildlife Refuge
♦	Steele National Conservation Area
♦	White Mountains National Recreation Area
♦	Charley National Wild River
♦	Delta National Wild & Scenic River
♦	Gulkana National Wild River
♦	Birch Creek National Wild River
♦	40-mile National Wild, Scenic, & Recreational River
State Recreation Areas:	
	Chena River State Recreation Area
	Harding Lake State Recreation Area
	Birch Lake and Donnelly Creek State Recreation Sites
	Salcha River State Recreation Site
	Fielding Lake and Clearwater State Recreation Sites
	Tanana Valley State Forest
	Wood-Tikchik State Park
	Denali State Park
	Neichina Public Use Area

Note: Other parks, refuges, and conservation areas may be affected by Joint Military Training Exercises and other military training infrastructure or activities.

We believe that low-level training overflights are incompatible with the Yukon Charley Rivers National Preserve's established purposes (ANILCA Section 201(10):

To maintain the environmental integrity of the entire Charley River basin, including streams, lakes and other natural features, in its undeveloped natural condition for public benefit and scientific study to protect habitat for, and populations of, fish and wildlife, including but not limited to porcupine, falcons and other raptorial birds, caribou, moose, Dall sheep, grizzly bears, and wolves--

The fact that such overflights are already authorized in an MOA or TMOA should not preclude analysis of an alternative which does not include this or other critical wildlife habitat, subsistence, recreation, or other nationally significant natural resource areas, especially since we are unaware that the public had the opportunity to comment on the initial establishment of the MOAs. One step in an overall analysis of the cumulative effects of military training on conservation system units should be a compilation of existing permits or authorizations granted to the military for uses on all conservation system units statewide.

The National Park Service, U.S. Fish and Wildlife Service, Bureau of Land Management, and the Federal Aviation Administration signed a new Interagency Agreement on January 15, 1993 intended to result in better coordination to reduce problems associated with low-flying aircraft over wilderness and other sensitive areas. In the agreement, FAA reaffirmed its commitment to establishing that 2,000' above ground level as the minimum requested altitude for aircraft operations over lands managed by the three agencies. The National Park Service was not contacted about the Major Flying Exercises EA (Section 14, Persons and Agencies Contacted) and therefore, that EA did not contain input concerning these Park Service lands from the land manager. Furthermore, many of the overflights proposed in this DEIS are less than 2,000', thereby already failing to comply with the NPS/FAA policy.

ALT-001 NO TRUE "NO ACTION" ALTERNATIVE IN MOA EIS - The EIS should contain, and analysis be based on, a real No Action alternative. Due to the fact that the initial aircraft conversion and subsequent related actions such as MFEs and MTRs were only considered in separate EA's instead of a comprehensive EIS, this new document should consider the proposed action as starting with the first change in 1991 (or whenever the beddown of F-15's and F-16's occurred). A true "No Action" alternative would not include the new temporary MOA's which have been designated, or any other new training situations (MTRs or MFEs) or facilities built, since 1991. Evaluation of impacts should reflect changes from the situation prior to the conversion to F-16's; e.g. for the noise analysis, comparisons of numbers of low-elevation flights and sonic booms, mapping and acreage of proposed airspace allocations (MTR's, MOAs, MFE, etc.) and other training infrastructure and land use. To illustrate the point that no true "no action" alternative is provided in the MOA DEIS, see Table 2, on following page.

PRO-005

PRO-002
AIR-012

ALT-001
CUM-002

TABLE 2

11th Air Force

Table ES-1 Average Daily Aircraft Operations by MOA for Each Alternative.

1993
MFE
Proposed
Action
A MFE

1993 MFE Proposed Action A MFE	Alaska On Active Alternative MOA	Proposed Action		Alternative A (No Clear Creek MOA)		Alternative B (Tussock MOA)		No Action Alternative (Including MOA/TMOA)	
		Building training day	MFE training day	Building training day	MFE training day	Building training day	MFE training day	Building training day	MFE training day
		NORTHEAST INTERIOR REGION							
10.1/140	YUKON 1 (YUKON 1)	18	208	PA	PA	PA	PA	PA	25
12.5/140	YUKON 2 (YUKON 2)	12	201	PA	PA	PA	PA	PA	13
0/70.0	YUKON 3 (YUKON 3)	6	148	PA	PA	PA	PA	N/A	118
0/134.0	YUKON 4 (YUKON 4)	3	144	PA	PA	PA	PA	N/A	N/A
	YUKON 5 (YUKON 5)	<1	120	PA	PA	PA	PA	N/A	12
0/70	YUKON 6 (YUKON 6)	14	187	PA	PA	PA	PA	N/A	71
0/1579	YUKON 7 (YUKON 7)	12	14	PA	PA	PA	PA	N/A	11
	BUFFALO (BUFFALO)	12	14	PA	PA	PA	PA	N/A	11
	BIRCH (BIRCH)	14	110	17	152	PA	PA	N/A	140
	BELLEVILLE (BELLEVILLE)	11	105	13	111	PA	PA	N/A	21
	FALCON	5	13	PA	PA	PA	PA	N/A	N/A
	CLEAR CREEK	3	11	N/A	N/A	PA	PA	N/A	N/A
	SOUTHERN INTERIOR REGION								
0/50	POW (POW 1)	16	10	PA	PA	PA	PA	PA	36
0/50	TANANA (POW 2)	N/A	N/A	N/A	N/A	3	148	N/A	10
	YUTIKA	3	3	PA	PA	PA	PA	PA	1
	WESTERN REGION								
	MANDEX 1 (MANDEX 1)	1	4	PA	PA	PA	PA	PA	4
	MANDEX 2 (MANDEX 2)	3	3	PA	PA	PA	PA	PA	4
	STONY A (STONY A)	17	14	PA	PA	PA	PA	PA	21
	STONY B (STONY B)	7	7	PA	PA	PA	PA	PA	9
	STONY C	N/A	N/A	N/A	N/A	N/A	N/A	N/A	18
	GLACIA	<1	41	PA	PA	PA	PA	PA	41

Drop Alaska MOA EIS
1993
MFE
Proposed
Action
A MFE

11th Air Force

Table ES-1 Average Daily Aircraft Operations by MOA for Each Alternative.

1993
MFE
Proposed
Action

Alaska On Active
Alternative MOA

Proposed Action

Alternative A
(No Clear Creek
MOA)

Alternative B
(Tussock MOA)

No Action Alternative
(Including
MOA/TMOA)

Building
training
day

MFE
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Table 2 shows that levels of the Average Daily Aircraft operations for MFE training day given in the "no action" alternative for virtually all the MOAs in the DEIS are considerably higher than the current levels of activity shown in the 1993 MFE EA.

ALT-002

WIDER RANGE OF ALTERNATIVES NEEDED FOR MOA EIS -- In addition to a true "No Action" alternative as described above, the EIS should contain a wide range of alternatives. These must address not only the designation of temporary and permanent MOAs, but also for the integrally related MTRs, MFE, and other joint and U.S. Air Force training airspace, land use, and facilities. There should be an alternative that does not include any new permanent or existing temporary MOAs, MTRs, or MFEs over conservation system units in Alaska. Mitigation to minimize effects of all MOAs should be incorporated in each alternative.

NEPA PROCESS IS FUNDAMENTALLY FLAWED -- Since the conversions to F-15 and F-16 aircraft in the late 1980's and early 1990's, the Air Force has failed to comply with the National Environmental Policy Act (NEPA). Instead of starting with a comprehensive EIS, it did only environmental assessments (Eas) for the aircraft conversions, expanding and upgrading Military Training Routes (MTRs), installation of the Yukon Measurement and Debriefing System (construction at 24 hilltops near Eielson AFB and in Yukon MOAs), restructuring Military Operating Areas with a major expansion of temporary MOAs for Major Flying Exercises, upgrade of target arrays for Ft. Wainwright and Ft. Greeley, and Cope Thunder (MFE) Range Microwave Link.

The proposed action described in the DEIS includes upgrade of Alaskan Special Use Airspace for training in Major Flying Exercises, joint exercises, and routine theater operations. The specific proposal is to convert 7 Temporary Military Operating Areas to permanent Military Operations Areas (MOAs); modify 5 existing permanent MOAs; create 2 new permanent MOAs; conduct supersonic operations in 9 new or existing MOAs; conduct joint/combined training; conduct up to 6 Major Flying Exercises (involving up to 100 aircraft in a maximum of 200 sorties per day) per year using the proposed MOA structure; and conduct routine training.

PRO-001

However, the proposed action fails to include the related and connected actions of upgrading and designation of Military Training Routes (MTRs), the Yukon Measurement and Debriefing System and other activities. Recently, the existing 1860 miles of Military Training Routes (MTRs) was expanded to about 2,400 miles, with the existing 5-mile widths doubled, as was discussed in a 1992 MTR EA. This is a total increase in area from about 14,060 square miles (8,998,400 acres) to about 25,491 square miles (16,314,240 acres). Travel on most MTRs is allowed at low altitude (as low as 100' above ground), in daylight or darkness, and in all weather conditions. The MTRs provide access to the MOAs where major flying exercises and joint/combined training occur.

In fact, this was explicitly stated in the MTR EA.

MTRs are low-level, high speed airspace corridors used to navigate a variety of terrain and are typically used to conduct tactical training missions to and from MOAs or RAs. (p.1-5). . . The current airspace configuration is costly in terms of wasted fuel and time since MTRs do not provide good access between air bases and MOAs. . . The specific needs are to . . . establish new MTRs that improve access and connectivity among air bases, existing MTRs, MOAs, and RAs. . . (To) accommodate an increase in WTD and LFE operations (p.1-1). . . The MTRs considered in this proposed action and its alternatives would be used to reach the various MOAs. (p.3-40).

In fact, one of the Air Force's own operation selection criteria for MTRs makes the relationship between the training using this type of airspace and MOAs: "MTRs must connect Elmendorf and Eielson AFBs to MOAs and RAs by incorporating the most direct route available that still meets all other selection criteria" (MTR EA p.2-1). Appendix Table E-1 (MTR EA) shows cumulative noise levels for both MTR and MOA sorties for each MTR segment. Although we don't believe the noise analysis in the EA to be adequate, or very meaningful, it does show that the Air Force in an earlier document considered these as related noise sources.

The separate Eas on MTRs (August 1992) and MFEs (February 1993) failed to adequately assess the effects of these integrally related activities, and due to the significance of the impacts required preparation of an EIS. The joint/combined training (including regional and international large force exercises such as Cope Thunder, winter/night LANTERN exercises, weapons training deployments, Air National Guard deployments, and NATO exercises) will also be conducted using the MTRs and the MOA's. Furthermore, the Air Force discussed in the MTR EA that consideration of many of the actions was concurrent, "the Air Force and Army are considering other actions in Alaska at the present time" (p.3-39,40 MTR EA), even though it chose to segment consideration of the actions including year-round major flying exercises, joint training exercises where Air Force units would support ground units, improvements to ground ranges on Army property, including construction of a mock airfield and target arrays, installation of the Yukon Measurement and Debriefing System, and modifications of MOAs. Therefore, all of the proposals are connected and will have cumulatively significant effects that need to be analyzed in a single EIS.

Furthermore, the 1992 MFE EA listed 14 different "facilities proposed for construction at Eielson AFB to support the MFE operations" (see Table 2.9, p. 2-16, 1992 MFE EA). These connected projects were merely listed with virtually no environmental analysis provided in the MFE EA. The nature of these 14 projects, such as "squadron operations facility," "chaff/flare facility," and "aircraft parking apron" to accommodate 30 more deployed aircraft are indicative of the substantial change in operations that was already underway. As well, prior to completion of the EA on MFE in February 1993 which activated temporary MOAs, the record shows that the connected EIS on MOAs was already underway: "the proposed restructuring of military use airspace will be determined by the recently commenced Environmental Impact Statement" (see

December 2, 1992 letter from Lt. Col. Probasco (USAF) to Patrick Sousa (USFWS) Section 7 Consultation under the Endangered Species Act, contained in MFE EA).

The impacts of these connected proposals will be additive rather than separate and distinct because together they would permit more flights over more total area. Each part of the training program will increase cumulatively the total level of impacts from military training in air space over Alaska--and particularly over conservation system units. As well, consideration of alternatives regarding geographic areas encompassed by MOAs and possibilities for exclusion areas within MOAs requires that alternatives for MTRs be considered simultaneously. Furthermore, other temporary or permanent airspace reservations or training areas in Alaska should be considered in the cumulative analysis.

In the DEIS, the Air Force has obscured the fact that many of the Temporary MOAs have only recently been activated. It was described that these were to accommodate a significant expansion in the intensity and scope of military training exercises, including the Major Flying Exercises. At the Fairbanks scoping meeting the Air Force said that the proposed action would not involve increased flying. This directly contradicts information contained in the MFE and MTR EA's. The MTR EA dated August 1993 said,

The reduction in military operations overseas in the Pacific Rim has brought a commensurate reduction in training areas previously used for WTDs and LFEs. Hence, the USAF has a growing need for additional US airspace where WTDs and LFEs can be held.

We do not believe that it is proper for the Air Force to consider the current proposal completely separate from the recent establishment of the TMOAs for the Major Flying Exercises and MTRs that were addressed (inadequately, we believe) in the two earlier EAs. This is an indication that the piecemeal approach and inadequate scope and nature of impact analysis that we commented on regarding the earlier MTR and MFE is continuing and still needs to be rectified.

The geographic extent and intensity of ground activities, including use of light vehicles or heavy equipment, live fire exercises, tree-cutting, amphibious landings, and other actions should be specifically described in the EIS, as well as what measures will be taken so that no evidence remains from the training exercises.

NEED FOR THE ACTION IS NOT ADEQUATELY JUSTIFIED -- According to the Air Force, "it is an inherent assumption of the EIS process that a proponent has need for the action proposed..." This is not an adequate identification of need. We believe that a national needs assessment of all military airspace needs should be conducted as a first step in justifying post-Cold War requirements, and that more specific requirements for the Alaska needs should be in the FEIS.

PAN-001

WILDERNESS SHOULD BE EVALUATED SEPARATELY -- Wilderness is one of the major qualities for which Alaska is world famous. The loss of solitude and quiet in great geographic areas is not adequately analyzed in the DEIS. The experience of natural quiet is one of the most rare resources in the world. The FEIS must consider the temporary and permanent effects to wilderness qualities of national and international significance. Wilderness is important for fish and wildlife, recreational, subsistence, scientific, educational, aesthetic, and spiritual values. Wilderness clearly requires substantial treatment as a separate topic. Impacts to areas designated in the National Wilderness Preservation System, as well as areas suitable for future designation according to wilderness reviews required under ANILCA (section 1317 and other sections), and de-facto wilderness areas of state and other public lands were not adequately evaluated in the DEIS.

LAN-009

TOURISM -- Tourism is a backbone of Alaska's economy and deserves treatment separate from recreational visitors. Tourists come to Alaska to get away from noise and the technological dominance of the twentieth century and to experience the solitude of wild nature. Few tourists will be wild to come to Alaska to experience overflights and sonic booms. Economic, as well as scheduling and qualitative impacts to outfitters and guides of fishing, hunting, backpacking, river floating and other types of adventure trips, as well as the other visitors, need to be described. Effects on bikers, floaters, boaters, birdwatchers, nature study, fishers, hunters, photographers, climbers, campers, and other recreational users need to be better scrutinized.

REC-001

HUMAN HEALTH EFFECTS -- The human health effects of jet noise and sonic booms throughout the flight routes for training (from bases to MOAs, including MTRs) and ground exercises need to be assessed for urban and rural residents, those involved in the exercises, and visitors need to be assessed. This is not simply a matter of aesthetics and deserves separate scrutiny. No super sonic flights should be allowed. The health risks from hazardous materials, flares and chaff and resultant fires, and target practice to the public and military personnel should be better described in the FEIS.

NOI-003

POLLUTION -- The contribution to localized Alaska air quality and global pollution, global warming, and ozone depletion from jet aircraft flights (emissions and fuel consumption) is greatly downplayed in the DEIS. For example, the findings by the General Accounting Office in the January 1992 report to the Chairman, Subcommittee on Oversight and Investigation, Committee on Energy and Commerce, House of Representatives entitled *Air Pollution: Global Pollution from Jet Aircraft could Increase in the Future*.

AIQ-001

FISH & WILDLIFE -- The impact analysis categories (i.e. Levels I - III) are not based on standard approaches used to evaluate impacts for conservation system lands. The impact levels fail to adequately account for the biological and aesthetic effects below the population level. Definitions of impact levels should also address effects on habitat, sublethal effects, and impaired productivity (decreases in nesting rates and success). We

BIO-007

do not believe that the evaluation of impacts should be averaged over huge acreage, but the zones where sensitive and critical wildlife habitats would be overlain by overflights should be mapped and better analyzed.

We believe the Air Force inappropriately states in the DEIS that "no scientific evidence was found during this review to support the contention of individual or population harm based on exposure to any level of noise generated by U.S. Air Force aircraft." Due to the paucity of studies to address this topic, it is more appropriate to say no studies were found to substantiate that there would be no effect of overflights from disturbance or noise impacts.

We would like to incorporate by reference the study, "Unfriendly Skies: The Threat of Military Overflights to National Wildlife Refuges," a report by Defenders of Wildlife, January 1994 in our comments.

AIR-008

AIRSPACE USE AND AIR SAFETY - The DEIS has inadequately described the major conflicts between military overflights and scientific and air taxi/civilian flights in the MOAs and MTRs. We are concerned about effects on resource agency management flights and the ability of federal and state law enforcement, scientific survey, and other land management flights to conduct essential operations that often operate in narrow time windows of good weather. Air access to conservation system units and private holdings within their borders, other public lands, Native lands, and other private lands will be more significantly affected than is described in the DEIS.

CUM-001

CUMULATIVE IMPACTS - There is no real cumulative analysis of noise, pollution, or degradation from all sources of military training flights and other activities. We are very concerned about this issue. Simply listing other related activities is not sufficient.

PRO-001

OTHER MILITARY USES OF CONSERVATION SYSTEM - Major expansions of joint military training exercises, which already occur annually, will add additional impacts on the ground and in the airspace over the public lands are inadequately addressed by the MOA DEIS. The cumulative effects of various MOAs and all military activities on the system of ANILCA conservation units throughout Alaska should be more rigorously analyzed. For example, in 1987 the Brim Frost Exercise conducted by the Alaska Air National Guard and the U.S. Army took place in 17 locations across Alaska, including in the Arctic National Wildlife Refuge (Arctic NWR). Before the end of the Cold War, a major NATO exercise took place in Alaska, and international exercises such as Cope Thunder are continuing. Recently, a joint peacekeeping training exercise with U.S. and Russian ground troops had been planned for Russia, but was rejected by that country, and there is now pressure to use Alaska instead.

Other military activities and facilities also occur in the conservation system in Alaska. In 1988 and 1989, the Arctic NWR was used for the North Warning System Small Target Testing which involved parachuting and retrieving via helicopter remotely

piloted aircraft. Radar sites powered by radioactive materials are located at Burnt Mountain in the Arctic NWR. Greater detail on the nature of past "Brim Frost," "Arctic Warrior," etc. winter exercises should be provided, including the number of flights, land area covered by ground troops, and extent of vehicle and heavy equipment use on military and non-military lands. Furthermore, the nature of "future similar exercises" should be better defined to include all geographic sites in Alaska for ground activity and all air corridors that might be used.

NOISE - We are very concerned about the intensity and extent of all noise that is above the ambient sound for a wilderness area within the ANILCA conservation system units, state recreation and habitat areas, subsistence use areas, villages, and sites of cabins. All impacts to the natural quiet that exists in the conservation system units are of concern, as this is a diminishing resource in the world. The DEIS should show this on Sound Exposure Level contour maps, which would be more readily understandable to the public.

The "average daily aircraft activity" numbers, based on "240-day averages" mask peaks for certain days, and make it impossible to tell what the full brunt of noise impacts from low-and higher elevation flights will be. We believe that SEL contour maps are better metrics to analyze and communicate the effects of noise to the public. The DNL measurement seems to be better suited to areas around airports, although it still does not adequately reflect all kinds of impacts there, but masks the effects of intermittent, sudden very loud noise which is of great concern to the public in the unique circumstances of natural quiet found in Alaska. In fact, the DEIS states that is considered appropriate for scenarios "in the vicinity of airports," (p.4-58)--clearly not the majority of the affected area.

There should be charts that show maximum numbers of supersonic flights and anticipated numbers, and acreage of sonic booms shown separately for routine training and for MFE's. Maps showing SEL contours for areas affected by sonic booms, as well as separate SEL contour maps for all MOA and MTR overflight noises should be included in the DEIS. The numbers of such occurrences > 20 Db should be shown. The maps included in the DEIS mask the effects of noise on humans and wildlife because they are based on averages, not peak levels.

A map of the entire flight path of a supersonic training flight showing the footprint of sonic booms on the ground should be included so that the public understands the acreage potentially boomed by a single flight. We are very concerned that individual booms range from 105.1 Db to 125.0 Db-- extremely loud sound. Nowhere in the Northern Interior region section does the EIS clearly reveal the total number of sonic booms due to MFE's. We do not believe that sonic booms have the same kind of effect on humans as does thunder. Circular reasoning is evident in the statement, "since sonic booms would not be mitigated, no mitigation is proposed," (p.4-107). Supersonic flights should not be allowed at all, especially in areas where sensitive

BIO-007 | wildlife habitat exists. What studies have been done evaluating the impacts of sonic booms to nesting trumpeter swans or other waterfowl, sheep lambing areas, caribou calving areas, etc.?

Specific Comments:

PRO-009 | ES-1 "Over the next decade, the Air Force must channel its resources to areas where the training environment is efficient, flexible, and cost effective." -- does this EIS explain all operations for Alaska during the next ten years? Is this code words for shifting more training to Alaska from lower 48?

CUL-001 | 1-6 Could sonic booms harm cultural resources by breaking windows? A more extensive review of the potential effects to the wide range of cultural resources present in the area should be provided.

OTH-010 | 1-6 Although the DEIS says, "No ground activities or ground disturbances are proposed," this is contradicted by the earlier statement on p.1-3 which states "another requirement is that the airspace provides access to air-to-ground weapons ranges and use of ground-based threat radar and weapon system simulators."

PAN-002 | 2-1 "Although most training events require only subsonic airspeed operations, some must be accomplished at supersonic airspeed to be effective." What criteria for which training requires supersonic?

OTH-003 | 2-2 We are disturbed that the second training feedback system, planned for the Eielson AFB area, is in the construction phase now. "The Yukon Measurement and Debriefing System (Yukon MDS) is expected to be complete in June 1995." This shows evidence of piecemealing. What MOAs are these systems dependent upon? If Yukon 3-5 MOAs were cancelled, would the system still be effective, efficient, and basically located in the right place?

PAN-003 | 2-3 Does ALL of the airspace have to have the characteristics described?

OTH-011 | 2-4 MOAs are needlessly given different numbers in the no action and proposed action.

AIR-010 | 2-23 What does air to air surge training involve and what are the effects?

2-73 The table on Recreation resource impact levels implies that the state and federal conservation units will primarily have recreation uses affected. However, because the impacts of the proposed overflights will affect the purposes for which these areas were established, which in some cases include recreation, but, primarily the wildlife and other

LAN-002 | natural values-- there should be another chart in the section on Conservation System Units listing the mandated purposes of the CSU's and how these would be affected.

SUB-001 | 2-79 Impacts to subsistence uses are downplayed because if wildlife receive major effects, then subsistence uses would also logically be affected.

NOI-004 | 3-2 It is unclear whether the Colorado study (Lillard et al 1965), did provide evidence that sonic booms can trigger avalanches. As written, it implies that sonic booms do not always trigger avalanches. Have there been other studies investigating the relationship between sonic booms and avalanches?

CUM-001
PRO-001 | 4-8 The operational relationship between MOAs and MTRs is acknowledged in the EIS, "Airspace scheduling and management of both the proposed MOAs and the MTRs coincident with this proposed structure would remain the joint responsibility of the 354th Fighter Wing at Eielson AFB and the 3rd Wing and Elmendorf AFB (Level I Impact). While the EIS documents a Level I Impact due to the MOAs and the MTRs in the Northern Interior, it fails to document frequency and intensity of noise impact levels, number of low-elevation training flights that would travel the MTRs, the number of training flights that would use both MOA for MFB or routine training in combination with one or more MTR's. It is not enough to discuss the number of sorties for flights using the MTRs in a separate EA, especially when that document failed to provide any alternatives for geographic areas used for MTR corridors, number of flights, or elevations authorized.

AIR-008 | 4-8 The EIS must address the special circumstances of pilots flying in extremely poor weather where "see and avoid" is a meaningless concept for the small pilot. The EIS must address the conflicts, especially in low-elevation airspace, between military training flights and aerial surveys for waterfowl, big game, and other wildlife. Pilot biologists are alert to other aircraft, but many of them are conducting counts simultaneous with flying making it virtually impossible to "see and avoid" aircraft flying as fast as the speed of sound. Because biologists often conduct intensive aerial surveys over the course of many days when radio or phone contact is not possible, they would not be able to get updated information on whether military flights are planned for remote areas or in poor weather conditions. If intensive military training is going on, it may cause delay in surveys for which there is a very narrow time window to conduct them. Relatively few pilots conduct many surveys, often for different studies, over the course of the short summer season. Even a few days delay--especially in good weather--could result in failure to collect important data.

4-8 The Northern Interior region MOAs YUKON 1-5 are dominated by federal conservation system units. This region is taking an unfair brunt of routine and MFE training flights. The EIS states that 45% of the routing training will occur in the Yukon 1-5 MOAs.

AIR-011 4-10 A better description of what low-altitude air-to-ground training sorties entail needs to be included in the EIS. What ground facilities are required for the air-to-ground exercises to be carried out. This should be compared with the air-to-air training exercises.

CUM-002 4-11 It is difficult to determine total number of sorties or to make comparisons with information in earlier EA on major flying exercises.

SAF-005 4-11 The USAF has downplayed the impacts to civilian pilots, especially to biological survey pilots and civilian pilots who often fly in terrible weather. While the EIS does recognize, the "increase in low-altitude military training airspace over a continuous basis (as opposed to the higher altitude temporary airspace used on a limited basis)," this should be considered a major, or Level III impact.

AIR-008 4-12 The EIS assumes that civilian pilots would be able to receive information about the exact timing of intensive block periods of MFE's of up to 2-hours long, and that the schedule disruption would be only temporary. However, temporary schedule disruptions could have permanent implications for certain survey studies. Furthermore, pilots often get backed up with pick-ups from the wilderness.

SAF-007 4-12 We do not understand how bird strike hazards could be adequately evaluated without considering specific flight paths with the MOAs. Known bird migratory flight routes should be mapped in the EIS and overlain with the MOA and MTR flight paths. What are the known losses, to pilots and to birds, from bird aircraft strikes in the MOA areas? As well, the cumulative effects of bird strikes due to MTRs and training in MOAs should be determined. Our interpretation of the sentence "avoidance recommendations necessary to avoid hazards within the large areas and wild altitude ranges may be too restrictive to meet training objectives," is that the USAF does not believe that it can make the necessary changes to flights which would avoid bird strikes, to the degree recommended by BASH model identification and recommendations. If "enough data are available to develop a risk algorithm and construct a bird avoidance model (BAM) that would provide a more refined flight risk," why hasn't this already been done? Maps, not just descriptions of the BASH model information, should be provided so that the public can visualize and understand the safety and wildlife risks.

NOI-005 4-59 The discussion of sleep disturbance neglects the critical fact that people camping in tents, hiking, fishing, hunting, etc. will not be inside buildings.

HAZ-011 4-81 Where are the airborne lasers in the eye-safe "training modes" throughout the ranges? These are another impact that is inadequately evaluated.

HAZ-003 4-83 We are concerned about the interference of chaff with radios, especially those used in biological radio-collaring studies. Would the chaff interfere with satellite radio-collars?

SUB-001 4-126 It is hard to believe that the analysis of impacts to subsistence fails to consider fishing and trapping activities. These are the lifeblood of rural residents along the Yukon River and throughout the Interior region (please incorporate by reference, Ellama, L. and P. Wheeler, 1989, Wetlands and subsistence-based economies in Alaska, USA, Arctic and Alpine Research, Vol. 21, No. 4, pp. 329-340). Harm to subsistence has socio-economic costs, as well cultural impacts.

cc: Eric Jorgensen, SCLDF

Harold W. Becker, FAA, Manager, Airspace-Rules & Aeronautical Information Division, AIP-200

FAA Flight Standards District Office, Anchorage

George T. Frampton, Asst. Sect. Fish, Wildlife & Parks, DOI

Wesley Henry, NPS Visitor Services Division, D.C.

Deborah Williams, DOI, Anchorage

Regional Director FWS, Anchorage

Keith Corrigan, BLM, Wilderness Branch, D.C.

Regional Director, NPS, Anchorage

Regional Director, BLM, Anchorage

Field Supervisor, Ecological Services, Fairbanks

Superintendent, Yukon-Charley Rivers National Preserve

Will Mayo, Tanana Chiefs Conference

THE RURAL ALLIANCE FOR MILITARY ACCOUNTABILITY

COORDINATOR
Arlene Tuller

COORDINATOR
June Mather



P.O. Box 6004
Alaska Peninsula, Alaska
99506-0004
Phone: (907) 477-2001
Fax: (907) 477-0182

P.O. Box 100
Chena, NIA 9704
Chena Office
DPO 984-141
Thurston

November 30, 1994

811 ASG/SLV
5500 G Street, Suite 203
Elmendorf AFB, Alaska 99506-2150

Dear Sir or Ma,

The following are the comments of the Rural Alliance for Military Accountability on the *Proposed Improvements to Military Operations Areas in Alaska*

On page ES-4 & 1-7 the DEIS states that, "It is an inherent assumption of an EIS process that a proponent has need for the action proposed...". We believe this statement is clearly inappropriate and insulting to the reader. This statement also clarifies the Air Force's, "Decide, Announce and Defend" attitude.

The Department of Defense has misled the public by piecemealing analysis of the connected and cumulative actions associated with military activities in Alaska. The piecemealed NEPA process violates NEPA regulations by hindering meaningful analysis and therefore discourages public participation. CEQ regulations clearly state that connected actions should be discussed in the same environmental impact statement (40 CFR 1508.25(a)(1)). These regulations describe connected actions as those that "...are interdependent parts of a larger action and depend on the larger action for their justification". The piecemeal process should be dropped like a hot potato and the impacts and alternatives be considered in one Programmatic EIS.

The 30 Aug 94 *Memorandum for Distribution* states, "This DEIS assesses our proposal to upgrade the MOA structure in Alaska to improve Air Force readiness through routine, joint service, and multi-national combat training and to support Major Flying Exercises". The DEIS failed to describe in full the connection between Air Force activities as described in the EA titled, "Major Flying Exercises in Alaska" and "Expansion and Upgrade of Military Training Routes Alaska". Since

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RAMA is a project of the Rural Alliance

Revised as Required Paper

the same aircraft could be utilizing the *Proposed Improvements to Military Operations Areas in Alaska* explain why the regional impacts of these proposed Department of Defense activities are being piecemealed? These actions are obviously connected but are not being addressed in any cumulative fashion prior to a decision to approve the activities. This is being done despite the Council on Environmental Quality (CEQ) regulations for comprehensive analysis which require that agencies should consider... connected actions, which means that they are closely related and therefore should be discussed in the same impact statement. Actions are connected if they trigger other actions which have required environmental impact statements; The EA's titled, "Major Flying Exercises in Alaska" and "Expansion and Upgrade of Military Training Routes Alaska" and the entire list of "Relevant NEPA Documents" found on page 1-9 clearly point out that the *Proposed Improvements to Military Operations Areas in Alaska* cannot or would not proceed unless those actions taken previously were interdependent parts of this larger action and depend on the larger action for their continued justification.

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The comply with NEPA the Air Force must postpone implementation of all proposed activities and expand the scope of the document to include the entire list of "Relevant NEPA Documents" found on page 1-9.

The United States Air Force (USAF) and by concurrence the Federal Aviation Administration have failed to abide by the requirements of the National Environmental Policy Act (NEPA). There were no public hearings or Environmental Impact Statements prepared for the basing of the F-15Es and F-16C/Ds at Elmendorf and Elmendorf Air Force Bases, clearly a major federal action. Likewise, no public hearing or Environmental Impact Statements were prepared for Cops Thunder activities.

PRO-002

The DEIS fails to provide a true "no action" alternative. The DEIS provides on page 1-9 a list of "Relevant NEPA Documents" which have been presented in a piecemeal fashion without adequate public participation. Today, the Department of Defense (DOD) is the only federal agency which does not provide the public with the opportunity to comment on draft Environmental Assessments (EAs). For decades, this deprivation of the NEPA process has allowed the Air Force to increase its activities by creating controversial Military Operations Areas, bombing ranges and Military Training Routes (MTRs).

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ALT-001

The DEIS notes on page 4-64 there will be an expected "increase in the number of MFE participants" under the proposed action. Again these findings are not presented to the reader in a up front manner. Explain in detail the expected increases in comparison to past MFE activities. If the proposed activities are approved will more and more participants travel to Alaska to train? We note that

PAN-004

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PAN-004 the entire SUA system in Alaska, if approved would involve the use of SUA three
PRO-001 times the size of Nellis AFB in Nevada where currently Red Flag maneuvers are conducted.

• The DEIS states on page ES-2 that MFE must also provide access to "ground based threat radar and weapon system simulators". Again, these actions are clearly connected with other DOD activities. For example, the Yukon Measurement and Debriefing System is clearly a connected action since this system will be utilized as part and parcel of the proposed activities. These cumulative impacts cannot be ignored. On page 1-3 these systems are described as, "Another requirement...". Likewise on page ES-2 these connections are put into a tidy little bundle, "As a short term solution, a number of Temporary Military Operation Areas (TMOAs)...". One can only conclude from this statement that the DOD has a long term plan for Alaska and that Pentagon officials have known all along that a major expansion of SUA would be requested. By installing the Yukon Measurement and Debriefing System, Expanding and Upgrading Military Training Routes, Upgrading Target Arrays and conducted Major Flying Exercises in Alaska prior to completing the NEPA process, the Air Force has violated, 40 CFR section 1506.1(a)(2). NEPA requires that federal agencies must not take actions which would limit their choices for selecting reasonable alternatives.

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OTH-003

• The DEIS presents information in a scattered manner which makes it difficult to determine impacts. For example all information on chaff and flares is not presented in unification. The reader must go to Volume II to learn that chaff is a potential human carcinogen.

EDT-001

• We fully expect that all comments submitted as part of the NEPA process be addressed in full. CEQ regulations for the implementation of the National Environmental Policy Act require a "worst case" analysis. The Draft EIS does not provide a worse case scenario as required by NEPA. For example, throughout the DEIS noise analysis is calculated for the F-16/F-15 aircraft yet on page C-5 there is a listing of over a dozen different military aircraft listed. Even this list is inadequate in describing the proposed activities when on page 1-3 the DEIS states that, "Deployed aircraft may include all types in the DOD inventory, as well as similar allied aircraft". Many of these aircraft are much louder than the F-15/F-16. For example, the F-4 is most likely the loudest aircraft in the Department of Defense (DOD) inventory. Additionally there is no noise calculation or data presented for additional NATO or multi-national combat training aircraft. Since this information is not provided are we to assume that NATO or multi-national combat training aircraft will not be utilizing the proposed Special Use Airspace (SUA)?

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SAF-001

• The DEIS failed to provide accident potentials for all aircraft potentially utilizing the airspace. Again only the F-15/F-16 mishaps are calculated. What is the probability of a mishap or crash occurring for the deployment of all types of aircraft in the DOD inventory, as well as similar allied aircraft?

• On page 1-3 the DEIS notes the applicable regulatory requirements which apply to the proposed action. This section failed to recognize the following applicable regulatory requirements:

"91.119 Minimum Safe Altitude: General

"Except for takeoff or landing, no person may operate an aircraft below the following altitudes:

"(a) An altitude allowing, if a power unit fails, and emergency landing without undue hazard to persons or property of the surface.

"(b) Over any congested area of a city, town or settlement or over any open air assembly of persons, an altitude of 1,000 feet above the highest obstacle within a horizontal radius of 2,000 feet of the aircraft.

"(c) An altitude of 500 feet above the surface, except over open water or sparsely populated areas. In that case, the aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure."

"91.13 Careless or Reckless Operation

"No person may operate an aircraft in a careless or reckless manner so as to endanger the life or property of another."

FAA Advisory 91-36C (10/10/84):

Special voluntary rules over noise-sensitive areas, including lands administered by the National Park Service. This advisory urges pilots to maintain a minimum 2,000 feet AGL over park territories.

National Park Service Creation and Purpose, 16 USC 5.1:

"The service... shall promote and regulate the use of national parks by such means and measures as to conserve the scenery and natural objects and wildlife therein -- and by such means as will leave them unimpaired for the enjoyment of future generations."

Wilderness Act, Title 16 USC 9. 1131:

Certain Lands are designated "wilderness," defined as "an area where the earth and its community of life are untempered by man." Federal land retaining its primal character which is protected and managed so as to preserve its natural conditions... [where the imprint of man's work is unnoticed -- [with] outstanding opportunities for solitude."

Wildlife Protection, 36 CFR 5.2.2: "The frightening or intentional disturbing of wildlife nesting, breeding, or to (its) activities ... is prohibited."

Aviation Disturbances, 36 CFR 5.2.12: "Operating equipment or machinery that exceeds a noise volume of 60 decibels measured on the A-weighted scale at 50 feet ... or makes noise which is unreasonable ... considering the purpose for which the area was established is prohibited."

Memorandum of Understanding between National Park Service (NPS) and FAA, September 1984:

"The FAA agrees to assist NPS ... in communicating with the various agencies of the Department of Defense in regard to problems associated with military aircraft operations over NPS ... areas."

Military Operations in the National Park System (Special Directive 83-4, from Director, NPS):

"Military activities, in general, should not be allowed in park areas with the exception of those that relate to usual and normal park activities, such as search and rescue, outdoor survival, and events not simulating conditions encountered in combat situations."

American Indian Religious Freedom Act, 42 USC Section 1996 (1978).

This act states that it is the policy of the United States to protect and preserve for American Indians their inherent right of freedom to believe, express, and exercise traditional religions. These rights include, but are not limited to, access to traditional sites, use and possession of sacred objects, and the freedom to worship through ceremonial and traditional rites.

Archaeological Resources Protection Act of 1979, 16 USC Section 4701(a)-4701(i) ensures the protection of archaeological resources on federal or Native American lands.

• Other regulatory actions demand attention in association with the *Proposed Improvements to Military Operations Areas in Alaska*. How will the regulations established in the Clean Air Act, Noise Control Act of 1972, National Park Organic Act of 1964, the Wild and Scenic Rivers Act of 1968, The Administration of the National Park Service Act of 1970, Archaeological and Historic Preservation Act of 1974, Farmland Protection Policy Act, Fish and Wildlife Coordination Act, and the Wild and Scenic Rivers Act be abided by?

• The DEIS notes on page 4-64 that there will be an expected increase in the expenditure of munitions by 35% under the proposed action. In light of these findings the DEIS failed to address the following scoping comments: What are the

HAZ-001

potential impacts associated with travel or delivery of the ordnance? What are the impacts of base storage and handling for all aircraft utilizing the *Proposed Improvements to Military Operations Areas in Alaska*?

• On page 1-6 the DEIS brushes off legitimate scoping comments. Since the DEIS fails to analyze increased activities associated with hazardous and toxic substances then we can assume that these substances will not be necessary to conduct the proposed activities. Additionally these activities will not include the transportation, storage or use of petroleum products, etc. NEPA requires a worst case analysis of impacts and the Eleison Environmental Management and Contingency Plan and the Eleison AFB Operations Plan 03 are not NEPA documents and therefore cannot fulfill NEPA requirements. Clearly, proposed activities could not proceed without the use of these materials, therefore, analysis must be included.

• Throughout the DEIS the reader is presented with conclusions that supersonic activities would be authorized to 5,000 feet AGL but would occur at 20,000 feet AGL. This is not a worst case analysis as required by NEPA. If the USAF does not expect to conduct supersonic activities at the 5,000 altitude then the floor of all supersonic activities must be 20,000 feet AGL. This analysis reminds of the following line from the movie *Field of Dreams*, "If you build it they will come!"

• The EPA joined the FAA in warning about the annoyances caused by sonic booms. An agency document entitled "Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety" (Environmental Protection Agency Document #550/9-004) states on page Q-13: "The peak overpressure of a sonic boom that occurs during the day should be no more than 35.01 pascals if the population is not to be annoyed or the general health and welfare adversely affected" (Note: 35.01 pascals equals 0.76 psf). On page 3-65 the DEIS calculates carpet booms at from a high of 14.6 pounds per square foot to a low of 1.5 psf. These levels far exceed levels found to be unacceptable by the EPA. The DEIS failed to analyze the expected terrain boom amplification effects or the impacts associated with cloud cover or other weather conditions which will amplify noise disturbances? Sonic booms trigger an involuntary startle reaction in human beings, a reaction that does not habituate and has both long term and short term detrimental effects on human health. Long term effects are unknown. Many scientists feel it would be unethical to expose an unwilling population to these types of impacts that rural and native communities will receive. A widespread misconception exists as to how sonic booms are generated. The aircraft does not simply break the sound barrier, create a loud bang, then quietly proceed on its way. Rather the shock wave is generated continuously; the sound barrier, in effect, is continuously broken, as long as the aircraft is supersonic. Sonic booms reflect from surfaces, water, earth, canyon

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walls, and man made structures, all reflect sonic shock waves. The DEIS fails to analyze that reflection of the sonic shock waves could increase the impact of the boom up to 12 times. The DEIS fails to provide information on secondary sonic booms. Scientific studies show that human will not tolerate long term exposure to sonic booms generated by air combat training below 30,000 feet.

The arguments that led to the prohibition of SSTs over people certainly apply to military supersonic aircraft training, wherein the significantly higher overpressures are certain to cause injury and damage. Indeed, the number of supersonic flights and the area they cover make the prohibition of SST supersonic flight superfluous at best. The boom from one military overflight can impact thousands of square miles of terrain. As an example, an F-16 aircraft on a ten minute supersonic flight at 20,000 feet MSL, will boom an area of more than 2000 square miles. The DEIS failed to adequately address the following scoping comments: Exactly what land areas will be impacted by all military supersonic activities in Alaska? Where are current SOAs located? Will these areas be charted? Will residents be bought out? The DEIS provides no mapping of proposed supersonic operations. Indeed, the words "SUPERSONIC OPERATIONS AREA" (SOA) cannot be found in the DEIS. This is clearly an attempt to hide this proposed reality from the general public. On page ES-7 SOAs are simply described as "conduct supersonic aircraft operations".

Nowhere in the DEIS is there a calculation of the number of supersonic events expected to occur! However on page 2-43 it is noted that 50% of all sorties on a routine training day would involve some training in air-to-air tactics that would result in supersonic events and the during MFE up to 35% of the sorties would result in supersonic events. The DEIS fails to tell the reader that the over 10,000 supersonic events are expected to occur. This oversight is a blatant attempt to hide the environmental consequences of the proposed activities.

The DEIS failed to address the following scoping comments: Nevertheless, property damage from chronic exposure to sonic booms remains an unaccounted-for cost associated with training in SOAs. Procedures through the Federal Tort Act are arduous and difficult. And, despite the adverse effects of sonic booms on human health, no medical claim for damages has yet been honored. Will the USAF honor Tort claims for property damage as well as impacts to human health? The DEIS states on page 2-56 that human injury will not occur from sonic booms. We take exception to these claims.

Military documents speak to these impacts as well as independent scientific research results and other federal agency studies. In its DEIS for the Gabbs 1 and 2 SOAs, NAS Fallon, the Navy said:

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"The proposed SOA could result in the eventual abandonment of some residential areas within or near the SOA. If current residents moved out and new residents were discouraged from settling in the area because of the supersonic activity and sonic booms." (page 5-30)

"The proposed SOA action would, however, possibly involve trade-offs between the long term well-being of certain individuals and the maintenance of a high degree of Navy combat readiness." (page 5-66)

"The booms would constitute a safety risk or nuisance factor, and the uncertainties about the health effects of long term exposure to sonic booms would be a source of stress in itself." (page 5-68)

Subsequent Naval studies bear out this initial finding. A study entitled "The Possible Health Impact of Sonic Booms" (May 1980) concluded that overpressures greater than 2 PSF would be unacceptable.

Nevertheless, property damage from chronic exposure to sonic booms remains an unaccounted-for cost associated with training in SOAs. Procedures through the Federal Tort Act are arduous and difficult. And, despite the adverse effects of sonic booms on human health, no medical claim for damages has yet been honored.

The first EIS ever done for the proposed establishment of a SOA -- the Oceana SOA off the coast of North Carolina in 1974 -- concluded that the type of supersonic flights conducted in the SOA could not be conducted overland due to the impacts on the people, wildlife and civil aviation. Despite this finding, the DOD has since decided that such flights would be conducted over rural inhabitants. Current SOAs include: the Oceana SOA; the Sells MOA in Arizona; the Gladden MOA in Texas; the Gandy MOA in Utah; and the Gabbs North MOA, Gabbs South MOA, and Austin One MOA, all in Nevada.

The SOAs slowly spreading across rural America generate sonic booms that the military predicts will average 4 to 5 PSF. These figures are well in excess of the thresholds of adverse effects noted by the EPA, the FAA and independent studies. Nevertheless, the effects of SOAs continue. Data collected on sonic boom activity at the Fallon Naval SOA for 1986 and 1987 showed a range of 0.45 PSF to 7.28 PSF.

RAMA believes that ample scientific data has been compiled on the effects of sonic booms on human health -- including research on the number and type of sonic booms, and the resultant physical and physiological problems -- and that it would be immoral to initiate a study for purposes of this congressional review of SOAs which uses human beings as unwilling guinea pigs. Instead, RAMA recommends the collection and analysis of the public health studies already

6

OTH-001
NOI-002

NOI-002
PRO-004

OTH-001
NOI-002

OTH-001
NOI-002

conducted. Such analysis would be indispensable in reaching decisions on the dismantling of inland SOAs and new emphasis on off-shore SOAs.

- The DEIS on page 3-77 poorly attempts to present the view that chaff is as natural as dirt, "a compound found in nature", and that we will find this material in "food products". Chaff is not a natural material. Chaff is not biodegradable. A recent chemical analysis of chaff conducted by Twin City Testing Corporation stated, "In our opinion, the degradation of these materials would occur through mechanical breakdown and they would not be degraded through biological action". The DEIS fails to provide information on how long it will take chaff to mechanical breakdown. The DEIS notes that chaff casings are "normally retained by the aircraft". How many casings are expected to hit the ground? Will these casings fall on public or private land? If chaff is dropped on public lands will the USAF be littering on public lands? The DEIS fails to consider the consequences if the animal or human does inhale chaff but notes on page 4-82 that inhalation concentrations would be too low to cause effects. Tell us what human guinea pigs were used to determine these findings. Just how much fiberglass or aluminum is OK in a human lung? Again the man on the street knows that proper inhalation protection is necessary when working with fiberglass. The minimum dimension of a chaff fiber is 0.0003 inches making the fiber small enough to be inhaled by humans or other large mammals. The DEIS fails to consider other impacts of chaff and flares to domestic animals and wildlife. The DEIS fails to consider events such as the sterile effect of chaff on local inhabitants, possible ingestion of the chaff, the use of chaff by nesting species and the accompanying skin irritation to impacted species clearly is not explored. The DEIS fails to provide information on whether the use of chaff will be restricted over wilderness, wildlife refuges and other sensitive environmental areas.

HAZ-003

HAZ-004
PRO-004

- The DEIS fails to fully describe the toxic and hazardous substances associated with all possible weapons systems. H-6, Tritonal, or Mino II explosives are discussed on page C-7. However the DEIS fails to provide data on the following scoping comment: What will be the impacts to Alaska's natural resources or human health from the toxic and hazardous substances?

SAF-002

- On page 3-35 the DEIS states that, "large numbers of arriving aircraft using less than required FAA minimum spacing requirements" will be arriving during MFE. The DEIS provides no analysis of the increased accident potential for these activities. Nor does the DEIS detail the potential populations which clearly will be exposed to any potential mishap.

HAZ-005

- The DEIS notes on page C-7 the use of the 30 mm ammunition. The DEIS failed to adequately address the following scoping comments: Will nuclear materials in the form of depleted uranium (DU) ammunition be utilized as part of the training

HAZ-005

the training scenario for any aircraft utilizing the *Proposed Improvements to Military Operations Areas in Alaska*. If so, what are the long term health and environmental impacts of DU use, including but not limited to the potential increase in cancer rates from DU use and wastes disposal practices? Please define "virtually" as discussed in the last paragraph on page C-7.

- On page C-5 it is noted that the A-10 "can be used against all ground targets, including tanks and other armored vehicles". It is well known that the weapon used to destroy tanks during the Persian Gulf War, the 30mm penetrator can be fired from the A-10 aircraft. Again, we ask the question are the aircraft described in the DEIS utilized munitions containing depleted uranium?
- The DEIS continually points to the economic benefits associated with the proposed activities while ignoring the following scoping comments: Responsibility for property damage, human injury or potential deaths from an accident involving military aircraft is of great concern to rural residents. Has emergency response equipment and personnel been proven adequate for any potential accident? What will be the economic costs of current and potentially necessary increases of police, fire, hospital and other services? Additionally, the DEIS claims that transient personnel will spend an average of \$60 per day in the local communities. This claim seems excessively high and quite unbelievable. We suggest that you go back to the drawing board and substantiate this claim with some hard facts since these claims are not substantiated. Do military personnel need this kind of money to spend?

SAF-003
OTH-001
SOC-001

HAZ-001

- The DEIS notes on page 4-84 that there will be an expected increase in the expenditure of munitions by 35% under the proposed action. In light of these findings the DEIS failed to address the following scoping comments: What are the potential impacts associated with travel or delivery of the ordnance? What are the impacts of base storage and handling for all aircraft utilizing the *Proposed Improvements to Military Operations Areas in Alaska*?

- The DEIS focuses on Class A mishaps because of their potentially catastrophic results. However, the DEIS fails to address other mishaps which have the potential to create environmental damage? Again, CEQ regs require a worst case analysis! The DEIS failed to address Class B & C accidents. Additionally the on page 3-81 the DEIS only addresses mishap rates for the F-16/F-15 & A-10 aircraft. Mishap rates must be presented for all aircraft which may potential utilize the proposed SUA.

SAF-001

OTH-002

- The DEIS states on page 2-4 that MFE would, "normally occur, but not be limited to, Monday through Friday, 8:00 am to 6:00 PM. This is in out the size of the Chrysler Building. In short, the USAF plans to fly when they so choose!

JUSTIFICATION

On page 3-23 the DEIS states, "The trend over the 1993 exercise year was toward more high-altitude deliveries as demonstrated during Desert Storm 1991". We concur. The need to do low-altitude training as currently being proposed not only is environmentally unsound, but in a war scenario low altitude tactics will unnecessarily place U.S. soldiers at risk. We urge that no low altitude training be conducted below 2,000 feet AGL be considered as an alternative. The need for the low level training as currently being proposed in the DEIS is questionable. Eugene J. Carroll, Jr. Rear Admiral, USN (Ret.), Deputy Director for the Center for Defense Information, 31 October 1991, wrote, "I hold that low level flight tactics are now obsolete and prohibitively costly. In the old days before the ballistic missile it was considered necessary to send unescorted aircraft into defended airspace at a very low level in hopes of escaping radar detection. This was the only feasible tactic for aircraft attempting deep penetration of defended territory because once detected they were almost certain to be shot down by surface to air missiles or fighter interceptors. Now nuclear bombers follow low missiles and the air defense system will be severely degraded or destroyed before our aircraft enter enemy territory. In a non-nuclear war, low level attacks are equally hazardous because of improved radar's, look-down --shoot down capable fighter interceptors, and greatly improved low altitude defenses with automatic weapons and shoulder fired surface-to-air missiles. Even in Vietnam we had to abandon low level attacks because of unacceptably losses and now the situation is even worse. Witness Iraq where British Tornado aircraft used low level tactics against Iraqi airfields. Their losses were catastrophic. The training goes on because it justifies flight hours, training funds, and it is exciting fun for the flight crews."

Eugene J. Carroll, Jr. Rear Admiral, USN (Ret.), Deputy Director for the Center for Defense Information, 17 June 1994 further addressed the necessity of low altitude flying in his testimony before the U.S. House of Representatives, Sub-Committee on National Parks and Public Lands, "With respect to additional low altitude training routes, the question to be asked is why continue low altitude training at all? I have flown hundreds of miles at low level when it was justified as necessary to penetrate heavily defended Soviet airspace with single aircraft on nuclear delivery missions. That justification no longer exists. For conventional operations, low level flight was sometimes used to stay out of Surface-to-Air-Missile (SAM) zones. As early as Vietnam, however, it was learned that low level operations placed aircraft in jeopardy from hand held automatic weapons and machine, high rate fire light anti-aircraft batteries. Losses to these weapons became prohibitive and low level attacks in defended areas were discontinued. Now the problem is even more acute at low level. Hand held heat seeking missile launchers such as the U.S. Stinger and the Soviet SA-7 Grail add to the vulnerability of low flying aircraft. Also look down--shoot down air to air

missiles on all modern fighters are deadly against low flying aircraft not supported by fighter cover. As recently as Desert Storm the vulnerability of low flying aircraft was once again demonstrated. British Tornado aircraft attacking Iraqi airfields suffered disproportional losses at low level. Four Tornados were lost at low altitude. The preferred, prudent tactics now are to remain above 4,000 feet to avoid small arms, rapid fire Anti Aircraft Artillery (AAA) and hand held SAMs."

a This assessment is supported by the Department of Defense Final Report to Congress of April 1992 which included the following findings on page 167: Perhaps the most significant tactical issue to arise in planning the air campaign concerned Coalition aircraft flying above the AAA and hand held SAM's threat. Despite the strong peacetime emphasis on training for low level delivery tactics, which exploit terrain to reduce aircraft detectability to radar and hence vulnerability to SAMs and to increase weapon delivery accuracy under the weather, the density of Iraqi AAA and the dangers posed by barrage fire to low-flying aircraft drove some aircraft to higher altitude delivery tactics. After the initial attacks on Iraqi air defense nodes succeeded in largely neutralizing the SAM's able to engage at medium and high altitudes, a virtual sanctuary existed for coalition aircraft above 10,000 feet, allowing medium altitude delivery tactics. The report went on to state on page 242: Ten aircraft were lost during the final 10 days of the war... During this period, Coalition aircraft often operated at lower altitudes. This not only exposed the aircrafts to battlefield defenses, such as hand held IR SAM's that were not a threat at the middle altitudes, but also reduced air crew reaction time and ability to evade SAMs.

In the report on the *Roles, Missions, and Functions of the Armed Forces of the United States*, Chairman of the Joint Chiefs of Staff, February 1993 Highlights many of our questions? The report continues on page III-20, "...the Air Force finds itself with more F-16s than its force structure requires". The reports continues, "...when an F-16 breaks down, it is easier to simply substitute another aircraft than to procure spare parts and do repairs at the squadron or wing level". The following scoring comments were not addressed: What role does this excess in the number of F-16 play in the *Proposed Improvements to Military Operations Areas in Alaska*? Where in the U.S. is F-16 training occurring?

e The DEIS provides a flawed analysis of the noise impact of the proposed activities. Specifically, the DEIS relies on averaged noise analysis instead of analyzing the noise impacts as they actually occur. Additionally, NEPA requires the environmental impact statements be written "... in plain language so that decision makers and the public can readily understand them". Because it is unlikely that the public could understand the riddled section on noise impacts, NEPA requirements have again been violated.

PAN-001

EDT-001
NOI-001

- NOI-002*
- The use of the Ldn metric is often criticized as not accurately representing annoyance and disturbance associated with aircraft noise. The most frequent criticism is based on the inherent feeling that people and animals react to single noise events, not a "meaningless time average sound level". Averaged noise impacts do not account for the episodic impacts created by low-level overflights or sonic booms. The DEIS fails to provide the peak over pressures of strike force overflights and sonic booms. Why is this? Exactly what is it that the USAP does not want the public to know? The "levelized" Ldn measurement means nothing to people hearing jet noise as they attempt to talk to friends, enjoy an outdoor barbecue or watch TV. People experience noise episodes, not day/night averaged booms. Residents will not experience the noise impacts of a low-level overflight or sonic boom over a day, month or year, but in a matter of seconds. It is also important to acknowledge that even at a decibel level of 55 or less, jet noise intrudes into the human environment, particularly in rural areas where ambient noise levels are exceptionally low, obliterating the sense of peace and quiet that attracts people to such areas. These factors were not adequately considered and calculated in the DEIS.
 - The DEIS failed to provide information on how many past complaints have been filled with all branches of the DOD in the region of influence in the past five years? If the proposed activities are approved what is the expected rise in complaints?
 - The DEIS fails to provide a composite map consisting of both SUA and MTRA.
 - The DEIS notes on page 1-6 that the analysis does not include other military airspace such as Military Training Routes or Army, Air National Guard, or other DOD airspace activities. We believe the cumulative impacts associated with these activities cannot be ignored. Therefore, a Programmatic EIS for all military activities conducted in the state of Alaska must be prepared to analyze these impacts prior to implementation of the proposed activities.
 - The DEIS fails to provide data on the economic impacts associated with lost revenue from tourists who may decide to go elsewhere to recreate. "Monitoring the Effects of Military Air Operations", published in January 1989 by the Nevada Department of Wildlife, documents what has happened to migrating shorebirds in the Lahontan Valley in the west-central area of the state. The report also found that the overflights has had an impact on hunters, fishermen and other recreationalists. Among its specific findings:
 - * Over half of the non hunters are annoyed by aircraft disturbances.
 - * 20% of the recreationalists contacted felt that the aircraft disturbances they experienced would influence their decision to return and recreate.

- REC-001*
- The DEIS ignores the probable financial loss to the state of Alaska from the loss of game hunter revenues. Including losses incurred by game guides, air taxi operators, hunting lodges, sporting good suppliers, and the associated service industries supporting these activities.
- REC-002*
- The DEIS ignores recreational resources located in the urban areas which will be impacted by the proposed activities. These impacts cannot be ignored and must be addressed in the FEIS.
- PAN-001*
- Page E9-1 the DEIS states, "Over the next decade, the Air Force must channel its resources ...". This statement highlights the fact that the proposed expansions are part of a much broader picture and that future increases, during the next decade, are likely to impact Alaska if the proposed actions are improved. What are future Pentagon plans for Alaska?
- SAF-002*
- On Page C-5 it is noted that the F-14 is powered by "two afterburning engines". The DEIS failed to adequately address the following scoping comments: What is the expected rise in noise levels and accident potential for aircraft using afterburners? What are the increased accident potential on this proposed airspace for night overflights? What are the increased accident potential for bad weather overflights?
- ALT-002*
- The DEIS fails to provide an over water alternative for supersonic operations. Explain why possible mitigation measures for sonic booms Level III impacts are ignored. Claims that sonic booms will be very minor are ludicrous. Mitigation for supersonic activities cannot be ignored. Supersonic activities represent the most abusive planned activities.
- NOI-002*
- The DEIS fails to provide information on alternate base refueling or air refueling. On page 2-1 this alternative is dismissed without any examination of suitable alternative base discussion.
- ALT-002*
- On page 2-2 the DEIS states, "A second training feedback system planned for Eielson AFB, is in the construction phase now". Were NEPA documents prepared for this system? Was the public notified? Again, this is obviously a connected action being piecemealed by the DOD.
- OTH-003*
- PRO-001*
- Page 1-1: "... a minimum number of acronyms or military jargon" was used in the preparation of this document. Again, these documents are not understandable to the general public. The Description of Proposed Improvements to Military Operations Areas in Alaska is alphabet soup with over 3 pages of acronyms listed. We also note that the Description of Proposed Action and Alternatives (DOPAA) was not made available for public review.
- EDT-001*
- PRO-006*

• Again, why is the DOD pursuing major airspace grabs when there are 25 Special Use Airspace Areas associated with the first round of base closures that is not being returned to the public domain. Why not? Instead the DOD is urging units to "Stake their Claims" (Project Blue Air). Why is the DOD hoarding this valuable natural resource as a child would hoard candy?

PAN-001

• The DEIS failed to fully address the following scoping comments: Will AWRAM air-to-air missile be employed? Will there be toxic and hazardous material involved? Will missiles be dropped or fired? Will the AWRAM air-to-air missile be infrared guided? What are the potential health and safety risks?

HAZ-006

• Are nuclear materials or weapons involved in any many with the described training scenarios? This scoping comment was not addressed in the DEIS.

HAZ-005

• These scoping comment was not addressed in the DEIS: The wing also provides support of two major missions: airborne training for the Army's 8th Infantry Division...resupply of remote long-range radar sites and special assignment airlift missions for Alaskan and Canadian Distant Early Warning stations. What impact do the activities of the USAF and the Army's 8th Infantry Division have on the environment of Alaska? Where are the Alaskan and Canadian Distant Early Warning stations located? Where are the long-range radar sites located? What are the special assignment airlift missions?

OTH-013

• These scoping comment was not addressed in the DEIS: The F-16 and other aircraft are equipped with computerized weapons delivery system. Have these systems played a role in the rash of F-16 crashes? Has the system experienced problems that have led to increased accident potential?

SAF-001

• These scoping comment was not addressed in the DEIS: The F-16 has air-to-air radar capable of acquiring enemy aircraft at distances of greater than 50 NM; missiles can be launched at ranges of 20NM or more. When and when will this air-to-air radar be used? When will missiles be launched? What are the environmental consequences?

HAZ-006

• These scoping comment was not adequately addressed in the DEIS: The F-15 is capable of flying as low as 100 feet AGL and as high as 60,000 feet MSL. Will the F-15 be training anywhere in the Proposed Improvements to Military Operations Areas in Alaska at the 60,000 Feet MSL? If so, what are the environmental consequences?

OTH-004

• The DEIS failed to provide up front information on the square mileage of the proposed expansions of SUA and MTRs. This information was not provided in any

LAN-004

cumulative fashion till page 3-83. Finally, we are told that 71,050 square miles of airspace are involved in the proposed expansions.

LAN-004

• This scoping comment was not addressed in the DEIS: How many acres of land will be impacted?

OTH-006

• These scoping comment was not adequately addressed in the DEIS: What is the radar detection range for all the aircraft which would be allowed to utilize the proposed Improvements to Military Operations Areas in Alaska?

HAZ-001

• The DEIS failed to address the following scoping comments: The increase in training will enhance the potential for inadvertent releases of ordnance and for aircraft malfunctions associated with ordnance. What is the potential of inadvertent releases of ordnance and for aircraft malfunctions associated with ordnance within the State of Alaska?

OTH-006

• The DEIS failed to adequately address the following scoping comments: What measures will the DOD take to implement new and proposed regulations under the Federal Facilities Compliance Act, RCRA and CERCLA? What is the potential maximum firing distance that will be implemented under the proposed and current actions? Are weapon systems capable of being fired outside of the current restricted airspace areas?

• The DEIS failed to address the following scoping comments: The information provided fails to honestly portray to the residents of Alaska that a major portion of the proposed Improvements to Military Operations Areas in Alaska includes plans for a Electronic Combat as described on page 1-2. Historically the placement of a Electronic Combat equipment has led to future land takings. Will there be land grabs in the future, particularly in the next 20 years?

PRO-007

• The DEIS failed to provide information on whether all civilian aircraft are shielded from EMR effects of the proposed Electronic Battlefield. If not what are the potential impacts? The DEIS failed to provide information on the elevation radar beams be utilized?

HAZ-007

• We are concerned that radar will be changing dramatically in the near future to be able to detect Stealth-type aircraft. This type of aircraft will create a need to increase the power output of radar ten times greater than is currently used. Will the Electronic Warfare equipment become obsolete in the new ten years because the increased power needs will exceed safe EMR ANSI standards? The DEIS failed to tell us if equipment has mechanical stops to keep the threat emitters from exposing people on the ground should they be routinely inspected by an outside agency. The DEIS failed to tell us the scenario if current ANSI standards should

ever be exceeded by operations in the ECTR. Would the Electronic Battlefield be shut down until modifications cause the standard to be met? In the future the EMR ANSI standards will be expected to become more stringent, modifications must cause the range to comply to the new standard or be shut down.

- The DEIS failed to tell us the power densities and frequencies of the Electronic Battlefield. Any new electronic equipment must entail a complete new EIS stating power densities, frequencies, location, purposes, etc.
- The DEIS failed to tell us how many emitter, radar, and/or Toss sites will be activated during any given period.
- The DEIS failed to provide information on the radar detection range of each aircraft. What is the radar detection range for all the aircraft which would be allowed to utilize the proposed SUA? These questions were asked in the scoping process but were not addressed in the DEIS.
- The DEIS fails to address the Hazards of Electromagnetic Radiation to Personnel (HERP).
- While the controversy over health impacts associated with electromagnetic fields has been brewing for over 40 years, much the same way scientists once debated the dangers of ionizing radiation such as X-rays and radiation from nuclear explosion, the growing body of scientific knowledge of health hazards associated with electromagnetic fields provides a clear message that preventive health policies should be instituted whenever possible.
- The DEIS fails to provide information on what measures would be taken to control radiation levels. Will all the devices be shielded and fenced off? Will residents be warned of potential health hazards? Will independent radiation monitoring programs be established? What are the siting, operating conditions per ANSI, AFOSH 161-S, and DOD 6055.1? The DEIS fails to provide information on the radar types which are proposed for use? The DEIS on page 2-3 notes that, "early warning and ground control intercept radar systems need to be provided in appropriate locations simulating enemy defense layouts". What layouts? Where will these additional radar devices be located?
- The DEIS fails to provide mapping of the potential radiation sources and exactly what electromagnetic fields exist and are proposed. It is therefore impossible to determine the environmental consequences of these activities.

HAZ-006

• The DEIS fails to recognize studies by the Congressional Office of Technology, Biological Effects of Power Frequency Electric and Magnetic Fields which found the following:

- In our view, the emerging evidence no longer allows one to categorically assert there are no risks.
- Despite the low energy of power frequency fields and the very small perturbations that they make to the natural fields within the body, studies over the last fifteen years have demonstrated unequivocally that under certain circumstances, the membranes of the cells can be sensitive to even fairly weak externally imposed low frequency electromagnetic fields. Extremely small signal changes can trigger major biochemical responses critical to the functioning of the cell (Adey 81, Adey 84, Adey 87)
- In contrast to more familiar environmental agents where "if some of it is bad, more is worse", it may not be safe to assume that ELF field exposure leads to health risks. Exposure to stronger fields or exposure for longer periods is worse than exposure to weaker fields or brief periods
- "More is Worse" paradigm does not hold: For this cellular level phenomenon at least, it is not true that a larger value of the field shows a larger, or even effect, compared to a smaller value of field.
- The central nervous system affects including circadian effects in animals and the possibility of cancer promotion appear most worthy of concern with respect to public health effects.
- It is now clear that 60Hz and other low frequency electromagnetic fields can interact with individual cells and organs to produce biological changes.
- Changes in DNA synthesis rates and alterations in the transcription patterns of RNA, with the resultant production of structurally changed proteins have been observed in cells exposed to low intensity ELF fields.
- Fields do exert an action on endocrine tissue and endocrine processes in vitro and these effects show windows.
- The EPA has brought to light serious questions regarding health impacts of non ionizing radiation to human and animals. Analysts at the U.S. EPA reported in An Evaluation of the Potential Carcinogenicity of Electromagnetic Field have recommended that extremely low frequency (ELF) electromagnetic fields be

HAZ-007

HAZ-007

classified as "probable human carcinogens". By classifying ELF EMFs as a probable human carcinogens, the EPA staff put them in the general class with PCBs, DDT and formaldehyde.

- The White House and the U.S. Air Force strongly objecting to the Environmental Protection Agency's (EPA) draft assessment of cancer risks associated with extremely low frequency (ELF) EMFs, radio frequency and microwave (RF/MW) radiation. This is the first detailed account of the White House and Air Force efforts to stop the release of the EPA report. The White House and the Air Force both contend that a final assessment of the EMF-cancer link should not be issued until the Committee on Interagency Radiation Research and Policy Coordination (CIRRPC), an arm of the White House Office of Science and Technology Policy (OSTP), has issued its own report. An Air Force critique asserts that, "if published, the report will contribute to needless public anxiety, and have serious impacts on capabilities and costs of the Air Force Programs".

- Other studies on the impacts of electromagnetic radiation, collected in Becker (1988), include:

- Lin (1985) reported that persons occupationally exposed to electromagnetic radiation had a significantly higher incidence of brain tumors than the general population. Lin also reviewed and analyzed a study previously published that purported to indicate that military personnel exposed to radar during the Korean War did not have a higher incidence of cancer than other personnel not so exposed. Lin's analysis indicated that the control group chosen was inappropriate in that they were similarly exposed to such radiation. When Lin re-analyzed the corrected data, he found a significant relationship between tumors and radiation exposure.

- Spitz and Cole (1985) found that children whose fathers were occupationally exposed to electromagnetic radiation had a statistically significantly higher incidence of brain tumors. This data may be interpreted as indicating that the exposure resulted in a genetic abnormality that was both related to the production of brain tumors in the fathers, and genetically transmitted to their offspring. This interpretation is compatible with other overwhelming evidence that the majority of tumors are associated with, or produced by, genetic defects induced by some environmental variable.

- Speers (1988) reported, among other findings, the startling data that electric utility linemen have a 13 times greater incidence of brain tumor than the general population.

- In three studies, Phillips (1986a, 1986b, 1986c) reported that exposure to 60 HZ magnetic fields causes a marked increase -- up to 1600% above normal -- in the growth rate of a number of different types of human cells. The significance of this work is that, contrary to the other papers cited which may indicate that field exposure produces cancer, Phillips indicates that it promotes the growth of established cancers. This means that such exposure results in a more rapid clinical course for a cancer patient, that treatment is much more difficult, and the tumor is much harder to control. Further, the accepted theory of cancer biology holds that we are constantly developing small cancers, from exposure to the many carcinogens in our environment, but that for the most part, we are unable to detect and destroy these few cells by means of our immune system. If, however, this type of cancer is exposed to an electromagnetic field, its rate of growth would be increased, and the immune system may not be able to control it. Therefore, such prompting effect upon the growth of cancer cells would also result in an increase in the incidence of cancer in the exposed population.

- Bawin (1976) indicates that microwave fields that are pulsed or otherwise modulated from devices such as these are capable of producing the same effects as low frequency radiation.

- The U.S. Navy-sponsored study by Dr. J. M. R. Delgado, director of the Neurobiological Research Institute in Madrid, Spain (1982), found that developing chick embryos exposed to extremely low levels of magnetic fields pulsed at a variety of low frequencies and incapable of producing heat effects, demonstrated significant developmental defects.

- US Navy electricians were two and a half times more likely to develop leukemia than were other naval personnel, according to a new study by Dr. Frank Garland and colleagues at the Naval Health Research Institute Center. The paper appeared in the American Journal of Epidemiology, 132, pp.293-303, 1990.

- Dr. Becker concluded, "It is my opinion that exposure to the EMR fields that would be generated by operation of the electronic warfare range would pose a significant hazard to the civilian population. The literature available in this field is now truly enormous and the majority of it is produced by chronic exposure to low levels of non-ionizing electromagnetic radiation. The hazard would include, but not be limited to; increases in the incidence of cancer and other stress related diseases, genetic alterations transmissible to offspring including the tendency for brain tumor, and developmental abnormalities in fetuses exposed to the fields".

• The DEIS fails to provide information on the current and future exposures by humans and wildlife to all forms of electromagnetic radiation from all DOD sources associated with the proposed and current DOD activities?

• The DEIS failed to address the following scoping comments: What electronic warfare or any other facility is currently utilized by the DOD in the State of Alaska? This cumulative impacts of these sites must be included to assess impacts.

• The DEIS failed to adequately address the following scoping comments: What are the types of military aircraft on-board radar systems that would be flown in the *Proposed Improvements to Military Operations Areas in Alaska*? On-board radar is mentioned on page C-4, but our specific questions were not answered.

• The DEIS failed to adequately address the following scoping comments: What will be the location of additional training devices such as threat emitters, scoring systems for combat training, radar installations, and other devices installed for the proposed changes? What measures will be taken to control radiation levels? Will the devices be shielded and fenced off? How many devices will there be and where will they be placed? Will residents be warned of potential health hazards? Will radiation monitoring programs be established? What are the existing, operating conditions per ANSI, AFOSH 161-5, and DOD 6055.1? What radar types will be used?

• The DEIS failed to address the following scoping comments: What are the current and future exposures by humans and wildlife to all forms of electromagnetic radiation from all DOD sources associated with the proposed and current DOD activities? Provide mapping of these sources.

• The DEIS failed to adequately address the following scoping comments: American Indians experience military overflights and sonic booms in greater proportion to their numbers. What will be the adverse impacts to any reservations or traditional Indian lands? What will be the specific impacts to spiritual and ceremonial sites, disruption of or intrusion upon ceremonial activities?

• The DEIS failed to adequately address the following scoping comments: Do Native Americans have sovereignty and jurisdiction of tradition use and Indian Reservation airspace? What impacts will the *Proposed Improvements to Military Operations Areas in Alaska* have on the American Indian Religious Freedom Act?

• The DEIS failed to adequately address the following scoping comments: Present a discussion the following issues of concern: Sovereignty: Have there been

HAZ-007

SUB-002

complaints or concerns regarding military activities? What kind of relationship has the tribal governments had with the DOD?

• Do Natives in the region of influence observe meditation, prayers or ceremonies which could be disturbed by the *Proposed Improvements to Military Operations Areas in Alaska*? What happens if these activities are disturbed? Are there sacred locations- both on and off any reservations- where holy people or other entities may be affected?

SUB-002

• The DEIS failed to adequately address the following scoping comments: In what ways has the DOD activities affected the peace of mind of some of the elderly, children, or others living in the area? What kinds of concerns have these people mentioned? What will be the impacts to the tribe's legitimacy, political credibility, and corporate/economic viability if the *Proposed Improvements to Military Operations Areas in Alaska* are approved?

• On page C-7 the use of inert ordnance is noted yet the DEIS failed to adequately the following scoping comments: For more than 10 years, the cause of the catastrophic waterfowl mortality in Eagle River Flats has been a mystery. Now, scientists at the Cold Regions Research and Engineering Laboratory and Dartmouth Medical School have determined the cause of high waterfowl mortality at the Army's Eagle River Flats, located 15 miles north of Anchorage. The cause of death for many of the ducks and swans has been the ingestion of white phosphorus particles left from smoke-producing shells fired on the range. The Army has fired thousands of the artillery shells on the area since the early 1940s. Will ordnance containing white phosphorus be used on the ranges? If so, document the potential impacts to wildlife, human health and the environment. Is white phosphorus reactive in air? Is white phosphorus irritating to the nose, throat and lungs as well as the skin, eyes and mucous membranes? If white phosphorus were ingested could it be absorbed from the gastrointestinal tract or through the lungs? Can white phosphorus cause "phosby-jaw"? Can white phosphorus cause chronic poisoning, anemia, loss of appetite, gastrointestinal weakness and weakness of bones, teeth, eyes, myopia, dilation of pupils, retinal hemorrhage, congestion of blood vessels or pallor? What percentage of the inert ordnance will have spotting charges? What are the types of spotting charges which will be used in the training ordnance. Will Hot Spot cartridges be used? If so, describe in full the environmental consequences of the use of red phosphorus, including but limited to, potential ground, air and water contamination, impacts to human health and impacts to wildlife. Describe in full the operational details associated with the use of the Hot Spot cartridges. Can the Hot Spot cartridge ignite vegetation? How far will the smoke cloud disperse? Is there any potential for the smoke cloud to disperse off range? Will Cold Spot cartridges be used? If so describe in full the environmental consequences of the use of gunpowder and titanium tetrachloride,

HAZ-001
HAZ-008

including but limited to, potential ground, air and water contamination, impacts to human health and impacts to wildlife. Describe in full the highly corrosive nature of titanium tetrachloride and its ability to liberate heat and hydrochloric acid upon contact with moisture. Describe in full the possibility of injury to skin and mucous membranes to human and animal and the possibility to threaten life or to cause permanent physical impairment or disfigurement. Can titanium tetrachloride be absorbed in to the body by inhalation, ingestion to through the skin? What exposure levels would threaten human and wildlife health? Would it take seconds, minutes or hours? Describe in full the operational details associated with the use of the Cold Spot cartridges. Can the Cold Spot cartridge ignite vegetation? How far will the smoke cloud disperse? Is there any potential for the smoke cloud to disperse off range? What is the chemical make up of the clouds? Will there be a requirement for Cold Spot use during the fire season?

HAZ-001
HAZ-008

• The DEIS failed to adequately address the following scoping comments: Describe in full the chemical make up of all inert and live ordnance which could be potentially used in the proposed training scenarios. Include a discuss on plans for range decontamination and monitoring of all environmental consequences of all proposed activities. Describe in full the cumulative numbers of inert and live ordnance which could be used. Include a description of each ordnance type which could be potentially used by military aircraft or on the training ranges.

• The DEIS failed to address the following scoping comments: What is the difference in bomb footprints from aircraft operating at all approved altitudes? At what altitudes will aircraft with be firing ordnance?

• The DEIS failed to adequately address the following scoping comments: What is the potential for "sterile" related accidents on Alaska Transportation systems? What is the locations of these transportation systems, including but not limited to roads, airfields and rail lines? What are the expected economic impacts to the State of Alaska if the state were held responsible for a incident involving military airspace use, such as recently occurred in Nevada?

SAF-004

• The DEIS while noting on page C-7 the use of the AGM -85 Maverick. The DEIS failed to adequately address the following scoping comments: Will aircraft be practicing simulated Maverick missile weapons delivery? Will this be done electronically? Will there be dummy Maverick missiles? How will pilots be scored for these training activities? Will there be toxic and hazardous material involved? Will missiles be dropped or fired? Will the Mavericks be infrared guided? Will training scenarios include the use of Sidewinder missiles? Will aircraft be equipped with ring laser gyros and the Global Positioning System? Will aircraft be equipped with the ALQ-119-15 or AN/ALQ-119 pods? If so, what are potential consequences to pilots and maintenance/base personnel and any

HAZ-001

conceivable environmental consequences? The Maverick missile equipped with the BSU49 low drag fin has experienced problems causing the missile to miss its target. What were these problems? What is the potential of all Mavericks to malfunction? Will Mavericks be deployed while the pilot is in a head down mode? What is the increased risks of these firings?

HAZ-001

• On page 3-64 the DEIS presents the reader with a new unofficial MOA/MAP noise model. Since this model is not officially approved we question any authority to utilize these new calculations without independent peer review. Has there been independent peer review of this model? Additionally, since the MOA/MAP limitations as discussed on page 3-65, are limited allowing for the calculation of single event "carpet booms". The DEIS fails to calculate noise impacts associated with more than one supersonic activity with the same region of influence. The DEIS fails to provide noise calculations for a focused or super boom or the expected number of focused booms. The DEIS presents two different pictures of the expected impacts. For instance on page 3-65 the DEIS states that peak over pressures from a focused boom could be 2 to 3 times greater while on page F-7 it is stated that peak overpressures could be 2 to 5 times greater. Likewise calculations are presented only for the aircraft most likely to go supersonic. The DEIS fails to provide calculations for all aircraft capable of going supersonic.

NOI-001

• On page 3-64 the DEIS presents the reader with noise calculations utilizing both NOISEMAP and ROUTEMAP calculations. Findings by the Air Force in the Generic Environmental Impact Statement (GEIS) for Air Force Low Altitude Flying Operations, Preliminary Draft, January 1980, Volume 1 are not calculated in this DEIS. The GEIS found that between 25% and 40% of the respondents reported being highly annoyed by low level overflights (page 4-18). These percentage rates are higher than the normally calculated 20%. The GEIS also found that one-fifth of the respondents beneath the case study airspaces reported either sleep interruption or interruption of three or more non sleep activities (page 4-21). The DEIS failed to consider the expected increase in sleep disturbance using GEIS findings. The ROUTEMAP computer program is flawed. The GEIS also stated on page 4-36, "Further, field data collected as part of the GEIS for the 11 case study sites indicate that actual levels of annoyance with aircraft noise on military training routes are, on average, 6.6 times greater than model predictions". The GEIS continues to state, "Overall annoyance on military training routes averages 11.7 times greater than ROUTEMAP predictions". The DEIS failed to consider the expected noise impacts calculated with the GEIS findings for the proposed activities. Obviously, the Department of the Air concurs that new calculations are necessary based on the GEIS findings and on 23 Oct 92 placed a Request for Proposal F41624-92-R-9006 to, "Update models in the current assessment methodology (ROUTEMAP)". The DEIS failed to consider the GEIS results! Perhaps the USAF did not like their own findings!

SAF-004

• The DEIS failed to adequately address the following scoping comments: What is the potential that the startle effect of sudden noise can temporarily impair one's ability to function and reason? Depending on when and where this happens, the risk of accidents can increase dramatically. How many accidents are expected to occur?

LAN-001

• The DEIS failed to address the following scoping comments: What is the population distribution, size, and age or residents below the proposed airspace? Where are the population centers, small towns, settlements, schools, hospital, medical facilities and religious institutions? How many children will be impacted? How many of these children are living at or below the poverty level? Throughout the DEIS impacts are analyzed for the newly exposed population. This is not a worst case analysis of all the exposed populations.

NOI-001
PRO-004

• The DEIS failed to address the following scoping comments: What will be the noise impacts of both single and multiple aircraft training scenarios? Additionally, what are the noise impacts for overflights not only on the centerline, but for overflights within the entire designated airspace, as well as flights which have deviated from the normal flight path, speed and altitude? A worst case analysis of airspace use within the potential impacted region is not calculated throughout the DEIS.

AIR-001

• The DEIS failed to adequately address the following scoping comments: What are the coordinates of all airspace associated with the proposed actions, including MTRs? Since MTR are "actually corridors for the practice of low altitude high speed penetration tactics and for the testing of certain low altitude weapons systems" (Project Blue Air Vol. 1, page 1-6). What are the proposed training scenarios on MTRs for the *Proposed Improvements to Military Operations Areas in Alaska*?

NOI-002

• The DEIS failed to address the following scoping comments: Subsonic aircraft at very high speeds at low altitude can cause sonic booms. What is the potential number of sonic booms created by subsonic low flying aircraft for the *Proposed Improvements to Military Operations Areas in Alaska*?

NOI-001

• The DEIS failed to adequately address the following scoping comments: Environmental documentation must include information comparing the noise footprints of the individual aircraft. What are the noise footprints of all the aircraft types which could utilize the *Proposed Improvements to Military Operations Areas in Alaska*?

• The DEIS failed to adequately address the following scoping comments: The SOAs slowly spreading across rural America generate sonic booms that the military predicts will average 4 to 5 PSF. These figures are well in excess of the thresholds of adverse effects noted by the EPA, the FAA and independent studies. Nevertheless, the effects of SOAs continue. Data collected on sonic boom activity at the Fallon Naval SOA for 1986 and 1987 showed a range of 0.45 PSF to 7.28 PSF. Will monitoring of supersonic flights be conducted? What is the worst case analysis for supersonic activities?

NOI-002
PRO-004

• The DEIS failed to provide data on the following scoping comments: What will be the adverse physical effects to any prehistoric or historic building, structure, or objects? What are the location of these sites? Will additional surveys be conducted? What are these sites? How many of these sites are eligible to be placed on the National Register of Historic Places? Will the *Proposed Improvements to Military Operations Areas in Alaska* comply with the National Preservation Act, including, but not limited to section 106? What are the irreversible and irremediable commitments of resources that could in any way be impacted by the *Proposed Improvements to Military Operations Areas in Alaska*?

CUL-001

We question how the SHPO could have resulted in a determination that the Proposed Actions would have no Adverse Effect to cultural resources prior to the completion of the EIS. Clearly, the cart has been put before the horse. Likewise traditional Native use sites are ignored. The DEIS claims that use sites were not identified during scoping or analysis. This is unacceptable. The DEIS fails to provide mapping of traditional native lands and has ignored the following scoping comments: American Indians experience military overflights and sonic booms in greater proportion to their numbers. What will be the adverse impacts to any reservations or traditional Indian lands? What will be the specific impacts to spiritual and ceremonial sites, disruption of or intrusion upon ceremonial activities?

SAF-001
OTH-001

• What precautions will be taken to assure no accidents threaten residents? Who would be responsible for any property damage, human injury or potential deaths from an accident involving military aircraft?

SAF-004

• On page 3-37 notes the George Parks Highway and the Richardson Highway are in the region of influence. The DEIS failed to address the following scoping comments: What is the potential for "startle" related accidents on roads or highways? Recently a federal judge ordered government payment of \$342,000 in damages to Leslie Brunch after she was buzzed and driven off the road by a military aircraft on July 6, 1988. She suffered a miscarriage and four broken ribs (Las Vegas Review Journal, Oct. 6, 1991). Who is responsible? Could the State of Alaska be held responsible as in Nevada?

- The DEIS fails to consider emission factors for all military aircraft types which will be utilizing the proposed SUA, not just the aircraft stationed in Alaska, including but not limited to all allied and U.S. aircraft? The DEIS fails to provide information on mitigation measures which could be taken if aircraft pollutant emissions exceed Ambient Air Quality Standards? ... The DEIS failed to address the following scoping comments: What are the cumulative impacts of these proposed operations including highway vehicle, maintenance vehicle, ground equipment, fire fighting & corrosion control emissions as well as aircraft emissions? What impacts will aircraft and vehicle fumes have on the flora of the Alaska? What are the emission factors for all military aircraft types which will be utilizing the proposed *Improvements to Military Operations Areas in Alaska*? What are the cumulative air quality impacts of all military activities? What are the health impacts to humans and wildlife from aircraft pollutant emissions? What are the health impacts of the exhaust pollutants sulfur dioxide, unburned hydrocarbon, carbon monoxide, oxides of nitrogen and of particulate matters by emissions from the aircraft? Will gaseous emissions from jet engines and the photochemical behaviors of the wide range of emission compounds include the major volatile species: Ethylene, Acetylene, Propene, Butadiene, Olefins, Aldehydes, Methanol, Ethanol, Ethane, Ethene, Propane, 2-Methyl propene, n-Butane, 2-Methylbutene - 2, Trans - 2 butene, n-Pentane, Cyclohexane, Benzene, Toluene, Dodecene, Tetradecane, Hexadecane, Naphthalene, Anthracene, Chrysene, Benzo pyrene, Formaldehyde, Acetaldehyde, Acrolein, and Benzaldehyde? Will flights at these levels be below the mixing height so these elevated pollutant emissions will be dispersed toward the ground? What are these contaminants and their potential environmental impacts?

AIQ-001

- The DEIS failed to address the following scoping comments: What are the sensitive geographic areas? Are there seismically sensitive areas which will be impacted? What are the potential impacts? What is the damage probability?

OTH-006

- The DEIS failed to address the following scoping comments: Describe the F-16's and all military equipment vulnerable to HERO (Hazard of Electromagnetic Radiation to Ordnance). In fly-by-wire incidents, unexpected electromagnetic interference (EMI), either from the aircraft own electronics such as radio or radar systems or from civilian or military external sources will overpower the electronic flight control systems, thus causing the pilot to lose control and crash. What other military external sources exist? Electronic warfare, radar and other equipment must be mapped to excess impacts. What other equipment is in the State of Alaska that could potentially cause a HERO accident? What is the potential for a HERO accident to occur in the *Proposed Improvements to Military Operations Areas in Alaska*? Will there be additional land needed? If so, where? Is "Kepton" wiring used in the F-16 which is proposed to be flown in the *Proposed*

SAF-009

- Improvements to Military Operations Areas in Alaska* What is the increased accidents potential for the F-16 and the associated HERO accidents?
- SAF-009
- PRO-008
- The DEIS failed to address the following scoping comments: Please provide through coordination with the Army, Navy, FAA and affected states an Air Force airspace plan that defines, validates and supports the *Proposed Improvements to Military Operations Areas in Alaska*. Does such a document exist? Can a copy be part of the DEIS?
 - The DEIS failed to address the following scoping comments: What impact will the *Proposed Improvements to Military Operations Areas in Alaska* have on the development, deployment, and maintenance of the Military Airspace Management System (NAMS)?
 - The DEIS failed to address the following scoping comments: Has the USAF submitted Annual Restricted Area Utilization Reports? If so, what was the utilization of current Restricted Airspace Areas?
 - The DEIS ignored the following scoping comments: What are the potential environmental consequences of refueling activities? Will there be Air Refueling Airspace (AR)? What are the details of these Air Refueling Airspace? Will these activities be chartered on aeronautical maps? What are flight times for the various aircraft, both unrefueled and refueled? How long will it take for aircraft to refuel? How large an area will be used? Will anchors or air refueling tracks be established? Will these areas be served by a military radar unit (MRU), who will direct the tanker-receiver rendezvous? The DEIS fails to provide a description or mapping of these tracks. What are the potential environmental consequences of these activities? Will there be Air Refueling Airspace (AR)? What are the details of these Air Refueling Airspace? Will these activities be chartered on aeronautical maps? What are flight times for the various aircraft, both unrefueled and refueled? How long will it take for aircraft to refuel? How large an area will be used? Will anchors or air refueling tracks be established? Will these areas be served by a military radar unit (MRU), who will direct the tanker-receiver rendezvous? The DEIS did not adequately describe these activities. Where will these additional areas be? When will this occur?
 - The DEIS failed to provide topographical data for all proposed SUA/MTRs.
 - The DEIS failed to provide information on the weather minima.
 - The DEIS failed to provide information on whether the SUA/MTR briefings are current and if there are established procedures for updating the briefing? How are briefings and procedures made available to other users of the SUA/MTR? Are
- EDT-002
- AIR-005
- AIR-006

<i>AIR-006</i>	aircrews, especially non-unit aircrews, briefed on environmental hot spots and no-lar sensitive areas?	<i>SAF-005</i>	must rely on the "See and Avoid" concept. According to a study done by Dr. John Andrews at the Massachusetts Institute of Technology, the ability to see and avoid a mid-air collision diminishes in proportion to the rate of closure between two aircraft. When an aircraft is flying at or near supersonic speed, any ability to see and avoid drops to near zero. This places civilian and military pilots at risk.
<i>SAF-001</i>	• The DEIS failed to provide information on known faults in the F-16 computerized weapons delivery system and/or any other aircraft which could be utilizing.	<i>SAF-001</i>	• The DEIS failed to recognize that dozens of F-16 aircraft have crashed in recent years due to cracks in the wings. Will defective aircraft be flying over Alaska?
<i>AIR-007</i>	• The DEIS failed to adequately provide information on what type of communication system will be used for proposed activities? What radio frequencies/ telephone lines will coordinate/monitor activities?	<i>OTH-007</i>	• The DEIS failed to provide information as to whether the ranges meet AFRSO-46 criteria without a waiver? The DEIS provides no proof that the ground area of the range sufficiently encompassed by restricted airspace to include all proposed hazardous activity? Will all the lands inside the Restricted Airspace boundary be owned, leased, or by agreement controlled? Are adequate safety measures taken with respect to public/private land? Is the land area within all Restricted Airspace Areas congested, sparsely populated, or uninhabited? Does the SUA allow for aerial access to public and private lands?
<i>HAZ-009</i>	• The DEIS failed to provide information on Air Force requirements for manufacturing reliability of flares. The DEIS failed to provide adequate information on the percentage of the flares expected to hit the ground without igniting(duds) other than stating that "the likelihood of this occurring in any significant numbers is negligible". We note that it takes only one flare for someone to experience personnel injury or for a fire to start. We are aware that flares usage has been the culprit in starting several fires in Alaska. The DEIS fails to even briefly mention this reality or provide any analysis of the potential for fires in the future. Permanent MOAs will blanket 13 million acres of Nevada. We also find it inappropriate to drop cheff or blazes in wilderness, wilderness study areas, national parks, native lands, animal refuges and in general all recreation and conservation lands. What are the potential health risks if a person (child) were to inadvertently light a flare? Will the person be blinded, burned, etc.?	<i>SAF-001</i> <i>SAF-005</i>	• On page 3-60 the DEIS report on near misses is reported from January 1991-June 1984. In the prior sentence it is noted that there are records dating back to 1983. The DEIS should report on near misses back to 1983.
	• Since flares are proposed to be dropped along the proposed SUA and MTR's the DEIS failed to provide information on the potential for contamination of surface water by chemicals associated with the expended flares, and possible hazards of ingestion by wildlife and domestic livestock?	<i>SOC-002</i> <i>AIR-008</i>	• The DEIS ignores the potential negative economic impacts of the <i>Proposed Improvements to Military Operations Areas in Alaska</i> to the future growth of commercial airlines. An example of these impacts was discussed in the Special Nevada Report, September 1982 prepared in accordance with P.L. 99-606. The report found that the potential for commuter service between Las Vegas, Ely, and Elko was considered by Skywest Airlines but was determined to be "economically unfeasible" due to indirect airway routing around the Nellis Desert MOA.
<i>SAF-001</i>	• The DEIS failed to recognize impact G forces have on pilots doing hard/fast turns such as "pop-ups"? Do the pilots pass out? Does this increase accident potential? What are the potential environment impacts? Because of the increased G forces on the F-16 wiring, explodes when it is overloaded(Valley Courier, July 23, 1993, Guard's Valley flights to be discussed tonight). What is the increased accident potential when this wiring explodes? Is this why ten F-16 aircraft crashed in a twenty month period at Hill Air Force Base? Will pilots be injured when the wiring explodes? Will the planes catch on fire?	<i>OTH-007</i>	• The DEIS did not adequately answer the following questions: Are all the lands inside the Restricted Airspace boundary owned, leased, or by agreement controlled? What are the safety footprints of each weapon used within the airspace boundary? Are adequate safety measures taken with respect to public/private land? Is the land area with all Restricted Airspace Areas congested, sparsely populated, or uninhabited? Does the original intended use match the actual use? Does the SUA allow for aerial access to public and private lands? Does actual activity justify the type of airspace as designated?
<i>SAF-005</i>	• The DEIS states on page 4-6 that, "Policy for joint use of these airspaces is based on the "see and avoid" concept". There is a significant amount of civilian aviation in Alaska. The safety of civilian pilots flying by visual flight rules (VFR)	<i>HAZ-010</i>	• The DEIS states on page ES-8 that there will be an, "increase in the occurrence of emergency fuel jettisoning". The DEIS failed to provide data on the following scoping comment: How much fuel and what is the location of where fuel will be

unloaded "going dirty" prior to landed? What are the potential environmental and human impacts of jet fuel? What types of jet fuel will be dumped? The DEIS notes on page 3-62 that time location, magnetic heading, altitude true speed, amount of fuel jettisoned, jettison rate, outside air temperature, and wind direction is reported to the appropriate base environmental engineer, safety, legal and operations personnel. Yet, this information was not provided. The DEIS failed to provide a map of these areas.

HAZ-010

• The DEIS failed to address the following scoping comments: What toxic and hazardous substances may be part and parcel of an accident, such as the hazards associated with hydrazine on F-16 aircraft as part of the emergency power unit (EPU)? Hydrazine in sufficient quantities can cause dizziness, severe burns, damage to the kidneys, and liver dysfunction. The Wendover Advocate has reported on several crashes of F-16 aircraft and the hazards associated with hydrazine. Indeed, low altitude training (220 feet AGL) has been curtailed at HII AFB following a serious of F-16 crashes. Will adequate emergency response procedures be implemented in the case of an accident involving hydrazine? Have local emergency response personnel been trained regarding the hazards of hydrazine?

HAZ-004

• The DEIS failed to provide maps depicting potential energies sources, such as geothermal and oil potentials. Will potential new development of energy sources be impacted? The following scoping comments were ignored: What are the potential energies sources, such as geothermal and oil which could potentially be impacted by the *Proposed Improvements to Military Operations Areas in Alaska*? Will potential new development of energy sources be impacted?

OTH-006

• The DEIS fails to scoping comments requesting analyze of the economic impacts of airspace restrictions on activities that depend on small aircraft operations, such as aerial location of cattle, aerial spraying for insect control, access to remote ranches and communities, and aerial medical or search and rescue operations.

AIR-008

• The DEIS provides no plotting or listing of military airspace over private property below 1000 feet AGL. This lack of information hinders any attempt to determine how much private property is potentially involved in illegal taking and condemnation.

PRO-007

• The DEIS provides no mapping of Station Keeping Equipment (SKE) routes.

EDT-002

• The DEIS fails to provide information and mapping of routes which might be utilized under the "no action" alternative. Just how will aircraft travel to these sites? What MTRs are utilized by activities at bases described as part of the "no action" alternative. Aircraft do not fall out of the sky!

AIR-009

• The DEIS states that the combat mode of the LANTIRN laser operates at wavelengths which can damage the human eye before the natural blink response can protect them at a distance of several miles. We do not accept DOD claims that all laser operations do not exceed range boundaries since there are three ranges in Nevada alone where range boundaries are exceeded. The DEIS failed to include information on all types of lasers, targets, attack headings, altitudes of designating aircraft and altitudes/distances form target. The following scoping comments were not addressed adequately in the DEIS: What are the laser footprints associated with the proposals to conduct weapons delivery at all ranges which aircraft utilizing the *Proposed Improvements to Military Operations Areas in Alaska* may use? What are the laser footprints on the ground? Will these laser footprints extend out of the current lands withdrawn? What actions will be taken to protect people from exploring and observing training activities within the Nominal Ocular Hazard Distances? Will these nominal Ocular Hazard Zones be posted on the ranges? What type of laser systems have been approved for use and what is the Nominal Ocular Hazard Distances (NOHD) for viewing by the unaided eye? What are the impacts to wildlife and domestic animals of all conceivable laser operations? What are the impacts of a laser aimed above the horizon? Considering the close proximity of Alaska highways specular reflections -- mirror-like reflections of laser energy from very smooth, flat highly polished surfaces such as mirrors, windows, polished metal and calm standing water -- could occur? What are the potential impacts? What actions will be taken to remove items which may pose a specular reflection hazard in the paths of laser aircraft and surrounding areas within the Nominal Ocular Hazard Distances established by the DOD? What are the potential burning hazards to humans, domestic animals, wildlife and lands associated with laser use?

• News account during the Persian Gulf War have raised serious questions regarding the effectiveness of laser guided weapons (*Laser-Guided Bombs are Not Always Smart*, The Columbus Dispatch, January 29, 1991). The Boston Globe reported found that only about 60% of the U.S. laser guided bombs hit their targets, and the other 40% have missed by as much as thousands of feet, according to past and present government officials familiar with U.S. intelligence reports. The report continued: John Lehman, the Secretary of the Navy under President Reagan, told CNN-TV that laser guided bombs "do go ballistic if -- suddenly a cloud comes between the plane and the target... and they'll go wide". He said yesterday that, as secretary, he had to pay settlement costs "at least once a month" when unarmed laser-guided bombs smashed into resort towns after going "2 or 3 miles off course" on test ranges in Nevada or California. The DEIS fails to provide accuracy estimates for laser-guided weapons and any possible off range ordinance associated with the proposed activities.

• The DEIS states on page 3-81 that, "Range personnel are required to wear protective glasses at appropriate times". Will the birds, moose, deer and other wildlife be given protective goggles as well? Will other state, federal, emergency response personnel be notified of the potential hazards? Will hunters, recreationalists, and site seers also be provided with goggles? Are appropriate warning signs posted?

• The DEIS fails to provide information on the amount of time it would take wildlife or humans to have eye damage from viewing DOD laser operations. The DEIS on page 2-63 states, "All safety procedures described above would be implemented prior to the use of lasers on targets, including assurance that the weapon footprints remained within state owned target areas". The DEIS has failed to provide answers to questions presented during the scoping process. The following questions were asked but remain unanswered: What classification of lasers will be used? Will the Nominal Ocular Hazard Distances be enforced? Will a health monitoring program be established on health impacts from lasers? What are the potential risks to residents? What actions will be taken to remove items which may pose a specular reflection hazard in the paths of passing aircraft and surrounding areas within the Nominal Ocular Hazard Distances under conditions of the proposed actions, including standing water? What are the potential burning hazards to humans, domestic animals, wildlife and lands associated with laser use? No map of the Nominal Ocular Hazard Distances was provided.

• The DEIS fails to consider impacts of the Martin Marietta Pave Penny day/night laser target identification set is installed on many F-16 aircraft. This system receives laser energy reflected from targets designated by either airborne or ground based lasers. Are the F-16 aircraft equipped with this system? If so, the DEIS failed to provide adequate information on the system and associated impacts of ground laser systems, etc.

• The DEIS fails to consider the increased laser hazards during "buddy landing".

• The DEIS fails to consider the features and operating restrictions associated with the safe usage of such systems? The DEIS fails to tell the reader what actions will be taken to protect people from exploring and observing training activities within the Nominal Ocular Hazard Distances? The DEIS fails to tell the reader if the Nominal Ocular Hazard Zones will be posted?

• The DEIS fails to consider impacts of a lasers aimed above the horizon. The DEIS fails to consider impacts of specular reflections -- mirror-like reflections of laser energy from very smooth, flat highly polished surfaces such as mirrors, windows, polished metal and calm standing water -- could occur? The DEIS fails

to consider impacts of actions necessary to remove items which may pose a specular reflection hazard in the paths of passing aircraft and surrounding areas within the Nominal Ocular Hazard Distances established by the DOD?

• Despite the growing body of knowledge about the dangers which lasers represent, DOD laser components that are designed for actual combat or combat training operations or are classified in the interest of national security are exempt from radiation safety and performance standards for laser products (21 CFR 1040.11). The exemption has been in effect since June 1988, when the Food and Drug Administration (FDA) granted a Pentagon request for the exclusion. As FDA Acting Commissioner Sherwin Gardner wrote in his letter of approval:

"It is my understanding that this exemption is necessary because laser products that are used by the military -- require capabilities which do not lend themselves to full compliance with all provisions of the laser standard promulgated under the Food and Drug Act. Your request for exemption acknowledges that in most instances the specified defense mission for which the products are intended could not be fulfilled if total compliance with the standard were required".

• The DEIS fails to provide laser hazard classification information. The Navy publication *Naval Laser and Radiation Hazards Prevention Program* (SPAWAR Instruction 5100.12A) identifies laser classifications; Class 1 are lasers which by inherent design cannot emit radiation levels in excess of the maximum permissible exposure (MPE) limits as defined in 21 CFR. Only a certification label is required. Class 2 lasers are low power lasers and laser systems not considered hazardous for momentary (less than 0.25 seconds) unintentional exposure. Class 3 lasers medium power lasers and laser systems are lasers which cannot produce a hazardous diffuse reflection. Class 4 are high powered lasers and laser system. This includes all lasers in excess of class 3 limitations. The signal word "DANGER" shall be used on all signs and labels associated with the class 4 lasers. Thermal burns to the retina are the greatest hazard to the eye with little recovery possible. Symptoms of corneal damage to the eye by an ultraviolet laser are red, watering eyes and acute pain. Since infrared and ultraviolet lasers cannot be seen by the naked eye, victims of corneal eye damage from lasers may not be aware of the contact with, and injury by, lasers for several hours. The risks of direct and indirect viewing of laser training activities are clearly described in the U.S. Department of the Navy document A-6E Laser Safety Program and Operating Procedures (CNAW-1 INST 3759.4A). All bombing ranges at the Fallon Naval Air Station (NAS) are presently certified for A-6E TRAM laser operation. In describing the safety hazards of A-6E Trum laser use, the report stated: "

The intensity within the beam of the laser exceeds that of the sun, nuclear weapons, burning magnesium or arc lights. Though the laser beam is invisible, the eye is able to focus this energy onto the retina with possibly severe and damaging effects varying from spot blindness, if the direct beam is viewed from a long distance, to complete and total loss of sight, if the direct beam is viewed from a distance very close to the aircraft. This hazard exists within the laser beam, along the aircraft flight path, out to a range of 6.0 nautical miles from the laser aircraft. The distance is increased when binoculars, spotting scopes or any other magnification device (including telescopic cameras) are used."

HAZ-011

• A November 19, 1987, Washington Times report reflects the urgency with which U.S. military officials view this development: 100,000 protective eye goggles able to handle "small mass, low velocity fragments" and lasers will be issued to the troops most likely to settle into battle or global emergencies. Military laser hazards derive from three factors: their high-powered output, their exemption from normal safety regulations and the lack of non-military controls on their use in training in rural U.S. Continued unregulated laser operations at laser ranges throughout the nation and Nevada pose an unacceptable risk for rural residents and visitors. Clearly, control over training activities should be passed to a non-biased agency of the people. DOD should move to bring its ranges into compliance with FAA regulations and limit its training activities to ranges at which acceptable safety margins may be possible. These training activities should not continue at ranges which cannot meet the proper safety margins.

• There are thousands of residences who will be impacted by the *Proposed Improvements to Military Operations Areas in Alaska*. According to the FAA report, *Aviation Noise Effects*, studies indicate that a one decibel change in cumulative noise exposure usually results in a 0.6 to 2.3% decrease in real estate property. The DEIS failed to document the expected decrease in property values for the residences impacted by the proposed actions and the associated loss in tax revenues?

PRO-007

• The DEIS failed to address the following scoping comment: The report *Guidelines for Preparing Environmental Impact Statements on Noise*, Report of Working Group 68, National Academy of Sciences, 1977, found that "permanent changes in acoustical environments should include projections of up to a twenty year period, and the assessment of these environments requires a projection of population and land uses affected by the environments over a twenty year period." What are the noise projections for the next 20 years? What is the expected future populations for the next 20 years? Since there is no time limit on the proposed actions, this information must be analyzed.

PRO-009

• Throughout the information provided the State of Alaska is represented as the only area where these activities can occur. Why were alternatives outside of the state not fully examined? Why, at a time when the Cold War is over, and our nation is experiencing a massive scale down in military budgets, is such a huge expansion being pursued? The failure to examine other alternatives clearly points out that this is a case of "empire building" by individuals in the USAF. These training activities do not stem from any national needs assessment! We note that Alaska is not the only area or state facing massive military airspace or land takings. In the Northeast, North Carolina, Florida, Nevada, New Mexico, Arizona, Idaho and Colorado also face massive withdrawals for military use. Why when the DOD currently controls approximately 50% of the airspace over the U.S. is there a need for more? Why is it that joint use of existing areas was not considered an alternative? Why is it that each branch of the DOD must have their own sandbox to train in? The answer is clearly stated in Project Blue Air on page 2-3, "Airspace has not been a candidate to be managed as a shared resource". Bingo! What other major training areas in the U.S. is the USAF utilizing for training? Findings by the Air Force in the Generic Environmental Impact Statement (GEIS) for Air Force Low Altitude Flying Operations, Preliminary Draft, January 1980, Volume 1 found the USAF, alone, controls 25% of the airspace over the U.S.

PAN-001

• In the words of Colin Powell, "Now the threat has largely disappeared, we simply no longer need such a large Air Defense Force". Today the Cold War is over. The Warsaw Pact is dissolved. The Berlin Wall has crumbled. The Soviet Union has ceased to exist. Entire classes of nuclear weapons are being eliminated, and thousands of tanks, combat vehicles, and artillery pieces are being destroyed. Bases are being closed and the overall size of our military forces is being significantly reduced. So why, in heavens name, are we seeing such massive proposals for expansion.

• Military officials continually claim that "Only if the existing airspace could not be used 'as is' or modified, was the acquisition of new airspace contemplated". The DOD no prepared a national needs assessment, including SUA, not just airspace in the State of Alaska. We believe it is premature for the DOD to pursue any further airspace and/or land takings prior to completion of such a study.

• In the words of Colin Powell, "Now the threat has largely disappeared, we simply no longer need such a large Air Defense Force". Today the Cold War is over. The Warsaw Pact is dissolved. The Berlin Wall has crumbled. The Soviet Union has ceased to exist. Entire classes of nuclear weapons are being eliminated, and thousands of tanks, combat vehicles, and artillery pieces are being destroyed. Bases are being closed and the overall size of our military forces is being significantly reduced. In short, the need for this type of massive expansion is

FORUM / LETTERS

Air Force 'takeover' of public lands must be stopped

By FRANK KERN

ANCHORAGE — Like many Alaskans, I came to this state to escape the rat race in the Lower 48. I was only 18 at the time and also searching for adventure and some sort of identity that connected me with a clean and untrammelled environment.

I enjoyed cross-country skiing, snowshoeing, canoeing and hunting, and I liked to do these away from the noise of civilization. I've been lucky, because over most of the past 24 years I've been able to realize my dreams. Two summers ago, however, this tranquility was shattered when I was in a party canoeing down Birch Creek, a wild and scenic river northwest of Fairbanks. The second day we were on the river, three swampy Air Force jet fighters screamed past us about 400 feet above our canoe. A few minutes later, we heard a series of sonic booms above the nearby hills.

We were to hear these same nerve-rattling booms for the remainder of our trip down the river. So much for peace and quiet.

Again, last summer, while I was canoeing with my son Eric, down another wild and scenic river, the Chukchee, we were awakened by the shrill of Air Force jet fighters directly over our tent.

Later that day, as we were watching some Dall sheep and a porcupine bloom eagle, we were visited by the same jets as they screamed round and round us at about 1,000 feet altitude.

It was also quite evident by the behavior of the animals that we weren't the only ones who did not appreciate the jets' ob-



serious mental levels.

I think my list at them, but this didn't deter them. They were to repeat the same offensive intrusion of our solitude every day twice a day for the rest of our boat trip.

On arriving at Coal Creek I complained to the Park Service about our problem. And in Fairbanks I spoke directly to the superintendent of the Yukon-Charley Preserve. They informed me that the same thing had been occurring on a regular basis for the past three summers, and that they had even documented the low-level, pulse-breaking overflights on video camera. Not to no avail.

They always received reactions from the Air Force, but during the next air exercise the same rules would be broken over and over.

Going a step further, I called the Air Force. And they very politely assured me that this couldn't have happened because their pilots received instructions each morning not to break airspace over national parks and endangered species and other critical wildlife areas. If they did, I was told, the pilots would be severely reprimanded. Well, I chalked these conversations up to doubletalk and went back to the drawing boards.

It wasn't long afterward that I read of Sen. Frank Murkowski's costly attempt last summer to prevent the FAA from enforcing overflight regulations in national parks and other such public-

lands areas, both federal and state.

This I felt to be an arrogant breach of the public confidence. And as he would have it, he did submit in our nation's capital, because Murkowski's mind at last failed.

Last month I learned that what I had thought would be only temporary inconveniences occasioned by military air operations (calling themselves Cope Thunder) would become permanent. In addition, the Military Operations Areas they were temporarily flying in were to be more than doubled in size, and half of them would allow both low-level and supersonic exercises.

By now I was steaming hot and began to fire off inquiries about the Air Force's proposals. One of them I inquired about was the basis for the service's protective classifications for critical wildlife populations. I became even more concerned after reading its quick response. The rationale of Air Force officials for what they termed "Impact Levels" and the wildlife they placed under three of these arbitrary categories were as misleading as that unclassified.

In their so-called research I found the words "speculative" and "subjective" mentioned often in a context that figured importantly in the selection of these classifications and the wildlife species that were to be placed under them. Any proper scientist would consider their report shameful. Speculation should not be a part of any determination which could have such far-reaching consequences for wildlife populations.

Any proper scientist would consider (the Air Force's) report shameful. Speculation should not be a part of any determination which could have such far-reaching consequences for wildlife populations.

What disturbs me even more is the way the U.S. Air Force is going about this expansion of its MDA.

I have not read any public announcements in the media involving public testimony. I certainly hope there have been some announcements since the National Environmental Policy Act (NEPA) requires public participation through seeking reviews and the like before any final decision of this kind is made.

But worse, I haven't seen any discussion of this most important issue by the mainstream press. How unfortunate this is since it represents yet one more cumulative federal incursion on the sovereignty of Alaska. Could it be that we have relegated it to such status because it involves the military, which is perceived to contribute so much to Alaska's economy? It doesn't help that the Air Force feels the takeover of these huge areas is in the interests of our "national security." In spite of the disappearance of both the Cold War and the need for this outdated concept.

I have another serious concern about the public comment period, which ends conveniently on Nov. 20.

The whole issue has been eclipsed by the election. We

this purported on the part of the Air Force in any case, for this reason alone the public comment period for this sweeping decision should be extended.

This problem is much more than an environmental one. It will affect Alaskans from all walks of life, including recreationists, hunters and trappers, Native villagers, and private and commercial pilots. I've discussed the problem with many of them and they agree that our mutual way of life will be altered radically from what it was before the Cope Thunder exercises began in Alaska.

Ultimately our choices boils down either to rolling over and allowing the Air Force to quietly seize many of Alaska's spectacularly beautiful wildlands as its exclusive playground, at a time of no demonstrated national security need for these exercises, or to giving it our best shot to reform their efforts and reassert authority over our public lands. I believe this to be a clarion call to consciousness. Wake up, Alaska!

□ Frank Kern is a public school teacher who has lived in Alaska for a number of years.

BIO-007

PRO-003

PRO-003

unnecessary for the support of U.S. troops. This is clearly being spurred on by the ban of low-level flights in Germany and the increasing pressure in Europe to halt abusive overflights. Apparently the DOD views Alaska as the "Last Frontier" where these abusive actions can occur over the expendable small population.

• In conclusion, we are extremely concerned that U.S. citizens living in sparsely populated areas are regarded as expendable by their own nation and by the very people entrusted to protect their lives and rights as citizens of our nation. That situation is exacerbated by the FAA's continued squandering of our airspace resource. The lack of controls on airspace allocation and use provides no incentive for the military to use airspace efficiently. Without a complete, federal level review of the existing SUA and MTR structure the present situation will continue to deteriorate.

Thank you for the opportunity to comment on this crucial issue. I also wish to note that Major Virgil Hanson has been cooperative and courteous throughout this process. He is to be congratulated.

Sincerely,

Grace Bukowski

Grace Bukowski
Military Airspace & Land Project Director



Anchorage Audubon Society, Inc.

P.O. Box 101161 • Anchorage, Alaska 99510 • (907) 276-3007

November 29, 1994

Major C. Virgil Hanson
611 ASG/ACV
5800 G Street, Ste. 203
Elmhurst AFB, AK 99506-2150

Dear Major Hanson:

The Anchorage Audubon Society appreciates the opportunity to comment on the proposed expansion of Military Operation Areas in Alaska.

Our primary concern is for the wilderness character of the lands that will be affected by overhead jet noise and sonic booms. Our second concern is with the way the airspace is being appropriated: four years of use on a temporary basis effectively sets the baseline of impact measurement at the present time instead of at the point where the usage began.

A limited review of the literature reveals that while overhead aircraft noise is an additional stressor of wild creatures, the effect varies considerably from species to species and is difficult to assess in the field. Since the impacts are cumulative, as stated in your EIS, it stands to reason that field studies to establish baseline data should have been undertaken during the previous 4 years and that the Air Force should be contributing to an ongoing monitoring effort. Many intrusions into the natural world have subtle effects that cannot be detected until irreversible damage has occurred. If existing data is spotty and makes a weak base for predictions, as in the present situation, we feel the proposed user should shoulder the responsibility for improving that knowledge in the most impartial manner possible.

To return to the effect on wilderness values, for which Alaska is justly famous and on which we rely for most of our tourism economy, jetfighter exercises over national parks and preserves are NOT compatible. Complaints have already been received from visitors to Denali Park and Preserve, a place with maximum tourist exposure. Considering the time and expense involved in visiting Alaska, it is understandable that the average visitor feels entitled to a soundscape that harmonizes with the awesome landscapes he is experiencing.

ANCHORAGE AUDUBON SOCIETY IS A CHAPTER OF THE NATIONAL AUDUBON SOCIETY



CUM-001
CUM-002

BIO-007
PRO-014

Major C. Virgil Hanson
Page 2

Frank Kelm, a resident of Marshall, wrote an eloquent account of his experience with jet trainers on wild and scenic rivers in the Interior (Anchorage Daily News Compass, 11-28-94, B8). He complains of violations of minimum altitude - getting "buzzed" - an activity the Air Force seems unwilling or unable to control. Official reassurances that pilots can be busted out of the training program for such behavior doesn't seem to reduce their propensity to play Masters of the Universe when they get the chance. And why should it? The daring and exhilaration of low-level flight is a natural expression of the "right stuff" a jet fighter pilot needs.

We recommend that jet training exercises not be conducted over parks and preserves or wild rivers during the peak visitor and recreation months of mid-May through mid-September. This timing would also avoid considerable stress on migratory bird populations and reduce the potential for bird-aircraft strikes. In addition, it would be best if all flying activity except in the vicinity of take-offs and landings be conducted at higher altitudes above ground level than 5000 feet. I refer to testimony of 17 June 1994 by Rear Admiral Eugene J. Carroll, Jr., U.S. Navy (Ret.) regarding the changing requirements for low level flight operations in modern warfare [attached.]

The military has long been a supportive presence in Alaska and many servicemen choose to make it their home after they leave the services. Let's make sure that in the process of training to defend our nation, we don't degrade the wild and scenic areas that are part of our citizens' spiritual birthright.

Sincerely,

Christine Maack

Christine Maack, President

cc: Bruce Babbitt, Secretary of the Interior
Paul Gallant, Federal Aviation Administration



Center for Defense Information

More Security for Less Money

STATEMENT BY

REAR ADMIRAL EUGENE J. CARROLL, JR., U.S. NAVY (RET.)

DIRECTOR

CENTER FOR DEFENSE INFORMATION

TO THE

SUB-COMMITTEE ON NATIONAL PARKS, FORESTS AND PUBLIC LANDS

OF THE

COMMITTEE ON NATIONAL RESOURCES

U.S. HOUSE OF REPRESENTATIVES

103rd CONGRESS
SECOND SESSION

17 JUNE 1994

Carl R. Le Beau, Director
Center for Defense Information
1500 Massachusetts Avenue, N.W., Washington, D.C. 20005, Telephone (202) 462-0700 FAX (202) 462-0708

James J. Carroll, Jr.
Rear Admiral, USN (Ret.)
Director, Center for Defense Information
1500 Massachusetts Avenue, N.W., Washington, D.C. 20005, Telephone (202) 462-0700 FAX (202) 462-0708

James A. O'Connor
Colonel, USAF (Ret.)
Director, Center for Defense Information
1500 Massachusetts Avenue, N.W., Washington, D.C. 20005, Telephone (202) 462-0700 FAX (202) 462-0708

AN Anchorage Daily News Monday, November 28, 1994

FORUM / LETTERS

Air Force 'takeover' of public lands must be stopped

By FRANK KERN

MARSHALL. — Like many Alaskans, I came to this state to escape the rat race in the Lower 48. I was only 18 at the time and also searching for adventure and some sort of identity that connected me with a clean and untamed environment.

I enjoyed cross-country skiing, snowboarding, canoeing and hunting, and I liked to be there every day from the noise of civilization. I've been lucky, because ever since the past 24 years I've been able to realize my dream.

Two summers ago, however, this tranquility was shattered when I was in a party canoeing down Birch Creek, a Wild and Scenic River northwest of Fairbanks. The second day we were on the river, three wing-wing Air Force jet fighters screamed past us about 600 feet above our canoes. A few minutes later, we heard a series of sonic booms above the nearby hills.

We were to hear these same nerve-rattling booms for the remainder of our trip down the river. So much for peace and quiet.

Again, last summer, while I was canoeing with my son, Eric, down another Wild and Scenic River, the Charlie, we were awakened by the shriek of Air Force jet fighters directly over our heads.

Later that day, as we were watching some Dall sheep and a peregrine falcon soar, we were visited by the same jets as they screamed round and round us at about 1,500 feet altitude.

It was also quite evident by the behavior of the animals that we weren't the only ones who did not appreciate the jets' in-

COMPASS

terfering with the birds' natural behavior.

I should say that, but this didn't deter them. They were to repeat the same offensive intrusion of our solitude every day twice a day for the rest of our float trip.

On arriving at Coal Creek I complained to the Park Service about our problem. And in Fairbanks I spoke directly to the superintendent of the Yukon-Charley Preserve. They informed me that the same thing had been occurring on a regular basis for the past three summers, and that they had even documented the low-level rule-breaking overflights on video cameras. But to no avail.

They always received reassurances from the Air Force, but during the next air exercise the same rules would be broken over and over.

Going a step further, I called the Air Force. And they very politely assured me that this couldn't have happened because their pilots received instructions each morning not to break airspace over national parks and endangered species and other critical wildlife areas. If they did, I was told, the pilots would be severely reprimanded. Well, I called those corrections up to doubletalk and went back to the drawing board.

It wasn't long afterward that I read of Sen. Frank Murkowski's weekly attempt last summer to prevent the FAA from enforcing overflight regulations in national parks and other such public do-

main areas, both federal and state.

This I felt to be an arrogant breach of the public confidence, and, as luck would have it, so did others in our nation's capital, because Murkowski's smug attack failed.

Last month I learned that what I had thought would be only temporary incursions were now being made permanent. In addition, the Military Operations Areas they were temporarily flying in were to be more than doubled in size, and half of them would allow both low-level and supersonic exercise.

By now I was screaming hot and began to fire off inquiries about the Air Force's proposals. One of them I inquired about was the basis for the service's selective classifications for critical wildlife populations. I became even more concerned after reading its quick response. The rationale of Air Force officials for what they termed "Target Levels" and the wildlife they placed under three of these arbitrary categories were so tentative that they qualified as nothing less than mendacious.

In their so-called research I found the words "speculative" and "subjective" mentioned often in a context that figured importantly in the selection of these classifications and the wildlife species that were to be placed under them. Any proper scientist would consider their report shameful. Speculations should not be a part of any determination which could have such far-reaching consequences for wildlife populations.

Any proper scientist would consider (the Air Force's) report shameful. Speculation should not be a part of any determination which could have such far-reaching consequences for wildlife populations.

What disturbs me even more is the way the U.S. Air Force is going about this expansion of its MOAs.

I have not read any public announcements in the media inviting public testimony. I certainly hope there have been announcements since the National Environmental Policy Act (NEPA) requires public participation through scoping sessions and the like before any final decision of this kind is made.

But worse, I haven't seen any discussion of this most important issue by the mainstream press. How unfortunate this is since it represents yet one more cumulative federal incursion on the sovereignty of Alaska. Could it be that we have relegated it to such status because it involves the military, which is perceived to contribute so much to Alaska's economy? It doesn't help that the Air Force took the takeover of these huge areas in the interests of our "national security." In spite of the disappearance of both the Cold War and the need for this outdated concept.

I have another serious concern about the public comment period, which ends conveniently on Nov. 30.

The whole issue has been eclipsed by the elections. Was

this purposeful on the part of the Air Force? In any case, for this reason alone the public comment period for this scoping session should be extended.

This problem is much more than an environmental one. It will affect Alaskans from all walks of life, including recreational hunters, anglers and trappers, Native villagers, and private and commercial pilots. I've discussed the problem with many of these folks and they agree that our mutual way of life will be altered irrevocably from what it was before the Cope Thunder exercise began in Alaska.

Ultimately our choices boils down either to rolling over and allowing the Air Force to utterly wipe many of Alaska's incomparably beautiful wildlands as its exclusive playground, or at a time of no demonstrated national security need for these exercises, or to giving it our best shot to reject their efforts and reassert authority over our public lands. I believe this to be a choice call to conscience. Wake up, Alaska!

□ Frank Kern is a public school teacher who has lived in Marshall for a number of years.

Because highly qualified witnesses will testify in this hearing concerning environmental, cultural and land use issues, I will confine my statement to this question: Is there a valid military requirement for additional bombing ranges and low level flight routes to support training for the 366th Air Interdiction Composite Wing at Mountain Home Air Base?

The first relevant fact is that there are existing range facilities in Utah, Nevada and Oregon within 30 minutes flying time of Mountain Home that satisfy all Wing training requirements.

There is nothing unique about training for a Composite Wing. Its tactical and heavy bomber aircraft conduct attack missions; its fighter aircraft provide air cover for the attack planes; its refueling aircraft pump fuel to the fighters and bombers -- nothing special here.

When coordinated exercises involving all of the aircraft are conducted, time and distance to exercise targets is desirable for realistic training because in the real world most such missions will involve strikes several hundred miles from the support bases. If Owyhee targets were available the participating aircraft would first have to fly away from them for rendezvous, refueling and target approach by the strike elements in order to practice realistically for wartime missions. Why not use the time and space between Mountain Home and existing range facilities for these phases of mission training?

As a separate observation, three years before there was a Composite Wing the Air Force wanted to expand Saylor Creek range facilities 1500 percent. The commissioning of the 366th Wing is simply an expedient excuse to pursue expansion under a new guise, in a new locale.

With respect to additional low level training routes, the question to be asked is why continue low level training at all? I have flown hundreds of hours at low level when it was justified as necessary to penetrate heavily defended Soviet airspace with single aircraft on nuclear delivery missions. That justification no longer exists.

For conventional operations, low level flight was sometimes used to stay out of Surface-to-Air-Missile (SAM) zones. As early as Vietnam, however, it was learned that low level operations placed attack aircraft in jeopardy from hand held automatic weapons and mobile, high rate of fire light anti-aircraft batteries. Losses to these weapons became prohibitive and low level attacks in defended areas were discontinued.

William D. Arvey
P.O. Box 81195
Fairbanks, AK
99708

November 25, 1994

Major G. Virgil Hanson
Chief, Environmental Management
United States Air Force
611 ASQ/OLCV
5800 G St Ste 203
Elmendorf AFB AK
99506-2150

Dear Major Hanson:

I wish to have the following comments considered in reference to the DEIS-Alaska Military Operations Areas (MOA's).

The Air Force proposes to expand existing military airspace in Alaska by some 65,000 square miles, an area that would encompass several states in the lower 48 states. Plans call for the conversion of seven existing MOAs to permanent MOAs, modification of five existing MOAs, creation of two new MOAs, conducting supersonic aircraft operation in nine MOAs, the standardization of floors for supersonic operation in three existing MOAs at 5,000 feet AGL, the conduct of routine and joint/combined flying training with Alaska-based and deployed aircraft and the conduct of up to six Major Flying Exercises (MFEs) per year involving up to 100 aircraft in a maximum of 200 sorties per MFE-day, using proposed MOA structure and defining air-to-ground weapons ranges.

The added airspace and proposed scope of military operations within them will add substantially to the impacts from such activities that occur under present use levels, considered by many to be significant in the Interior of Alaska. My objections to these proposals are along four lines:

PAN-001

1. The DEIS inadequately demonstrates a need for such a drastic enlargement of military airspace. In addition the statement treats each of the six military activities in the associated airspace as if each was an independent impact, instead of considering that there may be cumulative effects from all these proposed activities.

BIO-007

2. Many wildlife species are sensitive to the noise and disruption caused by low flying high speed jet aircraft. Such species as moose, caribou, Dall sheep, and trumpeter swans are vulnerable during certain critical life stages such as during nesting and calving.

SAF-005

3. Increased military flights at low altitudes will create greater safety hazards for civilian aircraft utilizing the airspace for various purposes. Despite all assurances, close encounters of aircraft have occurred, and will occur in greater frequency and perhaps severity if the proposals are adopted. As one who travels frequently in rural Alaska by small plane, the prospect of sharing airspace with even more high performance military planes is not a pleasant one.

4. Finally, I am deeply concerned that more of our state lands and airspace not be reserved for military activities because I and many others view them as incompatible with other uses by both people and animals. Many valleys and rivers of remote Alaska now reverberate daily during parts of the year at least with shock waves from passing jet aircraft presumably on training maneuvers.

Should the Air Force proposal be adopted, I feel that certain additional restrictions on activities are necessary to minimize impacts. I suggest that major consideration be given to placing all the expanded areas off limits during the open water season, from May until mid-October. That is the time period of most intense human use, and in addition would bracket the time period of most serious vulnerability of wildlife as well.

I thank you for the opportunity to add these comments to the record, and I sincerely hope that you will take into account the concerns of people who reside in this area.

Sincerely,



LAKE LOUISE, SUSITNA, AND TYONE LAKES
Lake Louise Community

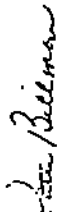
November 28, 1994

G. Vicgil Hanson, Major, USAF
Chief, Environmental Management
G11 A&C/LCV
5800 G. Street, Suite 203
Eldorado AFB, AL 36026-2150

RE: Draft Alaska MOA EIS

Please find enclosed a copy of a letter sent to Lake Louise area residents and property owners in regards to the Draft Alaska MOA EIS. We asked people to respond and I have enclosed those replies. We are unanimously against a Permanent FOX 1 MOA.

Sincerely,



Patti Billman
for Lake Louise Community

Portion of 113 signature
+25
138

HC01 Box 1706
Glennallen, Alaska 99588
907 822-5566

LAKE LOUISE, SUSITNA & TYONE LAKES

Lake Louise Community

October 25, 1994

Dear Community Member:

Many of the residents and property owners of the Lake Louise area, as well as the Copper River Valley Chamber of Commerce, have decided to go on record as -

- being against the Air Force's attempt to make a Permanent Military Flight Training Area (MOA) north of Lake Louise, and
- supporting the "No Action Alternatives" to keep the area as a Temporary Training Area (TMOA).

This decision has come in response to a proposal by the Air Force to make a large area north of Lake Louise into a permanent training area, called FOX 1. The boundaries of FOX 1 stretch in the south between Susitna and Tyone lakes over to south-west of Watna lake. In the east from north of Crosswind lake to Donnelly cutting across north of the Alaska Range.

The military wants to change FOX 1's training status to "permanent" so they can conduct fighter training on a regular basis without notifying or filing plans in advance with any government agencies. The change in status would allow many more flights (an average of 15.8 sorties daily or approximately 316 sorties per month) than under the current "temporary" system. In addition, the permanent status would authorize super sonic operations at altitudes of 5,000 feet AGL. Supervisory operations are not authorized under FOX 1's temporary status which is in effect now.

Community residents and property owners are worried about the effects the use of super sonic fighter planes, engaged in mock combat, would have on the wildlife habitats in this area. In particular, the trumpeter swans nesting sites and the Nelchina and Delta caribou herds.

We are also concerned about the changes it may have to our quality of life and the effect increased maneuvers would have on private pilots and air taxi operators who use the area extensively for hunting, fishing, wildlife photography, ice fishing, and sightseeing.

Although the Air Force has said it would not use the area for two weeks during hunting season, we note that the hunting season actually stretches from the 10th of August through the 20th of September and for the winter hunt from the 1st of January through the 31st of March.

Also, the trumpeter swan nesting period, from April 1 through August 31, could be permanently disturbed by the increased noise levels and supersonic booms.

Although we are sympathetic to the Air Force's needs, the present system of FOX 1 as a temporary training area seems to be working. A change to an unregulated permanent status might have serious biological, physiological and economic consequences for the Lake Louise area and the entire Copper River Basin.

Our letters must be submitted to the Air Force before November 30. If you agree with our concerns and would like to see FOX 1 stay a "Temporary Military Training Area", please return the bottom portion with your signature in the self-addressed envelope to us ASAP.

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Donald S. Lohak

I oppose any use of this area as an MOA, now or in the future, five or six years from now. The AF tried to establish

BIO-007

BIO-009

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AIR-008

MIT-028

BIO-014

an MOA in this very area. I authored several letters in opposition to this proposal. Due to the opposition the AF was forced to back away & withdraw the proposal.

I oppose this MOA or even the TMOA for the same reasons that I had in the past.

① The limited use of this area by private pilots. Some who use it as a source of lonely bad.

② The adverse effect that Los Angeles has on the wild life in this area. Not a few

- None
- Caribou
- Swan
- Wolves
- Wolves
- Beaver

BIO-007

and the list will go on + on.

Experience: 1994 5-14 Sept.

While hunting on the Mackinac river an F15 flew over me at an estimated 200 feet. The noise and shock was enough to scare the socks off of me. There were several other F15 over flights at this altitude during this period.

So much for the 5000 ft altitude limit and no training during hunting season.

Donald S. Lohak

AIR-016

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: M. D. W. [Signature]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]
Dave & Jack Hardy

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]
Thomas R. Stewart

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: David J. Medford

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Edward G. Holman

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Richard J. [unclear]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: William C. Deeser 11/9/99

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [unclear]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: John B. McKinnon

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: T. H. [unclear]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [unclear]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: James E. Brown
Shenell A. Brown

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: George S. [unclear]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: *J. E. Dygert* 11/11/14

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: *Paul E. Meenan*

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: *Gregory*

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: *Lyle H. Thompson*

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: *William M. Boyd*

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: *Arley H. Johnston*

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: *J. Mark H. Gentry*

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: *Robert E. Lyon*

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: *David L. Ponder*

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: *Tammy O. Toffland*
TAMMY O. TOFFLAND

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Rebecca Barbara Kelly

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Marion d. Stark

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: A. E. Ray

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Donald L. Crum

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: George Eslinger

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Nelson Foster

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: T. J. McConnell

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]

Donald G. Shovel
POB 8803
Murren, AL
795 4403
We don't want the
AIA Foxe 1000s Bank
land. The 1000s Bank
is not a wildlife
habitat. It is a
habitat for the
foxes.

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Jeanne H. Parker

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Charley H. Applelin

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Rae Hordine

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Julia Plummer
11-7-94

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Stephen L. Hordine

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: David K. Cook

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: James F. Elder

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: W. H. H. H.

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Donald E. Stanch
#601 Box 1917
Germantown, AL 36388

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Sheryl L. Carter

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Kaymond Curtis
Jan Curtis

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Elean Conroy

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Jeffrey H. Hesse

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Doug Dotsifer

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Mark R. Hesse

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: David L. Hesse

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Donald H. Hesse

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Robert J. Hesse

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Richard J. Hesse
C. M. Hesse

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Richard J. Hesse

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Don C. McLean

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Alfred Dygala

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Joel W. Hubbard 5 Nov 94
Alvin Hubbard Nov. 5, 1994

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Charles P. Miller

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Donna L. Dwyer

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Shirley Steward

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]
STEPHEN E. BRANCHFLOWER
P.O. BOX 100222
ANCHORAGE, AK 99510-0222

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]
David Moore

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Quinn M. Otter

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Robert T. Beach 11 NOV 94

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Melvin H. Hyman 11/10/94
M. DAVID HIGBIE

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Kay Ralston 11/14/94

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Selma E. Turing

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Glenn A. Danner

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Robert A. Smith

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Robert A. Smith

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Mr. & Mrs. James E. Smith

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Mr. Danner

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Robert D. Holt
4075 4-1 844-2 Lake Austin

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Robert Holt

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Jessie L. Little
Kenneth Britts

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Alan B. Stinson
Haci Box 1706
GLENN ALLEN, AK. 99588

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Robert Stinson
Haci Box 1703
GLENN ALLEN AK
99588

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Patricia Sullivan
Haci Box 1706
GLENN ALLEN, AK. 99588

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Patricia Sullivan
Haci Box 1706
GLENN ALLEN AK 99588

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Patricia Sullivan
(Pat Brady)

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Paul Stinson

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Carol Stinson

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Barbara S. Hunsicker

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Andrew D. Bessie

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Chris M. Webb

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Joe S. Smith

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: William L. Fulk

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: John A. Glynn

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: William J. Bessie

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Margaret K. Ketchick

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Charles A. Ketchick

I am against the Permanent FOX I MOA status and support the "No Action Alternative" to keep FOX I a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: William J. Bessie

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Don Stiles

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Pat Karella
Charles D. Karella

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: [Signature]

LAKE LOUISE, SUSITNA, AND TYONE LAKES
Lake Louise Community

November 28, 1994

G. Virgil Hanson, Major, USAR
Chief, Environmental Management
611 AGC/LGV
5800 G. Street, Suite 203
Blaindorf AFB, Ak. 99506-2150

RE: Draft Alaska MOA EIS

Please find enclosed a copy of a letter sent to Lake Louise area residents and property owners in regards to the Draft Alaska MOA EIS. We asked people to respond and I have enclosed those replies. We are unanimously against a Permanent FOX 1 MOA.

Sincerely,

Patti Billman

Patti Billman
for Lake Louise Community

12-2-94 LAKE LOUISE COMMUNITY

MAJOR HANSON -

PLEASE INCLUDED THESE RESPONSES TO
THE DRAFT ALASKA MOA EIS - THEY ARRIVED
IN TODAY'S MAIL SO I AM FAXING THEM TO
YOU. THERE ARE 05 ADDITIONAL RESPONSES
AGAINST A PERMANENT FOX 1 MOA.
THANK YOU,

Patti Billman
HCO1 Box 1706
GLENNALLEY, AK. 99588
(907) 822-5566

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: *Pat C. [unclear]*

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: *William A. [unclear]*

William A. [unclear] HARGATT STANLEY

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: John S. Simpson

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Charles J. Smith

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: John S. Smith

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Paul S. Darnell
Edith A. Darnell

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Joseph R. Murray

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Edith A. Darnell

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Paul S. Darnell

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Edith A. Darnell

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Signature: John S. Smith

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: James R. Darnell

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Edith A. Darnell

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Edith A. Darnell

GAILLE J. ANDY OLSEN
1804 26th AVE. NE
SEATTLE, WA. 98155

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Charles E. McHenry

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Robert M. Garvey

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Michael A. Bost

Michael O Butcher

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Richard A. Bost

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Michael A. Bost

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Charles E. McHenry

Don got a accident but have hunted this area for 40 to 50 years; and am concerned as to the effect on the wild game.

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Mark Vial

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: David H. Smith

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: James V. Hill

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: Robert A. Bost

I am against the Permanent FOX 1 MOA status and support the "No Action Alternative" to keep FOX 1 a temporary training area to preserve our precious wildlife habitat and quality of life in this region.

Signature: David H. Smith

From: S. Quirin
4140 Owl Drive
Edinburg, TX 79425

Chief, Operations Division
 11th Air Force
 ATTN: Major Siler
 5800 G Street, Suite 102
 Elmendorf AFB, AK 99506-2130

(907) 552-1807

Comments regarding proposed Alaska Military Operations Areas:

I am adamantly opposed to the military establishing a permanent MOA in the areas proposed, or any other area in Alaska. The MOA would be a hazard to commercial and private aircraft operations. (YES, I TOO HAVE BEEN STRAFED BY MILITARY AIRCRAFT) As you know, travel and transport of supplies by aircraft is imperative in remote areas.

The MOA would have a major detrimental effect on remote villages and settlements. Unless you have spent several months subjected to the unerving noise pollution, you cannot begin to imagine how it adversely affects humans.

The MOA would also be devastating to wildlife in the area, and as usual USAF propaganda refuses to acknowledge this fact.

Furthermore, considering the fact that there is absolutely no log cut basis for low level operations, there is clearly no reason to conduct such training maneuvers!

If the MOA supposedly creates such minimal impact, try conducting these operations at Prudhoe Bay and see how long the oil companies will tolerate its presence.

Alaska does NOT belong to the military. Most Alaskans prefer to promote ecotourism, NOT military operations. The military has a long history of environmental abuse in our state.

We do NOT want another permanent or temporary MOA in our state. We do not want further expansion of military bases in our state.

Send copies of your comments to the following people by November 3rd:

FAA, Region Management Branch U.S. Department of the Interior Honorable Ted Stevens
 ATTN: David E. AAL-33 Deborah Miller, Special Assistant to Federal Building
 700 East 7th Avenue the Secretary of the Interior 101 - 12th Avenue, Box 4
 Anchorage, AK 99513-7357 Anchorage, AK 99501 Palmdale, AK 99701-6256

SAF-005

AIR-005

BIO-007

PAN-001

ALT-002

I resent the USAF's greedy omnipotent attitude. I also feel comments and proposals from our Senators to manipulate constituents to support the USAF's demonstrable monopolization of more of our state to be despicable.

Senator Stevens has disappointed me by telling his constituency to not oppose this MOA, or the Military will leave. Start packing boys, and take your toys to Washington. Conduct your operations while our insightful senators decide whether or not it has any detrimental effect!

To NOT advise Alaskans of the MOA being considered until shortly before the deadline for public comment, and for our own senators to establish priorities which clearly indicate that the military has more right to predicate the use of our land than native inhabitants and other residents is truly unconscionable!



PRO-003

Nancy Hoyt
1119 Northwood
Fairbanks, Alaska 99712
November 27, 1994

Chief, Operations Division
11th Air Force
ATTN: Major Siter
5800 G Street, Suite 102
Elmendorf AFB, Alaska 99506-2130

Major Siter:

I am writing to express my vehement opposition to your proposed expansion of MOAs and the upgrade of current temporary MOAs to permanent status. My concerns are these:

- This is yet another incidence of increased federal control over Alaskan lands. The areas proposed impact on lands only recently handed over to the state. How many prospective landowners would like to buy land that will be subject to frequent low-level overflights and supersonic activity? What if these new landowners are pilots who would like to fly to/from their land? Alaskans who have homesteaded or purchased property in more remote areas now find that the peace and quiet they sought has been destroyed by aerial maneuvers. I know that I would think long and hard about buying any property in interior Alaska without checking its proximity to air force operations.

- All of the Bush pilots I have talked to are concerned about air traffic safety and have described "near misses" that have frightened them and their passengers. All of them have their own particular horror story to tell, so it seems hard to believe that there isn't at least some credibility to their statements. As you know, air travel is the only way most villagers can reach their homes, and your proposed expansion covers most of interior Alaska. Will Bush Alaskans be able to fly safely to/from their homes without unnecessary risks or restrictions? What about hunters and guides who transport themselves/clients to remote hunting/fishing

LAN-010

SAF-005
AIR-008

SAF-005
AIR-008

areas? I have heard pilots tell of taking off from a sandbar and only barely missing a low-flying jet that was not perceivable until it flew by. Other pilots describe being played with by air force jets that "lock onto" them or just try to see how close they can get before veering off. Given the increased air activity during hunting season, would it be possible for the air force to curtail some of its activities during that time of the year?

Air travel is the only way most Alaskans or tourists can experience the more remote parts of Alaska, and I cannot believe that your proposed expansion will not restrict where we can go.

- The EIS you submitted seemed incomplete at best. At the very least I hope you will consider restricting air activity over the northern foothills of the Alaska Range and through the Alaska Range during the annual migration of the cranes. I am also concerned about young dall sheep before they are strong enough to move safely with their mothers. Hunters have reported observing young sheep taking falls in attempts to follow their mothers who were startled by jets flying low through mountainous areas. Why not reduce your activities in mountainous areas during the times when young sheep are most vulnerable? Birds in general are more impacted by aircraft activity than are mammals. Geese may abandon their nests when harassed. I hope that you will take these concerns to heart when planning where and when to schedule exercises.

BIO-005

BIO-014

- The proposed expansions will impact almost all of the wilderness recreational areas of interior Alaska. As such they will affect hunters, trappers, guides, subsistence users, hikers, fishermen, bicyclists - people who either make their living off the land, or those who just want to enjoy what Alaska uniquely has to offer. During the past two years I have not had one outdoor experience that hasn't been interrupted by the unexpected appearance of low-flying jets. It might be forgivable if it didn't happen all the time. On a daily basis during the summer (at least) jets fly low right over my house to and from their exercises. That's a daily interruption of the peace and quiet I moved out of town and away from the lower 48 to appreciate. And now I hear that you are planning to significantly increase the number and size of your operations.

OTH-014

PAN-001

- Do you really need an area of this size to accommodate your needs?
- Why is there a need for low-level flight training when it has been proven (as recently as the Gulf War) that your aircraft are placed at an unreasonably greater risk from enemy attack or accident than from other forms of maneuver?

ALT-002

- Isn't there a less expensive area in which to operate than interior Alaska? As a fiscal conservative I find it hard to believe that the taxpayer does not underwrite some of the most costly flight training possible when they are conducted up here.

In conclusion, I hope that you will seriously reconsider your proposal for expanding Air Force MOAs in our area.

Sincerely,

Nancy Hoof

CC: Ted Stevens
FAA
USDOJ
FNSB



Fairbanks North Star Borough Assembly

209 Pioneer Road P.O. Box 71267 Fairbanks, Alaska 99707-1267 907/459-1000 Fax 907/459-1224

November 30, 1994

Major Virgil Hanson
United States Air Force
611th ASGALGV
Eggenfeldt AFB, Alaska 99600

Mr. Derril Berg, ALL-535
Federal Aviation Administration
System Management Branch
700 E. Savanah Avenue
Anchorage, Alaska 99513-7557

BY FAX; ORIGINAL MAILED

Dear Sirs:

The Fairbanks North Star Borough Assembly adopted Resolution No. 94-084, relating to approval of Proposed Military Operations Areas in the Fairbanks Area.

The Borough respectfully requests and urges the United States Air Force and the Federal Aviation Agency to seriously consider the recommendations contained in Appendix A and to further consider the public testimony expressed by borough residents on adverse impacts of low altitude aircraft on their Alaskan lifestyles before making any final decisions relating to the proposed restructuring of the Special Use Airspace in Alaska.

Enclosed is a copy of the above mentioned resolution, and copies of the November 29, 1994, Special Assembly Meeting tapes.

Respectfully yours,

Hank Babin

Hank Babin, Presiding Officer
FNSB Assembly

Enclosure:
Resolution No. 94-084
Special Assembly Meeting Tapes

By: Dan LaSola
Bob Logan
Introduced: 11/29/94
Amended: 11/29/94
Adopted: 11/29/94

RESOLUTION NO. 94-084

A RESOLUTION BY THE FAIRBANKS NORTH STAR BOROUGH ASSEMBLY EXPRESSING CONCERNS AND RECOMMENDATIONS TO THE UNITED STATES AIR FORCE AND THE FEDERAL AVIATION ADMINISTRATION RELATING TO APPROVAL OF PROPOSED MILITARY OPERATIONS AREAS IN THE FAIRBANKS AREA.

WHEREAS; the Air Force has proposed major restructuring of their Special Use Airspace in Alaska; and

WHEREAS; a Draft Environmental Impact Statement (EIS) has been produced which describes the proposed changes and, one of the major issues identified in the document, is a concern for aviation safety which involves the potential hazards of mixing high speed military aircraft operations with slower civil aircraft, and

WHEREAS, the principal concern of the aviation community is the increased risk of mid-air collisions resulting from (1) routine training exercises of Alaska based military aircraft which occurs on a year-round basis and (2) the greatly increased activity which occurs during Major Flying Exercises. High-speed military aircraft, often flying at low level and close to terrain to avoid detection, are a definite threat to small aircraft operating in the same area; and

WHEREAS, there are other concerns of the general and commercial aviation community including:

<i>AIR-008</i>	1. There is significant commercial air traffic between Fairbanks, Eagle, Tok, Delta Junction, Chicken, Boundary, Northway, Talin, Chisana, Healy Lake, and Dawson City, Yukon;
<i>MIT-017</i>	2. While there is no currently approved airway between Fairbanks and Eagle or Dawson, it is clear that rapidly evolving GPS technology and better radar coverage will probably make this a possibility in the near future;
<i>MIT-019</i>	3. VFR Corridors. In contrast to Instrument operations, the majority of civil users fly under visual flight rules. VFR traffic tends to concentrate much closer to the surface along valleys and low routes through high terrain. During times of low cloud conditions or poor visibility, traffic tends to concentrate along selected routes such as the rivers or highways that run in the valley bottoms. The major route in this region runs from Fairbanks along the Richardson and Alaska Highways to Northway, and into Canada. This route receives heavy use in the summer and by student pilots on solo cross country training flights;
<i>SAF-005</i>	4. During the hunting season there is an increase in general aviation traffic. Many of the aircraft used in hunting expeditions land on lakes, home-made air strips, sand bars, and clearings and are difficult to "see and avoid" because of weather conditions, terrain and off-airport activities;
<i>MIT-022</i>	5. During the May through September period, State and Federal agencies use aircraft in the proposed airspace to conduct game surveys, law enforcement, and rescue operations; 6. During holidays, especially in the summer months, there is increased general aviation and recreational flying and many pilots from the "Lower-48" flying in unaccustomed and unfamiliar areas;

PASSED AND APPROVED THIS 29TH DAY OF NOVEMBER, 1994

7. While the areas of special use airspace requested by the Air Force for training are vast, the areas actually occupied by groups of aircraft at any one time is relatively small. Channels for communication and continued dialog between the Air Force and the civilian aviation communities need to be enhanced and maintained, especially after permanent changes are made to the airspace; and

WHEREAS, General and Commercial aviation has always been a viable asset to the people of Alaska. With the lack of significant surface travel corridors and the great distances between municipalities, aircraft have been and are the most logical and economical method of travel in the State. Aviation allows the people of Alaska and their visitors to see, enjoy, and exist in this vast state. It is also one of the economic mainstays of the state and its people. The only way that aviation will continue to play a key role in the settlement, development, and continued growth of Alaska is through safe and cooperative aviation management. By the same token, it is recognized that training of the type the Air Force is contemplating, is essential to the continued superiority of our military pilots and crews and that Alaska is an ideal area to conduct that type of training.

NOW, THEREFORE, BE IT RESOLVED that the Fairbanks North Star Borough respectfully requests and urges the United States Air Force and the Federal Aviation Agency to seriously consider the recommendations contained in Appendix A, and to further consider the public testimony expressed by borough residents on adverse impacts of low altitude aircraft on their Alaskan lifestyles before making any final decisions relating to the proposed restructuring of the Special Use Airspace in Alaska.

BE IT FURTHER RESOLVED that copies of this resolution shall be sent to Major Virgil Hanson, United States Air Force; Darril Bergt, Federal Aviation Administration; and all members of the Alaska Congressional Delegation in congress.

Hank Bartos

Hank Bartos
Presiding Officer

ATTEST:

Mona Lisa Drexler

Mona Lisa Drexler, CMCIAAE
Municipal Borough Clerk

Ayes: Logan, Thentien, Hackenmillier, hove, St. John, LaSota, Chizmar, Kilgore and Bartos
Noes: None

APPENDIX A

RECOMMENDATIONS OF THE FAIRBANKS NORTH STAR BOROUGH

1. The existing IFR Victor 444 airway which connects Fairbanks, Delta Junction, Northway and extends to Whitehorse, must remain intact and protected to insure safe IFR flying between Fairbanks, Whitehorse, and the rest of the continental United States.

MIT-016

2. The FAA and the Air Force should immediately start to develop an airway route from Fairbanks direct to Eagle for future use with GPS area navigation. The route should be established as a "no fly corridor" for military aircraft except those flying along the route. Establishing this route would provide protection to VFR traffic traveling from Fairbanks to Eagle or Dawson and would provide a significant degree of safety for both military and civilian flyers.

MIT-017

3. The prospect of future GPS approaches to other airports in the area is a significant development. The impact of the MOAs on future IFR operations should be carefully considered to avoid precluding access to these areas.

MIT-018

4. A low level VFR corridor should be established along the Richardson and Alaska Highways from Fairbanks to Delta and Northway and from Delta through the Alaska Range. The corridor should be five miles wide with the Richardson Highway as its north and east boundary and should extend from the surface to 2,000 feet above ground. Military aircraft should not be permitted in this corridor.

MIT-019

5. To protect VFR operations, additional routes from Fairbanks to Central and Circle City along the Steese Highway, from Circle City to Eagle and Dawson, along the Yukon river, and from Northway to Chisana (south) and Chicken, Eagle and Boundary (north) should be established.

*MIT-020**MIT-021*

6. The Trans-Alaska Pipeline should be protected by a low level VFR corridor three miles wide, centered on the oil line extending to 1,500 feet above the surface. Military aircraft should be excluded from this corridor.

MIT-022

7. During certain times of the year, general aviation traffic increases across large portions of the Interior. Corridors aren't appropriate due to the disbursed nature of these operations. These times include Hunting seasons, fish and game surveys and recreational flying. No Major Flying Exercises (MFE's) should be scheduled between August 8 and September 30 annually to protect general aviation during hunting season. During this time, the Air Force should restrict all routine flying to no lower than 3,000 feet above ground level during the hunting season. Also, the Air Force should not conduct any MFE's during the time period one week before and one week after the July 4th holiday.

AIR-007

8. The Air Force should aggressively pursue improvement of their VHF communications capability through the proposed Military Operations Areas including Remote Communications Outlets disbursed throughout the MOA's to ensure adequate year round coverage, and a coordinated and well Informed Range Control capability which can provide specific, real-time information on the location and direction of flight of military aircraft. Tape recorded messages broadcast on separate frequencies alerting pilots to military traffic concentrations along major air traffic corridors should be available to all pilots.

MIT-023

A toll-free number should be made available to civilian pilots so they can obtain up-to-date information about military activity schedules. The phone lines would be direct to the Range Control personnel.

MIT-024

The military should explore the use of AWACS aircraft to provide both enhanced radar coverage and VHF communications during Major Flying Exercises.

9. The Air Force should immediately establish and facilitate an aviation advisory committee to provide coordination and communication between the general aviation and military aviation communities. This committee should meet periodically to assess aviation safety issues and to make recommendations to both the Air Force and the FAA which are intended to improve aviation safety within military air space.

MIT-025

10. The Air Force should maintain an "open door" policy with the aviation community. The toll-free number to receive input from civilians is a good step for civilian involvement and should be made permanent with documented input, serious consideration of suggestions and timely responses.

MIT-033

11. The Air Force should take whatever steps necessary to modify the boundaries of Yukon "A" in order to mitigate the negative effects of overflights over developed areas of the borough such as the upper portions of Chena Hot Springs Road, including the Two Rivers area as well as the Chena River Recreation area. Further, the western boundary of Buffalo should be moved east a sufficient amount to insure that residents of the developed areas of the Salcha River do not experience negative impacts from Air Force overflights over the Salcha River corridor.

OTH-014

EIS Team
Major C. Virgil Hanson
Chief, Environmental Management
611 ASG/LGV
5800 G Street, Suite 203
Elmendorf AFB, AK 99506

To whom it may concern:

I am writing to comment on the draft EIS on the Alaska Military Operations Areas.

To the best of my understanding, the legislative purpose behind the requirement that an Environmental Impact Statement (EIS) be completed is to identify both the adverse impacts from the proposed action and the appropriate mitigation activities to off-set any impacts. Since the draft EIS indicates that data showing the effect increased overflight activity has on the birds and other wildlife does not exist (or has not been gathered) the draft EIS does not comply with the statute or the regulations. Until such time as the data is available and can be evaluated and, if adverse, specific related mitigation steps proposed, you have not met your obligations and may not proceed further with the proposal.

BIO-007
PRO-014

As a frequent user of a cabin on the Tokositna River and a backpacker in the Talkeetna Mountains, I know first hand the impact sonic booms and military overflights have on my enjoyment of the wilderness. They simply destroy the experience because the noise is so very intrusive.

In my opinion, the proposed activities are not compatible with wildlife or the wilderness experience. Accordingly, none of the proposed alternatives is acceptable. Moreover, I am not aware that we have had any national debate on this issue...wherein it has been determined that the wildlife itself and my enjoyment of the wilderness are to be sacrificed because the Air Force desires additional and permanent training sites. The national and state debate we have had is that certain geographic areas in Alaska contain a variety of elements, such as wildlife, which we value so highly that we have chosen to "preserve" these areas from intrusive human activity. These areas include, for example, Forty Mile River, Yukon-Charley Rivers National Preserve, Wood River-Tikchik State Park and Denali Preserve, all of which are impacted by the proposed

PAN-001 activity. What is the Air Force's authority to compromise the values
 PRO-005 which we as a state and as a nation have already chosen to
 LAN-009 preserve????

Sincerely yours,



Susan Olsen
 November 28, 1994

1119 G Street
 Anchorage, AK
 99501

cc: Bruce Babbitt
 Paul Gallant

COMMENT #152
 IS A DUPLICATE OF COMMENT #75,
 SEE COMMENT #75 FOR RESPONSES

Fortymile Caribou Herd Working Team
c/o Alaska Department of Fish and Game
Division of Wildlife Conservation
1300 College Road
Fairbanks, AK 99701

November 28, 1994

G. Virgil Hanson, Major USAF
Chief, Environmental Management
611 ASG/LGV
5800 G Street, Suite 203
Elmendorf AFB, AK 99506-1807

Dear Major Hanson:

The Fortymile Caribou Herd (FCH) is a vitally important resource for the people of eastern interior Alaska and the Yukon Territory. The herd size was estimated to exceed 500,000 animals prior to the mining boom of the early 1900s. Several factors contributed to the decline of this herd to fewer than 10,000 caribou during the 1970s. Currently, the herd numbers about 22,000 animals but occupies only a fraction of its historic range. The FCH has not increased as rapidly as many other caribou herds in Alaska and has remained between 21,000 and 23,000 since 1989.

The Fortymile Caribou Herd Working Team was formed in 1994 to develop a management plan for the FCH. One goal of the working team is to promote and improve the long-term conservation of the FCH and its habitat. The team is comprised of user groups and land management agencies concerned about the FCH. The proposed Military Operations Areas (MOAs) alterations and amendments overlay almost the entire range of the FCH in Alaska, including important calving grounds, and have the potential to adversely impact the herd, its users, and the research and monitoring efforts so essential to management. The working team has the following concerns regarding an increased number of low level sorties and sonic booms in Yukon 1 through Yukon 4 MOAs and their possible effects on the FCH:

- The Alaska Department of Fish and Game conducts research and monitors the FCH throughout the year. The most intensive period occurs around the calving and post-calving periods (generally mid-May through the first week of June and mid-June through mid-July, respectively) and during the fall hunting season (ca. August 8 - September 10). Increased low-level training during this period poses a safety risk to the staff and pilots involved in overflights.
- The greatest impact to the FCH is likely to occur during the calving and post-calving aggregation period. The startle response caused by low level jet flights and sonic booms could have the greatest effect on cows and calves and calf survival. The separation of the cow and calf during a startle response could increase calf mortality

SAF-005
MIT-028

G. Virgil Hanson

2

11/29/94

by making the calf more vulnerable to predators, especially avian and other small predators that normally would not approach a calf when the cow is present.

- Following calving, the FCH forms large aggregations above treading seeking relief from insects. At this time, the FCH is again very vulnerable to harassment by low-flying aircraft. Forming and maintaining these aggregation groups for insect relief is energetically important to caribou. The manner in which low level flights will affect the integrity of the aggregations and caribou energetics is not known, but they could be detrimental and therefore should be avoided.

On the basis of these factors, the working team recommends that MOA-associated impacts to the FCH be listed in the final EIS as Level III impacts. The EIS finds the Delta Caribou Herd to be susceptible to Level III impacts in part because of its economic importance. The FCH is economically important to the residents and communities of eastern interior Alaska, perhaps increasingly so because of the recent population declines experienced by the neighboring Delta and Menista herds.

We also call your attention to the following concerns:

- *Sheep:* Dall sheep inhabit the mountainous terrain throughout the MOAs which overlay the upper Yukon and Tanana valleys. The escape terrain utilized by sheep to avoid predation is precipitous. Sheep exhibiting a startle response from low level jet flights near sheep habitat are more likely to accidentally fall. Expanded flight operations near sheep habitat will increase sheep mortality from accidental falls.
- *Waterfowl:* Waterfowl inhabit wetlands throughout the proposed MOAs. The upper Tanana and Yukon river corridors are important waterfowl migration routes. Increases in bird strikes with waterfowl are imminent with increases in the number of sorties operating at low levels.
- *Peregrine falcons:* Peregrines inhabiting the upper Yukon and Tanana river corridors are found in some of the densest breeding concentrations in North America. Peregrines usually occupy rock bluffs along major rivers within 2000 feet vertically of the water. The peregrine also is listed as endangered, thus requiring the Air Force to monitor its incidental take of these birds. Low level flights along river corridors greatly increase the incidental take of peregrines and other raptors.
- *Moose:* Disturbances caused by low level jet overflights during the calving season pose the greatest risk to moose in the Yukon MOAs. The separation of the cow and calf due to being startled could predispose the calf to predation by wolves or bears.

The working team recommends that the Air Force take steps to minimize the potential conflicts with caribou and other wildlife in the Yukon MOAs. Most ungulate and raptor species are vulnerable during the period when the young are small and relatively immobile. Raising the floors of the MOAs and limiting the number of overflights during the spring

MIT-028

G. Virgil Hanson

3

11/29/94

and early summer months would help to minimize the detrimental effects of overflights on wildlife. Prior to initiating Major Flying Exercises, we request that the Air Force consult with resource managers in the areas which include the Yukon MOAs.

We also recommend the following mitigation strategies:

- Avoid caribou concentrations in the Yukon MOAs from May 1 - July 15, which encompasses the calving and post-calving aggregation periods.
- Contact the Department of Fish and Game to identify the calving and aggregation areas.
- For the safety of military, agency, and public flight operations in the Yukon MOAs, establish a liaison process to coordinate flight activities with land management agencies.
- Maintain flight exercises at 5000 feet AGL and sonic booms above 10,000 feet AGL in the Yukon MOAs.

MIT-028

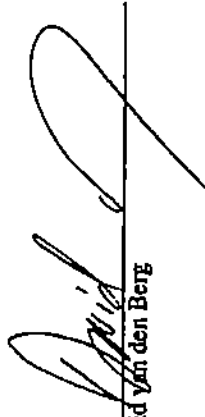
Thank you for the opportunity to provide comments on this important planning effort.

Sincerely,

Public members of the Fortymile Caribou Herd Working Team

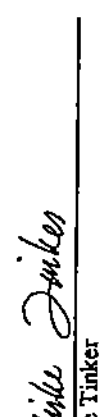
(Signatures on attached page)

Signature:

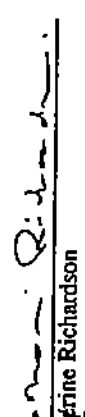

David van den Berg

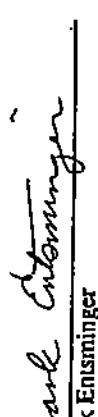

Jeff Road


Oliver "Bud" Burris


Mike Tinker


Brian Simpson


Kathyrne Richardson


Frank Entsminger

November 28, 1994

611 A.S.G./L.V.G.

5800 G St. SE, 203

Elmhurst, A.F.B AK 99506-2150

11-28-94

Sir: We are writing to comment on EIS for improvements to Military Operations Area in Alaska.

We own recreational property with improvements on the Salcha River and at Harding Lake. We have acquired the property gradually since the mid 1950s, and feel that we have absorbed enough more intrusion and disturbance at our long planned for retirement location. Our children have grown up in these areas, swimming, fishing, hiking, hunting, skiing etc. and have tolerated the noise levels that have existed up to now. Please do nothing to change this so that our grandchildren will not experience the same things with some way that parents and grandparents did. This is a very rural recreational area and noise is the issue.

I (Ken) am a Korean Vet, having served here in Alaska. As such, I and appreciate your desire to improve that training area in available now and in the future. We feel your present report has gone far too far and should be modified to avoid impacting the Salcha River, Harding & Birch Lake areas. We all know that none of us receive all that we want every time we request it. We note that the Central-Alaska interests have succeeded in obtaining a modification and would suggest

OTH-014

Page 2

11-28-94

that the larger population of owners and users in the Salcha community and basin^{DATE} and around Harding and Birch Lake be afforded modification and relief as well. We are confident you can accomplish this so that Alaskans and the military can each pursue their mission.

Our specific requests are; Eliminate the Goose Clear Creek MRA and provide 5 to 10 mile wide river sensitive corridors up the Salcha River and along the Richardson Highway to include the Harding & Birch Lake areas.

Sincerely yours

Wiley L. Hammen
Janette L. Hammen

P.S. The enclosed newspaper clipping from the Fairbanks Daily News Minn expresses many of our feelings regarding your proposal

OTH-014

Military expansion threatens Alaska lifestyles and wildlife

Some leaders do cut across all of the pre-existing boundaries between our local groups, and one prime example of this is the current push by the U.S. Air Force to merge the air space over much of Interior Alaska. The proposal by the Air Force is the latest move in their ongoing expansion of fighter planes training areas within the Alaska

The military is used with confidence by the Alaska National Guard, which is part of the Alaska platform, because its presence has an economic impact on the state as well as a national security. This is not intended to overstate the importance of the military, but it does underline the need in our present world situation for military forces. However, it is essential that we re-evaluate some of the manifestations of that military capability because the creation of permanent air space training air force throughout our Alaska. Once we see the expanded

We do need to question the rationale offered for the expansion of Military Training Routes and Military Operation Areas and Special Use Airspace designations encompassing the air space above states and Native-owned lands, national designated conservation areas, and critical watershed migration routes.

What the Air Force is requesting is literally staggering. The 10th Air Force has 100,000 sq miles of the air above central and northern Alaska, ranging from level 100 to 100,000 ft. The Air Force is not to the worse kinds of aircraft operations. During periods of actual training, many hundreds of military aircraft, not merely U.S. Air Force planes, but those of foreign air forces, as well, sometimes congregating at superpower headquarters sections, hazards for local civilian aircraft. The Air Force is requesting that the FAA suspend all civilian aircraft traffic. This would encompass not only the Air Force's own fleet and private or commercial airlines, but also the FAA's own civilian airlines, except those that question the potential for disaster in the area.

Many Alaskans have laboriously built wilderness cabins as a way of getting close to nature, but their joy of being able to enjoy the alpena and the natural sounds of birds are wiped out by screaming jet engines and the cacophony of modern conveniences. As one witness at a recent meeting angrily declared, "I have more peace and quiet in the middle of Fairbanks than I do at my two-way cabin on the Salish!"

$$A_1 = \begin{pmatrix} 1 & 0 & 0 \\ 0 & 1 & 0 \\ 0 & 0 & 1 \end{pmatrix}, A_2 = \begin{pmatrix} 1 & 0 & 0 \\ 0 & 1 & 0 \\ 0 & 0 & 1 \end{pmatrix}, A_3 = \begin{pmatrix} 1 & 0 & 0 \\ 0 & 1 & 0 \\ 0 & 0 & 1 \end{pmatrix}$$

Alaska's lakes provide migration routes for a host of migratory birds. The most evident are the waterfowl, like the sandhill cranes, the geese and ducks, but also many smaller birds, like the redpolls, the robins, thrushes, terns, and throngs of other bird life, which undergo death in many forms as they traverse the always between tundra and arctic and sub-arctic breeding grounds.

It would be ironic if the chief of our magnificent sandhill cranes during their spectacular migratory flight in spring and fall should be our own military aircraft. That's quite possible because a major MTR site is the northern foothills of the Alaska Range—the exact location of the flight path chosen by the cranes on their way to winter havens in the Lower 48. As this particular migration route utilized from the mapping of November 1971 to November 1973 as two large

Frankly, it seems as though many diverse Alutians, who utilize a wide variety of resources within the north included in the proposed IIRFA and MOAs are considered to be insignificant and irrelevant, diminishing the interests represented among the trappers, who have networks of traplines and shelter cabins scattered within the river valley forests. Their livelihood is

battered, but in addition, many of them chose this lifestyle because they enjoy being away from civilization and towns, and because they desire the solitude of wild surroundings.

Native people living in many small villages such as Dot Lake, Leafy Lake, and Tanacross, and a host of others within the proposed military air space, no large areas for their subsistence requirements. They occupied these lands long before any white people ventured into what we call Alaska. To retain these aboriginal rights to make their living off the land, the Native

leaders are caught up in the obfuscations and contradictions and sly maneuvering of a military bureaucracy determined to manipulate the cumbersome Environmental Impact Statement process to achieve their own ultimate goal. They are not interested in receiving and paying attention to public comments containing valid criticisms and objections.

Facilities by **Near John, Eugene**
2. **Carlton J. retired Naval**
the personnel who questioned
the members of the type of be-
all kinds of training. The type of be-
valued by the Air Force for the
Night and participated in various
as well as the type of be-
points out that experiences in re-
current armed conflict have resulted
in recommendations that combat
Algeria remains above 4,000 feet to
aerial attack units, rapid fire AA
batteries, and hand-held SAMs. As
he points out, training flight at low
altitudes results in an increase in
the number of aircraft on the part of
the enemy in attacking extremely
low altitudes. Both military au-
thorities will not be such a threat
to the enemy as they are in the
occurences, even when reported by re-
lated around observers.

The widespread public reaction to the excessive smoke position of the present-day fighter aircraft, to the cascading thunder of sonic booms, breaking windows and alarming everyone within range into carpool-free reactions, and the threats by wildlife and birdlife within or adjacent to intensive training operations has caused curtailment of such training in the Lower 48. Also, with the abundance of open terrain, by tempting both politicians and military planners to move all such operations sections and

Alaska's chances to control or virtually curtail invasion of our airspace will depend upon coordinated actions by everyone affected by these matters. A national organization for such efforts is the Rural Alliance for a Sustainable Future, P.O. Box 80034, Ithaca, NY 14854 (703) 877-0761. Local residents can obtain information and names of other concerned citizens from the Northern Alaska Environmental Center—452-8003.

Celia Hunter has been active in the Alaska conservation movement since 1960.

410-HIO

**CHUGLAK-EAGLE RIVER
CHAMBER OF COMMERCE**

REBOLITION 94-10

WHEREAS the military in Alaska is strategically located to respond in the event of a national security threat and

WHEREAS the military in Alaska is strategically located to allow rapid response in the event of an international crisis and

WHEREAS the military in Alaska adds to the social and economic stability of the state and

Alaska has excellent unpopulated areas which can accommodate necessary training operations

THEREFORE, BE IT RESOLVED, that the Chugotak-Eagle River Chamber of Commerce supports the efforts of the military to maintain and improve their readiness through securing permanent training areas. Furthermore, the Chugotak-Eagle River Chamber of Commerce supports the Air Force in its preparation of the Environmental Impact Statement for this purpose.

(This information pertains to and is not to be released to the public under E.O. 12958, The President John F. Kennedy Assassination Records Act)			
FACSIMILE ELECTRO MAIL TRANSMITTAL			
SECTION 1 - TO BE COMPLETED BY OPERATOR			
CLASSIFICATION	TRANSMISSION	ROUTINE	PAGE 1 OF 2 PAGES
N/A	☒ ROUTINE	☐ FAX NO.	
TO: (Organization and Functional Address Symbols)		DATE	COMMERCIAL
Col. Henson 611 ASG/CC		7/28	
ATTENTION		VOICE NO.	COMMERCIAL
		3442	
SUBJECT			
EA - Ansage			
FROM: (Organization and Functional Address Symbols)			
1 EFTOCC		DATE	COMMERCIAL
1134 QST		317	(907) 552-7500
ELKHOROUGH AFB, AK 99506-2830		VOICE NO.	COMMERCIAL
		317	(907) 572-2158
REMARKS Attached is a resolution passed by the Eagle River Chapter of Carmona that supports our effort to obtain additional training airframe. It is in response to EA sent out on this subject. Lt Col Stan			
DO NOT TRANSMIT CLASSIFIED INFORMATION OVER UNSECURED TELECOMMUNICATIONS SYSTEMS. OFFICIAL DOD TELECOMMUNICATIONS SYSTEMS ARE SUBJECT TO MONITORING AND USE OF DOD TELECOMMUNICATIONS SYSTEMS CONSTITUTES CONSENT TO MONITORING.			
RELEASER'S SIGNATURE	DATE	TIME	TIME
	29 Nov	1710	
SECTION 2 - TO BE COMPLETED BY RECEIVING MAIL OPERATOR			
DATE TRANSMITTED	TIME TRANSMITTED	TRANSMITTER'S SIGNATURE	
DATE ADDRESSABLE CONTACTED	TIME ADDRESSABLE CONTACTED	CONTACTOR'S SIGNATURE	

AF FORM 344, SEP 81(12)

P.O. Box 50
Lake Minchumina
Alaska 99757
November 19, 1994

EIB Team
Major C. Virgil Hanson
Chief, Environmental Management
611 ASG/LBV
5800 6.8 Street, Suite 203

Dear Sir:

We are very much disturbed by reports that the Draft Environmental Impact Statement for Alaska Military Operations Areas includes a Military Training Route that goes from near Eielson Air Force Base toward Galena, and then turns south to Stony River, northwest toward the Yukon River, and then south again parallel the river. The eastern leg of this route crosses several airways serving western Alaska from Fairbanks, and, with fast planes flying below 1500 feet, threatens the safety of people living in western Alaska.

Here at Minchumina, our supplies come from Fairbanks, either in privately-owned small planes or on the local air service. The eastern leg of your planned route cuts across the FAA-designated airway from Fairbanks to Minchumina and McGrath, and bush flights, both private and commercial, are below 10,000 feet and often below 1500 feet, depending partly on weather. We would have no way of dodging F16s or other high speed aircraft flying at low altitudes, especially if they are below 1500 feet as proposed. The western legs similarly intersect routes from here to McGrath, Galena, and other points often visited by Minchumina people, as well as routes out of those two towns, which are hubs for postal and supply services for most of western Alaska.

This area looks uninhabited, but, because there are no roads to it, we depend entirely on air transport. Anything that threatens it threatens us.

Flights below 1500 feet above the terrain are especially risky in fast planes; in case of accident, who is liable? Bumer is fire-hazard time—who will be responsible for controlling forest fires that might be caused by military planes, by accident or otherwise?

Military flights above 10,000 or 12,000 feet, where other traffic would consist of larger, faster, better-equipped planes, would not be such a danger to us, as we are not near any of the Military Operations Areas you propose. We are concerned, however, about environmental hazards, especially effects on wildlife and subsistence, the possibility of fires from jettisoned fuel and flares, and with the "locking up" of such large areas with activities dangerous to those who live or visit there.

PRO-002
AIR-016

OTH-001

HAZ-013

HAZ-009
HAZ-010

Sincerely,

Florence R. Collins

Florence R. Collins

Honorable Bruce Sabbit, Secretary
Department of the Interior
1849 C Street, NW Room 5355
Washington D. C. 20240

Paul Gallant
Federal Aviation Administration
800 Independence Avenue SW
Washington D.C.

Letters to the Editor
Fairbanks Daily News-Miner
P.O. Box 70710
Fairbanks, Alaska, 99707

Smith Aero Flight School
4230 University Avenue
Fairbanks, Alaska 99709

November 25, 1994

US Air Force
617 ASG/LGV
5800 G ST. Ste 203
Eldorado AFB, Alaska 99056-2150

Dear Sirs:

As a certified flight instructor of a high volume flight school based on the Fairbanks International Airport, I am extremely concerned about the possibility of conflict between high speed military aircraft and student pilot operations. As you are well aware, students are not well equipped with experience to deal with high volume or high speed traffic. We try hard to confine our operations to a practice area southeast of Fairbanks where there is very little commuter or military traffic. But students must make cross country flights as well to build skills toward a pilot certificate. To reduce the chance of student pilots becoming disoriented or lost, they utilize the route from Fairbanks to Northway and back, following the Richardson Highway and the Tanana River. Our flight school requires that our aircraft land at airports with hard surface runways and the Federal Aviation Administration requires that these be more than 50 nautical miles from Fairbanks. In Alaska our options are few. The only route of flight that satisfies these requirements is east to Tok and Northway, or southeast to Gulkana. Both these routes are through proposed military operations areas.

To protect students using this route (and the military aircraft in the area), I highly support the recommendation that a VFR corridor be established along the Richardson Highway to reduce the risk of conflict between inexperienced solo student pilots and military aircraft. Even if the military pilots were not to perceive a situation as a problem, high speed operations may cause high levels of stress in students who may make fatal mistakes trying to escape from what they may feel is a threatening situation.

SAF-005
AIR-008

MIT-019

OTH-014

If there were alternate routes of flight that could be utilized, we would be glad to do so, but since we are so limited here in Alaska, I certainly encourage you to implement the VFR corridor and to give utmost consideration to the thirteen recommendations forwarded to you by the Alaska Aviation Safety Foundation.

Sincerely,



Frances E. Thomas
Chief Flight Instructor

COMMENT #158
IS A DUPLICATE OF COMMENT #149,
SEE COMMENT #149 FOR RESPONSES

EIS Team
Nov. 28, 1994

Major C. Virgill Hanson
Chief, Environmental Management
611 ASG/LGV
5800 G Street, Suite 203
Eldorado AFB, AK 99506

Dear Major Hanson:

I support a strong military and I support Alaskan rights. I believe they both have coexisted somewhat. However, with the recent push by the Air Force to make permanent the temporary MOA's around Fairbanks, things have changed.

The chances for a mid-air collision between a high-speed jet and small planes is already high in the practice areas. As a private pilot I have been lucky but have listened to the close calls of other pilots. It is only a matter of time.

I have heard the argument that the Air Force does not really plan to expand exercises in the near future but still would like to make the temporary MOA's (Military Operations Area's) permanent. Supposedly this would lessen bureaucratic paper work in reapplying every time.

First off, if the Air Force is not going to expand exercises, it is unnecessary to change the temporary MOA status. Secondly, is this elimination of paperwork supposed to make us taxpayers believe we'll earn huge savings by the Air Force?

I have read over the Environmental Impact Statement by the Air Force. It falls way short of addressing any cumulative impacts whether it be noise, wildlife, air safety, or the environment.

Again we the people are being deceived in being told what is good for us - when it really isn't. To grant permanent status to the temporary MOA's would be a serious mistake and we really need to address what military operations "are" necessary for our well being.

Sincerely,

Donna C. Radtke

P.O. Box 80391
Fairbanks, Alaska 99708

cc Honorable Bruce Babbitt, Secretary of Interior
Paul Gallant, Federal Aviation Administration
Honorable Senator Ted Stevens, Alaska
Honorable Senator Frank Murkowski, Alaska
Honorable Representative Don Young, Alaska

COMMENT #160
IS A DUPLICATE OF COMMENT #115,
SEE COMMENT #115 FOR RESPONSES

**Rock Rest
ADVENTURES**
Canoe rentals, canoe instructions, travel adventures
Rt. 2, Box 424, Pittsboro, NC 27312, 919-542-5502

November 26, 1994

Major C. Virgil Hansen
611 ASG/LGV
5444-G-4600-001-2303
Elmendorf AFB, AK 99506-2150

Dear Major Hansen:

I am a member of the Alaska Wilderness Recreation & Tourism Association. I have become aware of the possible escalation in training flights over areas in which I guide canoeing and sea kayaking trips. The purpose of this letter is to let you know where we lead trips in the hope that you can avoid them and to alert you to a very good source of information to help you avoid critical wildlife habitat and significant natural areas.

At the present time, we lead trips in the Swan Lake Canoe System and on the Delta, Gulikam, Kaslof, Kenai, Matanuska, and Kenane Rivers. Our sea kayaking trips are in the Harrison Fjord/Fort Wells area of Prince William Sound. We have plans to expand our canoe trip program to include Birch Creek and the Yukon River.

A great source of information for you to consider is a three volume report produced by The Nature Conservancy and the Alaska Department of Fish & Game under a contract to the Alaska Department of Natural Resources. The report was prepared to guide the State through the last round of land selections. There is a great deal of information in the report about significant natural areas and critical wildlife habitat.

Sincerely,

Joe Jacob
Joe Jacob
Owner, Instructor, & Guide

OTH-014
REC-004
LAN-014

OTH-014

ALLVEST, Inc.
A Rehabilitative Services Corporation
November 28, 1994

Major C. Virgil Hansen
Chief, Environmental Management
811 ASG-LGV 5800 G Street, Suite 203
Elmendorf Air Force Base
Anchorage, Alaska 99508

Dear Major Hansen:

I am writing to voice my strong objection to the draft environmental impact statement for the Alaska military operations area. I am appalled that such little thought has been given to the substantial impacts of low level flights in vast areas of Alaska. There is also no question that hunting, fishing, and other recreational uses in the exercise areas would be greatly impacted.

As a "consumer" of Alaska's outdoors I am concerned over the possible impacts to tourism, recreation, and traditional lifestyles.

This draft EIS overreaches by far what is reasonable. I ask that you extend the comment period and seek additional information as to the impacts on the uses specified above.

Additionally, I believe there are potential flight safety problems with so many low altitude sorties in such large areas of Alaska. In a state with as many low flying aircraft as there are here I believe there may be substantial potential safety hazards. I also request that the Federal Aviation Administration conduct public hearings to determine what impacts are likely.

I appreciate the opportunity to comment on this issue and request that I be notified of any future developments.

Very truly yours,

ALLVEST, INC.

William C. Wolmar
William C. Wolmar
President

cc: Honorable Bruce Babbitt, Secretary, Department of the Interior
Paul Gallant, Federal Aviation Administration

OTH-014

PRO-003

SAF-005

AIR-008

AIR-015

Dear

Major C. Orgil Hanson,

Nov 23 1994

I am wishing out of concern for the nearly 13 million acres of Alaska that are due to be impacted by expansion and upgrade of the military air-space.

I am totally opposed to this - I live in a rural village and know that the people would be seriously affected by increases in noise pollution, chaff and flares, fuel-jettisoning, and electro-magnetic radiation hazards associated with military installations. Also the wildlife will be adversely affected by the increases in noise pollution.

I ask you to reconsider your decision for the people in these areas that will be negatively affected.

Thank you.

Carrie Farr

Box 84

Tanana AK 99777

LAN-004

NOI-001

HAZ-003

HAZ-007

HAZ-009

HAZ-010

BIO-007

OTH-014

COMMENT #166 IS

A DUPLICATE OF COMMENT #86,

SEE COMMENT #86 FOR RESPONSE

November 25, 1994

Mr. James Hostman
MOA Environmental Impact Statement
611 ASG/LGZ
5800 G Str., Suite 203
Elmendorf AFB, AK 99506 - 2150

Dear Mr. Hostman,

Thousands of Alaskan residents live, work, travel, and fly over the great expanses of Alaskan bush that most Americans wrongly consider wasteland. The United States Air Force wants to permanently annex huge portions of Alaskan airspace for high-speed combat training. Their plan to do so is unfair, uninformed, and unsafe.

AIR-016

AIR-008
SAF-005

Alaska, more than any other region in North America and quite possibly the world, relies heavily on transportation by small aircraft. These small planes fly low and slow due to design and due to local flying conditions. There are thousands of them in the state, virtually untrackable by either FAA or Military radar systems. In the same airspace the Air Force intends to conduct high-density air combat training. This is creating an extreme potential for mid-air collisions. I question the Air Force's ability to track, monitor, and limit their own operations, (e.g. the AWACS controlled shoot-down of U.S. Army helicopters in Iraq by USAF F-15s).

Furthermore, an increase in this high-speed, high-density air combat training is unfair to those living and traveling below this airspace. Our home is located in the rural Two Rivers area, about 10 mi northwest of Eielson AFB and beneath the Cope Thunder departure and recovery routing. On three separate occasions last summer, I saw and heard fighters recovering to base at an abnormally high rate of speed and with their afterburners lit. As a former military pilot with 2000+ hours of jet flight time, I cannot think of one legitimate reason why a pilot needs to engage afterburner on recovery at low altitude. I know all about the exemption to exceed 250 kts below 10,000 MSL for fighters, but the point is, I think that the Air Force follows the rules as they see fit and to heck with anybody who objects.

Please consider the thousands of us who live and fly in Alaska and stop the Air Force from creating any more permanent MOA's.


Todd M. Machinaw
3150 Chena Hot Springs Rd.
Fairbanks, AK 99712

Major C. Virgil Hanson
Chief, Environmental Management
611 ASG/LGZ
5800 G Str., Suite 203
Elmendorf AFB, AK 99506

November 27, 1994

Dear Major Hanson,

I'm writing to express my strong opposition to the Air Force's plan to vastly expand supersonic jet training exercises in Alaska. I have reviewed details of the proposal and find the plan unequivocally unacceptable. I believe the proposed increase in the number of training flights is totally unnecessary on national security grounds, and that the resulting damage to sensitive ecosystems and the species that depend on them should be more than enough reason to ground this ludicrous plan before it takes flight.

PAN-001

BIO-007

Basic biological science, as well as common sense, tells us that the species that depend on the natural character of these areas -- including caribou, Dall sheep, moose, golden eagles, trumpeter swans, and peregrine falcons -- will be adversely affected by the presence of low level training flights. Hating and breeding eagles will be altered, and future survival of some of these species put in jeopardy. And for what? To justify the continued maintenance of inflated defense budgets and to prepare for an enemy that no longer exists? We, the public, will no longer stand idly by and witness the destruction of our public lands under the guise of national security.

LAN-010

I have not visited all of the areas proposed for additional training, but have spent time in some of them and can assure you that the character of these natural areas will be forever changed by the presence of low flying supersonic military training flights. Surely you realize that sonic booms and jet-fueled jet fuel aren't conducive to the wilderness character that bring so many people -- and so much revenue -- to Alaska each year?

NOI-002

HAZ-010

REC-001

OTH-014

I'm certain that existing training areas in Alaska are more than sufficient to ensure adequate preparation for Air Force pilots. No new training areas are warranted, nor will they be accepted by the public. The time has come for the military to become responsible stewards of our public lands. Dump this plan now, and join the growing effort to save what little nature we have left on this fragile planet.

Sincerely,



T.J. Johnson

cc: Honorable Bruce Babbitt, Dept. of the Interior
Paul Cellent, Federal Aviation Administration
Senator Patsy Murray
Senator Slade Gorton
Representative Jolene Unsoeld

From: Eric J. Arneson
P.O. Box 2938
Soldotna AK 99669
907-262-2292

Chief, Operations Division
 11th Air Force
 ATTN: Major Siler
 5800 G Street, Suite 102
 Elmendorf AFB, AK 99506-2110

Comments regarding proposed Alaska Military Operations Areas:

I'm writing in regard to the Air Force Expansion. While I appreciate giving our boys all the practice they can get, it would like to suggest less flying time during hunting season. I'm a hunting guide and five of our boys in the eyes from mountain tops and have been knocked down by a sonic boom. I have two operations which are affected by your operations now. Any more flying seems unacceptable to me. I'm waiting for some horrible accident to happen as four pilots fly the same elevation and route as my pilots on August 8 to Sept 24. I'm against any and all permanent MOAs.

*Respectfully,
 Eric J. Arneson
 11-29-94*

Please send copies to:
 FAA, System Management Branch
 Attn: Dennis Berg, AAL-535
 700 E. 7th Ave.
 Anchorage, AK 99513-7587

Alaska Aviation Safety Foundation
 PO Box 83750
 Fairbanks, AK 99708

2306 Douglas Drive
 Anchorage, AK 99517
 November 27, 1994

EIS Team
 Major C. Virgil Hanson, Chief, Environmental Management
 611 ASG/LGV
 5800 G Street, #203
 Elmendorf AFB
 Anchorage, AK 99506

RE: Draft Alaska Military Operations Areas EIS

Dear Major Hanson,

I am writing to voice my opposition to the Air Force's proposal for permanent Military Operations Areas ("fly zones") in east central Alaska. I am a long-time resident of Alaska and user of the proposed permanent fly areas. I have spent much time canding on the Gulkana, Delta, Fortymile, and Yukon Rivers and hope to spend much additional time there. As a board member and former president of the paddle sport group, Knik Canoeers and Kayakers, Inc., I know I speak for many of the 150 members in voicing concern over this proposal. Having visited Alamogordo, N.M. and the White Sands area, I am fully aware of how intrusive and overwhelming supersonic aircraft flights can be to anyone nearby. Military overflights in the proposed Alaskan areas have the potential for significant adverse impacts on area residents and users, and numerous wildlife populations.

I, as many other Alaskans, have been drawn to these areas by the rare qualities of solitude and unimpacted landscapes. This is something we revere, and hold dear. Military overflights will pollute this environment with noise and intrude on all. I urge you to find another solution for your "training exercises". Your proposal is incompatible with the existing uses of the land.

Thank you for the opportunity to comment and I hope you will take all public testimony under serious advisement.

Sincerely,

Dave Blanchet

Dave Blanchet

OTH-014

LAN-010

OTH-014

EIS Team
Major C. Virgil Hanson, Chief of Environmental Management
611 ASG/LGV
5800 G. Street Suite 203
Elmendorf AFB, AK 99506

Major Hanson:

I am writing to voice my strong protest of the Air Forces' intention to designate and upgrade 71,650 square miles of Alaskan airspace for low level supersonic jet training exercises. This proposal will have major social, environmental and economic consequences for hunters, pilots, tourists and native communities. Over the years, many abuses have been tolerated and accepted by the Alaskan people in the name of "national security". Surely, the present geopolitical climate cannot justify the designation of nearly 13 million acres of Alaska wilderness as a jet training zone. In the Galena area we have been forced to cope with noisy low level jet overflights and sonic booms. Fuel jettisoning, mid air collision risks and the environmental impacts of the inevitable plane crashes are just a few more reasons why this proposal must be stopped. The impact of up to 19,500 low level jet flights on Caribou herds, Peregrine falcons and other wildlife are likely to be severe.

The entire proposal is completely unjustified and unnecessary. The proposed activity is unprecedented in its huge area, high frequency of flights and low flight levels. It would never even be considered in the lower 48 states. It is abusive and irritating the the Air Force sees Alaska as a giant wasteland where such infractions can go unnoticed. I insist that the Air Force extend the public comment period, that further environmental studies be undertaken and that the FAA hold public hearings on the issue.

Sincerely,

Mark Zimmerman

Mark Zimmerman
PO Box 94
Galena, AK 99741

CC: Bruce Babbitt, Secretary of the Interior
Paul Gallant, Federal Aviation Administration

LAN-004

SAF-005

HAZ-010

NOI-002

BIO-007

PAN-001

PRO-003

PRO-014

AIR-015

Richard Marson

PO Box 111355 Anchorage AK 98511 (907) 337-6106

Attention: EIS Team

Major C. Virgil Hanson,
Chief of Environmental Management
611 ASG-LGV
5800 G. St. #203
Elmendorf AFB, AK 99506

November 30, 1994

To Major Hanson:

I oppose the proposed changes to the Alaska military operation area. I am a pilot, a homesteader, an environmentalist and a long time Alaskan. I see nothing good about the permit acquisition of more airspace, however justifiable, by the military in Alaska. In many respects Alaska is one of the last bastions of wilderness left on this planet. Beyond noise and flight safety question is that the demand by all kinds of user groups are going to continue to chip away on the reasons most of us came here for or continue to come as tourists. Once we give some of it away it is almost impossible to get it back and it seldom ends there, there will always be another demand by some user group to follow. I feel that the proposed changes are too large a pill to ask Alaskans to swallow.

Sincerely,

Richard Marson

OTH-014

KUSPUK SCHOOL DISTRICT

P.O. Box 48
Aniak, Alaska 99557
(907) 875-4250

Roberta D. Bush
SUPERINTENDENT OF SCHOOLS
SUPERINTENDENT/BUSINESS OFFICE
FAX (907) 875-4250
GENERAL FAX (907) 875-4250

November 23, 1994

Ed Teem
Major C. Virgil Hanson
Chief, Environmental Management
611 ASG/LGV
5800 G Street, Suite 203
Eldorado AFB, AK 99506

Dear Major C. Virgil Hanson:

I am the superintendent of a rural Alaskan school district called Kuspuks School District. Our headquarters are located in Aniak, a village of 650, on the middle Kuskokwim River in Southwestern Alaska. Our school district stretches along 250 miles of the Kuskokwim River and contains seven village populations. Three of our upriver villages, Red Devil, Sleetmute, and Stony River, have experienced substantial impact from sonic booms caused by Air Force training missions in the past.

Most recently Stony River experienced a major sonic boom which did damage to the school facility in that village. We have been working with the Air Force in an attempt to determine the extent of the damage to the building. We were told that these training missions would be carried out in non-populated areas and would not occur directly over our village.

I am concerned because I have learned that the mission will not be reduced, but will in fact be increased. It is true that these villages are small, but they are here, and they are inhabited by people. Currently all three of these villages experience significant sonic booms on a regular basis. We are concerned about the integrity of our facilities and request that you examine whether or not it is necessary to conduct "flyovers" in this area.

Please contact me if you require further information on this matter.

Respectfully,

Roberta D. Bush
Roberta D. Bush, Superintendent
Kuspuks School District

Bruce Babbitt
Paul Gallant
Leo Morgan, Board President
Steve Hill, Facilities Coordinator

OTH-014

NOI-002

AIR-018

STATE OF ALASKA

OFFICE OF THE GOVERNOR
OFFICE OF MANAGEMENT AND BUDGET
DIVISION OF GOVERNMENTAL COORDINATION

WALTER J. HICKEL, GOVERNOR

☒ SOUTHERN REGIONAL OFFICE
2000 O STREET, SUITE 203
ELDMORE AFB, AK 99506
FAX (907) 875-4250
GENERAL FAX (907) 875-4250

☐ CENTRAL OFFICE
1000 O STREET, SUITE 203
ELDMORE AFB, AK 99506
FAX (907) 875-4250
GENERAL FAX (907) 875-4250

☐ PUBLIC DOCUMENTS OFFICE
1000 O STREET, SUITE 203
ELDMORE AFB, AK 99506
FAX (907) 875-4250
GENERAL FAX (907) 875-4250

November 30, 1994

Major G. Virgil Hanson
611 ASG/LGV
5800 G Street, Suite 203
Eldorado AFB, AK 99506-2150

Dear Major Hanson:

SUBJECT: FINAL NEPA FINDING
DEIS - Alaska Military Operations Areas
STATE I.D. NO. AK0410-19AA

The Division of Governmental Coordination (DGC) has concluded the State of Alaska's review of the Draft Environmental Impact Statement (DEIS) prepared by the Department of the Air Force for the proposed Alaska Military Operations Areas. We appreciate the opportunity to participate at this stage of planning, and offer a consolidated response on behalf of the State resource agencies (Alaska Departments of Environmental Conservation, Fish and Game, and Natural Resources). This review was conducted to satisfy the requirements of the National Environmental Policy Act (NEPA).

The State supports the proposed project to provide for continuing military tactical flying training in Alaska. The proposed action is to convert seven existing temporary Military Operations Areas (TMOAs) in Alaska to permanent Military Operations Areas (MOAs); modify five existing permanent MOAs (lines of operation, vertical dimensions, and internal boundaries); create two new permanent MOAs; conduct supersonic aircraft operations in nine (existing or new) MOAs; subdivide floors for supersonic operations in three existing MOAs that already have supersonic operations; and conduct routine and joint/combined training with Alaska-based and deployed aircraft; and conduct up to six Major Flying Exercises (MFEs) per year involving up to 100 aircraft in a maximum of 200 sorties per MFE-day, using the proposed MOA structure and existing air-to-ground weapons ranges.

ACMP COMMENTS
Upon implementation of the Record of Decision and the State's receipt of the federal consistency determination per 15 CFR 930.34, the Military Operations Areas activity will be reviewed, according to the time allowed in the federal coastal zone management regulations 15 CFR 900.35 (45 days), for consistency with the standards of the Alaska Coastal Management Program (ACMP). The State takes this opportunity to address potential ACMP issues to assist the Department of the

LAN-005

DEIS-AMOA
AK9410-19AA

-2-

November 30, 1994
Final NEPA

LAIN-005
Air Force in resolving any outstanding issues prior to the ACMP review. Although much of the proposed project takes place outside the coastal zone, concerns that could have significant impact on the coastal zone were raised. Specifically mentioned issues were regarding noise levels adversely affecting wildlife, decreasing enjoyment of recreation and subsistence gathering, as well as reducing access to, and therefore use of, state lands because of aircraft safety concerns.

ALT-002
ALT-003
The Alaska Department of Natural Resources (DNR) commented that a majority of the expanded and proposed permanent MOAs are above state owned or state selected lands. These lands are used for dispersed recreation, hunting, fishing, trapping, mining, and in some areas, occupied by remote cabins. DNR requested the USAF consider and re-evaluate use of more remote MOAs and maximize the amount of federal land under MOAs, particularly the Kuukokwim drainage or the National Petroleum Reserve. DNR also suggested the USAF establish temporary rather than permanent MOAs so that if the impacts on users of state land, wildlife, and other resources are significant, the USAF could terminate their use. An additional mitigation measure would be for the Department of Defense to balance its desire to expand MOAs with a simultaneous closing of other military lands that are currently off limits to public recreation use. For example, portions of the Yukon Training Area at Fairbanks not used for a bombing range has higher recreation values than some of the areas proposed for permanent or expanded MOAs. These areas could be opened to public use to compensate for other public lands made less desirable due to military overflights. (See Attachment A for specific comments)

MIT-027

Mitigation measures have been recommended by the Alaska Department of Fish and Game (DFG) to seasonally restrict low-level flight to reduce aircraft induced stress and disturbances to caribou calving, moose calving and Dall sheep lambing and post-birthing periods as well as to reduce conflicts and incompatible noise disturbances during major large game hunting and subsistence gathering periods. Further mitigation suggested by DFG for Level III impacts includes raising the appropriate MOA floors to 3,000' AGL over sensitive wildlife areas. (See attachment B for specific comments)

MIT-028

NEPA COMMENTS

The following summary issues should be examined in preparation of the FEIS and the final preferred alternative (see enclosures for specific comments):

DNR has commented that:

- primary access to state lands is via small aircraft - both private and charter. At a minimum, extensive overflights will discourage some pilots from flying in these areas, resulting in reduced use of state land
- increased use by the Air Force could result in mid-air collisions
- frequent, low level jet overflights and sonic booms will diminish the value enjoyment of the users. This can be caused by disruption of wildlife, noise and visual intrusion.

DEIS-AMOA
AK9410-19AA

-3-

November 30, 1994
Final NEPA

DNR suggested mitigation measures were previously listed under ACMP Comments and can be found in Attachment A.

The Department of Fish and Game would like the USAF to:

- allow specific need for the proposal to enlarge and modify airspace in Alaska. (Volume I, p. 1-1, paragraph 1.3)
- assess all impacts resulting from military aircraft activities within designated military airspace for cumulative environmental impacts
- assess impacts of low-level jet aircraft on Tanana Flats moose
- include in the DEIS an evaluation of the potential impacts characteristic to each type of aircraft proposed to fly over or near sensitive wildlife areas
- develop and initiate a program that includes a point of contact for coordinating flights to avoid future potential hazardous conditions
- restrict military flights to IFR activity outside the SOAs as mitigation for the proposed increase military flight activity in Alaska
- correctly characterize the state subsistence regulations to apply to all Alaska residents (Volume II, Section 3.7, Section 3.7.1., Background)
- demonstrate how the statement "80 percent of the subsistence use for a given community occurred within a 30-mile radius of the community" was determined (Volume II, Section 3.7.2, footnote 1)
- obtain existing data on the general patterns of subsistence for Tok included in the Marcotte et al. 1991 source cited for Tanacross and DOT Lake (Volume III, Appendix J: Village Subsistence Profiles, Section J.4.3)
- establish formal liaisons with local communities and state and federal subsistence managers. The DFG liaison should be a staff member of the Division of Subsistence (Volume II, 4.7.8 Subsistence: Special Considerations, Section 4.7.8.1, Cumulative Impacts and 4.7.8.2, Mitigation)
- provide support necessary to monitor the effects of activities in the MOAs and formally commit to address problems which are documented during the monitoring period (Volume II, 4.7.8 Subsistence: Special Considerations, Section 4.7.8.1, Cumulative Impacts and 4.7.8.2, Mitigation)

DEIS-AMOA
AK9410-19AA

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November 30, 1994
Final NEPA

More detailed information from DFG is included in Attachment B.

The Department of Transportation and Public Facilities (DOTPF) submitted comments regarding the following topics:

- purpose and need for MOAs in Alaska
- public involvement
- impacts displaced over state lands
- critical civilian aviation interruption
- potential for midair collisions
- Alaska flight service stations closures
- use of temporary vs. permanent MOAs.
- recommendations for any more proposals for permanent airspace changes

Specific comments are in Attachment C which will also be submitted to you under separate cover by DOTPF

Thank you for the opportunity to prepare a consolidated position on this project. The State of Alaska looks forward to the opportunity to participate in the ACMP consistency review process.

Sincerely,

Arlene Murphy

Arlene Murphy
Project Review Coordinator

cc: Larry Bulla, DNR
Dick Mylius, DNR
Al Townsend, DFG, FBX
Frank Rue, DFG, JNU
Joyce Bedman, DEC, FBX
Regulatory Branch, COB
Dawn Webster, MSB
Roselyn Smith, DNR, FBX
Tim Smith, SHPO, DNR
Don McKay, DFG
Elaine Pastorek, DEC
Carl Siebe, DOTPF
John Oscar, Canalbrai CRSA
Sue Flensburg, BBERSA

ATTACHMENT A

MEMORANDUM

Department of Natural Resources

State of Alaska
Division of Land

TO: Arlene Murphy
Division of Governmental Coordination

THRU: Ron Swanson, Director

FROM: Dick Mylius, Director
Resource Acquisition and Development Section

DATE: November 29, 1994

SUBJECT: Additional Comments - USAF Military Operations Areas (AK9410-19AA DEIS)

Please add the following statements to the state's comments regarding the USAF Draft Environmental Impact Statement for Military Operating Areas (MOAs):

A majority of the expanded and proposed permanent MOAs are above state owned or state selected lands. These lands are used for dispersed recreation, hunting, trapping, mining, and in some areas, occupied by remote cabins. There are two significant impacts that DNR foresees:

1) a primary access to these state lands is via small aircraft - both private and charter. At a minimum, extensive overflights will discourage some pilots from flying in these areas, resulting in reduced use of state land. Increased use by the Air Force could result in mid-air collisions.

2) frequent, low level jet overflights and sonic booms will diminish the value enjoyment of the users. This can be caused by disruption of wildlife, noise and visual intrusion.

DNR suggests the USAF consider the following alternatives:

1) re-evaluate and consider use of more remote MOAs, such as the over southwestern region or the Arctic Slope. The USAF should try to maximize the amount of federal land under MOAs, as the federal government owns over 70 percent of the state. In particular, the USAF should look at large federal holdings in the Kuskokwim drainage, or in the National Petroleum Reserve - Alaska.

2) establish temporary rather than permanent MOAs so that if the impacts on users of state land, wildlife, and other resources are significant, the USAF can terminate the use of these maps.

An additional mitigation measure would be for the Department of Defense to balance its desire to expand MOAs with a simultaneous closing of other military lands that are currently off limits to public recreation use. For example, portions of the Yukon Training Area at Fairbanks not used for a bombing range has higher recreation values than some of the areas proposed for permanent or expanded MOAs. These areas could be opened to public use to compensate for other public lands made less desirable due to military overflights.

cc: Jonathan Widdis, DOTPF

ATTACHMENT B

MEMORANDUM

State of Alaska

DEPARTMENT OF FISH AND GAME

TO: Arlene Murphy
Project Review Coordinator
Division of Governmental Coordination

DATE: November 28, 1994

FILE NO: Franklinoa

TELEPHONE NO.: 485-4105

FROM: 
Frank Rue
Director
Habitat and Restoration Division
Department of Fish and Game

SUBJECT: DEIS-Alaska
Military Operations
Areas (MOAs)

This Draft Environmental Impact Statement addresses the 11th Air Force (11 AF) actions proposed for Military Operations Areas (MOAs) in Alaska. These proposals include:

- Convert seven existing temporary MOAs to permanent MOAs;
- Modify five existing MOAs (lines of operation, vertical dimensions, and internal boundaries);
- Create two new MOAs;
- Conduct supersonic aircraft operations in nine MOAs;
- Standardize floors for supersonic operations in three existing MOAs at 5,000 feet above ground level (AGL);
- Conduct routine and joint/combined flying training with Alaska-based and deployed aircraft; and
- Conduct up to six Major Flying Exercises (MFEs) per year involving up to 100 aircraft in a maximum of 200 sorties per MFE-day, using the proposed MOA structure and existing air-to-ground weapons ranges.

The proposed actions include military operations in airspace over 65,194 square miles of Alaska. This airspace is in addition to the existing military airspace as follows:

Arlene Murphy

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November 28, 1994

- Restricted Areas (RAs) over three bombing ranges;
- Military Training Routes (MTRs);
- Air Refueling Anchors/Tracks (ARs);
- Air Traffic Control Assigned Airspace (ATCAA);
- Low-Altitude Tactical Navigation Areas (LATNAs); and
- Slow Speed Low-Altitude Training Routes (SRAs).

General Comments

The purpose of the proposed action (Volume 1, p. 1-1, paragraph 1.2) "...is to restructure and upgrade the MOAs in Alaska in order to provide adequate airspace in which routine training, joint/combined training, and MFEs may be conducted."

The need for the proposed action (Volume 1, p. 1-1, paragraph 1.3) is to ensure that pilots are able to receive comprehensive and realistic tactical flying training in as safe an airspace as possible. The MOA structure imposes significant restrictions and inefficiencies on training that limit 11 AF units' abilities to more fully develop combat capability.

The DEIS fails to show specific need for the proposal to enlarge and modify airspace in Alaska over an area the size of New England. The DEIS fails to address the cumulative impacts of the proposed action and military activities in associated airspaces (e.g., RAs, Controlled Firing Areas, ARs, ATCAAs, LATNAs, MTRs, and SRAs). The use of these other airspaces is acknowledged in the DEIS; however, the area affected, degree of aircraft activity associated with MOAs and other airspace, and expected impacts to wildlife, recreation, and subsistence resources and their uses are not adequately addressed. The 11 AF has instead chosen to rely on six "stand alone" environmental assessments that when viewed separately resulted in findings of no significant impact (Volume 1, p. 1-9, paragraph 1.7.4).

The ADF&G believes impacts to wildlife, recreation, and subsistence resources and their uses that are expected to occur within MOA boundaries as the result of military aircraft activities are indistinguishable from the impacts associated with similar activities by the same aircraft within the other military airspace in Alaska. All impacts resulting from military aircraft activities within designated military airspace should be assessed for cumulative environmental impacts (NEPA, 40CFR 1508.25(A)(1), (A)(2)).

PAN-001

CUM-001
PRO-001

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Specific Comments

Level III Impacts (Volume II, p. 4-88 definition. Major, significant impact; may help cause or maintain substantial reduction or large-scale disturbance of local regional or entire populations.) are expected to occur to trumpeter swans, caribou, Dall sheep, recreation activities, and subsistence activities without implementation of mitigation. Level III impacts are unacceptable and mitigation should be implemented to minimize adverse impacts. Mitigation proposed in the DEIS includes raising the appropriate MOA floors to 3,000 ft. AGL over sensitive wildlife areas and seasonal restrictions on low-level flights during sensitive seasons to reduce impacts to Level II. The ADF&G requests the 11 AF include as mitigation seasonal low-level flight restrictions (3,000 ft. AGL) for the Yukon, Fox, Stom, Elision, Buffalo, and Sustine MOAs during August 10 through September 30 to reduce conflicts and incompatible noise disturbances during major large game hunting and subsistence gathering periods.

MIT-028

Studies cited in the DEIS (e.g., Murphy et al. 1983) described caribou calving and post-calving as the most sensitive period. Similar data are lacking for other large game animals. The ADF&G requests the 11 AF to include as mitigation low-level flight restrictions (5,000 ft. AGL) over Dall sheep lambing, caribou calving, and moose calving areas identified by ADF&G during the scoping process. The low-level flight restriction should be in effect May 10 through June 30 to reduce aircraft induced stress and disturbance to these animals during birthing and the most vulnerable post-birthing period. A recommended study program to assess impacts to other large game populations is the effects of low-level jet aircraft on Tanana Flats moose.

A floor of 100 ft. AGL has been proposed for subsonic aircraft operations in several MOAs. In Volume III, pages E-30 through E-34, single event noise levels are presented for 14 different aircraft. All aircraft evaluated for noise exceeded 85 dB at ground level when flying at 1,000 ft. AGL (C-130, the least noise), 6,300 ft. AGL (F-16), and 10,000 ft. AGL (B-1, most noise). Volume II, p. 4-108, paragraphs 4.5.3.1.5 and 4.5.3.1.6, set the estimated noise level necessary to startle moose and Dall sheep at 85 dBA and 75 dBA. Yet Table 4-5 in Volume II shows potential Level III impacts to only trumpeter swans (Sustine and Fox MOAs), caribou (Delta caribou herd), and Dall sheep (Northern Alaska Range and Tanana Flats populations). The 11 AF has acknowledged a much wider distribution of wildlife within the boundaries of the proposed MOAs (e.g., Nelchina, Fortymile, Yenart caribou herds). It is reasonable to expect impacts to occur to wildlife species common to different MOAs. The ADF&G requests the 11 AF to include in the DEIS an evaluation

BIO-007

MIT-028

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MIT-028

of the potential impacts characteristic to each type of aircraft proposed to fly over or near sensitive wildlife areas.

SAF-005
MIT-025

ADF&G biologists conduct aerial surveys of wildlife and fish populations throughout the year. These surveys are conducted in small fixed-wing aircraft at low altitude and frequently share airspace with military aircraft. Surprise encounters (proximity) with military aircraft, both inside and outside of MOA boundaries, have occurred. The ADF&G requests the 11 AF to develop and initiate a program that includes a point of contact for coordinating flights to avoid future potential hazardous conditions.

Low-level VFR flights by military aircraft outside of MOA boundaries also occur. The multitude of Special Operations Areas (SOAs) including MTRs, MOAs, RAs, LATNs, and SRs available to military pilots should preclude VFR activity in general aviation areas. The ADF&G recommends restriction of military flights to IFR activity outside the SOAs as mitigation for the proposed increase in military flight activity in Alaska. This would reduce military aircraft impacts to wildlife outside of designated training areas, reduce potential hazards to ADF&G biologists during aerial surveys, and reduce conflicts with general aviation flights.

Volume II, Section 3.7: Substantive

SUB-004

Section 3.7.1., Background. The authors incorrectly characterize the state subsistence regulations as applying only to rural and Alaska Native residents. Under current state law, all Alaska residents are potential subsistence users. Subsistence also is the priority consumptive use of federal public lands and of lands presently under state management jurisdiction.

Section 3.7.2, footnote 1. The authors assumed that "80 percent of the subsistence use for a given community occurred within a 30-mile radius of that community," yet fail to explain how they arrived at this determination. We are unaware of the authors having consulted with Division of Subsistence staff before arriving at this conclusion. While the 80 percent/30 mile radius may be a valid assumption in quantitative terms, it is potentially deficient in other respects. For example, certain use areas located outside the 30-mile limit may be the primary locations used by particular individuals or family groups and may be the principal areas used for harvesting particular resources.

SUB-001

Arlene Murphy

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November 28, 1994

Volume III, Appendix J: Village Subsistence Profiles

Section J.4.3: Tanana MOA: Tok. The description provided incorrectly states that data are unavailable on the general patterns of subsistence for Tok. In fact, the Marcotte et al. 1991 source cited for Tanacross and Dot Lake contains similar information for Tok.

SUB-003

Volume II, 4.7.8 Subsistence: Special Considerations

Section 4.7.8.1., Cumulative Impacts, and Section 4.7.8.2, Mitigation. We are not surprised by the conclusion that "long-term adverse cumulative impacts will be avoided." We endorse the recommendation that the Air Force establish formal liaisons with local communities and state and federal subsistence managers, if any of the action alternatives in the EIS are implemented. The Department of Fish and Game Nelson should be a staff member of the Division of Subsistence. The Air Force should provide the support necessary to monitor the effects of activities in the MOAs and formally commit to addressing problems which are documented during the monitoring period. Without this commitment, there is little practical value in conducting the monitoring.

MIT-028

ATTACHMENT C

STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

WHITE / ANGEL COVENOR

211 AVIATION AVENUE
PO BOX 17999
ANCHORAGE, ALASKA 99516-4999
(907) 264-4444 or 264-9443
Alt (907) 264-1517

STATEWIDE AVIATION

November 30, 1994.

Re: Draft Environmental
Impact Statement, Military
Operations Areas

Ms. Arlene Murphy
Office of the Governor
Division of Governmental
Coordination
3601 "C" St., Suite 370
Anchorage, AK 99503-5930

Dear Ms Murphy:

The State of Alaska, Department of Transportation & Public Facilities (DOT&PF) offers the following comments to the Draft Environmental Impact Statement (EIS), Alaska Military Operations Areas, dated September, 1994. We submit the following concerns and statements for the record. Please include our concerns in your complete State response.

Purpose and Need

While we wouldn't question the need for the military's mission to have adequate training on a world-wide basis, we question why this should occur in Alaska, particularly with the substantial impacts and increased air safety risks which would result from this proposal.

PAN-001

PRO-011

Secondly, the purpose and need do not adequately address the military and civilian airspace needs together in terms of their overlap and conflicts which compromise air safety.

In both these areas it appears to us that the purpose and need are inadequate considering the substantial airspace and safety impacts in Alaska.

Public Involvement

The public involvement program outlined in the Draft EIS concentrated on the communities located within, or adjacent to the MOAs and proposed MOAs, plus Anchorage. However, virtually all

PRO-003

-2- November 30, 1994

Alaskans use MOA airspace even though they do not all live within or adjacent to the MOA. This leaves out a significant portion of the users who will be affected if the proposed plan is placed into effect.

As we have maintained several times previously, the U. S. Air Force needs to contact the air taxi operators in the areas surrounding the affected areas for their input. Many of these carriers have not heard of the EIS. Dillingham, for an example, serves as the mail hub and home base for the air carriers who provide commercial service to Koliganek which is located in the Naknek 1 MOA. Aniak and Bethel are the mail hubs and home bases for the commercial air carriers who serve the villages in the Stony MOA. None of these communities has received a public meeting.

The Alaska Air Carriers Association must be specifically contacted to solicit comments on routes that the scheduled mail carriers fly between the communities. Without question, established patterns of travel exist. You should also contact the U. S. Postal Service for a listing of the carriers who fly the mail, and then specifically contact these carriers directly. The public involvement process is completely inadequate unless it is expanded accordingly.

MOA Impacts Displaced Over State Lands

The mitigation actions described in the proposal attempt to displace the impacts to less sensitive areas, or into areas from which nobody has yet complained about the proposals. Unfortunately, this discriminates against the people whose comments do not carry the impact of a resource agency. For example, the National Park Service objected to aircraft noise over their lands in a March, 1994 Notice of Proposed Rulemaking. The Park Service has a narrow interest and their proposal did not account for the unique aviation needs in Alaska. There are over 300 public-use airports, the majority of which serve as primary access to communities with no other regular means of transportation. In most cases, people must traverse over National Parks and MOAs to travel between communities. In the lower 48 states, this travel would primarily be accomplished on roads and highways. However, in Alaska, air travel is the primary means of accomplishing this travel.

The proposed mitigation would now raise the floors of the MOAs, or expand the MOAs so they lie outside of the National Parks. The

PRO-003

ALT-002

ALT-002

AIR-003

SAF-005

-3-

November 30, 1994

expanded MOAs displace the impacts outside of the National Parks onto land and into air which is used by someone else, such as lands owned by the State of Alaska or privately owned by individuals and Alaska's native corporations. This is seriously flawed. It is unclear why National Park Service airspace should be untouched in favor of a tripling of the impact on the remaining state airspace.

Critical Civilian Aviation Interruptions

The Draft EIS contains descriptions of aviation impacts and proposed mitigation measures. Listed is the statement that "Civilian operators may occasionally postpone flights during certain times of the day." It is improper to suggest that critical life safety activities in Alaska should wait for military training. Medical evacuation emergency flights take place completely without scheduling and cannot wait. The Alaska State Troopers provide critical law enforcement activities throughout these areas where other law enforcement does not exist. The Troopers are able to respond because they travel by air.

Most of the flying to move goods and people in rural Alaska is conducted under Visual Flight Rules (VFR) conditions. Most of the aircraft used for these flights are not certified for flight in Instrument Meteorological Conditions, nor are they required to be. Flights are conducted when weather allows. The consequences of not flying could be perishable groceries sitting on the ramp of a hub airport and spoiling, waiting for delivery to a village located within the MOA because of military flying activity.

An example of the pressure air carriers are placed under to fly without delay is the U. S. Postal Service penalties under the 36/24 rules of delivery. Air carriers receive these penalties if they fail to deliver the mail within the prescribed time periods.

Potential For Midair Collisions

Another portion of the Draft EIS states that heightened awareness would minimize the potential for a midair collision. This statement does not adequately depict the condition or the risk. In fact, the potential for a mid-air collision is extremely high. Heightened awareness certainly helps, but a recent accident near Steptoe, Washington in April, 1993 between a military aircraft on a training mission and a civilian aircraft demonstrates the difficulties involved. In this accident, the military aircraft was painted in low visibility paint, similar to the paint used on the

November 30, 1994

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SAF-005

military aircraft used in Alaska. The National Transportation Safety Board investigation of the accident indicated that the high speed of the military aircraft did not leave adequate reaction time to avoid the accident.

The FAA provides information on avoiding midair collisions in Advisory Circular 90-48C. This document states that during the situation when two aircraft are on a collision course, a time of 12.5 seconds is required from initial target acquisition to the completion of a successful avoidance maneuver. It is extremely difficult to visually acquire military jet fighters with their low visibility paint. The NTSB analysis of the Steptoe accident determined that the civilian airplane would have become visible to the military flight crew approximately 8.5 seconds before impact, and, the civilian pilot could have first seen the military aircraft approximately 3.5 seconds before impact.

The potential for this type of collision along the Richardson Highway corridor is so high, and presents such an unacceptably significant risk to the flying public and the US Air Force, that the Air Force must re-examine methods for separating civilian and military aircraft.

MIT-028
AIR-007

The US Air Force tested an information distribution system along the corridor during the summer of 1994. Although this system showed positive results, it is not adequate mitigation. The test system provided advisory services with general information on training activity. True mitigation would involve conflict resolution advisories, or positive control of all aircraft in the corridor.

Alaska Flight Service Station Closures

The Flight Service Stations (FSS) are the primary interface between the military and civilian users. They are supposed to communicate notices of the time and location of military activity to civilian users. Because of recent closures and lack of personnel, the FSSs cannot perform this function satisfactorily.

Fourteen FSS have been permanently closed. Another fourteen are being operated on a part time or seasonal basis. Remote Communications Outlets (RCO) are supposed to relay communications from users to three Automated FSS and replace communications from the closed FSS. In order to reduce the workload at the Automated

OTH-012

November 30, 1994

-5-

FSS and the part time FSS, the FAA is reducing communications opportunities with users by changing MCO frequencies so they are different than the Common Traffic Advisory Frequencies that aircraft use for normal position broadcasts and deconfliction advisories.

The civilian flying activity is continuing to occur without these normal safety communications with the FAA. Many civilian pilots continue to fly without NOTAM and weather information. Normal information is not being passed between the FSS and the Automated FSS because of the heavy workload. Thus the use of the FSS to help communicate times of activity in a MOA, or deconfliction information between civilian and military users is unlikely to occur. The lack of communication is causing a dangerous situation for all users of the airspace, and the FAA needs to fix the inadequate communication to resolve this serious safety problem before any military flying takes place in current or future MOAs.

Conclusion

The temporary MOA concept forces the U. S. Air Force to communicate with the other users of the land and air resources within Alaska on a regular basis. It offers the Air Force planners the flexibility to change the MOA configurations to meet the changing needs of the military and the other users in Alaska. Alaska is a growing state. The issuance of a final EIS or a Record of Decision at this point in time will make changes to accommodate future growth much more difficult.

The Draft EIS as presented does not make an adequate case for changing the system of using temporary MOA, and we suggest retaining that system for the foreseeable future. Even the use of temporary MOA needs to have more extensive public involvement than it has received in the past, based on the serious problems which have surfaced during the limited public involvement which has occurred on this draft EIS proposal.

Any more proposals for permanent airspace changes needs the following submitted, (1) more public involvement; (2) a more adequate plan for the lack of communication related to the FSS consolidation and closures; (3) resolution of the Richardson Highway corridor conflict; (4) positive mitigation for midair collision;

OTH-012

ALT-003

PAN-001

-6-

November 30, 1994

(5) more appropriate distribution of MOA training missions into airspace over both federal and state lands; (6) conflict resolution mitigation between civilian aviators who must fly throughout the MOAs.

Sincerely,



Carl Siebs, PE
Airports Engineer
Statewide Aviation

cc: Major G. Virgil Hanson
Chief of Environmental Management
611 ASG/LGV
5800 G Street, Suite 203
Elmendorf AFB, 99506-2150



ALASKA AIR CARRIERS ASSOCIATION

1117 E. 35th Avenue, Suite 102
Anchorage, Alaska 99508
(907) 277-0071 Fax (907) 277-0072

November 30, 1994

Major Robert Siler
11 AF/DOOQ
5800 G Street, Suite 102
Elmendorf AFB 99506-2130

Re: Airspace Study 94-AAL-004NR

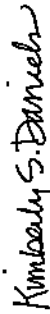
Dear Major Siler,

The aviation industry has grave concerns that the USAP will develop permanent and temporary MOA's without considering the varied safety issues surrounding joint commercial and military use of the same airspace environment.

Some time ago, AACAA was approached by a USAP public relations representative and asked to provide initial input on the MOA proposal from a commercial operator's perspective. During that one hour-long meeting numerous concerns and issues were addressed particularly with respect to the established commercial route structure. Assurances from the military representative that more communication and involvement between the industry and military would be forthcoming to ensure a safe operating environment for all parties. To this date, AACAA has received no further contact from any military representatives regarding this issue.

With the safety interests of the public in mind, it would behoove the USAP to meet with the commercial aviation industry to gather crucial input before developing MOA's over multi-use airspace.

Sincerely,



Kimberly S. Daniels
Executive Director

AIR-008
SOC-002

PUBLIC COMMENT FOR MOA/EIS DATE: 30 NOV 94 taken by SSgt Anne Proctor

Jeannette Hanson
6770 Cook Circle
Salcha, AK 99714
phone: 488-3601

OTH-014 We have a private plane that we fly in the area and have seen jets and helicopters flying low, along the Salcha River and over our house. We want them to fly at higher altitudes, like 3-5,000 feet.

NOTE: She asked for an executive summary.

A damaged letter was received via mail. It could not be scanned into the document. It was retyped and it read as follows:

From: Abigail C. Johnson
Consulting, Community Assistance, Grant Management, Public Involvement
617 Terrace Street, Carson City, Nevada 89703
(702) 882-0296, Fax (702) 883-0226

To: EIS Team
Major C. Virgil Hanson
Chief, Environmental Management
611 ASG/LGV
5800 G. Street, Suite 203
Elmendorf AFB, AK 99506

Dear Major Hanson & the EIS Team:

RE: Draft Alaska Military Operations Areas EIS

The activities proposed in the Draft EIS for Alaska Military Operations Areas will have extreme environmental social and economic consequences for humans,

AIR-008
SAF-005

Our experience in Nevada, where military operations areas also dominate, is that commercial and private air travel is disrupted, distances further lengthened, and safety jeopardized.

REC-003
BIO-007

The DEIS should provide a complete analysis of impacts to all affected recreational resources and natural resources.

NOI-003

The DEIS should also provide detailed impact analysis of the consequences and impacts of long term exposure to sonic booms generated by air combat below 30,000 feet.

PRO-014
REC-001
REC-003
SUB-002

Neither Nevada nor Alaska should become national sacrifice zones for Air Force military training activities.

The DEIS is inadequate because it fails to provide complete information about impacts to tourism, recreation, subsistence, and other human activities.

PAN-001
ALT-001
ALT-002

The DEIS does not provide sufficient documentation of the need for the training activities. The "no action" alternative should describe the consequences of not imposing this burden on this remote and fragile area and on any other area - ie no action at all.

Thanks for considering any comments.

Sincerely,

Abigail C. Johnson

cc: Secretary Bruce Babbitt, DOI
Paul Gallant, FAA
Senator Harry Reid
Senator Richard Dwyer
Congressman Barbara Vucanovich
Grace Bukowski, RAMA

PETER G. BIESIOT
P.O. BOX 80849
FAIRBANKS, AK 99708
Tel. 907 479 4628

November 27, 1994

To:

The Honorable Bruce Babbitt Federal Aviation Adm. Maj. C. Virgil Hanson
U. S. Dept. of the Interior 800 Independence Ave SW 611 ASGILGV
1849 C Street, Rm 555 Washington, DC 20591 5800 G St, Ste 203
Washington, DC 20240 Elmendorf AFB, AK 99506-2150

Dear Administrators,

Re. US Air Force Proposed Supersonic MOA's in ALASKA

I would like to offer my strong objections to the proposed new MOA's. I have been a pilot since 1941 and was a pilot during WWII in both the AAF and the USAF. I presently own a Cessna float plane. I often fly to Kenai via Windy Pass and just east of Anchorage, to Lake Clark, to Katmai National Park, to King Salmon, and return to Fairbanks via McGrath and Galena. In addition we fly to Whittier, Yukon Territory, via Delta Junction, Tok and Northway, and also Fairbanks, Ft. Yukon, Eagle and Dawson following the Yukon River east of Ft. Yukon.

In June of 1994 on a return flight from Quartz Lake(east of Fairbanks) at an altitude of 2,500 ft. I had jet fighters flying under me.

SAF-005 Much of the proposed supersonic Yukon 1, 2, 3, 4 and 5 areas will make it either hazardous or just suicidal for private pilots to use this traditional air space.

AIR-008 It would seem that the Air Force is going through all the requirements of an Environmental Impact Statement as a formality without recognizing that the Yukon MOA is taking a major air corridor out of citizens use for military operations, including foreign Air Force's e.g. the British and the Japanese, etc. I am concerned about access to traditional flying areas in the state and the freedom that we have enjoyed to date.

AIR-019 As a canoeist on rivers within the YUKON MOA we are frequently harassed by low flying A-10's and other jet aircraft flying at 300-500 ft above the rivers. It is an intrusion into an otherwise pristine canoe trip. From all the training that the Air Force does, how often do these pilots spend strafing the enemy vs. high altitude engagements? I am sure that we want the Air Force to be trained, but there must be a multiple use of the resources with the citizens taking precedence over the itinerant Military Officers who are either here for an exercise or an assignment of 2 or 3 years. Not to mention the fires that the Air Force

HAZ-009

HAZ-013

HAZ-001

starts every summer, frequently refusing to acknowledge that they did so, and not notifying the Bureau of Land Management when they do start fires. Also keep in mind that large areas will never be safe to walk on after all the unexploded bombs, missiles are scattered about. Note: The Military in Alaska have a very dismal record of leaving behind toxic waste, atomic waste, canisters of deadly gases, etc.

The United States must recognize that Alaska is not ready to be exploited by the military for their own convenience. Alaska is rapidly becoming a preferred destination for vacationers who want to experience an unpolluted and pollution free wilderness experience. Supersonic jets are an unneeded intrusion.

Perhaps the U.S. Air Force can have joint exercises with the new regions of Eastern Siberia, e.g. the Air Base at Anadyr. That would give them a real challenge - operating on rough airstrips, primitive refueling facilities and those regions are less concerned with EIS's. I am sure their air space is for rent

Sincerely,



Peter G. Biesiot, D.B.A.
Professor Emeritus
University of Alaska

Rick Schikora
1416 Gillem Way
Fairbanks, AK 99701
Phone: (907) 456-1566 vx

November 29, 1994

US AirForce
611 ASG/LGV
5800 G. St. Ste. 203
Elmendorf AFB, AK 99506-2130

Dear Sirs:

Almost 20 years ago, I was almost run over by a couple of low flying high speed jets out in Restricted Area 2201 while it was "cold". I checked with FAA Flight Service Station before traversing the area south bound and again north bound twenty minutes later. Both times I was told it was "cold".

I can still vividly see the picture off my left wing. Two small black streaks coming out of the sky with two little black specks at the bottom. My curiosity in this case probably saved my life and my wife's. I was puzzled as to what the little specks were, when all of a sudden the specks got bigger and then very big. I pushed the Citabria's nose down and cranked a hard right turn to get the hell out of the way. Two fighter jets flew by in the airspace that I had just occupied.

I can still hear the response I got from FAA FSS when I called back and requested confirmation that the area was "cold". Oh yes it is "cold". Why then was I just about run over by two jets at very low level (just a few hundred feet)? Well, they weren't bombing out there today, they are just practicing their strafing runs. Thanks a bunch, from now on "cold" doesn't mean "cold" to me.

My mother was flying her plane back from Anchorage at the time and heard all the radio transmissions regarding this. When she was safely on the ground, she went in a read the jerk at FSS the riot act. She didn't think it was a very safe operation the AirForce was running and the lack of good information from FSS only caused the situation to be worse.

I used to do (and still do) a lot of flying out to the foothills of the Alaska Range going to and from Fairbanks and North Pole areas. I also spend many hours a year in the mountains and valleys draining the Salcha, Charley and Forty Mile country. I spend a number of hours a year in the Yukon flats and the hills around Central. I haven't spent as much time recently as I would like to going fishing down in the McGrath area and beyond, but anticipate resuming those activities. While doing so, I do not wish to have an increased opportunity to mix it up with your low level fast flying airplanes.

I have studied your proposal and have read the recommendations put forth by the Alaska Aviation Safety Foundation. I generally concur with their recommendations. When they recommend a corridor be extended from the surface to some level above ground level, I believe the lower limit

OTH-014

should be above the highest terrain feature in the area. Otherwise, it will be very difficult to determine just where the corridor starts.

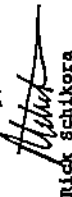
When I was Chairman of the Greater Fairbanks Chamber of Commerce, I promoted an increase in Military presence. I only did so because I felt we could live and work together. I still believe that is the case. However, I also believe the Military already has ample area to perform its training functions in Alaska. In order for this issue to be resolved satisfactorily, you need to back off your expansion plans and scale back the temporary areas as well. You also need to pay particular attention to the sonic booms or other activities that can cause glass (window) breakage in houses and cabins near your areas of operation.

OTH-014

I own property on the Salcha River, just east of Restricted Area 2205. I have found flying over there to be a general pain in the neck. But, I have accepted that, since the Air Force has installed facilities and set up practice areas. I can understand the need for restricted airspace in order to keep civilian and military aircraft separated. Besides RA 2205, you have substantial restricted airspace in RA 2202. There seems to be plenty of room for your exercises.

Thanks for the opportunity to comment.

Sincerely,


Rick Schikora

Susan Wren
Box 48
Chicken, Alaska 99732

November 25th 1994

Major C. Virgil Hanson
611 ASG/LGV
5800 G Street, Ste 203
Elmendorf AFB, AK 99506-2150

Dear Major Hanson,

I am writing to inform you that my husband and myself are against the proposed MOA. My husband is an IFR commercially rated pilot and occasionally goes IFR to Fairbanks. He would not be allowed to do this if it is approved and active. We are both concerned about our wilderness environment and want it protected.

On the 22nd of November in the afternoon, two military helicopters 'buzzed' our house flying barely a 100 feet above the ground frightening our children. Is this what would happen if the proposed MOA gets approved? Or will it worsen? I am upset they flew at such low levels over our house. They have no right and were flying illegally. I am also upset that flying like this, compounded with military jets sonic boom noise will affect our environment. Obviously, these pilots have no respect for people. God knows what they think about our caribou and peregrine falcon populations.

We are totally against this new MOA --as inclosed for more reasons why. Thank you very much for your attention.

Sincerely,
Susan Wren
Susan Wren

cc Honorable Bruce Rabbitt
cc FAA



Northern Alaska Environmental Center

218 DRIVEWAY
FAIRBANKS, ALASKA 99701
(907) 433-0021

*** ALERT *** ALERT *** ALERT *** ALERT ***

The United States Air Force is proposing the designation and upgrade of 71,650 square miles of military airspace which if approved would impact nearly 13 million acres of Alaska (see map).

Severe environmental consequences are expected which will affect hunters, trappers, pilots, recreationalists, and native communities.

Alaska will experience:

- Increased areas of noisy low level military jet overflights and sonic booms
- Impacts associated with chaff and flares
- fuel-jettisoning
- electro-magnetic radiation hazards associated with military installations

Impacted resources include:

- the Delta Caribou Herd
- Dall sheep populations in the Tanana Hills and Alaska Range
- Peregrine Falcon nest sites

Recreational resources expected to receive serious impacts include:

- Forty mile National Wild, Scenic, and Recreational River
- Yukon-Charley Rivers National Preserve
- Charley National Wild River, Gulkana National Wild River
- Delta Wild Scenic and Recreational River
- West Fork Gulkana River Area of Environmental Concern

Native communities at Eagle Village, Dot Lake, Healy Lake, Circle Village, Lime Village, and Eagle City will receive major adverse impacts to subsistence resources.

Commercial and private pilots can expect increased potential of mid-air collisions and costs associated with Special Use Airspace.

Send your comments by November 31st to:

The Honorable Bruce Rabbitt
US Department of the Interior
1049 C Street, NW, Room 839
Washington, DC 20240

Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Major C. Virgil Hanson
611 ASG/LGV
5800 G Street, Ste. 203
Elmendorf AFB, AK 99506-2150
(907) 552-1507

OTH-014

AIR-019



ALASKA AVIATION SAFETY FOUNDATION

Position Paper on the Draft Environmental Impact Statement Alaska Military Operations Areas

Introduction

The Air Force has proposed major restructuring of their Special Use Airspace in Alaska. A Draft Environmental Impact Statement (EIS) has been produced which describes the proposed changes. One of the major issues identified in the document is a concern for aviation safety. The potential hazards of mixing high speed military aircraft operations with slower speed civil aircraft is a concern to pilots (military and civilian) and the traveling public. This position paper identifies issues and constructive recommendations aimed at minimizing conflicts, while attempting to accommodate the needs of all users of the airspace.

The principal concern of the aviation community is the increased risk of mid-air collision resulting from (1) routine training exercises of Alaska based military aircraft which occurs on a year-round basis and (2) the greatly increased activity which occurs during Major Flying Exercises (MFE's). High-speed military aircraft, often flying at low level and close to terrain to avoid detection, are a definite threat to small aircraft operating in the same area. While some military aircraft are equipped with sensors to help locate "threats," experience indicates that the pilots who are flying in formation and/or engaged in realistic combat exercises may be focusing on details other than looking constantly for small aircraft which are not participating in the exercise.

Civil users of the airspace under consideration includes airline and air taxi operators, private business aircraft, guides, hunters, recreational users, biologists conducting game surveys, air ambulance services, people engaged in resource exploration or land management, pipeline patrol activities, etc. This area, like most of Alaska, has no or very few roads. Consequently the use of aircraft is required for a wide variety of purposes --more than is apparent from a casual look at a map of the region. The frequency and nature of these activities are what must be compared to the military training activities to evaluate risks to aviation safety.

Input for the positions presented in the document was gathered from (1) study of Air Force proposals, (2) discussions with Air Force personnel and (3) comments recorded from public pilot meetings held in Fairbanks earlier this year. The geographic areas evaluated are those immediately south, east and north of Fairbanks. While the scope of the overall proposals cover other areas across the state, we perceive the greatest impact in these areas. This is not to say that there aren't potential problems in other

areas which need to be evaluated. They were beyond the scope of our ability to evaluate at this time.

We would like to acknowledge that the Air Force has supported public meetings and made themselves available to provide information concerning their mission, training techniques, and equipment used. This has been immensely helpful to understand the nature of their operations, and to evaluate potential conflicts with civil aviation uses. We hope the recommendations identified will lead to improved safety for all users of the airspace.

Recommendations are grouped under four major headings: (a) corridors for IFR and VFR operations; (b) seasonal timing of military exercises (c) communications between military and civil users and (d) overall coordination.

Corridors for IFR and VFR operations

There are significant amounts of travel along identifiable high traffic routes in the proposal areas. Several commercial operators conduct scheduled flights between Fairbanks, Eagle, Tok, Delta Junction, Chitken, Boundary, Northway, Teller, Chisana, Healy Lake, and Dawson City, Yukon. The commercial operators have expressed concerns about the impact the proposed special use airspace will have on their ability to continue to provide service to the communities located inside or adjacent to the MOAs. Corridors to protect this use, in addition to other private traffic along and between these areas must be considered. We will address IFR and VFR needs separately.

IFR Corridors

Recommendation (1) The existing Victor 444 airway which connects Fairbanks, Delta Junction, Northway and extends on to Whitehorse, must remain intact and protected, ensuring IFR routing between Fairbanks and points east. This airway not only connects these communities, it also is a major air route used by traffic between Alaska and the rest of the continental US.

Recommendation (2) While there is no currently approved airway between Fairbanks and Eagle or Dawson, it is clear that rapidly evolving GPS technology and better radar coverage will probably make this a possibility in the near future. The FAA and the Air Force should immediately start to develop an airway route from Fairbanks direct to Eagle for future use with GPS area navigation. This route should then be established as a no fly corridor for military aircraft, except those flying that route. The floor of the corridor would be the Minimum Enroute Altitude established for such an airway. Other dimensions would be identical to any standard Victor Airway. This route would also provide protection to VFR traffic traveling from Fairbanks to Eagle or Dawson, at least during good weather. A corridor along this route would provide a significant degree of safety for both military and civilian flyers.

Recommendation (3) The prospect of future GPS approaches to other airports in the area is a significant development. The impact of these MOAs on future IFR operations

should be carefully considered to avoid precluding access to these areas. Air Traffic Control clearances for IFR approaches could perhaps be sequenced in-between Air Force traffic. The majority of civil users would most likely be passengers of commuter aircraft, not individual pilot owners.

VFR Corridors

In contrast to instrument operations, the majority of civil users fly under visual flight rules. Unlike IFR traffic which is flying at altitude to avoid terrain, VFR traffic tends to concentrate much closer to the surface along valleys and low routes through high terrain. During times of low cloud conditions or poor visibility, traffic tends to concentrate along selected routes such as the rivers or highways that run in the valley bottoms. The major route in this region runs from Fairbanks along the Richardson and Alaska Highways to Northway, and on into Canada. This route is used by local traffic year around, and receives heavy use in the summer by pilots flying to Alaska from Canada and the US, and therefore not familiar with the area. The route is also heavily used by student pilots on solo cross country training flights.

Recommendation (4) A major VFR route exists between Fairbanks and the Canadian Border (via Big Delta and Northway), and from Big Delta through the Alaska Range along the Richardson Highway. A low level VFR corridor should be established along the Richardson and Alaska Highways along these routes. Military aircraft should not be permitted in this corridor. The corridor should be five miles wide, with the Richardson Highway as its north and east boundary. The corridor should extend from the surface to 2,000 feet above ground. This would allow safe VFR transit of general aviation aircraft during inclement weather conditions without the potential for conflicts with military aircraft.

Recommendation (5) Additional routes run from Fairbanks to Central and Circle City along the Steese Highway, between Circle City to Eagle and Dawson along the Yukon River, and from Northway to Chisena (south) and Chicken, Eagle and Boundary (north). Corridors, or floors above ground level along these routes should also be considered to protect VFR operations.

Recommendation (6) The Trans-Alaska Pipeline is routed through the proposed special use airspace. Alyeska Pipeline Service Company uses helicopters for surveillance and inspections of the pipeline year round. Most of the flights are conducted at low level altitudes, which can make "See and Avoid" more difficult. Helicopter pilots reported experiencing near miss situations with military aircraft while conducting inspections and other operations along the pipeline. The Trans-Alaska Pipeline should be protected by a low level VFR corridor three miles wide, centered on the oil line, starting at the surface and extending to 1500 feet above the surface. This would provide a safe operating environment for both pipeline related helicopter traffic and general aviation traffic using the pipeline as a visual reference in marginal weather. Again, military aircraft should be excluded from this corridor.

Seasonal Timing of Military Operations

During certain times of the year, general aviation traffic increases dramatically across large portions of the Interior. Corridors aren't appropriate due to the dispersed nature of these operations. Fortunately, there is a time dependency which makes these activities both predictable and avoidable. The major uses are:

Hunting Seasons: Beginning approximately two days prior to the opening of Dall Sheep season until approximately two days after the close of moose season there is a significant increase in general aviation traffic. Most of this increase in traffic will be due to Air Taxi operators and private pilots flying to and from hunting camps located in the Forty Mile area (Yukon MOA) and the Alaska Range. Currently, sheep season opens around August 10th and many moose and caribou seasons close around September 30th in the Interior. Due to the nature of hunting operations, many of the aircraft participating in these activities will be conducting off-airport operations (landing on and taking off from lakes, rivers and gravel bars). The combination of increased traffic, difficulty in "See and Avoid", off airport operations, and fall weather conditions results in a significant increase in the accident threat level.

Fish & Game Surveys: State and federal agencies such as Alaska Department of Fish & Game, US Fish and Wildlife and the National Park Service use aircraft in the proposed airspace to conduct game surveys and law enforcement surveillance. These game survey operations are more concentrated during the May through September time period.

Recreational Flying: During the week around July 4th, there is a peak in general aviation recreational flying. At this time people are vacationing and traveling by aircraft all across the state, many transiting portions of the proposed areas. Also during this period, there is an increase in tourist traffic flying along the Alaska and Richardson Highways, and between Dawson and Fairbanks. Recreational users from other parts of Alaska and visitors from outside the state are generally not familiar with specific corridors, time and space phasing which may be in place, increasing the opportunity for them to inadvertently wander into high risk situations.

Recommendation (7) Potential conflicts between military and civilian aircraft were identified within specific time windows. The military should make every effort to avoid overflights, particularly low level overflights, during these time windows.

It is recommended that no Major Flying Exercises (MFE's) be scheduled between August 8 and September 30 annually. This would provide temporal separation between large scale military operations and general aviation aircraft operations during the hunting seasons. Since Dall Sheep hunting season currently opens on August 10 this would offer a two day window of protection during which most hunters would be flying to and from their hunting areas. The September 30 date would cover most of the current moose and caribou seasons.

In addition, the Air Force should restrict all routine flying to no lower than 3,000 feet AGL during the hunting seasons listed above.

The Air Force should not conduct any MFE's during the time period one week before and one week after the July 4th holiday. This period would largely deconflict Air Force activities with the high levels of recreational and tourist aviation traffic which occurs in this time period.

Taking these seasonal constraints into account along with the winter months that are not conducive to large scale Air Force operations, it appears that four Major Flying Exercises could be accommodated each year. Levels of activity above this number should result in further measures to mitigate conflicts with civil users of the airspace.

Communications Between Military and Civil Users

While the areas of special use airspace requested by the Air Force for training are vast, the areas actually occupied by groups of aircraft at any one time is relatively small. If knowledge of the location and direction of travel of military aircraft can be communicated to civil users, this would go a long way toward allowing effective use of the airspace by civil and military users concurrently. We recognize and applaud the Air Force for their efforts to install VHF communication outlets and radar facilities which provide some coverage of the corridor between Fairbanks and Big Delta last summer. Those that tried using the service reported variable results.

Recommendation (8) The Air Force should aggressively pursue improvement of their VHF communications capability throughout the proposed Military Operations Areas (MOA's). This should include Remote Communications Outlets (RCO's) disbursed throughout the MOA's to ensure adequate year round coverage, and a coordinated and well informed Range Control capability, which can provide specific, real-time information on the location and direction of flight of military aircraft at any given time. In addition, tape recorded messages broadcast on separate frequencies alerting pilots to military traffic concentrations along major air traffic corridors could be available to pilots as soon as they become airborne from remote sites. The FAA should also examine its procedures to disperse more detailed information about military traffic to the civilian users via tape recorded broadcasts over navigation aides and through the use of commercial radio and television news programs.

Recommendation (9) The Air Force should provide access to Range Control personnel via a toll-free telephone number so that civilian users can obtain information about military activity schedules. This will enable civilian aviators to plan their operations around the highest levels of military activity. The level of detail available should include timing and location of planned activity, which would allow the maximum flexibility for civil users to accomplish their missions while minimizing exposure to encounters with military aircraft.

Recommendation (10) The possibility of using AWACS aircraft to provide both enhanced radar coverage and VHF communications capability during Major Flying Exercises (MFE's) should be explored. This capability if feasible, should be implemented. This coverage would only be available during MFE's, but since these are the times when military activity will be highest, the AWACS capabilities could conceivably provide significant enhancements to safety.

Coordination

It was apparent at the meetings held in Fairbanks that a majority of general aviation pilots are not well informed of the Air Force's training operations. By the same token, it was also clear that the Air Force is continuing to gain new insights into the nature and magnitude of general aviation activity which occurs in Interior Alaska. Channels for communication and continued dialog between the Air Force and the civilian aviation communities need to be enhanced and maintained, even after permanent changes are made to the airspace.

Recommendation (11) The Air Force should immediately establish and facilitate an aviation advisory committee to provide coordination and communication between the general aviation and military aviation communities. The FAA and an aviation user group should be requested to assist in the selection of individuals to represent general aviation interests. This committee should include a representative from the following groups: a scheduled air carrier who flies routes between Fairbanks and Eagle/Dawson; an air taxi operator who conducts on-demand air charter operations in the MOA's; a resource pilot who conducts wildlife inventory and surveillance flights; a flight instructor who trains primary students in the area; a member who represents helicopter operations in and near the MOA's and a member-at-large, who represents recreational and other aviation interests.

This committee should meet periodically to assess aviation safety issues and to make recommendations to both the Air Force and the FAA which are intended to improve aviation safety within military air space. Committee recommendations would be non-binding but would serve to enhance communications and coordination between the civilian and military communities. The committee members would serve as an additional point of contact for aviators who have had problems with, or wish to make suggestions to the military.

Recommendation (12) The Air Force should maintain an "open door" policy with the aviation community. Activities such as site visits, open houses and tours of facilities should be conducted to help maintain open lines of communications and educate the aviation community to the nature of military flight operations. The open house at Eielson AFB last summer was an impressive first step in this direction.

Recommendation (13) The Air Force has implemented a toll-free number to receive input from civilians. We compliment the Air Force's efforts in this regard. This service should be made permanent and all input should be documented, given appropriate consideration and response.

Summary

The mixture of military and civil uses of the airspace under consideration in the Draft EIS creates a significant challenge to planners and regulators in both camps. It is our hope that with careful consideration of the needs of all users we can adopt operational procedures which will provide the safest possible operating environment and the ability to accomplish everyone's purposes.

Major C. Virgil Hanson

23 November 1994

611 ASG/LGV

5800 G St Ste. 203

Re: USAF Proposal to increase

Elmendorf AFB 99506-2150

Military Airspace

Dear Major Hanson -

Below is a copy (verbatim) of my letter to Secretary of the Interior Bruce Babbitt.

Dear Sir: This letter is my protest and is part of the movement which I hope will succeed in preventing further military encroachment on the beautiful pristine wilderness of Alaska.

I am a woman of 75 years who arrived in '89 and moved to Cheek, Alaska with the wish to spend my "twilight" years in a ~~great~~ quiet peaceful environment. There are just a few of us here during the winter when the highway is barely passable but in summer, this highway brings hundreds of miners (seeking their fortune) and tourists from all over the world (wishing to enjoy the Alaska Experience - quiet wilderness as far as one can see) - we are on one of the routes

connecting Alaska with Canada. The Air Force is proposed to turn this area into a military playground for the U.S. and possibly

other countries is absolutely appalling. To change this last wilderness frontier into an area for all sorts of military exercises, experiments, whatever, is one more indignity this planet is being subjected to. I refer to Sonic Booms (S. spectra summer reaction near) Inguire (Q. B. in n.g.) which are disturbing not only to humans but to wildlife as well, possible electro magnetic radiation (we are now hearing the horror stories of what the military has done near some native villages), if all this is disturbing to me, what effect would it have on the (already decreasing) caribou, moose, sheep, wolves - all creatures down to the tiny vole?

And why is this additional territory needed? We seem to have done okay so far with the area now used by the Air Force.

Please use your influence to contain this new military threat to Alaskan State Territory.

Thank you
Sincerely
Onedus Nien

P.O. Box
Cheek AK
99732

23 November '94

MOA/EIS
ATTN: James Hostman
611 ASG/LGV
5800 G Street
Elmendorf AFB, AK 99506-2150

Nov. 27, 1994

Dear Mr. Hostman,

As a resident of Fairbanks, a student pilot, and as a recreationist and hunter in the areas outlying Fairbanks and the Yukon River, I am writing to express my extreme opposition to the expansion of military training areas in Alaska and to the military's proposal to upgrade temporary MOA's to permanent.

I am not opposed to keeping our airforce pilots well trained, but I feel that Alaskans are taking the brunt of a military land grab. Even Colonel Siter has stated that the airforce doesn't need all this land now, but is looking down the road 20 years. As the military gets pushed out of the lower 48 more and more, we Alaskans do not want to be living in the center of increasing military training. My major complaints about the military's proposal are the following:

- 1) The EIS document is flawed in the fact that it does not address all of the military training exercises- airforce flight training, bombing exercises, and airforce support of army land based exercises- that will be performed in the MOA's, as well as on leased public lands in the state.
- 2) The EIS is totally inadequate in stating, much less studying, the cumulative impacts that increasing Cope Thunder exercises and routine training will have on the quality of life for area residents and recreationists; the quality of hunter success and enjoyment of hunting experience; and on wildlife populations-both breeding and wintering. Additionally, it does not address the increased levels of ordinance bombed in target ranges and the resulting necessary expansion of target areas within those ranges- which will encroach closer to the borders of public and privately owned land.
- 3) There are severe conflicts with both private and commercial aircraft flying in these areas, especially for student pilots who often utilize the V444 airway for cross-country flights, and with small-aircraft pilots flying VFR, low to terrain for weather related reasons, as well as for tourism, guiding, hunting, and for biological surveys during the summer and fall months.
- 4) Although the EIS process has taken approximately 18 months, the public was very poorly informed on how to respond during the public comment period. There was no large scale advertising or public hearings in the local media, and, besides a concerted effort by the FAA to involve pilots in the process, little was known about the scope and availability to the public sector of

LAN-010

PRO-001

REC-003
BIO-007

HAZ-001

AIR-008
SAF-005

PRO-003

this entire project. It is up to the military to publicize their intent- actively, not the public's responsibility to ferret out what the military is intending to fully acquire and achieve. Even town scoping meetings the military set up during this period were poorly or inaccurately advertised- almost as if they didn't wish anyone to show up.

PRO-003

Above all else, the military has had a long history of taking and using the airspace and land given to them by the people of the United States without ever having to be accountable for how such they realistically need, and for what purposes they need it. Indeed, there is a GAO project at this time devoted to finding out how much land the military owns, leases and operates out of in the U.S.; the military complex- you- cannot tell us, because you don't know the answer. To me, and every other rational person that has basic common sense, this is not only appallingy wasteful, but is dishonest to the public you serve and just plain bad business.

LAN-010

Before you take more of the public's land I feel you should accurately assess what land you do have. At the very least, an EIS for a project the size of this should not be rushed. Careful and long term study should be conducted on the cumulative impacts on wildlife populations, native peoples' subsistence lifestyles, and on the relatively isolated communities and individuals living in the interior which will suffer the brunt of the military's noise and presence. Peace, quiet, and a respect for wild country are all values most Alaskans cherish and care here to pursue.

Sincerely,

Marta McWhorter

Marta McWhorter
3895 Venture Lane
Fairbanks, AK 99708

cc:

Federal Aviation Administration

U.S. Dept. of the Interior

Northern Alaska Environmental Center

P.O. Box 81051
Fairbanks, AK 99708

Nov. 30, 1994

Chief, Operations Division
11th Air Force
ATTN: Major Siler
5800 G Street, Suite 102
Elmendorf AFB, AK 99506-2130

Dear Major Siler,

I would like to express my concerns over the proposed changes in the Alaska Military Operations Areas (MOAs) from the standpoint of a student pilot in the Fairbanks area. To quote from my Jeppesen *Private Pilot Manual* (1993), "VFR aircraft are not prevented from flying through MOAs while they are in operation, *but it is wise to avoid them when possible*" (emphasis added). This brief statement tells me that to ensure my safety, I should not fly through MOAs. Indeed, my instructor has told me to avoid flying through these areas.

Practical experience has already reinforced these written and verbal instructions. I was practicing maneuvers in the area south of the Tanana River near Fairbanks (commonly known as "the practice area" by Fairbanks student pilots and instructors) when a military aircraft flew rapidly past me -- too close for comfort. Although I was on radar advisories from Fairbanks Departure, they failed to inform me of the existence of this traffic. Both myself and my instructor were rather surprised (to put it mildly), and the experience provided me with two vivid lessons: (1) Radar advisories are just that - advisory. The pilot in command is responsible for *seeing and avoiding traffic at all times*. (2) Military aircraft are very difficult to see -- they fly at low elevations and at high speeds. As I am flying a small, low-powered aircraft, my maneuvering time for collision avoidance is extremely short.

When I take these two lessons in conjunction with the statement that I have heard many times: "Fighter pilots are flying missions, they are listening and flying on instruments, *they are not looking for you*," it is enough to scare me away from MOAs. Indeed, I feel very uncomfortable flying around military aircraft in general. If the FAA allows the Air Force to designate a large, continuous chunk of eastern central Alaskan airspace as permanent MOAs, then the available airspace in which I can safely fly with a reasonable degree of confidence that I will not encounter high-speed low-flying aircraft will be severely reduced. I have found that it is not easy learning to fly in the Fairbanks area. The locations to which I am allowed to go for my required cross-country flights are few in number. Down the Richardson Highway is one well-used student route, as it keeps us from having to cross any mountains. I would hate to see this route eliminated, as it

would be if the proposed MOAs are designated. If all goes well, in the future I hope to become an IFR rated pilot. Should this be the case, I would not be allowed to fly IFR at all in this whole area of Alaska.

I live in Fairbanks, it is my home, I want to be able to fly in the area around my home. I can understand the need to share airspace, and as you can tell from my comments, I really do want to avoid areas where military aircraft are actively flying. Please do not designate large continuous areas of Alaskan airspace as permanent MOAs without making provisions for the safe transit of general aviation aircraft in these areas. Suggestions to avoid severely restricting general aviation use of airspace are to provide VFR/IFR corridors along well-traveled routes (between communities, for example), and to provide toll-free 24-hour direct phone access to accurate information on military activity in a given MOA at a given time. Regardless of what action is taken, there should be provisions made for far greater communication and cooperation between the general and the military aviation communities.

Thank you for your consideration of my viewpoint and comments.

Sincerely,

Carol P. Scott

Carol P. Scott
Student Pilot
Fairbanks, Alaska

OTH-014

Department of the Air Force
611 ASG/CC
5800 G St. Suite 203
Elmendorf AFB, AK 99506-2150

To Whom It May Concern,

I am a resident of Fort Yukon, Alaska, a city that is affected by Yukon 5 of the proposed Alaska Military Operations Areas, and I would like to voice my opposition to this particular MOA.

After experiencing two sonic booms during August, it's hard to imagine that they will not adversely affect our wildlife resources, and it's my opinion that the environmental impact study isn't complete without the input of our own resource technicians; this input has yet to be solicited by your department.

In conclusion, I would like to state my position as being opposed to Yukon 5 being established as a permanent MOA, and that one of the alternative sites be used instead.

Additional comments:

PRO-003
OTH-014



SIERRA CLUB LEGAL DEFENSE FUND, INC.

The Law Firm for the Environmental Movement

333 4th Street, Juneau, Alaska 99801 (907) 986-1775 fax (907) 651-8891

November 30, 1994

Major G. Virgil Hanson
611 ASG/CC
5800 G Street, Ste. 203
Elmendorf AFB, AK 99506-2150

Re: Draft EIS, Alaska Military Operations Areas

Dear Major Hanson:

We submit these comments on behalf of The Wilderness Society, Alaska Center for the Environment, Sierra Club, and Northern Alaska Environmental Center. The comments are intended to supplement any other comments submitted by these organizations.

The Draft Environmental Impact Statement (Draft EIS) prepared by the U.S. Air Force for Alaska Military Operations Areas is inadequate under the National Environmental Policy Act (NEPA), 42 U.S.C. §§ 4331-4370, and its implementing regulations, 40 C.F.R. § 1500 et seq. The Draft EIS analyses and proposals also violate or conflict with various provisions of the Alaska National Interest Lands Conservation Act (ANILCA), 16 U.S.C. §§ 3101-3233.

The Draft EIS continues the Air Force's recent practice of piecemealing connected actions with cumulative impacts in Alaska into separate projects with discrete NEPA analyses, rather than preparing a single EIS as required by 40 C.F.R. § 1508.25. In 1992 the Air Force published an EA for expanding Military Training Routes in Alaska, and in 1993 it published an EA for expansion of Major Flying Exercises in Alaska, in both cases finding no significant impact. These actions, along with the present proposal to expand Military Operations Areas, are interdependent parts of the larger Air Force action of providing what the Air Force believes is appropriate flying training in the present defense structure. Draft EIS, pp. 1-1 to 1-3. Further, the expansion of Military Operations Areas would not occur absent the past expansions of aircraft numbers, training routes, and Major Flying Exercises. This series of proposals constitutes connected action for which a single EIS is required. *Thomas v. Peterson*, 733 F.2d 755, 758-59 (9th Cir. 1985); *Shoshone-Paiute Tribes v. United States*, No. 92-188-S-HLR (D. Idaho, filed October 7, 1994) (Magistrate's Recommendation and Order).

In addition, a single EIS is required where several proposals concurrently before the agency have significant cumulative impacts. *Kluge v. Sierra Club*, 427 U.S. 390, 410 (1976);

PRO-001
PRO-005

Mrs. Margaret Wahl

Sincerely yours,

Barbara Mendenhall - Denver, Colorado - Humboldt National Forest, California
Kathleen Washington - Portland, Oregon - Washington, D.C.
San Francisco, California
Washington, D.C.

Sierra Club v. Penfold, 664 F.Supp. 1299, 1303-04 (D. Alaska 1987), *aff'd* 857 F.2d 1307 (9th Cir. 1988). The expansions of the Yukon Measurement and Debriefing System, Military Training Routes, Major Flying Exercises, and Military Operations Areas were pending concurrently before the Air Force, yet no EIS considers, much less considers adequately, the cumulative impacts of these multiple expansions. For example, the pending Draft EIS does not consider the impacts over the large acreages covered by the MTRs, and the expanded MTRs are part of the "no action" alternative, thereby minimizing the cumulative effects of these actions and the incremental effect of the proposed action. Draft EIS, pp. 2-2 to 2-5. The Air Force has avoided the cumulative impacts of these multiple expansions by piecemealing the proposals. *Thomas*, 753 F.2d at 758.

OTH-003
CUM-001
PRO-001

An equally serious defect in the Draft EIS is its inadequate range of alternatives. Because this section is the "heart" of the EIS, the Air Force must rigorously explore and evaluate all reasonable alternatives. 40 C.F.R. § 1502.14(a); *City of Jacksonville Springs v. Clough*, 915 F.2d 1308, 1310 (9th Cir. 1990). Instead, the action alternatives in this Draft EIS all cover vast acreages including many sensitive areas; Alternative A deletes only a small MOA (Clear Creek) from the proposed action, while Alternative B adds a large MOA (Tanana) to the proposed action, with only a slight decrease in the Yukon MOAs.

No attempt has been made to design an alternative which completely avoids conservation system units (CSUs) or an alternative that minimizes impacts to CSUs, wildlife, recreation, and other resources impacted by military overflights. Little or no reasons are given for not considering continued use of TMOAs. There is almost no variance in the boundaries of the proposed MOAs between alternatives.

ALT-003

Further, no alternatives consider variations in training methods or operational parameters such as operational floors. All alternatives authorize supersonic operations down to 5,000 feet AGL, yet we are unaware of any other MOA over land in the United States which includes supersonic operations below 10,000 feet AGL. Such rigidity among alternatives, especially where the purpose and need is questionable and vaguely explained, does not permit a reasoned choice and is inconsistent with NEPA. *Methow Valley Citizens Council v. Regional Forester*, 833 F.2d 810, 815 (9th Cir. 1987), *rev'd on other grounds sub nom. Robertson v. Methow Valley Citizens Council*, 490 U.S. 332 (1989).

The Draft EIS also fails to describe and discuss adequately the impacts of the proposed action. For example, one of the critical issues posed by the proposed action is its impacts and inconsistency with the purposes of conservation system units, including National Parks, Wild and Scenic Rivers, and Wilderness. Yet, the Draft EIS does not directly assess these impacts or inconsistencies. Although some sections of the Draft EIS may touch upon these issues, the public and the decisionmaker are left with an incomplete and inadequate understanding of the pervasive negative impacts the proposal will cause to CSUs and the fundamental inconsistency between the proposal and the statutory purposes for CSUs. This does not qualify as a "hard look" or "reasonably thorough" discussion of significant environmental impacts. *Idaho Conservation League v. Mumma*, 996 F.2d 1508, 1519 (9th Cir. 1992).

LAN-002

Likewise, the impacts directly assessed in the Draft EIS are minimized or otherwise described inadequately. An example of this is the socioeconomics section, which consists of two pages primarily describing the benefits of increased temporary personnel at Eielson and Elmendorf Air Force Bases. Completely missing from this section and the remainder of the Draft EIS is any discussion of the proposed action's impacts to other sections, such as tourism, guiding, and park concessions which depend on the unique resources and attributes of Alaska that will be harmed under the proposed action.

REC-001

In addition to its NEPA defects, the Draft EIS violates sections 810(a) and 1310(b) of the Alaska National Lands Conservation Act (ANILCA). The Draft EIS recognizes numerous instances of potentially significant impacts to subsistence uses, pp. 4-126 to 4-135, but makes no attempt to comply with the substantive and procedural requirements of section 810(a). Similarly, there is no indication of compliance with section 1310(b), which requires consultation with the Secretary of Interior to minimize the adverse effects of these facilities for national defense within conservation system units.

PRO-005

In sum, the Air Force has not met the requirements of either NEPA or ANILCA. The Air Force should revise the scope of its proposed action, consider a range of alternatives with reduced environmental impacts, fully disclose and evaluate these impacts, and comply with ANILCA sections 810(a) and 1310(b).

Sincerely,

SIERRA CLUB LEGAL DEFENSE FUND, INC.

Douglas A. Rukey
Douglas A. Rukey



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

November 30, 1994

REPLY TO
ATTN OF: WD-126

Major G. Virgil Hanson
511 ASG/LGV
5800 G Street, Ste. 203
Eimendorf AFB, AK 99506-2150

Dear Major Hanson:

The Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for the Alaska Military Operations Areas. Our review was conducted in accordance with the National Environmental Policy Act (NEPA) and our responsibilities under Section 309 of the Clean Air Act.

This draft EIS evaluates a variety of alternatives for establishing additional training areas and modifying existing ones. This No Action Alternative is also included in this analysis. Our detailed review comments on the proposed action are enclosed.

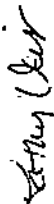
Based on our review, we are rating this draft EIS EO-2 (Environmental Objections - Insufficient Information). Our environmental objections are based on: impacts to biological and recreation resources; potential adverse effects on subsistence activities; and potential noise impacts on off-base residents. Additional information and clarification is needed to: describe cumulative adverse impacts and mitigation effectiveness monitoring; develop more specific noise thresholds for impacted species; and describe the conformity of the proposed action with the requirements of Executive Order 12896. The FEIS should also present the anticipated effectiveness of the proposed mitigation measures; describe a detailed monitoring plan; and describe the staffing requirements and other resources needed to ensure that the mitigation and monitoring measures described will be carried out. An explanation of the EPA rating system for draft EISs is enclosed for your reference. This rating and a summary of these comments will be published in the Federal Register.

Enclosure

2

We appreciate the opportunity to review and provide comments on this draft EIS. If you have any questions about our comments you may contact David Tetia in our Program Coordination Branch at (206) 553-1327.

Sincerely,


Kathy Velt, Chief
Program Coordination Branch

ENVIRONMENTAL PROTECTION AGENCY
DETAILED REVIEW COMMENTS
ALASKA MILITARY OPERATIONS AREAS
Preferred Alternative

ALT-005

We are concerned about the selection of the preferred alternative due to its potential noise impacts on biological and subsistence resources, as well as its potential human impacts. Some of the potential environmental consequences of the preferred alternative include:

- Level III Impacts on trumpeter swan, caribou and dall sheep populations, along with Level II impacts on peregrine falcon populations.
- Impacts to subsistence activities in East Village and Dot and Healy lakes.
- The potential for the impacts mentioned above is made more significant by the lack of information on cumulative effects from changes in flight operations since 1990.

We suggest that consideration be given to identification of the No Action Alternative as the preferred alternative or the development of an alternative that limits the level of routine flying to approximately 1990 levels. A preferred alternative that focuses on developing improved habitat thresholds for noise impacts, and monitoring these activities prior to significantly increasing aircraft operations would represent a more balanced and environmentally sensitive approach.

BIO-007

General Comments

The DEIS does not contain an adequate cumulative effects analysis. To adequately assess project impacts, the FEIS (as required by NEPA) must include a detailed cumulative effects analysis. We recommend the analysis include the potential for cumulative impacts associated with: military operations where the locations of MOAS and MTRs overlap; slow-speed training within MOAS and military aircraft operations in combination with civilian aircraft operations; and activities that occur on the ground beneath the MOAs and MTRs.

CUM-001
PRO-001

A specific discussion on the staffing requirements and other resources needed to implement the mitigation measures and monitoring proposed for each alternative should be presented.

PRO-013

Environmental Justice

The EIS should address the extent to which the proposed action may disproportionately affect human health and the environment among minority and low-income populations as directed by Executive Order 12898. In particular, the EIS

PRO-010

SUB-001

should provide more detail on how the proposed project will impact subsistence activities and how those impacts will be addressed pursuant to the Executive Order.

Threatened and Endangered Species

The proposed activities are described as potentially impacting Listed Species. The EIS should include the Biological Assessment and the associated U.S. Fish and Wildlife Service (FWS) or National Marine Fisheries Service (NMFS) Biological Opinion or formal concurrence for the following reasons:

- (1) NEPA requires public involvement and full disclosure of all issues upon which a decision is to be made;
- (2) The Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA strongly encourage the integration of NEPA requirements with other environmental review and consultation requirements (40 CFR 1502.25); and
- (3) The Endangered Species Act (ESA) consultation process can result in the identification of mandatory, reasonable, and prudent alternatives which can significantly affect project implementation.

We appreciate the fact that the DEIS clearly documents the degree of coordination with federal and state agencies to date. The Air Force should continue to work closely with appropriate state and federal agencies to ensure that impacts are minimized.

Note

We recommend that the following information be included in the EIS to evaluate possible mitigation measures for the noise effects of the proposed project and the alternatives.

- (1) the existing and anticipated land uses near the proposed training ranges that have a sensitivity to noise and the number of people living in those areas; and
- (2) the effectiveness of current administrative procedures to resolve noise complaints. For example, are noise events that generate complaints avoidable or unavoidable?

LAN-001

OTH-001

(3) the effectiveness of other possible mitigation measures such as altered flight paths and equipment modifications to further reduce identified noise impacts on people and wildlife.

(4) the discussion throughout Section 4 should provide a more prominent evaluation of single event metrics such as L_{max} and SEL. Estimates of the number of sonic booms per month per MOA should also be factored in to the general impact evaluations in this section.

In addition, the FEIS should describe in more detail how the existing data on noise impacts on biological and subsistence resources will be used in developing mitigation and monitoring plans.

Mitigation

The lack of a thorough discussion of mitigation measures and their effectiveness in minimizing environmental impacts is a significant deficiency of this report. A comprehensive discussion of proposed mitigation for direct, indirect and cumulative impacts is required by the CEQ Regulations for implementing the Procedural Provisions of NEPA. The CEQ Regulations state that an EIS should include the means to mitigate adverse environmental effects (40 CFR 1508.7). Judicial reviews of NEPA cases have supported the need for identifying mitigation measures as well as discussing mitigation measure effectiveness.

Monitoring

The draft EIS should include a discussion of monitoring for each resource category determined to be significant through the scoping process. A properly designed monitoring plan will demonstrate how well the preferred alternative resolves the identified issues and concerns by measuring the effectiveness of the mitigation measures in controlling or minimizing adverse effects. The final EIS should include a discussion of how the three basic types of monitoring (implementation, effectiveness and validation monitoring) are being incorporated into this project.

The monitoring plan should include types of surveys, location and frequency of sampling, parameters to be monitored, indicator species, budget, procedures for using data or results in plan implementation, and availability of results to interested and affected groups.

The final EIS should describe the feedback mechanism which can use monitoring results to adjust standards and guidelines, BMPs, standard operating procedures, and monitoring intensity at the first detection of adverse effects. Provision of such an adjustment process ensures that mitigation strategies will improve in the future and that unforeseen adverse effects are identified and minimized.

MIT-028

NOI-001
NOI-002

MIT-030

MIT-028
MIT-030MIT-002
PRO-013

A fence displayed, smaller in size than its previous cousin, inside after a road built. Despite the fence on highway, the display continues to be threatened by passing traffic, including future construction. The Wildlife Conservation Society is working to protect the magnificent bird in many projects throughout Africa.

I OOPSIE designation of 71,650 sq. miles in Alaska For super-sonic jet training.

Study show candidate peregrine falcon experience general impact from sonic booms. Train over water please, not my parks & wilderness.

Sincerely,
David C. Cullbert

David Cullbert
38 Mulberry Street Drive
Savannah, GA 31406

OTH-014

ALT-002

EIS Team
Major Hanson
611 ASG/LGU
5800 G. Street, Suite 203
Elmendorf AFB
AK 99506

Prepared and made from recycled paper. 100%

Mike Kelly
1625 Wolverine Drive
Fairbanks, Alaska 99709

November 29, 1994

US Air Force
611 AEG/LCW
5800 G Street, Suite 203
Eldorado AFB, AK 99506-2150

Dear Sirs:

I have read with interest your plans to establish and expand several permanent MOAs in Alaska. As a private pilot, flying mostly in the local Fairbanks area, including north, south and east of Fairbanks, I took special notice of the recommendations made by the Alaska Aviation Safety Foundation. I concur with their recommendations.

Although the AASF has limited its recommendations to the areas more local to Fairbanks, I fly all over the place. I find that many of AASF recommendations could fit for areas you propose south, north and west of Fairbanks (and elsewhere) as well.

I would appreciate your taking these comments into consideration while making decisions on your final EIS.

Sincerely,

Mike Kelly
Mike Kelly

OTH-014

COMMENT #189 IS A DUPLICATE
OF COMMENT #138

SEE COMMENT #138 FOR RESPONSES

1154 Eastwood Lane
Fairbanks AK 99712

November 28, 1994

Attn: James Hostman

MOA-EIS
611 ASG/LGD
5800 G Street, Suite 203
Elmendorf AFB AK 99506-2150

Dear Mr. Hostman:

OTH-014

I strongly disapprove of any increase in the airspace allotted to the United States Air Force in Alaska. Besides low-level overflights disrupting enjoyment of outdoors and tranquility of living in areas overflown, I am concerned for the safety of pilots and passengers in small planes and the potential for harm to wildlife.

As this issue has been overshadowed by the state and local elections in November, as well as the beginning of the holiday season, the period for public comment must be extended until at least January 31, 1995.

PRO-003

Thank you.

Sincerely,

Raymond J. Haldeman
Raymond J. Haldeman
25-year resident of Fairbanks, Alaska

cc: Ted Stevens, US Senate
US Department of the Interior
Federal Aviation Administration
Fairbanks North Star Borough

Raymond D. Cameron III
Ester, AK
99725

November 27, 1994

United States Air Force
611 ASG/LGV
5800 G St Ste 203
Elmendorf AFB AK
99506-2150

Dear Major Hanson:

SAF-005

Proposed expansion of Military Operations Areas (MOAs) in Alaska as outlined in the DEIS-Alaska Military Operations Areas seriously concern me as a pilot and a professional wildlife biologist. The huge area reserved by the proposed expansion, as well as the military activities expected within them, pose significant threats to the safety of pilots and their passengers in western and interior Alaska, and in addition, will create impacts to sensitive wildlife and other human activities.

BIO-007

As a member of the general aviation community in this area, I have occasion to fly often in the areas proposed for new expanded MOAs for both business and personal reasons. I have done so for more than 25 years. I am extremely concerned for hazards that may be created when high performance jet aircraft operate at low altitudes and occupy more and more airspace in Alaska.

PAN-001

Before proceeding with proposed plans, the Air Force needs to justify why such expansions are needed at this time. Many fear that Alaska's airspace will be utilized as an international training ground for low level jet flight training because such training would be considered unacceptable in other more congested states and countries. During the 45 some odd years of the cold war era, when Air Force readiness was, by-and-large thought adequate for all contingencies, existing military airspace sufficed for all training requirements. It is puzzling that major expansion is required at a time when threats to national security are less than at any time in the past half-century.

I urge reconsideration of Air Force plans to expand military airspace in Alaska.

Sincerely,

Raymond D. Cameron III

Dear Major Hanson,

I do not, under any circumstances, approve of you expanding further jet traffic in Alaska. Your jets already have plenty of room to fly. If you need more, why not fly over the ocean?

As a hunter I am very angered by knowing the USAF wants more space for its war games. It makes me furious.

I'll be writing my congressman about this, though I personally don't think they care. They have given the military everything they want. This makes me madder still.

For what it's worth Major, I think the plans to expand airspace really stinks.

I thank you for listening, though I don't think it does any good, which is a very sad state of affairs. Cordially,
John D. Lyle
Box 23718
Fair AK 99708

OTH-014

3315 Ashwood Dr
Cincinnati, OH 45213
20 November 1994

EIS Team

Major C. Virgil Hanson, Chief
Environmental Management

611 ASG/LGV
5800 G St. Suite 203
Glenview AFB, AK 99506

To whom it may concern

Recent word of the United States Air Force's plans to designate and upgrade 71,650 square miles of Alaskan airspace for supersonic and jet training at 5,000 ft above ground are disconcerting. These activities would be dangerously disruptive to all living creatures and people of this cold the proportion of Alaskan land proposed to use is far too high.

I urge you strongly to reconsider this plan. Sincerely,

Margaret McKelvey Leason
Pete McKelvey

LAN-012

LAN-004

OTH-014

P.O. Box 10198
Fairbanks, AK 99710
November 29, 1994

EIS Team
611 ASG/LGV
5800 G Street, Suite 203
Elmendorf AFB, AK 99506

Dear Major C. Virgil Hanson:

I am writing to offer some comments on the Draft Alaska Military Operations Areas Environmental Impact Statement. Last summer, I worked as a horse wrangler and naturalist in the Wood River Valley of the Alaska Range at a remote, wilderness lodge that will be impacted by your proposed designation and upgrading of airspaces in Alaska. This area of the Alaska Range, as well as all the other areas covered in your EIS, are already impacted too heavily by noisy low-level jet overflights and sonic booms. Working 35 air miles from the nearest road, I (as well as the guests to the lodge and other wilderness users of the area) should not have to tolerate supersonic jet training exercises at 5000 feet above the ground while engaged in such activities as horseback riding and nature hikes. Not only do these flights destroy the inherent serenity of such activities, but they could also cause safety problems with spooky horses and scientific studies have also shown that humans will not tolerate long term exposure to sonic booms generated by air combat training below 30,000 feet. Nor should the vulnerable Delta caribou herd, the Alaska Range moose and Dall sheep populations, breeding birds, and various other wildlife populations of the area be subjected to such military exercises that are allowed nowhere else in the United States!

Despite its low numbers of human inhabitants, Alaska should not be considered a national sacrifice area for national and international military training. The proposed areas for such activities are too large, the flight levels are too low, and the numbers of sonic booms too many. Additionally, commercial and private pilots who already make a livelihood out of shuttling visitors, hunters, and recreationists into these areas should not have to deal with the increased risks of mid-air collisions and costs associated with Special Use Airspace. I would like to see additional documentation that justifies these training activities as well as additional studies to clarify the impacts to tourism, recreation, subsistence, and wildlife that these training activities will cause. Please consider extending the comment period on such an important issue as well.

Sincerely,

Karen R. Rock
Karen R. Rock

OTH-014

NOI-003

NOI-002

SAF-005

AIR-008

PAN-001

PRO-014

PRO-003

1154 Eastwood Lane
Fairbanks AK 99712

November 28, 1994

Attn: James Hostman

MOA-EIS
611 ASG/LGD
5800 G Street, Suite 203
Elmendorf AFB AK 99508-2150

Dear Mr. Hostman:

I strongly oppose any increase in the airspace allotted to the United States Air Force for training maneuvers in Alaska. The safety of the human and wildlife populations cannot be guaranteed when massive areas of our state are invaded by low-flying, high-speed aircraft. Enjoyment of life is impaired by the high-intensity noise generated by these aircraft.

The public comment period was too short and ill-chosen due to the state and local elections in early November and the beginning of the holiday season last week. To be fair to the residents of Alaska, the period for public comment must be extended until at least January 31, 1995.

Thank you.

Sincerely,

Terry Wilson
Terry Wilson
45-year resident of Fairbanks, Alaska

cc: Ted Stevens, US Senate
US Department of the Interior
Federal Aviation Administration
Fairbanks North Star Borough

November 29, 1994

Major C. Virgil Hanson
611 ASG/LGV
5800 G Street, Suite 203
Elmendorf Air Force Base, AK 99506-2150

Dear Major Hanson:

Please oppose and work to stop the U.S. Air Force's proposed designations and upgrades of 71,650 square miles of military airspace in Alaska.

These military-airspace proposals would cause adverse environmental impacts on nearly 13 million acres. These impacts would also harm many public uses and Native American communities.

For example, many wildlife species are sensitive to noise and may be harmed by repeated military overflights. In this regard, low-level military jet overflights and sonic booms may be particularly disruptive. These proposals include areas of the Delta caribou herd, peregrine falcon nest sites, and Dall sheep populations.

These proposed military overflights would also degrade recreational activities in a number of areas designated for public recreation. These areas include the Yukon-Charley Rivers National Preserve, the Delta Wild and Scenic River, and the West Fork Gulkana River Area of Environmental Concern.

Many Native American communities would be adversely affected. These include Eagle Village, Dot Lake, Circle Village, and Lime Village.

It is difficult for me to understand why there is a need to expand military airspace when the "Cold War" has ended and international conflicts appear to be generally declining. I do not believe it is necessary to further jeopardize wildlife, public recreational uses, and Native American communities for the sake of augmented military training.

Thank you very much for your consideration.

Sincerely,
Jane Ringer
Jane Ringer

129 East Fairview Ave., Apt. 2
Glendale, CA 91207

LAN-004

BIO-007

REC-003

SUB-001

PAN-001
OTH-014

Antonie K. Churg, Ph.D.

25802 Skylark Drive
Torrance, CA 90505

(310) 539-6506
(310) 539-6506 FAX; E-mail: achurg@igc-ape.org

November 26, 1994

EIS Team, Alaska Operations
Major C. Virgil Hanson
611 ASG/LGV
5800 G Street, Suite 203
Elmendorf AFB, AK 99506

Dear Sir:

It is preposterous, shameful and utterly inexcusable that the US Government is planning 19,500 supersonic flights at an altitude of 5000 feet above ground in the Alaskan wilderness. First of all, the sonic booms constitute human rights and animal rights violations. Secondly, there will be chemical contamination on the ground, and probably the nitroxides and hydroxyl in fuel exhausts will cause ozone depletion. The sensitivity of the polar regions to ozone depletion is well known. Thirdly this project is a huge welfare outlay on military crap that we don't need, can't afford, and shouldn't have anyhow.

Yours,
Antonie Churg
Ms. Antonie Churg

cc: Paul Gallant FAA, Senators Boxer & Feinstein, Congresswoman Jane Harman

Kenneth V. Morton
3942 Turnagain Blvd
Anchorage, Alaska 99517

November 30, 1994

EIS Team

Major C. Virgil Hanson
Chief, Environmental Management
611 ASGLOV
5800 G Street, Suite 203
Eldorado AFB, AK 99506

Re: DNR ALASKA MILITARY OPERATIONS AREAS EIS

Dear Major Hanson:

I am a planner by profession, a private pilot, an avid outdoorsman, and beginning a new tourist-oriented business. I have reviewed the Air Force's proposal for "improvements" to Military Operations areas in Alaska. I am adamantly opposed to establishment and upgrading more military training areas in Alaska. As a planner, I see inefficiency and waste with under-utilized existing MOAs across the country. As a pilot, I am concerned for the safety of pilots and passengers with the proposed low altitude supersonic jet training. As an outdoorsman and entrepreneur, I believe the proposed operations will have negative impacts on both wildlife populations and on the outdoor experiences of visitors and residents. The sizes of the areas and the numbers of flights are too great. The flight levels over parks and wildlife refuges are entirely too low. Considering the cost and possible consequences, there is insufficient justification for this proposal. Additional studies and documentation would be required before I could support the proposal. Additional public hearings should be held by the Federal Aviation Administration across the affected areas. Surely the timing is not so urgent as to preclude this. If your proposal is sound, it should stand up to additional scrutiny. If it is not sound, we should know before it is implemented.

Thank you.

Sincerely,



Kenneth V. Morton

cc:
Interior Secretary Bruce Babbitt
Paul Gallant, FAA

OTH-014

PAN-001

PRO-014

AIR-015

LAN-004

SAF-005

NOI-003
BIO-007

PRO-003

P.O. Box 1169
S. Wallbert, WA
Nov 27, 1994
02663

Dear Mayor Hanson,

I am writing to you because of my concern about the proposal to designate and upgrade over 71,000 square miles of airspace that will impact 13 million acres in Alaska. I fear that supersonic jet training exercises at only 5,000 feet will have serious environmental consequences. Commercial pilots, hunters, recreationists and Native communities will be jeopardized. Long term exposure of humans and animals to sonic booms can have serious adverse health effects.

The public comment period should be extended and public hearings should be held all over the United States. I am writing to Secretary Babbitt and my congressional representatives.

Sincerely yours,
Cynthia Hope

1462 West 5th Avenue
Eugene, Oregon 97402
November 23, 1994

ER's Team
Major C. Virgil Hanson, Chief,
Environmental Management
611 ASG/LGV
5800 G Street, Suite 203
Elmendorf AFB, Alaska 99506

Dear Major Hanson:

I understand that the United States Air Force wishes to designate 71,650 square miles of airspace in Alaska for supersonic jet training exercises at 5,000 feet above ground.

LAN-004

NOI-002
NOI-003

I urge strongly that this proposal be dropped. The proposed area is too large, the flight levels too low and the expected number of sonic booms too many for the health of humans and wildlife in the area. It is unsafe. Scientific studies indicate that humans cannot tolerate long term exposure to sonic booms generated by such air combat training below 30,000 feet. Nor can wildlife; studies of caribou and peregrine falcons also indicated that these species experience unwanted impacts from sonic booms.

Alaska's wilderness and the health of native communities, tourists and wildlife must not be sacrificed for national and international military training.

OTH-014

Sincerely,

Patricia Murphy
Patricia Murphy

cc: Bruce Babbitt, Department of the Interior
Paul Gallant, Federal Aviation Administration
Rep. Peter DeFazio
Senator Bob Packwood
Senator Mark O. Hatfield

November 30, 1994

Major C. Virgil Hanson
611 ASG/LGV
5800 G Street, Suite 203
Elmendorf AFB, AK 99506-2150

Dear Major Hanson:

Please oppose the proposal by the U.S. Air Force to designate and upgrade 71,650 square miles of military airspace in Alaska.

LAN-004

If implemented, this proposal would harm wildlife, public recreation, and Native Americans' subsistence uses.

OTH-014

Many important federal lands in Alaska would be adversely affected, including those ostensibly designated for wildlife protection and primitive recreation. Sonic booms from low-flying military jets would not be compatible with these purposes and uses.

Thank you for your consideration.

Sincerely,

Richard Spotts
Richard Spotts
Route 1, Box 66BB
Ashland, WI 54806

NoMetatal
 HC 33 Box 3177 K
 Wasilla, AK 99654
 907-376-6231

26 November 1994

EIS Team
 Major C. Virgil Hanson
 Chief, Environmental Management
 611 ASG/LGV
 5800 G Street, #2203
 Elmendorf AFB, AK 99506

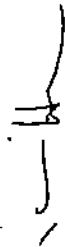
Dear Mr. Hanson:

I would like to register my complaint about the extension of the Military Operations Areas. I have had first hand experience of what these fly overs are like and it definitely has a huge impact on recreation use, wildlife, and our remote areas. I was on the Charley River in the summer of 1991 when military jets flew over every morning. The first morning they came in very low over the ridge - we heard the shots they were firing (probably at the sheep on the opposite ridge) before we ever heard or saw the planes. I now know what it must be like to be in a war zone - it scared all of us. We were camping in a National Preserve and were transplanted into a war zone. A few days later these same jets that flew over every day started a wild fire that we had to go through. Yes it was even proven that the military started the fire.

Need I say more - these low fly overs are not necessary for no where else does the military do them. I feel that the military is trying to take advantage of Alaska, and I don't approve. I personally saw wildlife affected, habitat destroyed, and a wild and scenic river impacted by these types of fly overs, and now you proposed to negatively impact six other recreational resources. NO! stop it now!!!

Alaska has the last remaining complete ecosystems. This is what makes it so special for wildlife, recreation and those of us that live. I do not want to see it compromised and ruined by needless military actions.

Sincerely,


 Karin Holser

Tom E. Hansen Chair
 405 Castleton Circle
 Seldovia, AK 99581-1624
 907-29-1994 -

EIS Team
 Major C. Virgil Hanson, Chief Environmental Management

611 ASG/LGV
 5800 G Street - Suite 2203
 Elmendorf AFB, AK 99506
 Dear Major C. Virgil Hanson,

We are writing you, because we are concerned about the Air Force proposal to land a supersonic jet training exercise 5,000 ft above the ground, in an airspace in Alaska. This will have extreme environmental, social and economic consequences. It would be risky for pilots, whose planes are frequently used in big - doozer-type situations that are necessary in a large state like Alaska.

It would have an adverse effect on the people who live in Alaska. Sonic booms, all the associated noise, fuel jettisoning, electric magnetic radiation all are damaging to people.

SAF-005

NOI-003
 HAZ-010
 HAZ-007

BIO-007

animals, birds are equally damaged
by these environmental of preparing
for warfare.

We do not want my Federal tax dollars
used to have this huge detrimental effect
on Alaska, it's unique environment
and it's people.

OTH-014

I want my tax dollars used instead
to benefit all the peoples of this world
and not to deplete our only home this
planet.

Sincerely,
Tom and June Chase
C.C. Chase (Baker), Appropriation
Paul Bellant, 3rd District Com.
H.S. Hunter - Ex-Senator
Annex Baker
Congressman - Ted Stevens.

Rod Combellick
P.O. Box 82422
Fairbanks, AK 99708

November 29, 1994

U.S. Air Force
Alaska Military Operations Areas Proposal
611 ASGLGV
5800 G Street, Suite 205
Ellumford AFB, AK 99106

Subject: Comments on Draft Environmental Impact Statement

Dear Sir:

As a commercial pilot operating out of Fairbanks, I am strongly opposed to the expansion of Military Operations Areas (MOAs) as outlined in the September 1994 draft EIS. The only acceptable alternative is the No Action Alternative and, if necessary, consideration of other airspace in Alaska that would have far less impact on public transportation than in this area of increasingly heavy private and commercial air traffic.

ALT-002

The premise of the existing proposal is that the current MOAs are outdated because they provide inadequate airspace for modern jet fighters and do not provide linkage to existing air-to-ground weapons ranges. The fallacy of this proposal is that it is built around air-to-ground weapons ranges that are themselves outdated in the context of current and projected use of public airspace and should be moved. When these weapons ranges were developed, they were far enough away from most private and commercial air traffic so as not to interfere with them severely, although even at that time considerable objections were made. Now, the area is very heavily used by private pilots and commercial air carriers, particularly along airway V444 between Tot and Fairbanks. The area surrounding the weapons range at Blair Lakes restricted area R-2211 is a primary training area for private and commercial pilots because of its proximity to Fairbanks. There have already been several fatal mid-air collisions in this area and countless close encounters with military aircraft. I personally have had to execute abrupt collision-avoidance maneuvers below 1,000 ft AGL outside of R-2211 to avoid colliding with A-10 aircraft. This area is simply too heavily used for public air transportation to accommodate the scale and type of military operations you propose. As a result, it poses an immense threat to public safety—an issue not adequately addressed by the draft EIS.

AIR-019
SAF-005

I strongly urge you to withdraw this entire proposal and consider instead moving the weapons ranges to an area used far less by private and commercial pilots. As alternatives, I suggest either expanding the Stony and Naknek MOAs in southwestern Alaska, where there also is no conflict with National Parks or Wildlife Refuge, or revisiting and expanding the old Kobuk MOA northwest of Galena. This latter alternative would have by far the least impact on public air transportation.

Thank you for the opportunity to comment on this draft EIS.

Sincerely,

Rodney A. Combellick

Rodney A. Combellick

OTH-014

"In the wilderness
is the preservation
of the world"

Henry David
Thoreau

Dear Folks:

I am very much opposed to
the proposed to have supersonic
jet trainings by the US Air Force
in Alaska. These exercises will
present conditions very disruptive
to the environment and thus should
be prohibited. I anticipate your
response to this letter. Robert Gornel.
4 Homestead Ln.
Brookfield, Conn. 06804

OTH-014

OTH-014

MIT-028

MIT-016

AIR NORTH

November 29, 1994

U.S. Air Force
611 ASG/LGV
5800 G. St., Ste 203
Elmendorf, A.F.B.
Anchorage, Alaska
99506-2150

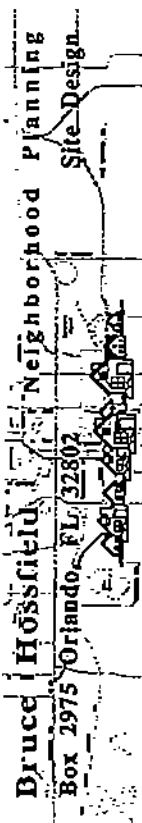
FAX: 317-552-5287

Dear Sir:

Thank you for your recent correspondence concerning the proposed restructuring of Alaskan M.O.A.s. As you may know Air North provides scheduled air service between Whitehorse and Fairbanks via Dawson City on a year round basis. Frequency is 4 times weekly during the summer and 3 times weekly during the winter. Annual passenger volumes are about 2500. Our present routing is either YNA-PAI or YDA-BIG-PAI. It is only on the YDA-BIG-PAI routing that IFR flights are possible. It is necessary to have the ability to operate under instrument flight rules if we are to continue to provide a reliable and dependable scheduled air service. I suggest that the community of interest between Dawson City and Fairbanks and indeed between the Yukon and Alaska in general is such that it is in the public interest to maintain existing air transportation links. Additionally, these links are essential if tourism development potential is to be realized. It would seem to me that it should be relatively easy to reach a compromise solution wherein the M.O.A. restructuring would be permitted with the provision made for an IFR corridor between YAI and YDA either via EAA or via SIG and the further provision made for the continuance of the existing IFR route along V444.

Yours very truly,

Joseph R. Sparling
President
JTS/saf



November 30, 1994

EIS Team
Major C. Virgil Hanson
Chief, Environmental Management
611 ASGLGV
5800 G Street, Suite 203
Edwards AFB, AK 99506

Dear Major Hanson:

I am writing to express my very great concern about the Draft Alaska Military Operations EIS. Nowhere else in the United States has the US Air Force proposed supersonic jet training exercises at just 5000 feet above ground level. Such flight can result in extreme environmental, social and economic consequences affecting hunters, pilots, recreationalists, Native communities and their subsistence activities, trappers, tourists, miners and neighbors from

- increased areas with noisy low-level jet overflights and sonic booms
- impacts associated with draft and flares
- fuel-jettisoning
- electro-magnetic radiation hazards from military installations and relay sites.

Scientific studies show that humans will not tolerate long term exposure to sonic booms generated by air combat training below 30,000 feet. Carlson and peregrine falcon studies indicate these species experience devastating impacts from sonic booms.

I strongly urge you to reject the Draft EIS, extend the comment period and hold public hearings on the proposed Military Operations Area.

Very truly yours,

Bruce Hoasfield

cc: Senator Bob Graham
Hon. Bruce Babbitt

PUBLIC COMMENT FOR MOA/EIS DATE: 29 NOV 94 1-800-538-6647
(ANSWERING MACHINE)
Transcribed by SSgt Anne Proctor

Jane Brown, Glenallen
872-5520

I'm calling about the military operating area in the Lake Louise area. I am against any increased activity there. We've had many incidents with military aircraft flying too close to our property.

OTH-014

210

To whom it may concern:

I am writing to express my opposition to the proposed supersonic jet training at 5,000 feet, by the Air Force over specific areas of Alaska. There are fragile natural wonders inhabited by few people, but abundance of wildlife.

Certainly there are open ocean areas that can be used, that will not be affected. In too many instances the military has ruined natural habitat, in the name of defense, only to find out later that it was irreparable.

OTH-014

ALT-002

Thank you for reading this letter.

Sincerely-

Mary L. Jordan
6449 S. Coldwater Rd.
Coldwater
Alaska.

5/3/84

211

PUBLIC COMMENT FOR MOA/VEIS DATE: 28 NOV 94 1-800-538-6647
(ANSWERING MACHINE)
Transcribed by SSgt Anne Proctor

ANONYMOUS

I got this number of a news program Saturday with some Air Force guy talking. I am adamantly opposed to the MOA project and will do everything in my power to stop you. The military has too much already. You are not wanted and should leave, close the bases.

OTH-014

PUBLIC COMMENT FOR MOA/EIS DATE: 28 NOV 94 1-800-538-6647
(ANSWERING MACHINE)
Transcribed by SSgt Anne Proctor

Tom Tyson
895-4850

I've been bothered by numerous A-10s flying near my property. I live at mile 1414 Alaska Highway and have a home in the Clearwater subdivision. The IFR route off of runway 18 at Fort Greely has a minimum descent of 1,200 feet. I have observed military aircraft flying at a lot lower. I am opposed to the MOA project for the same reasons of impacting wildlife and safety to pilots. Military aircraft shouldn't be allowed to fly below 10,000 feet.

OTH-014

To whom it may concern:

I am writing in response to your proposed increase in size, and flights of MOAs. I've lived in the bush, mostly the interior for 14 years.

I've read the proposal with the alternatives A & B, as well as the no action alternative.

Based on my experience with low-level jet flights and noise, I am not in favor of increased flights, nor lowering the flight levels.

Last spring, as an example, a sonic boom near Fort Yukon blew a bird's nest completely down from the top of a light box. This nest was built on the lee-side of the building under an eave and was completely protected, until one of your jets destroyed it. Can you imagine what affect that had on all other nest sites in the area? In the spring as well! Poor timing to say the least.

Another time a cabin I was staying in on the Neuse River lost a window when one of your pilots decided a wilderness River valley was an afternoon playground.

Harmless people is one thing, harassing wildlife is unacceptable.

I am in favor of your no action alternative which would not increase "sorties" nor lower AGL limits.

Thank you for the opportunity,

Shirley Roberts
Herbert 8225
Saldotna, AK 99669

OTH-014

PRO-002

PO Box 35223
Fort Walnwright, AK 99703
27 November 1994
Chief, Operations Division
11th Air Force
ATTN: Major Sit
5800 G St. Suite 102
Elmendorf AFB AK 99505-2130

Dear Sirs:

This is my response to the draft EIS for "Improvements" to Alaska Military Operations Areas.

Throughout the EIS you list massive changes to your TMOA's and MOA's which are our air space, homes, wilderness and wildlife areas, and subsistence and recreation areas. Most of these changes are detrimental and in many cases dangerous. The EIS states that many of these actions are currently underway with no EIS or public input having been done. Basing much of the justification for the current EIS on this fact discredits the whole statement.

The following are areas of particular concern to me.

Airspace Management, Aircraft Operations, and Aviation Safety. Meetings, on 9 and 14 November, with pilots who routinely use these areas shown that adverse impact is not just being proposed but is currently happening. Not one pilot has not either had adverse contact with air force aircraft, or knows of many who have, but when such occurrences are reported, a nearly impossible task in itself, the Air Force routinely denies they could have happened "we have not aircraft in that area" or state that civilians cannot tell when an aircraft is flying too low. It is only a matter of time until military/civilian aircraft accidents happen. Military accidents are already happening. Three pilots have died within the last two years mostly attributable to low level flights. There are continual examples of pilots flying recklessly and not significant action being taken. One example is given by Rear Admiral Eugene J. Carroll Jr. U. S. Navy (Ret) of a pilot that took out 36 telephone lines between Los Angeles and San Diego, started numerous brush fires and cost the taxpayers a substantial sum of money and was allowed to keep his wings! The most recent was the tragic crash of the B52 flown by a pilot who was still flying after the Air Force took no action on complaints of his reckless flying filed by pilots who flew with him some of whom also died with him. Ret Admiral Carroll further stated "Low level flight training is undeniably enjoyable, even exhilarating for pilots. It is also a budget builder for the Air Force since it is very expensive. But it no longer can be justified as necessary for combat readiness of air crews. This has been demonstrated by the rates of losses

SAF-001

PAN-001

in Vietnam and Desert Storm and training accidents due to low level flying. Low level flying is no longer a viable tactic in warfare nor training. Low level flying is, in addition, the cause of most of the level III impacts on civilian aircraft, subsistence, wildlife, recreation, aesthetics and quality of life. Finally, page ES-2 of the Executive Summary states "Use of TWOMs for recurring MFE's also conflicts with the FAA's intended use of this type of airspace-a procedural concern." This is NOT a procedural concern! This means this airspace is not meant for military flying exercises.

AIR-020

Subsistence. You are taking about peoples livelihood.

Level II and III impacts are predicted for the prime hunting season of August and September in Eagle Village, Dot Lake, Healy Lake, Circle, Eagle City, Chicken and Lime. In previous talks with the Air Force, the people of Dot and Healy Lake were told low level flights would not occur over these areas. These are also all native villages, which raises possible discrimination issues.

AIR-005

PRO-010

Wildlife. Level three impacts are possible for trumpeter swans, the Delta caribou herd, and Dall sheep populations. Level two impacts are possible for Peregrine falcon nest sites, and waterfowl and Raptor concentrations, breeding and nesting areas in MOA's with floors lower than 2000' or supersonic aircraft operations. Then there is Chaff which does not always disperse, as even the EIS admits. Comparing Chaff (fiber glass like) to quartz is ludicrous. Birds do not build nests from quartz, but they do from Chaff. These impacts on wildlife will also negatively impact the hunting, fishing and trapping going on in these areas as well as the quality of life of the people who live in affected areas and are or will be putting up with the sonic booms and low level flights.

BIO-007

HAZ-003

Recreation. I hike, ski backpack or canoes in Chena Recreation Area, the White Mountains, Tangle Lakes, Denali State Park and Circle. I will also be canoeing or kayaking on many of the wild and scenic rivers that are targeted for massive low level flights. I have already tangle with low flying Air Force planes in Chena Recreation area at a level so low, that after several passes I gave them a visual finger sign that I wasn't happy with them and they left. Low level or supersonic flights are incompatible with recreation areas.

REC-003

The Oklahoma and Blair Lakes Air to Ground Weapons ranges are in all likelihood, permanent hazardous waste areas. There are also reports of ordnance falling outside of these areas. As for emergency fuel jettisoning, I didn't even know this was happening! While all the major military bases and post are spending millions to clean up toxic waste, the Air Force is and plans to increase fuel jettisoning of volatile, toxic jet fuel! Crazy. Equally disturbing is the fact that this same Air Force is trying to bring us the HAARP project situated near Gakona. The purpose of which "causes...total disruption of communications

HAZ-010

over a very large portion of the Earth....disruption not only of land based communication, but also airborne communications and sea communications (both surface and sub-surface)...missile or aircraft destruction, deflection, or confusion...weather modification, etc." The hazards to migrating birds, nearby wildlife and humans are dismissed as trifling.

There has been no review of how much other airspace in Alaska is being used by the Air Force, Army, Navy and National Guard both as air corridors or training. Review of the Joint Military Training Exercises Environmental Impact Statement shows many other areas where there will be aerial support of combat forces, i.e. low level flights.

PRO-001

In view of the above I will ask that the FAA not grant the Air Force permanent MOA's, not allow low level flights over public and private lands, except for a few low level, low speed corridors to ranges, and not allow supersonic flights over public or private lands at a level where the sonic booms will be a noise hazard.

AIR-015

Sincerely,

CP
Darril Borgt, FAA
Dorothy Williams, Interior Department

GERALDINE SMITH

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CHAPTER 4

INDEX OF COMMENTS AND RESPONSES

This chapter contains three indexes to the coded comment letters and hearing transcripts and the responses to comments. The first index lists the name of the individual or organization commenting and provides the accession number at which the original comment can be found in Chapter 3. The second index is arranged sequentially by accession number and lists the comment/response codes assigned to each letter or transcript. To find a specific comment or transcript, use the name index to determine the accession number assigned to it; then use the comment/response code index to identify the codes assigned to the letter or transcript, and turn to the corresponding comment/response in Chapter 2. The third index is organized alpha-numerically by response code and is a key concept directory of the codes.

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4.3 Definition of Response Codes

<i>AIQ * AIQ * AIQ * AIQ * AIQ * AIQ</i>	
AIQ-001	Air Quality
<i>AIR * AIR * AIR * AIR * AIR * AIR</i>	
AIR-001	Airspace coordinates
AIR-002	Military Airspace Management System (MAMS)
AIR-003	Restricted Areas (RAs)
AIR-004	Air refueling
AIR-005	Regulations pertaining to aircraft operations
AIR-006	Pilot briefings
AIR-007	Special Use Airspace Information Service (SUAIS)
AIR-008	Civil aviation access to Military Operations Areas (MOAs)
AIR-009	Military Training Routes (MTRs)
AIR-010	Surge training
AIR-011	Air-to-Ground and Air-to-Air operations
AIR-012	Federal Aviation Administration (FAA) Advisory Circular regarding Visual Flight Rules (VFR) Flight Near Noise-Sensitive Areas (AC No. 91-36C)
AIR-013	Supersonic approval process
AIR-014	SUSITNA MOA
AIR-015	FAA Circularization process for airspace proposals
AIR-016	MTRs and Low Altitude Tactical Navigation (LATN) areas
AIR-017	Definition of the impact levels for airspace management, aircraft operations, and aviation safety
AIR-018	STONY A and STONY B MOAs
AIR-019	FAA regulations regarding slow speed aircraft operations
AIR-020	Temporary MOAs—use and process for establishing
AIR-021	Public use airports
AIR-022	FAA Handbook 7400.8
AIR-023	Temporary MOAs—air route traffic control procedures
AIR-024	FOX and SUSITNA MOAs—simultaneous activation

<i>ALT * ALT * ALT * ALT * ALT * ALT</i>	
ALT-001	Definition of the No Action Alternative
ALT-002	Alternatives selection process
ALT-003	Temporary MOAs
ALT-004	This code is not used in the EIS
ALT-005	Identification of the Preferred Alternative
<i>BIO * BIO * BIO * BIO * BIO * BIO</i>	
BIO-001	Neotropical birds
BIO-002	Rare plants
BIO-003	Raptors in SUSITNA MOA
BIO-004	Fortymile Caribou Herd
BIO-005	Dall sheep
BIO-006	Section 7 consultation under the Endangered Species Act
BIO-007	Definition of the impact levels for biological resources
BIO-008	This code is not used in the EIS
BIO-009	Nelchina Caribou Herd
BIO-010	Moose
BIO-011	Bears
BIO-012	Bald Eagles and other raptors
BIO-013	Wildfire/Ordinance impacts on wildlife
BIO-014	Waterfowl
<i>CUL * CUL * CUL * CUL * CUL * CUL</i>	
CUL-001	Cultural resources
<i>CUM * CUM * CUM * CUM * CUM * CUM</i>	
CUM-001	Cumulative impact assessment methodology, explanation of baseline, definition of the Region of Influence
CUM-002	Comparison between the No Action Alternative and the Proposed Action
<i>EDT * EDT * EDT * EDT * EDT * EDT</i>	
EDT-001	Format and readability of the EIS
EDT-002	Maps
<i>HAZ * HAZ * HAZ * HAZ * HAZ * HAZ</i>	
HAZ-001	Ordinance

HAZ-002	Hazardous materials and wastes
HAZ-003	Chaff
HAZ-004	Aircraft accidents—hydrazine and emergency response procedures
HAZ-005	Depleted uranium (nuclear) weapons
HAZ-006	Advanced Medium-Range Air-to-Air Missile (AMRAAM)
HAZ-007	Electronic Combat and electromagnetic fields
HAZ-008	White phosphorous
HAZ-009	Flares
HAZ-010	Fuel jettisoning
HAZ-011	Lasers
HAZ-012	Chaff and flares—procedures for use
HAZ-013	Wildfire hazards
<i>LAN * LAN * LAN * LAN * LAN * LAN</i>	
LAN-001	Land use and population distribution
LAN-002	Conservation System Units
LAN-003	FOX MOA
LAN-004	Size of airspace and underlying land areas
LAN-005	Coastal Zone Management Act—consistency determination
LAN-006	Impact on access to state lands
LAN-007	Aesthetics
LAN-008	Property values
LAN-009	Wilderness values
LAN-010	Airspace use vs. Land use
LAN-011	This code is not used in the EIS
LAN-012	Tetlin National Wildlife Refuge
LAN-013	Talkeetna
LAN-014	Kenai Peninsula and Prince William Sound

<i>MIT * MIT * MIT * MIT * MIT * MIT</i>	
MIT-001	Limit number and timing of Major Flying Exercises (MFEs)
MIT-002	Monitoring
MIT-003	Reduce STONY A, NAKNEK 2, SUSITNA, and FOX MOAs to avoid Department of Interior (DOI) lands
MIT-004	Restrict use of YUKON 4 and 5 MOAs to MFEs only
MIT-005	Provide a two-week break between MFEs
MIT-006	Do not conduct MFEs from April 15 to June 15 to protect lambing, calving, and nesting seasons; avoid fall subsistence and sport hunting seasons
MIT-007	Limit MFEs to three per year, and none between June 16 and August 31
MIT-008	Restrict overflight of selected components of the National Wild and Scenic Rivers
MIT-009	Restrict flare use
MIT-010	Restrict chaff use over Conservation System Units
MIT-011	Limit supersonic operations to 10,000 feet AGL or higher
MIT-012	Do not exceed 1990 levels of routine training
MIT-013	Include a "sunsetting" provision in the EIS
MIT-014	Raise the floor of GALENA MOA to protect the Nowitna National Wildlife Refuge
MIT-015	Raise floors over trumpeter swan habitat to 5,000 feet AGL
MIT-016	Protect IFR routing along V-444
MIT-017	Establish an airway between Fairbanks and Eagle
MIT-018	Consider impacts on future GPS approaches to airports
MIT-019	Protect VFR access along the Alaska and Richardson Highways
MIT-020	Establish additional VFR routes in Interior Alaska
MIT-021	Protect the trans-Alaska oil pipeline with a 3-mile wide, 1,500 foot AGL corridor over the pipeline
MIT-022	Protect the fall hunting season by restrict aircraft operations from August 8 to September 30; conduct no MFEs one week prior to or one week after the 4th of July
MIT-023	Improve VHF communications throughout the MOAs
MIT-024	Use Airborne Warning and Control System (AWACS) aircraft to provide enhanced radar coverage and VHF communications during MFEs
MIT-025	Establish an aviation advisory committee
MIT-026	Establish a toll-free number for civilian pilots to use to obtain information on military aviation activities
MIT-027	Close other military lands to public use
MIT-028	Clarify what mitigation measures will be adopted
MIT-029	Restrict military aircraft to IFR outside the MOAs

MIT-030	Explain the rationale for the mitigation proposed for wildlife
MIT-031	Use MSL values rather than AGL to define MOA floors
MIT-032	General mitigation for recreation, subsistence, and land use
MIT-033	Maintain an "open-door" policy with the civil aviation community
MIT-034	High-use VFR routes should receive as much latitude as possible
<i>NOI * NOI * NOI * NOI * NOI * NOI</i>	
NOI-001	Noise analysis methodologies—subsonic
NOI-002	Noise analysis methodologies—supersonic
NOI-003	Health effects of noise exposure
NOI-004	Avalanche potential
NOI-005	Sleep disturbance potential
<i>OTH * OTH * OTH * OTH * OTH * OTH</i>	
OTH-001	Noise complaints and damage claims
OTH-002	Hours of operation
OTH-003	Yukon Measurement and Debriefing System (YMDS)
OTH-004	High-altitude aircraft operations
OTH-005	This code is not used in the EIS
OTH-006	New and proposed regulations under the Federal Facilities Act; the Resource Conservation and Recovery Act (RCRA); and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
OTH-007	Restricted Areas (RAs)—underlying lands
OTH-008	Noise/Flight Sensitive Area List
OTH-009	Final EIS distribution List expansion
OTH-010	Activities on the ground
OTH-011	MOA nomenclature (numbering scheme)
OTH-012	FAA Flight Service Stations
OTH-013	Other Department of Defense activities in Alaska
OTH-014	General response to commenters' input

<i>PAN * PAN * PAN * PAN * PAN * PAN</i>	
PAN-001	Purpose and need for restructuring MOAs in Alaska
PAN-002	Purpose and need for supersonic training
PAN-003	Required MOA characteristics
PAN-004	MFE sortie numbers
<i>PRO * PRO * PRO * PRO * PRO * PRO</i>	
PRO-001	Environmental Impact Analysis Process (EIAP) for complying with the National Environmental Policy Act (NEPA)
PRO-002	Public involvement process in previous Environmental Assessments (EAs)
PRO-003	Public involvement process in the EIS
PRO-004	Worst case analysis
PRO-005	Applicable regulatory requirements, including the Alaska National Interest Lands Conservation Act (ANILCA), the American Indian Religious Freedom Act (AIRFA), and the Federal Land Policy and Management Act (FLPMA)
PRO-006	Description of the Proposed Action and Alternatives (DOPAA)—availability
PRO-007	Takings assessment
PRO-008	Agency participation
PRO-009	Reasonably foreseeable actions
PRO-010	Executive Order 12898 (<i>Federal Actions To Address Environmental Justice in Minority and Low-Income Populations</i>)
PRO-011	Military and civilian airspace needs
PRO-012	This code is not used in the EIS
PRO-013	Record of Decision (ROD) and mitigation plan
PRO-014	Incomplete or unavailable information
<i>REC * REC * REC * REC * REC * REC</i>	
REC-001	Economic impacts on commercial recreation and tourism
REC-002	Impacts on urban recreation
REC-003	Definition of the impact levels for recreation resources; explanation of the methodology used to assess impacts on recreation
REC-004	FOX MOA
REC-005	Beaver Creek, and the Chatanika, Nenana, and Susitna rivers

<i>SAF * SAF * SAF * SAF * SAF * SAF</i>	
SAF-001	Aircraft mishap rates and accident potential
SAF-002	Minimum spacing arrivals
SAF-003	Emergency response to aircraft accidents
SAF-004	Startle response
SAF-005	Midair collision potential; see and avoid concept
SAF-006	Midair collision potential over Denali National Park and Preserve
SAF-007	Bird-Aircraft Strike Hazard (BASH) analysis
SAF-008	This code is not used in the EIS
SAF-009	Hazard of Electromagnetic Radiation to Ordnance (HERO)
<i>SOC * SOC * SOC * SOC * SOC * SOC</i>	
SOC-001	Economic impacts on local communities
SOC-002	Economic impacts on commercial airlines
<i>SUB * SUB * SUB * SUB * SUB * SUB</i>	
SUB-001	Explanation of the methodology used to assess impacts on subsistence
SUB-002	Impacts on Native American spiritual or traditional use sites
SUB-003	Tok community profile
SUB-004	State subsistence regulations
SUB-005	Communities included in the subsistence analysis

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