

# STATE OF ALASKA

## CITIZENS' ADVISORY COMMISSION ON FEDERAL AREAS

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March 4, 2011

Captain Uriah L. Orland, USAF  
Director, Alaskan Command/11th Air Force/Alaskan NORAD Region/JTF-AK Public Affairs  
ALCOM Public Affairs  
9480 Pease Avenue, Suite 120  
JBER, Alaska 99506

Dear Captain Orland:

The Citizens' Advisory Commission on Federal Areas (CACFA) has reviewed the current information available regarding the Joint Pacific Alaska Range Complex (JPARC) Modernization and Enhancement Environmental Impact Statement (EIS). We appreciate both the opportunity to provide comments and the extension of the Scoping Comment Period. Your group has made a good presence in the affected communities across Alaska with a reasonable public meeting schedule in January. Extending the comment period also demonstrates a commitment to the public process and to the affected public. Please accept the following comments as you begin the draft EIS process.

The CACFA has an expressed interest in this topic as our main charter is representing the best interest of the citizen's of Alaska on proposals for the management and use of federal lands across the State. At our recent meeting in Juneau, we were disappointed that ALCOM declined our invitation to present, as it would have been helpful in better understanding the proposal and its potential impacts to public use of the proposed areas. We do appreciate and accept your invitation to meet once the public comment period is closed. The Commission has formed a sub-committee to track this project and will contact your office in the near future to schedule a meeting.

ALCOM has done a considerable amount of work to closely define the 10 proposals and alternatives on the front end of the NEPA process. While this preparation has its advantages we have heard from some residents who believe that critical "decisions" have already been made. We will look forward to a comprehensive draft EIS document that resolves the issues presented here with a thorough examination, and expect the process will be fully committed to its statements of stewardship and cooperation.

It is well known that the military's presence in Alaska is a vital part of our economy. The Commission supports the Department of Defense mission to and the need for training areas to ensure readiness of our military forces. However, that need and the military's mission also must recognize the importance of the use of these areas to local residents, along with the fish and game and recreational resources found there..

One issue of considerable concern is the expansion of Fox 3 Military Operation Area (MOA) and the establishment of a new Paxon Military Operation Area. Significant public concern has been expressed about the negative impacts of air operations extending from as low as 500 feet above ground level (AGL) This is a considerable change from the current 5000 feet AGL boundary. The information provided during this scope phase fails to provide any explanation or rationale for this significant increase.

The draft EIS should provide a full justification for the proposed change and a complete analysis of all potential impacts. Those potential impacts from such low level operations include, but are not limited to, possible negative impacts on the Nelchina Caribou herd calving and migration, impacts to waterfowl nesting, staging and migration, moose winter range and fish stocks. This expansion also could introduce negative impacts from high noise levels over important recreation areas along the Richardson and Denali Highway corridors, Summit, Paxon and Fielding Lakes, Lake Louise, and the Gulkana, Delta and Wood Rivers.

Air and ground safety could also be compromised in this area from low level flight operations. Impacts to civilian aviation, both private and commercial, throughout this region could be considerable and must be fully analyzed and addressed in the draft EIS. The draft EIS must also outline a plan for providing adequate and timely notice of operations and exercises to the general public and the aviation community. Notice to airmen alone is not sufficient.

The draft EIS must also contain an ANILCA Section 810 determination. Section 810 requires that the potential impacts to subsistence use of federal lands be evaluated "in determining whether to withdraw, reserve, lease, or otherwise permit the use and occupancy or disposition of public lands under any provision of law authorizing such actions. Section 810 also requires hearings, not just public meetings, in the affected area. It also requires consultation with local fish and game advisory committees and regional councils.

The Commission suggests that the preparers of the draft EIS consult closely with the Alaska Department of Fish and Game and the Federal Subsistence Management Program staff in preparing the Section 810 determination. State and federal agency staff can help ensure compliance with the procedures outlined in that section of ANILCA. We should also point out that subsistence or personal uses of fish and game is provided for under State and federal law for all Alaskans, irrespective of ethnicity.

Finally, once the draft EIS is released, a minimum 90 day public comment period should be provided. As experienced with this initial scoping public comment period, additional time allows for the public and groups to receive notice, meet, discuss and respond with substantive

comments based on thorough evaluation of the document. Public meetings should also be scheduled in all affected communities within or adjacent to the affected area.

We again appreciate the opportunity to comment on this project. Please maintain our contact information for future notifications, and contact our office if there are questions about our comments.

Sincerely,

A handwritten signature in black ink, reading "Stan Leaphart". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Stan Leaphart  
Executive Director