Legislative Environmental Impact Statement (LEIS) For Land Withdrawal Extension at U.S. Army Garrison Alaska

Draft LEIS Comment Period Summary Report

September 2023

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Attachment 4: Comment Responses

Acronyms

ADFG Alaska Department of Fish and Game

ADNR Alaska Department of Natural Resources

ANILCA Alaska National Interest Lands Conservation Act

Army U.S. Army

BLM Bureau of Land Management

DOI U.S. Department of the Interior

EPA U.S. Environmental Protection Agency

FNSB Fairbanks North Star Borough

LEIS Legislative Environmental Impact Statement

NEPA National Environmental Policy Act

NOA Notice of Availability

PSA Public service announcement

USAG U.S. Army Garrison

USFWS U.S. Fish and Wildlife Service

1. Introduction

The opportunity for the public to comment on the Draft Legislative Environmental Impact Statement (LEIS) allows the U.S. Army (Army) to ensure the public's concerns have been addressed and helps fulfill its due diligence under the National Environmental Policy Act (NEPA). The Army published a Notice of Availability (NOA) of the Draft LEIS for a Land Withdrawal Extension at the U.S. Army Garrison (USAG) Alaska in the Federal Register on May 12, 2023. The publication of the NOA initiated a 60-day comment period that ran from May 12 through July 11, 2023, during which members of the public, government agencies, tribes, private organizations, and other interested parties were invited to comment on the content of the Draft LEIS. Comments could be submitted through mail, email, or the project website (https://home.army.mil/alaska/index.php/fort-wainwright/NEPA). The project website contained background information on the proposed action, downloadable materials, contact information, and details on opportunities for public involvement.

2. Outreach

The Army conducted two public comment meetings, the first on the evening of June 20, 2023 in Fairbanks, AK and the second on June 21, 2023 in Delta Junction, AK. The Delta Junction public meeting also served as the Alaska National Interest Lands Conservation Act (ANILCA) Section 810 Subsistence hearing to fulfill Bureau of Land Management (BLM) requirements. The meetings were held in-person at the Fairbanks Pioneer Park, Centennial Center Blue Room and the Delta Junction Community Center, respectively. The meeting details and comment period dates were published in the NOA and advertised locally in the Fairbanks Daily News-Miner on May 12th and June 16th, and in the Delta Wind on May 11th and June 15th. 2023. A public service announcement (PSA) ran on KUAC radio station for eight weeks, beginning on May 15th and ending on July 11th in varying frequency with increased frequency leading up to the public meetings. The Army posted flyers advertising the meetings and comment period in the Delta Junction Community Library. No members of the public attended the Fairbanks public meeting and no oral comments were provided. The Delta Junction public meeting had one member of the public in attendance but they did not provide comments. Attachment 1 contains a transcript of both public meetings.

The Army held an additional comment meeting for federal, state, and local agency representatives, elected officials, and tribal representatives on the morning of June 20th, 2023. The agency meeting was held in-person at the Westmark Hotel and Conference Center, Harper Boardroom in Fairbanks, AK. Agency letters containing the meeting information were mailed to the contacts listed in Attachment 2. A reminder email was sent out to the same list of people the week before the agency meeting. Fifteen people attended the agency meeting, including members of the Army's project team. Attendees included representatives from the U.S. Fish and Wildlife Service (USFWS), BLM, Alaska Department of Fish and Game (ADFG), Fairbanks North Star Borough (FNSB), Alaska State Senate, and the City of North Pole. No attendees provided verbal comments. A full transcript of the meeting is included in Attachment 3.

As previously mentioned, following the public meeting in Delta Junction, the BLM conducted their ANILCA Section 810 analysis subsistence hearing. No comments were provided during the hearing.

3. Comment Summary

Four written comment letters or emails were received during the public comment period from four public agencies including the Tanana Yukon Historical Society of Fairbanks, Alaska Department of Natural Resources (ADNR), U.S. Environmental Protection Agency (EPA), and U.S. Department of the Interior (DOI) Office of Environmental Policy and Compliance. The Army also received one written comment from a private citizen outside of the comment period, which they have accepted. No verbal comments were submitted during the public or agency meetings. The five written comment letters and emails included a total of forty-nine distinct comments. All written comments and emails can be found in Attachment 4.

The primary topics expressed in the public comments included suggestions for the resource sections and appropriate level of analysis, general support of the Army's proposed action, impacts to land management under each alternative, requests for publication of a Final LEIS, and specific requests for content to be covered in the environmental analysis. Overall, most commenters expressed support for continued use of the withdrawn lands for Army training. Some commenters expressed concern about the continuation of existing agreements regarding wildland fire management on the withdrawn lands and at the interface between Army lands and adjacent towns. Staff from federal agencies commented on the level of analysis expected for the Draft LEIS and a Final LEIS and specific resource areas to expand the environmental analysis on including environmental justice, wildland fire, water resources, air quality, greenhouse gases and climate change, subsistence resources, public access, wildlife, hazardous materials, and tribal coordination.

Comments received during the public comment period received individual responses, but will not be addressed in the Draft or a Final LEIS. Comment responses can be found in Attachment 5.

Attachment 1: Public Meeting Transcripts

In The Matter Of:

Draft Legislative Environmental Impact Statement For Land Withdrawal Extension

June 20, 2023
Fairbanks Public Meeting

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Original File FAIRBANKS PUBLIC MEETING LEIS.TXT

Min-U-Script® with Word Index

Fairbanks Public Meeting

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         Draft Legislative Environmental Impact Statement
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                   for Land Withdrawal Extension
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 3
                     U.S. Army Garrison Alaska
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                       Tuesday, June 20, 2023
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                          5:00 - 7:00 P.M.
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    Speakers:
    Matt Sprau " DPW Environmental Planning Chief
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    Colonel Nathan Surrey " USAG Alaska Garrison Commander
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21
    Moderators in Attendance:
22
    David Munro " Tetra Tech Project Manager
    Corinna Holfus " Tetra Tech Coordinator
23
24
    Melanie Roed " DPW Environmental NEPA Program Manager
25
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2 TUESDAY, JUNE 20, 2023 1 2 FAIRBANKS, ALASKA 3 5:00 P.M. 4 MS. HOLFUS: All right, everyone. We're going 5 6 to get started. So hopefully people start to, you know, 7 filter in, but we're going to go ahead and get started 8 anyways. 9 So welcome to the public meeting for the land withdrawal extension, Legislative Environmental Impact 10 11 Statement, or LEIS. So we're going to go through a presentation, and then tell everyone how to make comments. 12 We have comment cards in the back, which we'll go over 13 this in detail later. If you also want to sign that 14 15 sign-in sheet in the back, that way we can keep track of 16 who is here. A couple housekeeping things. Emergency exits 17 18 are that way, downstairs where you came in. And then there's also restrooms over that way, so . . . 19 And with that, I will hand it over to Matt 20 21 Sprau. 22 MR. SPRAU: All right. Thanks, everybody. 23 And it's always good talking to my colleagues again. 24 All right. So good afternoon, everyone. 25 name is Matt Sprau. I am the project manager for this

Legislative Environmental Impact Statement, this land
withdrawal Legislative EIS. And I will be one of the
speakers for today's meeting. So I am the planning chief
for Environmental Division at Fort Wainwright.

And so thank you for joining our public meeting today for the Public Law 106-65 Land Withdrawal Extension, Draft Legislative Environmental Impact Statement. The link to our project website where the project information can be found is easy to find if you search for Legislative Environmental Impact Statement for the Land Withdrawal Extension, U.S. Army Garrison Alaska in your preferred search engine. I'll point out the poster board here that has our project website, as well as my address for submitting it and mailing comments.

So thank you again for your participation in this meeting, the Draft LEIS public meeting. At the end of this meeting, we'll close down this formal period, and then we'll be able to be here so you can provide comments and talk to one of us. We do have a court reporter here today to submit comments and formally submit your comments for this EIS. And the comments from this meeting will be recorded and transcribed, as I just mentioned for the project team, and become part of the administrative record.

The comment period runs through July 11th, so

we ask that all comments are received or postmarked by

July 11th for consideration into this LEIS.

And now I would like to turn it over to

Colonel Nathan Surrey, the U.S. Army Garrison Alaska

Garrison Commander who will be providing an overview of
the land withdrawal.

Sir.

COLONEL SURREY: All right, team. How is everybody doing? Everybody excited? Do some jumping jacks.

So as Matt said, we recently announced the Draft LEIS, Legislative Environmental Impact Statement, to assess potential impacts of continued military use on the withdrawn public land in Alaska.

These lands are extremely important to us. The training that we do up here in the Arctic, especially with the Arctic strategy from the highest levels of our nation built in the national security strategy, all the way down through the different levels of the executive branch of the Army. This is a very competitive space. And the training lands that you see here are only -- we have the Tanana Flats, which is not included. That's in a permanent withdrawal, or definite. But the other two, the Yukon Training Area and the Donnelly Training Area that you see towards Greely, if you combine all of this

together, that's 10 percent of the Army's training lands. 1 2 And that's for good reason, because the maneuvering that we do up here, joint multinational maneuvering that's 3 growing every year, is critical to our nation's defense. 4 Because this is where you learn to train in extreme cold. 5 That is the bottom line. 6 7 And we have a new training exercise every This will be a third rotation this February called 8 9 Joint Pacific Multinational Readiness Center. That's where we bring our observer controllers and trainers up 10 from Fort Polk, Louisiana, or NTC, National Training 11 Center at Fort Irwin, and then also from Hawaii. And that 12 is where our units up here fight blue on red, so good 13 versus bad, like we do at the other training centers. 14 15 we do it here in the Arctic, because we need to train like 16 we fight. And the Air Force is a big part in that, along 17 18 with our other services, special operations, Canada, and many other Arctic nations that come over here to train 19 with us. It's good to continue to expand. That's why 20 21 these training lands are so important. Because it gives us that vast maneuverability to train in the Arctic. 22 23 So the information presented today about the 24 LEIS will inform our legislative proposal submitted to Congress by the Army to support Congress™s decision on 25

granting an extension to the current land withdrawal, 1 2 Which you can see was in 1999, and it goes through November 6, 2026. So ultimately we need to get this 3 extended. And we've asked for 25 years or more. And so 4 they can decide to do that indefinitely if they choose, or 5 6 for any ordinal between 25 and that. 7 The Bureau of Land Management, or BLM, has jurisdiction by law over this land withdrawal extension 8 9 and the process, and is a cooperating agency for this They're actively participating in its development 10 11 and review. U.S. Army Garrison Alaska -- this is a key 12 point -- acknowledges that the lands the Army manages and 13 uses for readiness of our force has provided for its first 14 15 stewards for generations. The Den'a Athabascans of Alaska -- past, present, and future -- and their 16 dedication to this homeland will be honored by the Army™s 17 18 continually improving stewardship. The Army will work with Alaska™s lands for as long as they are needed in 19 support of our warriors. 20 21 We want to hear from you and what your comments are and what your concerns are. And all those 22 23 comments, as Matt was saying, will be submitted and 24 reviewed for consideration by us and Congress when making 25 the decision on what or how long that withdrawal will be.

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Your feedback is important. We can't think of
 1
 2
    everything, obviously. So we want to hear from you.
    Again, please get your comments in by 11 July, or at least
 3
    postmarked by that time. And you can deliver those via
 4
    the website, email, regular mail, and today. If anybody
 5
    provides comments, they will be recorded as stated
 6
 7
    earlier.
                So again, I'll sum it up by saying this:
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 9
    These lands are incredibly important to us, not just the
    Army but the entire Department of Defense. And as the
10
    Arctic strategy continues to mature, and the
11
    implementation of that, because it's fairly new, becomes
12
    more executable, these lands will be even more important,
13
    especially with the modernization of our equipment across
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15
    all of the services, and even some of our interagency
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    folks that come up here in operation.
                So with that, Matt, I'll turn it over back to
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18
    you.
19
                MR. SPRAU: All right. Thank you, sir.
20
                All right.
                             So we'll go ahead and get in the
21
    presentations out of here.
22
                So the purpose of this Draft Legislative
23
    Environmental Impact Statement for land withdrawal at
    U.S. Army Garrison Alaska -- the purpose of today's
24
25
    meeting is three-fold.
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1 One is to learn about the purpose and need for 2 the land withdrawal. 3 Two is to learn about the findings of the 4 Draft LEIS. And then three is to submit comments on the 5 6 Draft LEIS. Again, we have comment cards in the back. 7 have a court reporter here today. And we have online resources as well, and mailing to submit comments. 8 9 Next slide, please. So the National Environmental Policy Act, or 10 11 NEPA, requires federal agencies to consider its environmental impacts prior to making decisions. We are 12 13 required to follow the NEPA process for this land withdrawal proposal, and we prepared a Draft LEIS, a 14 15 Legislative EIS, to analyze the effects of the proposed action of withdrawing the land. And then a no-action 16 alternative on the environment. Those are the impacts on 17 18 the environment. The NEPA process allows the public to be 19 involved in the Army's decision-making process, and in 20 this instance it's ultimately Congress's. 21 22 I will make a quick point here is the LEIS is 23 a different -- there's a difference between a Legislative 24 EIS and an EIS in that the Legislative EIS, the 25 decision-maker is Congress. Any comments that are

received throughout this process are submitted as a part 1 2 of a package that is sent up to Congress to the respective agencies in the Department of the Interior and the 3 Department of Defense to draft legislation for Congress's 4 ultimate decision. 5 6 So the input that we receive from the public 7 comment period will go directly to the decision-makers at Congress on drafting the legislation. 8 9 Next slide, please. All right. So why do we have a Draft LEIS 10 11 meeting? The meeting allows us to update you on the 12 13 project and present the analysis and potential environmental effects on the proposed action and 14 15 alternatives. It provides us an opportunity to listen to 16 your concerns on the environmental effects of continued 17 18 military use of these withdrawn lands. 19 And lastly, it provides a direct avenue for 20 collecting your comments on the Draft LEIS. 21 Next slide, please. As Colonel Surrey mentioned, the Bureau of Land Management 22 23 retains jurisdictional authority over the withdrawn lands 24 for military training and testing. And they also oversee 25 the process for requesting land withdrawals. So they are

a cooperating agency working very close with them throughout this entire process.

We've also coordinated with appropriate federal, state, and local and tribal agencies and other members of the public throughout this process so far on the proposed action.

Next slide, please.

For today™s agenda, what we will do is just a quick project overview, a summary of the alternatives analyzed, a summary of the analysis and impacts of the proposed action, the project timeline and important dates, and, again, collect your comments.

After the end of this formal presentation, we'll just kind of hang about and have any further discussions. And, of course, if comments are -- if anybody wants to submit comments, we have a court reporter here, and the other means that we previously mentioned.

Next slide, please.

Okay. So, as you can see here on the map, this map shows the entirety of -- almost the entirety of the U.S. Army Garrison Alaska training land footprint. We are talking specifically about the 869,862 acres of land that was withdrawn under Public Law 106-65. That includes the areas in red, bounded by red, the Yukon Training Area east of Eielson Air Force Base and the Donnelly Training

Area east and west down by Delta Junction.

withdrawn for a period of 25 years in 1999. It expires in 2026, and we are going through the process now -- part of the process which is the EIS to request the extension -- these lands be extended for continuing military use. And we've determined that there is a continuing military need for these lands. And, as I mentioned earlier, Congress is the decision-maker in this process, so this feedback will -- your feedback will be a part of Congress's decision.

Next slide, please.

All right. So the purpose and need. This really forms the basis of the NEPA analysis, and the purpose of this proposed action -- again, to extend the withdrawal -- is to obtain an extension of the land withdrawal of the training areas that I just showed for 25 years or more, or have the land assigned to the control of the Secretary of the Army until such time as the Army determines it no longer needs the lands for military purposes.

The need is to produce a force trained to be successful anywhere in the world, including Arctic and sub-Arctic, to coordinate and conduct operation with the U.S. Air Force, and lastly to fulfill the U.S. Army

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mission in Alaska.
1
2
                Next slide, please.
3
                So when we develop our purpose and need, we go
4
    through what's called an alternative viability analysis,
    and to do that, we developed a screening criteria that
5
6
    will get us to -- help us get to what our purpose and need
7
         And in this instance, we've identified three
    screening criteria. And for an alternative to be
8
9
    considered viable, it needs to meet all three of these
10
    screening criteria.
11
                So the first one is the action must allow the
    Army to meet their training needs and mission.
12
                Screening Criteria 2 is the action must
13
    provide training lands that meet the Army™s need and
14
15
    replicate a real-world combat situation, including
    providing enough acreage and the appropriate weather
16
    conditions. As the colonel mentioned, we are in the
17
18
    Arctic, so Arctic environments, boreal ecosystem is
    important for the training that occurs here.
19
                Screening Criteria 3: The action must be
20
21
    feasible, cost-effective, and similar in scale and quality
22
    to the current operating conditions.
23
                Next slide, please.
24
                So as we went through the purpose and need, we
25
    looked at the criteria we developed, what potential
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alternatives could get us to our need. And these are the
1
2
    list of alternatives that we've considered in this Draft
    LEIS.
3
                The first one is extend land withdrawal for 25
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5
    years or more.
6
                The second one is to transfer administrative
7
    jurisdiction from the Department of the Interior to the
8
    Department of Defense.
9
                Third, extend land withdrawal for less than 25
10
    years.
11
                There's partial land withdrawal.
                Acquire additional training lands.
12
13
                Acquire alternate training lands.
14
                And use existing alternative training lands.
                For the last one there, using existing
15
    alternative training lands would be focusing on the other
16
    training areas that we have under our purview, like the
17
18
    Tanana Flats or the Gerstle River, Black Rapids training
19
    area.
20
                Next slide, please.
21
                Okay. So when we went through the screening
22
    criteria, the alternative screening criteria, we have our
23
    purpose and need identified, and then we have our list of
24
    alternatives.
25
                And again, I mentioned that for an alternative
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to be considered viable, it's got to have -- it's got to
meet all training criteria.

So as you can see, the one that met all our screening criteria was to extend the current land withdrawal for an additional 25 years or more. That meets our screening criteria of fulfilling our current training needs, and meets our Army operational parameters, and locating where it is in the Arctic, and then feasibility, meaning we already have the infrastructure in place to support our mission requirements.

The other one that is "no" across the board, but we still have to consider anyways, is a no-action alternative. And that is a requirement of NEPA that sets a baseline standard, and it allows us to compare the action alternative compared to a baseline.

In this instance, baseline is a little bit different, the no-action is a little bit different because no-action means we would not -- the Army would not be operating in these lands anymore. So there would be another pertinent act of public domain instead of military use of those lands.

Okay. Next slide, please.

So in the end what we came to was two action alternatives. Or I'm sorry, one action alternative and a no-action. The action alternative is to extend the land

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   for 25 years or more.
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The 25 years or more, I'll just touch on that a little bit. Again, as I mentioned earlier, Congress is 3 the final ultimate -- is the ultimate decision-maker on 4 So they will draft legislation to determine how long the military will get these lands if withdrawn. public input plays a part in that; the Department of the Interior plays a part in that; the Department of Defense. So Congress will ultimately provide that legislation. 25 years or more is what we've identified as our minimum 10 11 requirement.

No-action alternative again, not extend the land withdrawal, and the military land -- these lands will no longer be available for military use after November 6, 2026.

Next slide, please.

So these are the primary resources that Okav. we evaluated. So this is -- let's see. I won't go through each one of them. We'll go through those slides after this, but as you can see, the EIS process covers a full and a wide array of environmental and some that are not quite environmental, but still really like socioeconomics and environmental justice resource areas into our analysis. And I'll go over those in these next few slides.

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Next slide, please.
 1
 2
                Okay. So we'll just do a high-level summary
 3
    of the impacts. The proposed action, again, is to extend
    the withdrawal. So all the actions and activities that
 4
    are currently happening on the lands will continue to
 5
 6
    happen on the lands. The existing environmental practices
 7
    and best management practices, management plans, will
    continue to be implemented in coordination with our
 8
 9
    agency, local and state, and public members will still
10
    continue.
11
                So with that under the proposed action there
    would be no changes to each resources from existing
12
13
    conditions.
                And we don't anticipate significant impacts
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15
    under the proposed action, meaning significant of action,
    you don't have to space the impacts under continued
16
    military use of these training lands.
17
18
                And then the next slide will go into more of
    the potential ongoing impacts from the analysis.
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20
                Next slide, please. Thank you.
21
                Okay. So -- let's see, this is Slide 16, I
22
    believe.
23
                MS. HOLFUS:
                              15.
                                   Sorry.
24
                MR. SPRAU:
                             15?
25
                MS. HOLFUS: Yeah.
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1 MR. SPRAU: Yeah. Sorry. So this table lists some of the 2 Okay. resources analyzed with their potential impacts under both 3 alternatives. And there are only three similar slides to 4 5 this. 6 And so from the action alternative side -- the 7 action alternative side, again, extending the land withdrawal -- we do not anticipate any changes to land 8 9 use, visual resources, noise, recreation, utilities, traffic and transportation, airspace, or public health and 10 11 safety. Go to the next slide, please. 12 So under the action alternative in this -- under these 13 resource areas, the action alternative there would be a 14 15 beneficial impact to hazardous materials, mainly in the form of management and storage. So we do have to utilize 16 hazardous materials during our regular operations, but we 17 18 have management plans in place to manage that appropriately. With that, though, comes the potential for 19 impacts from spills or whatnot. 20 21 So again, we manage that accordingly with our 22 appropriate plans, but that will be an impact there, an 23 ongoing impact. 24 There would also be no changes in impacts to 25 air quality, and negligible impacts to visibility and the

degradation of Denali National Park. 1 2 Next slide, please. 3 All right. So under the no-action 4 alternative, there would be no change to wildland fire due to continued wildland fire management on these withdrawn 5 6 lands. 7 We will point out that there could be continued potential impacts of archeological sites, and 8 9 negatively impacted from military training activities. However, there would be no impacts to properties of 10 11 traditional and cultural significance. As I mentioned earlier, we have a cultural 12 resources management plan that we work very closely with 13 the training community on to implement litigations and 14 15 management of the cultural resources. There would be beneficial impacts. The impact 16 on the action alternative side so we can withdraw both 17 18 training areas with the extension of the withdrawal would be beneficial impacts, economic impacts due to the 19 continued need for Army personnel, and contributions to 20 the local economic. And there would be no impacts to 21 22 environmental justice communities. 23 And then lastly, under the action alternative, 24 there would be no changes in impacts to subsistence 25 because there will be no effects to resource abundance or

availability on these withdrawn lands; however, there 1 2 would be no opportunity for withdrawn lands to become eligible for federal subsistence use under the Alaska 3 4 National Interest Lands Conservation Act, or ANILCA. 5 Next slide, please. 6 All right. So this is a much-pared-down 7 version of the process map for the land withdrawal process. And like I mentioned earlier, we work very 8 9 closely with the BLM. The BLM has parts of this, the Army has parts of this, and then we have joint parts of this 10 11 process. The legend outlines some of the various laws, 12 the Military Land Withdrawal Act in process, the DOD Land 13 withdrawal application process, the National Environment 14 15 Policy Act. All three laws which we need to follow, process we need to follow. 16 And then the boxes highlighted or bounded in 17 18 yellow are opportunities for public engagement. So we are in the Draft LEIS public comment period. And that closes, 19 again, on July 11th. So postmark comments received by 20 21 July 11th when we consider going forward. The star 22 signifies where we are currently in the process. Ultimately DOD and DOI will take the 23 24 information, the EIS, the findings and recommendations that the BLM puts together, and we'll use that information 25

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to draft the legislation for this proposed action.
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2
                Next slide, please.
                So, again, why we're here is we want to hear
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4
               This is an opportunity to provide public
    from you.
               And as I mentioned, July 11th is the due date.
5
    comments.
6
    So postmark your comments by then. You can leave comments
7
    today here with the court reporter. And there's comment
8
    cards in the back. You can email comments to the project
9
    website. You can mail written comments to me. You can
    also reach out to Grant Sattler, who is our public affairs
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11
    officer. I believe his information -- we can get his
    information to you -- is on the comment cards. And then
12
13
    we also have a project website.
    home.army.mil/alaska/index.php/fort-wainwright/nepa.
14
15
                And I believe that is the last slide. So I'll
    turn it back over to Colonel Surrey, if you have any
16
17
    closing comments, sir.
18
                COLONEL SURREY: I do not.
                MR. SPRAU: Okay.
                                   So that will conclude the
19
    formal part of our meeting, and we will be here to answer
20
21
    any further questions and have some discussions with any
22
    member of the public that may be in the audience at this
23
    time. So thank you.
24
    5:26 P.M.
25
    (End of Public Meeting.) (No public comments recorded.)
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	17:25	15:23;17:14;18:18	board (2)	9:20
\mathbf{A}	airspace (1)	Army (19)	3:13;14:11	Colonel (8)
	17:10	1:3;3:11;4:4,20;	boreal (1)	1:19;4:4,8;9:22;
a cooperating (1)	Alaska (12) 1:3,19;2:2;3:11;4:4,	5:25;6:12,13,18;7:10, 24;10:21;11:19,19,	12:18 both (2)	11:2;12:17;20:16,18 combat (1)
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able (1)	10:21;12:1;19:3	18:20;19:9	bottom (1)	combine (1)
3:18	Alaska TM s (1)	Army's (2)	5:6	4:25
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acknowledges (1)	allows (3)	array (1)	19:17	2:13;3:25;8:6;9:7;
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Acquire (2)	almost (1)	assess (1)	4:20	comments (26)
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acreage (1)	along (1)	assigned (1)	5:10	21;4:1;6:22,23;7:3,6;
12:16	5:17	11:18	built (1)	8:5,8,25;9:20;10:12,
acres (1)	alternate (1)	Athabascans (1)	4:18	15,16;19:20;20:5,6,6,
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In The Matter Of:

Draft Legislative Environmental Impact Statement For Land Withdrawal Extension

June 21, 2023
Delta Junction Public Meeting

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Delta Junction Public Meeting

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         Draft Legislative Environmental Impact Statement
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                   for Land Withdrawal Extension
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                     U.S. Army Garrison Alaska
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                      Wednesday, June 21, 2023
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                          5:00 - 7:00 P.M.
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    Speakers:
    Matt Sprau " DPW Environmental Planning Chief
16
    Richard Fromm " USAG Alaska Deputy Garrison Commander
17
18
    Tim Hammond - BLM Eastern Interior Field Manager
19
    Jim Herriges - BLM Wildlife Biologist (Subsistence)
20
21
    Moderators in Attendance:
    David Munro " Tetra Tech Project Manager
22
    Corinna Holfus " Tetra Tech Coordinator
23
24
    Melanie Roed " DPW Environmental NEPA Program Manager
25
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1	WEDNESDAY, JUNE 21, 2023	
2	DELTA JUNCTION, ALASKA	
3	5:00 P.M.	
4		
5	MS. HOLFUS: Okay, everyone. We're going to	
6	get started here. So go ahead and take your seats.	
7	All right. So thank you so much for coming	
8	out, and welcome to the Land Withdrawal Extension,	
9	Legislative Environmental Impact Statement or LEIS Public	
10	Meeting. Thank you for showing up. And we have a	
11	presentation for you today (indiscernible) by some project	
12	overview, and then how you can provide a comment. There's	
13	some handouts in the back, if you want to look through	
14	that during the presentation. And we also have a sign-in	
15	sheet if you want to make sure to sign in.	
16	So that's pretty much it, so thank you so	
17	much. And I will hand it over to Matt.	
18	MR. SPRAU: Okay. Thank you.	
19	All right. So good evening, everyone. Thanks	
20	for coming out for this public meeting today for the	
21	Legislative Land Withdrawal Extension, Legislative EIS	
22	Public Meeting.	
23	My name is Matt Sprau. I'm the chief of the	
24	Planning Branch in the Environmental Division at Fort	
25	Wainwright, Alaska. And I'll be one of the speakers	

1 today. 2 So thank you for joining in this public 3 meeting for the Public Law 106-65 Land Withdrawal Extension, LEIS, at U.S. Army Garrison Alaska. 4 This meeting today will actually serve two 5 6 The first being the Army's public comment purposes. 7 meeting for the Legislative EIS, and it will also serve as the Bureau of Land Management Subsistence 810 Analysis 8 9 Public Hearing. So I will go through my presentation, and after the presentation, then I will turn it over to the 10 BLM, (indiscernible) in order to start the Subsistence 810 11 12 period portion. We do have guite a number of Army folks 13 represented to (indiscernible), so I can quickly go 14 15 through here to just indicate who's here so the folks know who is in the audience. 16 We have Mr. Richard Fromm, the Deputy to the 17 18 Garrison Commander with the U.S. Army Garrison Alaska at Fort Wainwright. Justin Smith, a Natural Resource 19 Specialist at Fort Wainwright. Bob Larimore, who's our 20 21 Environmental Commission Chief at Fort Wainwright. And 22 Justin Hoagarth over here. He's in Natural Resources in 23 Fort Greely. 24 Let's see here. I'll go down the line. Clint

Baker who is our TSA director in the 11th Airborne

Steve Tucker who is our high tech coordinator. 1 Division. 2 Again, 11th Airborne Division. Melanie Roed in the back there is our NEPA program manager at Fort Wainwright. 3 Ellen Clark, High TAM coordinator at DTA Donnelly Training 4 Area Range down here in Delta Junction. And Derrick 5 6 Larson, the ETA Maintenance Officer here as well as down 7 in Fort Greely, Delta Junction. We also have Lieutenant 8 Colonel Keith Marshall. 9 So that's the Army representatives today. We also have Tetra Tech who is here supporting our Army 10 efforts of Dave Munro and Corinna Holfus. 11 So we'll go ahead and get this 12 presentation started. But we have some boards in the 13 I have links to our project website, and where the 14 15 information can be found. And we've also provided our local advertisements, and the notice of availability for 16 this meeting. And in addition, the project website link 17 18 can be easily found by searching for Legislative Environmental Impact Statement for Land Withdrawal 19 Extension at U.S. Army Garrison Alaska in your preferred 20 21 search engine. 22 So, again, thank you for your participation 23 tonight at this public meeting. You may provide comments 24 at any meeting. Again, how we're structuring this, we'll

go through our presentation, BLM will host a hearing, and

there will be some comments. And then we'll shut down the 1 2 formal period, and we'll be available for just discussion and conversations with you. And then you can provide 3 comments today by speaking with a court reporter, who is 4 here recording the meeting for the administrative record 5 6 for this project. You can also write your comments on a 7 comment card which are provided on the table in the back. And you can leave that here. You can also mail it in to 8 9 me, Matt Sprau. And my address is on the back poster there, but I'll also (indiscernible). It's AMIM-AKP-E 10 (Sprau), 1060 Marks Road, #4500, Fort Wainwright, Alaska 11 99703-4500. You may also provide your comment online at 12 13 our website. And the website is on the information, and it's on the poster in the back. 14 15 So the comments from the public meeting tonight will be recorded and transcribed for the project 16 Comments received today and throughout the comment 17 team. 18 period until July 11th -- so this comment period is open until July 11th -- will be considered by the project team 19 as part of this EIS. So any comments that are submitted, 20 21 you need to have them postmarked by July 11th for

All comments will be part of the public record, and today's meeting is being recorded, as I mentioned, as part of the administrative record.

consideration in this Draft LEIS process.

22

23

24

So now I would like to introduce Mr. Richard Fromm, our Deputy to the Garrison Commander of U.S. Army Garrison Alaska for an overview of the land withdrawal effort.

MR. FROMM: So most of you know me as the deputy of Fort Greely, so yes, I recently accepted a different job at Fort Wainwright. Colonel Surrey and Colonel Marshall are still here to support us. And I'll be helping them to transition to the deputy in here.

So on behalf of Colonel Surrey, thank you for coming out to the meeting tonight. Like Matt said, the Army recently announced, you know, the Draft Legislature EIS. But what Colonel Surrey wanted me to talk about is the importance of this land and why the Army really needs it.

I will tell you that if you look at our nation's strategy and how we -- in relation to the Arctic trend, what's going on in the Arctic, there are several adversaries right now pushing into the Arctic. And so we need to train our forces, right, in the Arctic as a deterrence; right? Lord forbid we don't want to go in conflict ever, but what we have found through our national security strategy over the years, if we had a strong forces training in a certain area, our adversaries don't even try to tempt us.

So the whole Arctic strategy right now is to start training in the Arctic, and advanced training in the Arctic. It's been going on now a couple of years. We've had some major exercises. I think Delta has been impacted as we get people through here in springtime; right? Both positive and negative. We've talked about it; right? You know, positive for the economy. Some major traffic flow that we had to work through.

But the bottom line is, you know, we have to have the Donnelly training area in the country in order to expedite that training. That's what we're talking about here. Tanana Flats is covered under separate legislation. So we're really talking about the Yukon and Donnelly for this EIS. Without those two training areas, it really lends to the Army's ability to train in the Arctic. And that's why we really need this push through as we move forward.

That said, we welcome your comments. Right. So the BLM owns the land, and is the (indiscernible) here and now, but we want to hear the public's comments, you know, from people telling how it affects you. Right. So please -- you know, Matt will tell you exactly how to give your comments to get them in the record. And all this will go up to Congress who will ultimately make the decision. You know, we'll lay out the Army case, but also

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look at all the comments, and we'll move forward.
1
2
                That said, you know, I have several
    environmental people in here. Right. They're all --
3
    we're committed to taking care of the land. All right.
4
    As long as the State's working with the DOT, we will do
5
6
    the right thing with the land. Right. And we will
7
    continue to, you know, make sure it's cleaned up, and make
    sure that our troops up there are doing the right thing
8
9
    and it's available for other people to use also.
                So with that, that pretty much summarizes the
10
    big ones that Colonel Surrey covered last night at the
11
    meeting in Fairbanks. I'll turn it over to Matt now to go
12
13
    through the presentation. And then please, you know,
    whatever comments you have, please enter them into the
14
15
    record so we can make sure that Congress gets the full
16
    picture.
17
                Okay.
                       Matt.
18
                MR. SPRAU: Thank you, sir.
19
                Okay. So we'll go ahead and get into the
20
    presentation.
21
                Next slide, please.
22
                Hi, everyone. So again, welcome to the Draft
23
    Legislative Environmental Impact Statement for the Land
24
    Withdrawal Extension for the U.S. Army Garrison Alaska.
    Again, this is a public meeting, and the purpose of this
25
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1
    is threefold.
                So, one, the first is to learn about the
2
    purpose and need of the land withdrawal extension.
3
                 Second is to learn about the findings of the
4
5
    Draft LEIS.
6
                And the third is just to make comments on the
7
    Draft LEIS.
                And as I mentioned earlier, this meeting will
8
9
    also serve as the BLM Subsistence 810 Hearing.
                                                     So there
    is another -- at the end of our presentation, this meeting
10
    will (indiscernible) after this.
11
12
                Next slide, please.
                So the National Environmental Policy Act or
13
    NEPA is a requirement for federal agencies to consider
14
15
    environmental impacts prior to making a decision. And the
    request for the extension of this land withdrawal is a
16
    federal decision that requires an environmental analysis,
17
18
    and specifically a Draft EIS -- or an Environmental Impact
    Statement.
19
                I will point out that under NEPA, there's a
20
21
    typical Environmental Impact Statement, and in this
    instance, because it's a land withdraw and Congress is the
22
23
    ultimate decision-maker, this is a Legislative EIS.
24
    Meaning Congress is the final decision-maker.
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comments that are received throughout this process, BLM's

findings and recommendations since they oversee the land 1 2 withdrawal process, gets packaged and sent out to Congress for drafting the legislation and ultimately the land 3 4 withdrawal. The NEPA process does allow the public to be 5 6 involved, and as I mentioned, this is an important one 7 since it goes up to Congress for the ultimate decision-making, and the public voice is important for 8 9 that and will get considered, so . . . 10 Next slide, please. 11 Okay. So why do we have a Draft LEIS? So it allows us to update the public and interested parties on 12 the project and present the analysis of potential 13 environmental impacts from the proposed action and the 14 15 alternatives. It also provides an opportunity to listen to comments, to hear the public and the concerns about the 16 environmental effects of continued military land use of 17 18 these withdrawn lands. And it provides, again, a direct avenue for collecting your comments to be incorporated 19 into this process for consideration by Congress. 20 21 Next slide, please. So as Mr. Fromm mentioned, the BLM is the 22 23 underlying land owner of these withdrawn lands, and they 24 also control the process for requesting the land withdrawal and the extension. 25 And with that, they are the

cooperating agency that has been actively participating in 1 2 this process with us. 3 We've also coordinated with federal, state, and local and tribal agencies and other members of the 4 public about this withdrawal, and we got into what's 5 6 called a scoping process that fed into this draft 7 analysis. 8 Next slide, please. 9 Okay. So the agenda for today is, again, just a project overview, summary of the alternatives analyzed, 10 summary of the analysis of the impacts of the proposed 11 action, project time line and important dates, and then 12 13 just, again, to collect your comments. As I mentioned earlier, I'll just mention 14 15 again, after I conclude, we'll turn it over to the BLM for the Subsistence 810 Hearing, and that will be a different 16 part of the presentation. 17 18 Next slide, please. 19 So the project area here, as pointed on Okay. the map, we're really focused on the red areas. 20 21 total the USAG Alaska manages 1.6 million acres of training area in the Interior of Alaska. Public Law 22 23 106-65 covers the Yukon and the Donnelly Training Area.

That's approximately 870,000 acres. And again, they were

withdrawn back in 1999 for a period of 20 years -- 25

24

```
years or something -- for a period of 25 years, which
1
2
    expires in November 6, 2026. And we are doing this
    process now because there's a time line involved with
3
    this. So we finish the EIS, and then that gets handed off
4
    and allows for time for Congress and the DOI, the
5
6
    Department of the Interior and the Department of Defense
7
    to draft legislation.
                The Army has determined that there is a
8
9
    continuing military need for these lands. Hence why we're
    requesting an extension of this land withdrawal. And as I
10
11
    mentioned, Congressional approval is the ultimate
    decision-maker. So there's no what's normally called a
12
    record of decision. This EIS will end in legislation.
13
                                                             So
    again, Congress is the decision-maker here.
14
15
                Next slide, please.
                Okay. So a little bit about the purpose and
16
           So the purpose and need of NEPA and for this
17
    need.
18
    project really kind of forms the basis of our proposed
    action, our alternatives, and our analysis.
19
20
                So the purpose of the proposed action is to
21
    obtain an extension of the land withdrawal of the three
    training areas -- so the Yukon Training Area, Donnelly
22
23
    East, and Donnelly West Training Area -- for 25 years or
24
    more. Or have the land assigned to the control of the
25
    Secretary of the Army until such time as the Army
```

determines it no longer needs the lands for military
purposes.

Now, the need is to produce a force train

Now, the need is to produce a force trained to be successful anywhere in the world, including Arctic and sub-Arctic, to coordinate and conduct operations with the U.S. Air Force, and lastly to fulfill the U.S. Army mission in Alaska.

So that's another good piece of this is these lands are old, and they're overseen and managed by the Army, but the Air Force is a major component, obviously, and the people in Delta are aware of that as well too. So this is not only to support the Army's mission, but to support the Air Force mission as well in Alaska.

Next slide, please.

Okay. So the alternative viability analysis. This really helps us determine, as we develop our purpose and need, what type of alternatives are available to us to fulfill that proposed action. And again, the purpose of this is to develop some criteria that allows for us to consider an alternative reasonable and viable.

And so for it to be viable, it needs to be all these three criteria. The first one is it must allow the Army to meet their training needs and mission.

The second is the action must provide training lands that meet the Army's needs and replicate real-world

```
combat situations, including providing enough acreage and
1
    appropriate weather conditions. So the need to train and
2
    be ready in Arctic conditions are obviously applicable
3
4
    here.
5
                And the action must be feasible,
6
    cost-effective, and similar in scale and quality to
7
    current conditions.
                And go ahead to the next slide, please.
8
9
                So with that when we look at our purpose and
    need and our criteria, we came up with this list of
10
    alternatives that we considered.
11
                The first one, extend the withdrawal for 25
12
    years or more. 25 years is the current length of the
13
    withdrawal. It's kind of a standard number, so we settled
14
15
    on 25 years or more with that.
                The second is transfer administrative
16
    jurisdiction from the Department of the Interior to the
17
18
    BLM underlying watershed to the Department of Defense.
19
                Third is extend the withdrawal for less than
20
    25 years.
21
                Fourth is partial land withdrawal.
22
                Fifth, acquire additional training lands.
23
                Acquiring alternative training lands.
24
                Or using existing alternative training lands.
25
    And the existing alternative training lands, as pointed
```

```
out, would be, you know, Tanana Flats, Black Rapids,
1
2
    Gerstle, the other smaller training areas that the
    U.S. Army Garrison Alaska oversees.
3
                Next slide, please.
4
5
                Okay. So then once we put the alternatives
6
    considered into the screening criteria matrix here, what
7
    came out with, I guess, across the board, meaning they can
    fulfill all screening criteria, was the second one.
8
9
    Extend the withdrawal for 25 years or more.
                The first one there, no-action alternative,
10
    that is no across the board. However, per NEPA, it sets
11
    the baseline and is something that we can consider as part
12
    of our announcement. It kind of set the standard for
13
    baseline.
14
15
                I will point out in this instance, the
    baseline of the no-action alternative means not extending
16
    the land withdrawal. Meaning the Army would not use the
17
18
    lands after November 6, 2026. So it's kind of a different
    scenario. There are impacts from that, and there are
19
    impacts from the proposed action to continue using the
20
    military lands, their designs of the military lands.
21
22
                Next slide, please.
23
                       So as we went through, again, the only
24
    ones that came out with yeses across the board were the
```

proposed action to extend the land withdrawal for 25 years

or more, and then the no-action alternative to not extend the land withdrawal and the lands would no longer be available for military use after November 6, 2026.

Next slide, please.

So in every Environmental Impact Statement, you have a standard kind of list of resource areas that we analyzed. And this here is the list of those. A few that are kind of specific to Alaska, like subsistence, that we also take into account. But the Draft LEIS goes through an exhaustive analysis of background information for these resource areas, and then the analysis of the impacts from the land withdrawal and extension action alternative.

Next slide, please.

So under the summary of impacts, we'll go into a little bit more depth in the next few slides, but under the summary of impacts, the proposed action -- meaning withdraw the land, extend the land withdrawal -- there would be no changes from existing -- there would be no change to resources or existing conditions. We can still implement our management plans, our natural and cultural resource and management plans, our various permit requirements, our training activities. There would be essentially a status (indiscernible). And with that, we're not anticipating any significant impacts under the proposed action. But we do anticipate some potential

ongoing impacts from the continued use of the lands for military purposes.

Next slide, please.

Okay. So this table here might be a little hard to see. We also have it in the back there on one of the posters.

So this table lists one of the resources analyzed for potential impacts under both alternatives.

And under the action alternative -- so the proposed action to withdraw the land, there would be no change to land use, visual resources, noise, recreation, utilities, traffic and transportation, for airspace, for public health and safety.

And let's see, next slide, please.

So under the action alternative on these ones here, we would anticipate a beneficial impact to hazard materials, as well as a major impact to hazard materials. Meaning as part of our continued activities, we utilize hazard materials, we utilize oil, we utilize fuels, and we have management plans in place to utilize that type of stuff for military training. But it's inevitable; spills do happen, and again, they have -- we follow our plans to respond to those spills. And this is the category we've identified potential unofficial impact because we're going to continue to clean up the land and a spill that's

```
happened, but obviously negative impacts if a spill would
1
2
    have happened.
3
                Let's see, the next.
                No changes in -- I'm sorry. No changes in air
4
    quality. Negative effects on the visibility of Denali
5
6
    National Park. We are quite a ways away from that;
7
    however, part of the training areas do kind of touch on
    the borough boundaries, the Park borough boundaries, so we
8
9
    need to be thinking about that.
                No changes in earth resources, water
10
11
    resources, and biological resources. Again, we're
    following our natural resource management plans and
12
13
    various plans that are in place.
14
                Next slide, please.
15
                Under the action alternative, there would be
    no change to wildland fire due to continued wildland fire
16
    management that is currently ongoing.
17
18
                And one thing we did identify was potential
    continued -- or continued negative impacts or adverse
19
20
    impacts to cultural resources from training activities.
21
    We have a lot of cultural sites across the training areas,
    and we do a lot to survey and investigate the sites and to
22
23
    protect the sites. But again, inevitably some things
24
    happen, and so we just -- we can follow our cultural
25
    resource management plan.
```

```
However, there would be no impacts to
1
2
    properties of traditional religious or any cultural
3
    significance.
                We do expect beneficial impacts to --
4
    beneficial economic impacts from the proposed action
5
6
    because the military would still retain -- would still be
7
    utilizing these lands, and would still be contributing to
8
    the local growths in this area.
9
                And lastly under the no-action -- I'm sorry --
    under the action alternative, there would be no change in
10
    impacts to subsistence because there will be no effects on
11
    resource abundance or availability. However, there would
12
13
    be no opportunity for the withdrawn land to become
    eligible for federal subsistencies [sic] if they are -- if
14
15
    they remain for military use, withdrawn military use. And
    that's where the BLM will go further into depth on the
16
    subsistence part after I'm done.
17
18
                Next slide, please.
19
                So this is just a quick snapshot of the
20
    process here. And each color represents a different law
21
    in the process. The military land withdrawal, the 1999
    process. The Department of the Interior no-withdrawal
22
23
    application process. And the national environmental
24
    policy process.
25
                The boxes with yellow boundaries on them, that
```

represents an opportunity for the public to be involved 1 2 and engaged and send in comments. We're in the box with the star right now, the Draft LEIS Public Comment Period. 3 Again, it closes on July 11th. So we're asking for 4 5 comments postmarked by July 11. 6 Once it gets done with that, we will work with 7 the BLM to, you know, package all the comments up. BLM will prepare some findings and recommendations on 8 9 their side. And then that whole packet will be sent out to the headquarters of the Department of the Interior, 10 Department of Defense to coordinate Congress to draft 11 12 legislation. 13 Next slide, please. 14 And yeah, lastly, we want to hear from you. So there is, again, here today is a court reporter to 15 capture any comments that you might have. You can also 16 leave a comment by using a comment card. You can email 17 18 comments to our project website, and you can make sure to get the email address that they need. You can mail 19 20 written comments to myself, and that information is on the 21 poster board in the back there. And then we have a really awesome website for this. And we just got kudos on it 22 23 today from a colleague. So I suggest checking out the 24 website. A lot of good information on there. And, again,

comments are due by July 11, 2023, your public comment

```
1
    period for this Draft LEIS.
2
                And that's it for our part. So I'm going to
    turn it over to Tim Hammond the Bureau of Land Management
3
    Eastern Interior Field Manager for the Subsistence 810.
4
5
    Thank you.
6
                MR. HAMMOND: Do you want to see if there's
7
    any questions for you before I get to it?
                ATTENDEE: Will the public comments be
8
9
    separated between the subsistence and the EIS?
                MR. SPRAU: They will be separated.
10
    Ultimately they will be looked at as whole -- as part of
11
    the whole package, but any comments you submit on the EIS
12
    will be for the EIS. The comments for the 810 will go to
13
    the 810.
14
15
                MR. HAMMOND: And we'll work together.
    there's stuff that was submitted for the EIS that looks
16
    like subsistence, we'll make sure we're paying attention
17
18
    to it.
19
                So in case you're wondering about the
    comanagement in action here, I just got a call. We have a
20
21
    new life and fire start on YTA that they initially thought
22
    was a military start. So we all play a role in -- at
23
    there.
24
                So this is a little bit formal. I don't have
25
    a slide show, but it shouldn't take too long to explain
```

what's going on here. The Section 810 of the Alaska 1 2 National Interest Lands Conservation Act, or ANILCA, requires that in determining whether to withdraw public 3 lands, the federal agency with primary jurisdiction 4 evaluate the effect of such use on subsistence uses and 5 6 needs, the availability of other lands for purposes sought 7 to be achieved, and other alternatives which would reduce or eliminate the use of lands needed for subsistence 8 9 purposes. If it's determined that under any alternative 10 11 or in the cumulative case the actions being considered would significantly restrict subsistence uses, then the 12 federal agency of the primary jurisdiction is required to 13 give notice and hold a hearing of the area involved. 14 15 this is that hearing. The preliminary Section 810 Analysis for the 16 proposed extension of these withdrawals reached the 17 18 following findings: For the no-action alternative -- under the 19 20 no-action alternative, the withdrawal will not be renewed; 21 the lands would be returned to the public domain for management by the BLM, and would be considered public 22 lands for subsistence purposes with access managed 23 24 similarly to other general BLM-managed public lands. 25 The findings for the no-action alternative are

that it would not significantly restrict subsistence uses 1 2 and needs. Cessation of the military training would have net benefit for subsistence uses and access. 3 For the action alternative, under Action 4 5 Alternative 1, the withdrawn plans would continue to be 6 withdrawn for a period of 25 years or more from all forms 7 of appropriation under the public land laws, or would be assigned the control of the Secretary of the Army until 8 9 such time as the Army determines it no longer needs the lands for military purposes. 10 And the finding is that for Action 11 Alternative 1, renewal of the withdrawal would have both 12 positive and negative effects on abundance and 13 availability of subsistence species relative to the 14 15 no-action alternative, but would not result in significant reductions of abundance or availability. 16 However, relative to the no-action 17 18 alternative, the action alternative may result in a significant reduction and access to subsistence resources 19 by rural communities and Game Management Unit 20D, 20 including Dot Lake, Dry Creek, Healy Creek, and Delta 21 Junction area communities. 22 23 And for the cumulative case as presented in 24 this analysis, it also may result in a reasonably 25 foreseeable and significant restriction of subsistence use

```
for the communities and game management units. We're
1
    going to be including Dot Lake, Dry Creek, Healy Creek,
2
3
    and Delta Junction area communities due to a restriction
    on access to subsistence resources. This is the same
4
5
    finding presented for the action alternative.
6
                So we're now formally opening the ANILCA
7
    Section 810 hearing on effects of the proposed action and
    alternatives on subsistence. Comments will be used to
8
9
    inform development of the final Section 810 Analysis.
                                                            To
    be most helpful, comments should be as specific as
10
               The most useful comments provide new
11
    possible.
    information, point out a specific flaw in the analysis,
12
    make factual corrections, or identify a different source
13
    of credible information which may result in different
14
15
    findings.
                All testimony will be recorded by the court
16
               And in the interest of time and ensuring that
17
    reporter.
18
    all parties have the opportunity to testify, responses and
    discussion will be limited to clarifying terminology.
19
    Time permitting, BLM staff will be available for further
20
21
    discussion after the hearing is closed.
                So is there anyone who would like to testify
22
23
    on the Subsistence 810 Analysis? Not everybody at once.
24
                Okay. Do we have it on the record that no one
```

wanted to testify? Okay.

```
So we're now formally closing the ANILCA
1
2
    Section 810 Hearing. And as I said, if you want to have a
    less formal discussion about subsistence, I'll be glad to
3
    do that on the side.
4
                            So we're going to be here until
5
                MR. SPRAU:
6
           This will kind of close the formal part of our
7
    meeting tonight, and we'll just kind of be here, you
8
    know --
9
                ATTENDEE:
                           Public comments?
10
                MR. SPRAU:
                             I'm sorry?
                           Public comments be recorded?
11
                ATTENDEE:
                MR. SPRAU: Yes, sir. That's why we have --
12
                           Is that part of this portion?
13
                ATTENDEE:
14
                MR. SPRAU: It's not part of this part. But
15
    you can speak individually, then, and ask us for any type
    of comments you want.
16
                So we'll be here until 7:00. Mr. Fromm, do
17
18
    you have anything further?
19
                MR. FROMM: No.
                                 Thanks for coming.
                MR. SPRAU: Okay. All right. So yeah.
20
21
    5:30 P.M.
22
          (End of Public Meeting.)
23
          (No public comments recorded.)
24
25
```

For Land Withdrawar E		I	I	June 21, 2023
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11	adverse (1)	16:24	Baker (1)	14:10;15:7,24
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			-	

				· · · · · · · · · · · · · · · · · · ·
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sure (6)	25:7	Unit (1)	20:18,22,24	1
2:15;8:7,8,15;	total (1)	23:20	Wednesday (2)	
20:18;21:17	11:21	units (1)	1:5;2:1	1 (2)
Surrey (4)	touch (1)	24:1	welcome (3)	23:5,12
6:7,10,13;8:11	18:7	unofficial (1)		
			2:8;7:18;8:22	1.6 (1)
survey (1)	traditional (1)	17:24	West (1)	11:21
18:22	19:2	up (8)	12:23	1060 (1)
	traffic (2)	2:10;7:24;8:7,8;	what's (4)	5:11
${f T}$	7:7;17:12	10:7;14:10;17:25;	6:18;11:5;12:12;	106-65 (2)
	train (3)	20:7	22:1	3:3;11:23
table (3)	6:20;7:15;14:2	update (1)	whole (4)	11 (2)
5:7;17:4,7	trained (1)	10:12	7:1;20:9;21:11,12	20:5,25
	13:3	USAG (2)		
talk (1)			who's (2)	11th (6)
6:13	Training (25)	1:17;11:21	3:15,20	3:25;4:2;5:18,19,
talked (1)	4:4;6:24;7:2,2,10,	use (11)	wildland (2)	21;20:4
7:6	11,14;11:22,23;12:22,	8:9;10:17;15:17;	18:16,16	1999 (2)
talking (2)	22,23;13:23,24;14:22,	16:3;17:1,11;19:15,	Wildlife (1)	11:25;19:21
7:11,13	23,24,25;15:2;16:22;	15;22:5,8;23:25	1:19	<u> </u>
TAM (1)	17:21;18:7,20,21;	used (1)	withdraw (4)	2
4:4	23:2	24:8	9:22;16:17;17:10;	
				20 (1)
Tanana (2)	transcribed (1)	useful (1)	22:3	20 (1)
7:12;15:1	5:16	24:11	Withdrawal (28)	11:25
team (2)	transfer (1)	uses (4)	1:2;2:8,21;3:3;	2023 (3)
5:17,19	14:16	22:5,12;23:1,3	4:19;6:3;8:24;9:3,16;	1:5;2:1;20:25
Tech (4)	transition (1)	using (3)	10:2,4,25;11:5;12:10,	2026 (3)
1:22,23;4:1,10	6:9	14:24;15:20;20:17	21;14:12,14,19,21;	12:2;15:18;16:3
telling (1)	transportation (1)	utilities (1)	15:9,17,25;16:2,12,	20D (1)
7:21	17:12	17:11	17;19:21;22:20;23:12	23:20
tempt (1)	trend (1)	utilize (4)	withdrawals (1)	21 (2)
-	I .	I	I	I

1:5;2:1 25 (10)			
11:25;12:1,23; 14:12,13,15,20;15:9,			
25;23:6			
5			
5:00 (2) 1:6;2:3			
5:30 (1) 25:21			
6			
6 (3) 12:2;15:18;16:3			
7			
7:00 (3) 1:6;25:6,17			
8			
810 (13) 3:8,11;9:9;11:16; 21:4,13,14;22:1,16; 24:7,9,23;25:2 870,000 (1) 11:24			
9			
99703-4500 (1) 5:12			
	1		

Attachment 2: Agency and Tribal Letters

Letters were sent to the following agency representatives on May 12, 2023:

Name	Title	Organization
Geoff Beyersdorf	District Manager	Bureau of Land Management
Kent Slaughter	Deputy State Director, Fire and Aviation	Bureau of Land Management - Alaska Fire Service
Public Affairs Office	Public Affairs	U.S. Army Corps of Engineers
Jamie Burke	Environmental Program, NEPA Program Manager	Eielson Air Force Base
Bob Henszey	Conservation Planning Assistance Branch Chief	U.S. Fish and Wildlife Service
Sarah Conn	Field Supervisor	U.S. Fish and Wildlife Service
Lincoln Parrett	Regional Supervisor	Alaska Department of Fish and Game (ADF&G) - Fairbanks, Wildlife Conservation Division
Audra Brase	Regional Supervisor	Alaska Department of Fish and Game (ADF&G) - Fairbanks, Habitat Division
Terri Lomax	Program Manager	Alaska Department of Environmental Conservation (ADEC), Division of Water, Water Quality Standards Assessment and Restoration Program
Jason Olds	Division Acting Director	Alaska Department of Environmental Conservation (ADEC), Division of Air Quality
Tiffany Larson	Division Director	Alaska Department of Environmental Conservation (ADEC), Division of Spill Prevention and Response
Christianna Colles	Division Director	Alaska Department of Natural Resources
Public Information Center	Fairbanks Public Information Center	Alaska Department of Natural Resources
Jeremy Douse	Regional Forester	Alaska Department of Natural Resources, Division of Forestry, Northern Region
Lauren Boldrick	NEPA Reviewer - Energy Sector Lead	U.S. Environmental Protection Agency Region 10
Mark Jen	NEPA Reviewer	U.S. Environmental Protection Agency Region 11
Betsy McCracken	NEPA Reviewer	U.S. Environmental Protection Agency Region 12
Lanien Livingston	Public Information Officer	Fairbanks North Star Borough
Mayor Bryce Ward	Mayor	Fairbanks North Star Borough
Donald Galligan	Transportation Planner	Fairbanks North Star Borough
Joe Kemp	Acting Regional Director	Alaska Department of Transportation and Public Facilities
Judy Chapman	Acting Deputy Director of Planning	Alaska Department of Transportation and Public Facilities
Shannon McCarthy	Communications Director	Alaska Department of Transportation and Public Facilities
Jackson Fox	Executive Director	Fairbanks Metropolitan Area Transportation System
Mayor Dave Bronson	Mayor	Municipality of Anchorage, AK
Mayor JW Musgrove	Mayor	City of Delta Junction, AK
Kendall Greenleaf	City Administrator	City of Delta Junction, AK

Pete Hallgren	City Council Representative, At- Large	City of Delta Junction, AK
Emily Dove	Deputy Mayor	City of Delta Junction, AK
Mayor David Pruhs	Mayor	City of Fairbanks, AK
Mayor Michael Welch	Mayor	City of North Pole, AK
Teal Soden	Public Information Officer	City of Fairbanks, AK
Sarah Creachbaum	Regional Director	National Park Service
Grant Hilderbrand	Associate Regional Director	National Park Service
Jennifer Pederson Weinberger	Team Manager, CR Team	National Park Service
Jeremy Johnson	President/CEO	Greater Fairbanks Chamber of Commerce
Scott Raygor	Fire Chief	Fairbanks Fire Department
Ronald K. Inouye	President	Tanana Yukon Historical Society
Dan DeBartolo	Director	Alaska Department of Labor and Workforce Development - Administrative Services
Trina Bailey	Fairbanks Regional Special Assistant to U.S. Senator Lisa Murkowski	U.S. Senate
Avery Fogels (Sen. Dan Sullivan's office)	U.S. Senator Dan Sullivan Office Contact	U.S. Senate
Mary Peltola	U.S. House of Representatives	U.S. House of Representatives
Scott Kawasaki	Senator - Fairbanks	Alaska Senate
Click Bishop	Senator - Fairbanks	Alaska Senate
Robert Myers	Senator - North Pole	Alaska Senate
Mia Costello	Senator - Anchorage	Alaska Senate
Roger Holland	Senator - Anchorage	Alaska Senate
Natasha Von Imhof	Senator - Anchorage	Alaska Senate
Elvi Gray-Jackson	Senator - Anchorage	Alaska Senate
David Wilson	Senator - Wasilla	Alaska Senate
Peter Micciche	Sentor - Soldotna	Alaska Senate
Bert Stedman	Senator - Sitka	Alaska Senate
Shelley Hughes	Senator - Palmer	Alaska Senate
Gary Stevens	Senator - Kodiak	Alaska Senate
Jesse Kiehl	Senator - Juneau	Alaska Senate
Donny Olson	Senator - Golovin	Alaska Senate
Lyman Hoffman	Senator - Bethel	Alaska Senate
Tom Begigh	Senator - Minority Leader - Anchorage	Alaska Senate
Bart LeBon	Representative - Fairbanks	Alaska House of Representatives
Steve Thompson	Representative - Fairbanks	Alaska House of Representatives
Grier Hopkins	Representative - Fairbanks	Alaska House of Representatives
Adam Wool	Representative - Fairbanks	Alaska House of Representatives
George Rauscher	Representative - Sutton	Alaska House of Representatives
Mike Prax	Representative - North Pole	Alaska House of Representatives
Bill Wielechowski	Senator - Anchorage	Alaska Senate
Lora Reinbold	Senator - Eagle River	Alaska Senate
Joshua Revak	Senator - Anchorage	Alaska Senate

Mike Shower	Senator - Anchorage	Alaska Senate
Chris Tuck	Representative - Anchorage	Alaska House of Representatives
Andi Story	Representative - Juneau	Alaska House of Representatives
Geran Tarr	Representative - Anchorage	Alaska House of Representatives
Matt Claman	Representative - Anchorage	Alaska House of Representatives
Ben Carpenter	Representative - Nikiski	Alaska House of Representatives
Mike Cronk	Representative - Tok/Northway	Alaska House of Representatives
Harriet Drummone	Representative - Anchorage	Alaska House of Representatives
David Eastman	Representative - Wasilla	Alaska House of Representatives
Neal Foster	Representative - Nome	Alaska House of Representatives
Ronald Gillham	Representative - Soldotna	Alaska House of Representatives
Sara Hannan	Representative - Juneau	Alaska House of Representatives
Delena Johnson	Representative - Palmer	Alaska House of Representatives
Andy Josephson	Representative - Anchorage	Alaska House of Representatives
James Kaufman	Representative - Anchorage	Alaska House of Representatives
Jonathan Kreiss-Tomkins	Representative - Sitka	Alaska House of Representatives
Kevin McCabe	Representative - Big Lake	Alaska House of Representatives
Ken McCarty	Representative - Eagle River	Alaska House of Representatives
Kelly Merrick	Representative - Eagle River	Alaska House of Representatives
Dan Ortiz	Representative - Ketchikan	Alaska House of Representatives
Josiah Patkotak	Representative - Barrow	Alaska House of Representatives
Sara Rasmussen	Representative - Anchorage	Alaska House of Representatives
Liz Snyder	Representative - Anchorage	Alaska House of Representatives
Louise Stutes	Representative - Kodiak	Alaska House of Representatives
Sarah Vance	Representative - Homer	Alaska House of Representatives
Tiffany Zulkosky	Representative - Bethel	Alaska House of Representatives
Cathy Tilton	Representative - Wasilla	Alaska House of Representatives
Ivy Spohnholz	Representative - Anchorage	Alaska House of Representatives
Calvin Schrage	Representative - Anchorage	Alaska House of Representatives
Tom McKay	Representative - Anchorage	Alaska House of Representatives
Christopher Kurka	Representative - Wasilla	Alaska House of Representatives
Bryce Edgmon	Representative - Dillingham	Alaska House of Representatives
Zack Fields	Representative - Anchorage	Alaska House of Representatives
Laddie Shaw	Representative - Anchorage	Alaska House of Representatives
David Nelson	Representative - Anchorage	Alaska House of Representatives

Letters were sent to the following tribal representative on May 12, 2023:

Jacqueline Baalam First Chief Birch Creek Tribe Tammy Straughn President Native Village of Cantwell Stephanie Herbert First Chief Chalkyitsik Village Cheesh-Na Tribe Jessica Fields First Chief Circle Native Community Tracy Charles-Smith President Village of Dot Lake Karma Ulvi First Chief Native Village of Eagle Darin Gene President Native Village of Gakona Roy S. Ewan President Gulkana Village Nancy James First Chief Gwitchyaa Gwichin Tribal Government Native Village of Fort Yukon Patricia MacDonald President Healy Lake Village Raymond Woods Chief Manley Hot Springs Village Caroline David First Chief Mentasta Traditional Council Joseph Alexander First Chief Native Village of Minto Native Village Mentasta Traditional Council Joseph Alexander First Chief Native Village of Minto Native Village Mentasta Village Mentasta Traditional Council Joseph Alexander First Chief Native Village of Minto Native Village Minto Native Village Minto Northway Village Minto Moses President Northway Village Milton Moses President Northway Village Michael Simon Chief Native Village of Stevens Herbert Demit President Native Village of Tananca Native Village of Tanana Johnny Goodtaw President Native Village of Tazlina	Full Name	Title	Tribe
Tammy Straughn President Native Village of Cantwell Stephanie Herbert First Chief Chalkyitsik Village Larry Sinyon President Cheesh-Na Tribe Jessica Fields First Chief Circle Native Community Tracy Charles-Smith President Village of Dot Lake Karma Ulvi First Chief Native Village of Eagle Darin Gene President Native Village of Gakona Roy S. Ewan President Gulkana Village Nancy James First Chief Gwitchyaa Gwichin Tribal Government Native Village of Fort Yukon Patricia MacDonald President Healy Lake Village Karl Pete President Native Village of Kluti-Kaah Raymond Woods Chief Manley Hot Springs Village Caroline David First Chief Native Village of Minto Caroline Ketzler First Chief Nenana Native Association Chair Northway Village Milton Moses President Rampart Village Michael Simon Chief Native Village of Tanana Native Village of Tanana Notive Village of Tanana Notive Village of Tanana Native Village of Tanana Native Village of Tanana	Rhonda Pitka	Chief	Beaver Village
Stephanie Herbert First Chief Chalkyitsik Village Larry Sinyon President Cheesh-Na Tribe Jessica Fields First Chief Circle Native Community Tracy Charles-Smith President Village of Dot Lake Karma Ulvi First Chief Native Village of Eagle Darin Gene President Sulvie Village of Gakona Roy S. Ewan President Gulkana Village Nancy James First Chief Gwitchyaa Gwichin Tribal Government Native Village of Fort Yukon Patricia MacDonald President Healy Lake Village Karl Pete President Native Village of Kluti-Kaah Raymond Woods Chief Manley Hot Springs Village Caroline David First Chief Native Village of Minto Caroline Caroline Ketzler First Chief Nenana Native Association Chaaiy Albert President Native Village Milton Moses President Rampart Village Milton Moses President Native Village of Stevens Herbert Demit President Native Village of Tanana Johnny Goodtaw President Native Village of Tanana Native Village of Tazlina	Jacqueline Baalam	First Chief	Birch Creek Tribe
Larry Sinyon President Cheesh-Na Tribe Jessica Fields First Chief Circle Native Community Tracy Charles-Smith President Village of Dot Lake Karma Ulvi First Chief Native Village of Eagle Darin Gene President Sulvi Village of Gakona Roy S. Ewan President Gulkana Village Nancy James First Chief Gwitchyaa Gwichin Tribal Government Native Village of Fort Yukon Patricia MacDonald President Healy Lake Village Karl Pete President Native Village of Kluti-Kaah Raymond Woods Chief Manley Hot Springs Village Caroline David First Chief Mentasta Traditional Council Joseph Alexander First Chief Native Village of Minto Caroline Ketzler First Chief Nenana Native Association Chaaiy Albert President Northway Village Milton Moses President Rampart Village Michael Simon Chief Native Village of Tanana Johnny Goodtaw President Native Village of Tanana	Tammy Straughn	President	Native Village of Cantwell
Dessica Fields	Stephanie Herbert	First Chief	Chalkyitsik Village
Tracy Charles-Smith President Village of Dot Lake Karma Ulvi First Chief Native Village of Eagle Darin Gene President Native Village of Gakona Roy S. Ewan President Gulkana Village Nancy James First Chief Gwitchyaa Gwichin Tribal Government Native Village of Fort Yukon Patricia MacDonald President Healy Lake Village Karl Pete President Native Village of Kluti-Kaah Raymond Woods Chief Manley Hot Springs Village Caroline David First Chief Mentasta Traditional Council Joseph Alexander First Chief Native Village of Minto Caroline Ketzler First Chief Nenana Native Association Chaaiy Albert President Northway Village Milton Moses President Rampart Village Michael Simon Chief Native Village of Stevens Herbert Demit President Native Village of Tanana Johnny Goodtaw President Native Village of Tazlina	Larry Sinyon	President	Cheesh-Na Tribe
Karma Ulvi First Chief Native Village of Eagle Darin Gene President Native Village of Gakona Roy S. Ewan President Gulkana Village Nancy James First Chief Gwitchyaa Gwichin Tribal Government Native Village of Fort Yukon Patricia MacDonald President Healy Lake Village Karl Pete President Native Village of Kluti-Kaah Raymond Woods Chief Manley Hot Springs Village Caroline David First Chief Mentasta Traditional Council Joseph Alexander First Chief Native Village of Minto Caroline Ketzler First Chief Nenana Native Association Chaaiy Albert President Northway Village Milton Moses President Rampart Village Michael Simon Chief Native Village of Stevens Herbert Demit President Native Village of Tanana Johnny Goodtaw President Native Village of Tanana Johnny Goodtaw	Jessica Fields	First Chief	Circle Native Community
Darin Gene President Salvana Village of Gakona Roy S. Ewan President Gulkana Village Nancy James First Chief Gwitchyaa Gwichin Tribal Government Native Village of Fort Yukon Patricia MacDonald President Healy Lake Village Karl Pete President Native Village of Kluti-Kaah Raymond Woods Chief Manley Hot Springs Village Caroline David First Chief Mentasta Traditional Council Joseph Alexander First Chief Native Village of Minto Caroline Ketzler First Chief Nenana Native Association Chaaiy Albert President Northway Village Milton Moses President Rampart Village Michael Simon Chief Native Village of Stevens Herbert Demit President Native Village of Tanacross Curtis Sommer Chairman Native Village of Tanana Johnny Goodtaw President Native Village of Tazlina	Tracy Charles-Smith	President	Village of Dot Lake
Roy S. Ewan President Gulkana Village Nancy James First Chief Gwitchyaa Gwichin Tribal Government Native Village of Fort Yukon Patricia MacDonald President Healy Lake Village Karl Pete President Native Village of Kluti-Kaah Raymond Woods Chief Manley Hot Springs Village Caroline David First Chief Mentasta Traditional Council Joseph Alexander First Chief Native Village of Minto Caroline Ketzler First Chief Nenana Native Association Chaaiy Albert President Northway Village Milton Moses President Rampart Village Michael Simon Chief Native Village of Stevens Herbert Demit President Native Village of Tanana Johnny Goodtaw President Native Village of Tazlina	Karma Ulvi	First Chief	Native Village of Eagle
Nancy James First Chief Gwitchyaa Gwichin Tribal Government Native Village of Fort Yukon Patricia MacDonald President Healy Lake Village Karl Pete President Native Village of Kluti-Kaah Raymond Woods Chief Manley Hot Springs Village Caroline David First Chief Mentasta Traditional Council Joseph Alexander First Chief Native Village of Minto Caroline Ketzler First Chief Nenana Native Association Chaaiy Albert President Northway Village Milton Moses President Rampart Village Michael Simon Chief Native Village of Stevens Herbert Demit President Native Village of Tanacross Curtis Sommer Chairman Native Village of Tanana Johnny Goodtaw President Native Village of Tazlina	Darin Gene	President	Native Village of Gakona
Fort Yukon Patricia MacDonald President Healy Lake Village Karl Pete President Native Village of Kluti-Kaah Raymond Woods Chief Manley Hot Springs Village Caroline David First Chief Mentasta Traditional Council Joseph Alexander First Chief Native Village of Minto Caroline Ketzler First Chief Nenana Native Association Chaaiy Albert President Northway Village Milton Moses President Rampart Village Michael Simon Chief Native Village of Stevens Herbert Demit President Native Village of Tanacross Curtis Sommer Chairman Native Village of Tanana Johnny Goodtaw President Native Village of Tazlina	Roy S. Ewan	President	Gulkana Village
Karl Pete President Native Village of Kluti-Kaah Raymond Woods Chief Manley Hot Springs Village Caroline David First Chief Mentasta Traditional Council Joseph Alexander First Chief Native Village of Minto Caroline Ketzler First Chief Nenana Native Association Chaaiy Albert President Northway Village Milton Moses President Rampart Village Michael Simon Chief Native Village of Stevens Herbert Demit President Native Village of Tanacross Curtis Sommer Chairman Native Village of Tanana Johnny Goodtaw President Native Village of Tazlina	Nancy James	First Chief	
Raymond Woods Chief Manley Hot Springs Village Caroline David First Chief Mentasta Traditional Council Joseph Alexander First Chief Native Village of Minto Caroline Ketzler First Chief Nenana Native Association Chaaiy Albert President Northway Village Milton Moses President Rampart Village Michael Simon Chief Native Village of Stevens Herbert Demit President Native Village of Tanacross Curtis Sommer Chairman Native Village of Tanana Johnny Goodtaw President Native Village of Tazlina	Patricia MacDonald	President	Healy Lake Village
Caroline David First Chief Mentasta Traditional Council Joseph Alexander First Chief Native Village of Minto Caroline Ketzler First Chief Nenana Native Association Chaaiy Albert President Northway Village Milton Moses President Rampart Village Michael Simon Chief Native Village of Stevens Herbert Demit President Native Village of Tanacross Curtis Sommer Chairman Native Village of Tanana Johnny Goodtaw President Native Village of Tazlina	Karl Pete	President	Native Village of Kluti-Kaah
Joseph Alexander First Chief Native Village of Minto Caroline Ketzler First Chief Nenana Native Association Chaaiy Albert President Northway Village Milton Moses President Rampart Village Michael Simon Chief Native Village of Stevens Herbert Demit President Native Village of Tanacross Curtis Sommer Chairman Native Village of Tanana Johnny Goodtaw President Native Village of Tazlina	Raymond Woods	Chief	Manley Hot Springs Village
Caroline Ketzler First Chief Nenana Native Association Chaaiy Albert President Northway Village Milton Moses President Rampart Village Michael Simon Chief Native Village of Stevens Herbert Demit President Native Village of Tanacross Curtis Sommer Chairman Native Village of Tanana Johnny Goodtaw President Native Village of Tazlina	Caroline David	First Chief	Mentasta Traditional Council
Chaaiy Albert President Northway Village Milton Moses President Rampart Village Michael Simon Chief Native Village of Stevens Herbert Demit President Native Village of Tanacross Curtis Sommer Chairman Native Village of Tanana Johnny Goodtaw President Native Village of Tazlina	Joseph Alexander	First Chief	Native Village of Minto
Milton Moses President Rampart Village Michael Simon Chief Native Village of Stevens Herbert Demit President Native Village of Tanacross Curtis Sommer Chairman Native Village of Tanana Johnny Goodtaw President Native Village of Tazlina	Caroline Ketzler	First Chief	Nenana Native Association
Michael Simon Chief Native Village of Stevens Herbert Demit President Native Village of Tanacross Curtis Sommer Chairman Native Village of Tanana Johnny Goodtaw President Native Village of Tazlina	Chaaiy Albert	President	Northway Village
Herbert Demit President Native Village of Tanacross Curtis Sommer Chairman Native Village of Tanana Johnny Goodtaw President Native Village of Tazlina	Milton Moses	President	Rampart Village
Curtis Sommer Chairman Native Village of Tanana Johnny Goodtaw President Native Village of Tazlina	Michael Simon	Chief	Native Village of Stevens
Johnny Goodtaw President Native Village of Tazlina	Herbert Demit	President	Native Village of Tanacross
y e	Curtis Sommer	Chairman	Native Village of Tanana
M. 1 . 1 C	Johnny Goodtaw	President	Native Village of Tazlina
	Michael Sam	President	Native Village of Tetlin
Julian Roberts Tribal Chief Native Village of Venetie Tribal Government	Julian Roberts	Tribal Chief	Native Village of Venetie Tribal Government
Timothy Roberts First Chief Venetie Village	Timothy Roberts	First Chief	Venetie Village

The following pages are examples of the letters sent to agency and tribal representatives.



DEPARTMENT OF THE ARMY

INSTALLATION MANAGEMENT COMMAND HEADQUARTERS, U.S. ARMY GARRISON ALASKA 1046 MARKS ROAD #6000 FORT WAINWRIGHT, ALASKA 99703-6000

May 12, 2023

First Name Last Name Title Organization Mailing Address City, State Zip Code

Dear Salutation Last Name,

The Department of the Army (Army) invites you to participate in an agency meeting to discuss a Legislative Environmental Impact Statement (LEIS) that was prepared to evaluate the potential environmental impacts on land currently withdrawn from the public under Public Law 106-65 for military use in interior Alaska. The Army prepared a legislative proposal to extend the current withdrawal of 869,862 acres of land from public use for 25 years or more, or assign control of the land to the Secretary of the Army until such time as the Army determines it no longer needs the land for military purposes.

The current withdrawal expires in November 2026, and Congressional approval of the legislative proposal is required to extend it. The Army has determined that there is a continuing military need for this land and is requesting to extend its use of three training areas (Yukon Training Area, Donnelly Training Area East, and Donnelly Training Area West). The purpose of the withdrawal is to ensure that the Army will retain full and continued use of the training areas to successfully execute and fulfill its mission in Alaska.

After the Notice of Availability of the Draft LEIS is published in the Federal Register, there will be a 60-day comment period for the public to learn about the proposed action and provide comments. The Army will host a public meeting during the comment period and will advertise it in area newspapers. Comments received during the comment period will help inform and develop the LEIS analysis.

The agency meeting will be held as an in-person presentation at the Westmark Hotel and Conference Center on Tuesday, June 20, 2023 from 10:00 a.m. to 12:00 p.m. ADT. The meeting will be held in the Harper Board Room at the Westmark Hotel and Conference Center at 813 Noble St., Fairbanks, Alaska 99701.

Public meetings will be held from 5:00 p.m. to 7:00 p.m. ADT on Tuesday, June 20, 2023 at the Pioneer Park Centennial Center Blue Room at 2300 Airport Way, Fairbanks, Alaska 99701 and on Wednesday, June 21, 2023 from 5:00 p.m. to 7:00 p.m. ADT at

the Delta Junction Community Center, 2287 Deborah St., Delta Junction, Alaska 99731. The Delta Junction meeting will also serve as a public hearing for the ANILCA Section 810 Subsistence analysis. For more information, please visit https://home.army.mil/alaska/index.php/fort-wainwright/NEPA.

In addition to oral comments received during the public meetings, written comments will be accepted until July 11, 2023. Written comments may be submitted via mail to Mr. Matt Sprau, Directorate of Public Works, Attn: AMIM-AKP-E (M. Sprau), 1046 Marks Road #4500, Fort Wainwright, Alaska 99703-4500, or email to usarmy.wainwright.id-pacific.mbx.lwe-leis@mail.mil. Comments may also be submitted online through the project website at https://home.army.mil/alaska/index.php/fort-wainwright/NEPA.

A copy of the LEIS Notice of Availability published in the Federal Register, and other project information, is also accessible online at the project website.

The Army looks forward to your participation in the LEIS comment process. If you would like any additional information, please contact Mr. Grant Sattler, Public Affairs Officer, at (907) 353-6701 or Alan.G.Sattler.civ@army.mil.

Sincerely,

Nathan S. Surrey Colonel, U.S. Army Commanding



DEPARTMENT OF THE ARMY INSTALLATION MANAGEMENT COMMAND

INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, U.S. ARMY GARRISON ALASKA
1046 MARKS ROAD #6000
FORT WAINWRIGHT, ALASKA 99703-6000

May 12, 2023

First Name Last Name Title Tribe Mailing Address City, State Zip Code

Dear Title last name,

The Department of the Army (Army) Army invites you to participate in a public meeting to discuss the draft Legislative Environmental Impact Statement (LEIS) that was prepared to evaluate the potential environmental impacts on land currently withdrawn from the public under Public Law 106-65 for military use in interior Alaska. The Army prepared a legislative proposal to extend the current withdrawal of 869,862 acres of land from public use for 25 years or more, or assign control of the land to the Secretary of the Army until such time as the Army determines it no longer needs the land for military purposes.

The current withdrawal expires in November 2026, and Congressional approval of the legislative proposal is required to extend it. The Army has determined that there is a continuing military need for this land and is requesting to extend its use of three training areas (Yukon Training Area, Donnelly Training Area East, and Donnelly Training Area West). The purpose of the withdrawal is to ensure that the Army will retain full and continued use of the training areas to execute and fulfill its mission in Alaska successfully. The withdrawn land provides the Army with the necessary space and unique environmental conditions to complete training and testing required by established training doctrine. Uninterrupted access to suitable training land is needed to ensure that the Army will continue to produce a force trained to mobilize, deploy, fight, and win anywhere in the world.

Public meetings will be held from 5:00 p.m. to 7:00 p.m. ADT on Tuesday, June 20, 2023 at the Pioneer Park Centennial Center Blue Room at 2300 Airport Way, Fairbanks, Alaska 99701 and on Wednesday, June 21, 2023 at the Delta Junction Community Center, 2287 Deborah St., Delta Junction, Alaska 99731. The Delta Junction meeting will also serve as a public hearing for the ANILCA Section 810 Subsistence analysis. For information about joining the meeting, please visit https://home.army.mil/alaska/index.php/fort-wainwright/NEPA.

In addition to oral comments received during the public meetings, written comments will be accepted until July 11, 2023. Written comments may be submitted via mail

to Mr. Matt Sprau, Directorate of Public Works, Attn: AMIM-AKP-E (M. Sprau), 1046 Marks Road #4500, Fort Wainwright, Alaska 99703-4500, or email to usarmy.wainwright.id-pacific.mbx.lwe-leis@mail.mil. Comments may also be submitted online through the project website at https://home.army.mil/alaska/index.php/fort-wainwright/NEPA.

If you believe that a tribe-specific meeting is warranted for this proposed action or if you wish to enter into government-to-government consultation please advise Ms. Elizabeth A. Cook in writing by 60 days from the Federal Register's publication of the Notice of Availability of the Draft LEIS. Please consider this letter our notification in accordance with the Department of Defense (DOD) Instruction Number 4710.02: DoD Interactions with Federally Recognized Tribes and the DoD American Indian and Alaska Native Policy.

Requests should be directed to Ms. Elizabeth Cook, USAG Alaska Native Liaison, at Attn: AMIM-AKP-E (Cook), 1046 Marks Road #4500, Fort Wainwright, Alaska 99703-4500 or Elizabeth.A.Cook80.civ@army.mil.

Sincerely,

Nathan S. Surrey Colonel, U.S. Army Commanding

Attachment 3: Agency Meeting Transcript

In The Matter Of:

Draft Legislative Environmental Impact Statement For Land Withdrawal Extension

> June 20, 2023 Fairbanks Agency Meeting

Crystal Thompson Court Reporting Services, LLC
516 Second Avenue, Suite 315
Fairbanks, Alaska 99701
(907) 460-9535
AlaskaCrystal@gmail.com

Original File FAIRBANKS AGENCY DRAFT LEIS.TXT

Min-U-Script® with Word Index

Fairbanks Agency Meeting

	1
1	DRAFT LEGISLATIVE ENVIRONMENTAL IMPACT STATEMENT
2	FOR LAND WITHDRAWAL EXTENSION
3	U.S. ARMY GARRISON ALASKA
4	
5	Tuesday, June 20, 2023
6	10:00 A.M 12:00 P.M.
7	
8	
9	
10	
11	
12	
13	
14	
15	Speakers:
16	Matt Sprau " DPW Environmental Planning Chief
17	Catherine Miller " Deputy to the USAG Alaska Garrison Commander
18	
19	Moderators in Attendance:
20	David Munro " Tetra Tech Project Manager
21	Corinna Holfus " Tetra Tech Coordinator
22	Melanie Roed " DPW Environmental NEPA Program Manager
23	
24	
25	

	2
1	TUESDAY, JUNE 20, 2023
2	FAIRBANKS, ALASKA
3	10:00 A.M.
4	
5	MS. HOLFUS: Thank you so much for joining us
6	today. You're at the agency meeting for the Land
7	Withdrawal Extension Legislative Environmental Impact
8	Statement. That's quite the handful of words. Also known
9	as LEIS.
10	Also, just some general housekeeping things.
11	Emergency exits are down the hall this way; restrooms are
12	also that way. And then, you know, COVID is not it's
13	not the height of COVID anymore, but if you feel more
14	comfortable, you're welcome to wear a mask. And yeah, we
15	will go ahead and get started. I will hand it off to
16	Matt.
17	MR. SPRAU: All right. Welcome, everybody. I
18	see that that's getting passed around. I appreciate
19	everybody signing in this morning.
20	So yeah, good morning. My name is Matt
21	Sprau. I am the project manager for this Legislative Land
22	Withdrawal Environmental Impact Statement, and I'll be one
23	of the speakers today.
24	My official title is a Directorate of Public
25	Works, Environmental Division Planning Branch Chief at

Fort Wainwright. And today what we're here for is the Agency Meeting for the Public Law 106-65 Legislative Land Withdrawal Extension Environmental Impact Statement. Both this meeting and the project website provide opportunities to provide comments on the development of this LEIS.

The link to our project website where information can be found has been provided in our local advertisements, as well as the notice of availability for the LEIS. In addition, the project website link can be found by searching for "Legislative Environmental Impact Statement for Land Withdrawal Extension at U.S. Army Garrison Alaska" in your preferred search engine.

So, again, thank you for participating. You may provide comments in this Agency Meeting for the LEIS. You may provide comments at the end of the meeting by speaking to -- you know, we have a court reporter here who is recording this meeting as well -- by just bringing it up in conversation, as well as we have comment cards, I think, over here on the desk, on a table, and then we also have a website, and obviously mail as well too. I always hate going through this part because it's like laying it on very specifically, but you could mail your comments to me to AMIM-AKP-E (Sprau), 1060 Marks Road, #4500, Fort Wainwright, Alaska 99703~4500. And again, I'll lay that all out for you as well. And then also on our comment

Fairbanks Agency Meeting

```
4
1
    website.
                Do we have our website on our slides?
2
                MS. HOLFUS: Yes.
3
                MR. SPRAU: Okay.
4
                             The last slide has more details
5
                MS. HOLFUS:
6
    on how to provide a comment.
7
                MR. SPRAU: Okay. So instead of reading out
    all that, I will point to that and make sure that
8
9
    everybody's got it before the end of the day.
                So the comments, again, from this meeting will
10
    be recorded and transcribed for the project team.
11
    Comments received today and throughout the comment period
12
    until July 11th, which is the end of the comment period,
13
    will be considered by the project team during the final
14
15
    development of this EIS. And then all the comments are a
    part of the public record, and today™s meeting is being
16
    recorded for the administrative record.
17
18
                Now, I would like to turn it over to
    Ms. Miller, Deputy to the Garrison Commander, for
19
    providing an overview of the land withdrawal project.
20
                MS. MILLER:
21
                             Okay.
22
                MR. SPRAU: Thank you.
23
                MS. MILLER: Great. Thank you, Matt.
24
                So Colonel Surrey wanted to be here today.
25
    was attending a change of command on the installation, so
```

1 you get me.

So as Matt said, my name is Catherine Miller,
I am the Deputy to the Garrison Commander. I'm outgoing,
though, and so I'm here for about another week and a half,
and then Mr. Rich Fromm will be the new Deputy to the
Garrison Commander.

And so as Matt mentioned, we are here to talk about the comment period for the Army's intent to request an extension of our current land withdrawal. But before I go into too much detail, I want to recognize the Den'a Athabascans. We recognize that we're on their land, and hopefully, I think we've been very good stewards of the land through the years that the Army has managed it and maintained it in partnership with BLM.

And so as we are looking to withdrawal -continue the withdrawal with this legislative action, the
training lands are very important to the military here in
Alaska. If you've been tracking, you know, the news at
all in the past few years, an Arctic strategy has been put
out by the Department of Defense and the Army, and Alaska
is a critical component of that strategy as we train here
in Alaska.

And so the 11th Airborne division stood up, like, almost a year ago. It's been actually just over a year ago, and we started the JPMRC. And so we use both of

these areas, the YTA and DTA area, to train in. They've 1 2 had two JPMRCs so far using both of these locations, and they've been critical training opportunities for the 3 military in the Arctic environment. So that is one of the 4 primary reasons why we are continuing to ask for the 5 6 withdrawal of lands, with our partners, a cooperating 7 partner, the BLM, Bureau of Land Management, as they help 8 us work through this. 9 So Matt gave me some bullets that I guess I'm supposed to cover, so I want to make sure I got them all. 10 11 And so I mentioned that we're here. It helps train and equip that we're managing cooperative partners with the 12 Bureau of Land Management, and your comments are important 13 to this process because it will -- those comments will be 14 15 looked at and forwarded to Congress. Right. little different than a normal EIS, as Congress is going 16 to make the decision to allow us to withdraw the lands 17 18 further. And so your input is critical to that process. 19 We want to hear from you. And, of course, we will look at 20 21 all -- every single comment that comes in will be looked So I appreciate the feedback that you're going to 22 23 provide us. I'm looking forward to reading. 24 continue to follow the LEIS, even after I depart because 25 it's been -- we've been engaged in this for quite a while.

Fairbanks Agency Meeting

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7
    And I hope that we can get some good feedback and continue
1
2
    to have good training lands available for our soldiers
    here in the Arctic.
3
                Did I miss anything?
4
5
                MR. SPRAU: That's it.
                                        Sounds good.
6
                MS. MILLER: Okay.
7
                MR. SPRAU: And Ms. Miller was here in 2019
8
    when we did the kickoff workshop --
9
                MS. MILLER: Yeah.
                MR. SPRAU: -- with all the other
10
11
    installations that were going through the same land
    withdrawal under Public Law 106-65, and had the BLM there
12
    from local, state, and D.C. And so you kicked off the
13
    meeting, and you're here to help us hopefully close it out
14
15
    and get towards the --
16
                MS. MILLER: Yeah. Thanks for letting me
17
    participate. I appreciate it.
18
                MR. SPRAU: Thank you.
                                        Thank you.
19
                Okay. So we'll go ahead and go through the
    slides here and get started. I think we're moving to
20
21
    welcome -- yep.
22
                Okay. So again, welcome to the Draft
23
    Legislative Environmental Impact Statement or LEIS --
24
    that's what we'll be calling it today -- for Land
    Withdrawal Extension at U.S. Army Garrison Alaska.
25
                                                         This
```

is the Agency Meeting. We do have public meetings 1 2 scheduled. One for tonight here in Fairbanks at Pioneer Park. And then one tomorrow night down at Delta Junction 3 at the Community Center. 4 5 So let's see. This is just an opportunity to 6 learn -- for you-all to learn about the purpose and need 7 of the land withdrawal extension, to learn about the findings of the Draft LEIS, and to submit comments on the 8 9 Draft LEIS. So this will be -- more, I think, how we'll do 10 it is go through the slides, and then just open it up for 11 a conversation and discussion, answer any of your 12 13 questions you might have. But again, I just encourage any comment or questions that are brought up, please feel free 14 15 to submit them, you know, formally to the website, email, letter, or comment cards so that we can capture that for 16 the administrative record. 17 18 Next slide, please. Thank you. So the National Environmental Policy Act, or 19 NEPA, it requires that federal agencies must consider 20 21 environmental impacts prior to making a decision. And due to this, we follow this process, the NEPA process, to 22 23 prepare a Draft LEIS to analyze the effects of the 24 proposed action and the no-action alternative on the 25 environment.

1	The NEPA process allows for the public to be
2	involved, and as Ms. Miller said, this is slightly
3	different than the normal EIS process because this ends in
4	a congressional legislation, so Congress is the
5	decision-maker at the end of the day on this one. Any
6	comments that are received or provided get submitted as
7	part of the overall package to Congress for eventual
8	legislation.
9	Next slide, please.
LO	So, again, the purpose of this meeting. So
L1	why do we have this Draft LEIS meeting?
L2	Well, it allows us to update you-all on the
L3	project and present the analysis, and potential
L4	environmental impacts of the proposed action and the
L5	alternatives.
L6	It also provides us an opportunity to listen
L7	to your concerns about the environmental effects of
L8	continued military use on the withdrawn lands.
L9	And then lastly, it provides a direct avenue
20	for collecting your comments on the Draft LEIS, as I
21	mentioned.
22	Next slide, please.
23	So cooperating agency. The Bureau of Land
24	Management represented here by Tim Hammond he's your
25	Interior Field Manager today, at this meeting today is

```
a cooperating agency on this LEIS. And the BLM maintains
 1
 2
    jurisdictional oversight on the lands that were withdrawn.
 3
    They were withdrawn from the BLM for military training and
    testing. But they also oversee the process for the land
 4
    withdrawal process itself, the extension request process.
 5
 6
    So they are a huge asset and a great partner so far on
 7
    this process. And, yeah, we welcome their involvement as
 8
    a cooperating agency.
 9
                Additionally, we've coordinated with other
    appropriate state, federal, and local and tribal
10
    organizations in the development of this -- and the public
11
    in the development of this Draft LEIS. We did a scoping
12
    meeting. I think it was October in '21 now, I believe.
13
    So far ago now. Yeah, October 2021 is when we did a
14
15
    scoping meeting. So we got comments received then, and
    then incorporated that into the analysis for the Draft
16
17
    EIS.
18
                The next slide, please.
                                         Okay.
19
                So today™s agenda. What we'll do is go over a
20
    project overview; we'll talk about the summary of the
21
    alternatives analyzed, summary of the analysis and the
    impacts of the proposed action, project timeline and
22
23
    important dates; and again, collect your comments. Okay.
24
                So I believe everybody should be familiar with
    at least the Army training lands here in the Interior, but
25
```

```
if not, this image represents all the training areas in
 1
    the Interior, the Army training areas in the Interior, and
 2
    we're only talking about two fairly big ones, but two of
 3
           So the Yukon Training Area just kind of east of
 4
    Eielson Air Force Base, and then the Donnelly Training
 5
 6
    Area east and west, and that is down by Delta Junction.
 7
                So the current land withdrawal comprises
    869,862 acres. And that withdrawal expires in 2026,
 8
 9
    unless Congress, you know, enacts to renew that. Hence
    why we're going through the process of requesting the
10
    renewal again. Again, it covers the Yukon Training Area
11
    and the Donnelly Training Area, east and west.
12
                The Army has determined that there is a
13
    continuing military need for these lands, and
14
15
    congressional approval of the legislative proposal is
16
    required.
                And let's see, I think that's it for that one.
17
18
    Yep.
          Thank you.
19
                So the purpose and need. So the purpose of
    this proposed action is to obtain an extension of the land
20
21
    withdrawal of the training areas for 25 years or more. Or
    have the land designated, or assign the control to the
22
    Secretary of the Army until such time the Army determines
23
24
    it no longer needs the land for military purposes.
25
                The need is to produce a force trained to be
```

```
successful anywhere in the world, including Artic and
 1
 2
    sub-Arctic. To coordinate and conduct operations with the
    U.S. Air Force. And lastly, to fulfill the mission of the
 3
    U.S. Army in Alaska.
 4
                Next slide, please.
 5
 6
                So how we do a NEPA analysis is we prepare --
 7
    you know, we start off with the purpose and need. We
    identify that, and then we start to evaluate and identify
 8
 9
    alternatives. And as we do this, as well to the
    development of purpose and need, we develop screening
10
11
    criteria.
                Now, for an alternative to be considered
12
    reasonable and viable, it's got to meet all the screening
13
    criterias. For this LEIS in particular, we've identified
14
15
    three screening criterias. And I'll go through those.
                So the first is: the action must allow the
16
    Army to meet their training needs and mission.
17
18
                The second one is: the action must provide
    training lands that meet the Army™s need and replicate
19
20
    real-world combat situations, including providing enough
21
    acreage and appropriate weather conditions.
                And then three, the action must be feasible,
22
23
    cost-effective, and similar in scale and quality to
24
    current conditions.
25
                So when we talk about that, as Ms. Miller
```

```
mentioned, we are the 11th Airborne Division; we have the
1
2
    new Arctic Strategy setup, obviously Arctic training.
    It's important here. So we have the weather conditions;
3
    we have the acreage -- because we're training on, you
4
    know, large areas, over 870,000 acres -- adjusted for this
5
6
    one in particular. And these training areas have proven
7
    to show the training needs -- they meet our training needs
8
    in our current mission.
9
                So go ahead to the next slide, please.
                So as we went through this analysis and these
10
    discussions, we identified these alternatives as part of
11
    the -- we've identified these alternatives initially.
12
13
                So the first one is our proposed action.
    Extend the withdrawal for 25 years or more.
14
15
                The second one is transfer administrative
16
    jurisdiction from the Department of the Interior to the
          So this would mean the BLM would no longer have any
17
    DOD.
18
    management control or stake in the lands. It would be
    formally transferred to the Army for complete and total
19
20
    management.
21
                Extend the withdrawal for less than 25 years.
22
                Partial land withdrawal. Meaning only
23
    portions of those 870,000 acres will be withdrawn, rather
24
    than the entirety of what we currently oversee.
25
                Acquire additional training lands in a new
```

1 area.

2

4

5

6

7

8

9

10

11

12

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24

25

Acquire alternate training lands instead of the Yukon or the Donnelly Training areas. 3

And then use existing alternative training lands. And those existing alternative training lands are, as the map shows, we have, you know, a lot of other training lands, as well as these two very important ones. Anyway, the totality of the entire training lands are needed to fulfill the mission. So doing one on others like the Black Rapids or the Whistler Creek are obviously too small to do these large-scale exercises.

All right. So the next slide, please.

So then what we did with the alternative screening analysis, the viability analysis, it was then we just measured up our screening criteria, which are those three that we initially discussed, and then our alternatives considered. And basically all the screening criteria need to be met in order for it to be considered a reasonable and viable alternative. Which, as you can see here, as we went through all of them, the only one that allowed us to move forward with our intended need is the Alternative 1, the extend the withdrawal for 25 years or more.

Let's see, we can skip past that. We can get back into here.

```
1
                MS. HOLFUS:
                             The next slide?
2
                MR. SPRAU:
                            The next slide, please.
3
    Sorry.
                All right.
                            So then what that left us with is
4
    the proposed action to extend the land withdrawal of 25
5
6
    years or more, and then the no-action alternative. And
7
    the no-action alternative is a requirement of NEPA.
                                                          It's
    a baseline. It kind of sets our baseline. This is, I
8
9
    think, an interesting one in that the no-action
    alternative would not extend the land withdrawal, which
10
    means the Army would not train on those lands anymore. So
11
    it kind of has a different set of impacts from the Army no
12
13
    longer being a manager of those lands, and reverting back
    to the public.
14
15
                MR. INOUYE: I've got a guestion.
16
                MR. SPRAU: Yes, sir.
                MR. INOUYE: Extend the land withdrawal for 25
17
18
    years or more, is there some set on when you're going to
    reconsider that or it can go on forever?
19
                MR. SPRAU: That's a good question.
20
21
    left it as 25 years or more. Right now the last one, the
22
    current one that was withdrawn was for 25 years. So our
23
    expectation is that the next one will be 25 years. But we
24
    also want to allow Congress, I guess, the flexibility to
25
    go as long as needed, as long as they determine.
                                                      I don't
```

```
know what that could look like, but we wanted to try to
 1
 2
    provide that flexibility as long as we possibly could, I
 3
    quess.
                MS. ROED:
                           So it could be 30 years.
 4
 5
                MR. SPRAU: It could be 30 years, yeah. And
 6
    I --
 7
                MR. INOUYE: It could be forever, unless you
    have a renew process.
 8
 9
                MR. SPRAU: It could be, yeah. It could be.
    And that's exactly, yeah. It could be indefinite, but
10
    that will be in the drafting of the legislation that will
11
    come after this use. Once Congress and BLM -- because BLM
12
    is going to have a role in drafting that legislation as
13
    well. So once this part is done, all these comments will
14
15
    be pushed forward for that to be considered.
16
                But I encourage you to submit that if you want
    to submit that as part of your comments.
17
18
                Any other questions on the action or proposed
    action, no-action? Okay. All right.
19
20
                All right. So the next slide, please.
21
                So these are the areas where -- I'll kind of
22
    let folks take a look through all these, but these are the
23
    areas where we primarily -- the resource areas that we
24
    have evaluated. So recreation, air quality, soil,
25
    biological resources, cultural resources, hazardous
```

```
material, subsistence, noise, water quality, wildland
 1
 2
    fire, air space, land and visual resources, wetlands,
    traffic and transportation, public health and safety, and
 3
    socioeconomics and environment justice.
 4
                These are all pretty standard EIS resource
 5
    areas that get evaluated under NEPA. And then we'll go
 6
 7
    ahead and get into some more of the specifics on these.
    And I think we have a slide -- or a map over there, as
 8
 9
    well, too, we can utilize.
                 So the overall summary of the impacts here is
10
    that there are no anticipated -- I'm sorry.
11
                Under the proposed action, which is renewing
12
    the land withdrawal, there's no changes to resources from
13
    existing conditions. And with that there are no
14
15
    anticipated significant impacts under the proposed action.
                And then the next slide, we will go into
16
    impacts that would not change from current conditions, or
17
18
    potential ongoing impacts.
19
                So in this one we'll focus primarily on the
    action alternatives, and we'll just kind of run through
20
21
    these. So these next three slides will present a table
22
    that lists resource areas analyzed for their potential
23
    impacts under both alternatives.
24
                But under the action alternative, there would
25
    be no change to land use, visual resources, noise,
```

```
recreation, utilities, traffic and transportation,
 1
 2
    airspace, or public health and safety.
 3
                Okay. The next slide, please.
                And so under the action alternative, there
 4
    would be a beneficial impact to hazardous materials due to
 5
    the continued hazardous materials use and storage
 6
 7
    management that is implemented on the installation.
    of course, as you utilize and manage hazardous materials,
 8
 9
    we do anticipate adverse impacts from disposal or from
    utilizing the hazardous materials on the training lands as
10
11
           So a positive and a continuing ongoing no change, I
12
    guess, in impacts.
                There would also be no change in impacts to
13
    air quality, which includes climate change, and negligible
14
15
    impacts on the visibility in Denali National Park.
    did take a look at that.
16
                Okay. Next slide, please.
17
18
                Okay.
                       I'm sorry.
                                   There would also be no
    change to impacts to earth resources, water resources, and
19
20
    biological resources.
21
                So in this slide -- yes.
22
                            In the report, did you expand on
                ATTENDEE:
23
    the bullet points, if you will, so that people can
24
    understand -- there would be concerns about historical
25
    impacts and talk about that. Is that in the report?
```

```
1
                MR. SPRAU: Absolutely, yeah.
 2
                ATTENDEE:
                           It's in the report?
 3
                MR. SPRAU: Yeah. We're going over a really
    quick summary of all this stuff. But, yeah, I mean, there
 4
 5
    are chapters dedicated to each one of those resource
    areas. But we can chat about that on the next slide,
 6
 7
    actually, if you're interested in historic resources.
                MR. MUNRO: Just to add to that, Matt. It's
 8
 9
    Section 4 of the Draft LEIS where we discuss the potential
    impacts in detail. In Chapter 3, we discuss the existing
10
    resources, the baseline conditions.
11
                ATTENDEE: And was that the document -- was
12
13
    there a link to that document on the notice that you sent
14
    out?
15
                MR. SPRAU:
                            There was, yeah.
                MS. HOLFUS: Yeah. And it's also available on
16
    the website, the LEIS itself. So if you go to the
17
18
    website, you can click on it there and access it.
19
                MS. ROED: You can actually have one if you
20
    want, yeah.
21
                MS. HOLFUS: We do have printed ones.
22
                MR. SPRAU: We're trying to bring our
23
    processes into the 21st century. We're not quite there,
24
    yet, but --
25
                MS. ROED: You have to read it by hand, by
```

20 1 that. 2 MR. SPRAU: I like to have a document on my desk like that every once in a while, but yeah. 3 MS. HOLFUS: It looks pretty. 4 5 MR. SPRAU: It does, yeah. Nice pictures at 6 least. 7 So then with this slide here, under the Okav. action alternative, there would be no change to wildland 8 9 fire due to continued wildland fire management. And then here to the point that you brought 10 up, sir, is cultural resources could be negatively 11 impacted due to adverse impacts just from training 12 activities to the archaeological sites. We do have quite 13 an extensive cultural resources program that manages 14 15 archeological sites and investigations across all of the training lands, including these two large areas. So we do 16 anticipate some adverse impacts, but we will continue to 17 18 follow our management plans and our procedures for mitigating concerns or impacts to the extent that we 19 20 can't. 21 And there would be no impacts to properties of 22 traditional, religious, or cultural significance. 23 We do expect a beneficial economic impact 24 would result from the action alternative due to the

continued need for Army personnel, and there would be

```
no -- this is, I'm sorry, for the socioeconomic section.
1
2
    But there would be no impacts to environmental justice
    communities.
3
                And then, lastly, under the action
4
    alternative, there would be no changes in subsistence
5
6
    because there will be no effect to resource abundance or
7
    availability; however, there would be no opportunity for
    the withdrawn lands to become eligible for subsistence
8
    under the Alaska National Interest Lands Conservation Act,
9
    or ANILCA, for federal subsistence use.
10
11
                So, again, we can talk to these in more
             Those are just the overall summaries of the
12
    detail.
13
    impacts.
14
                Next slide, please.
15
                So this is quite an involved process. And you
    can see in the legend up there, each color corresponds to
16
    a different law that kind of outlines this entire process.
17
18
    Military Lands Withdrawal Act, Plan Withdrawal Application
    Process in the NEPA. And then opportunities for public
19
    involvement. Those are the ones that are circled in
20
    yellow there. And obviously with the star, that's where
21
22
    we're at. The date is wrong on that because we -- oh, I'm
23
    sorry. We published. I'm sorry. You're right. We
24
    published the notice of available on May 12th, but we are
25
    in that comment period now where we're doing public and
```

agency meetings.

And then ultimately we will respond to comments. They get into the case file that is submitted to the BLM to higher headquarters for consideration and legislation, and then congress does or does not enact legislation to extend the land withdrawal. As simply as we could possibly put this.

And let's see, next slide, please.

Okay. So yeah. So mainly what this meeting is intended for is we want to hear from you. So we want to hear your comments, your input, your questions.

These are the potential options for submitting your comment. So verbal comments today. Again, the meeting is being recorded. Later you can email comments to the project email inbox. I believe we also have that on here. We can send that information out to everybody again if you need it. You can mail written comments to me. And then Grant Sattler, our public affairs officer, also can be a great resource for any questions that might pop up.

As a reminder, if you want to submit comments, do so until the deadline on July 11th. So we accept comments. You know, July 11th we tend to ask for it postmarked. We do accept comments if they come in after that, but we try to encourage everybody to help us keep

```
our time line on schedule and submit comments by July 11th
1
2
    so we can consider them into this process.
                          So thank you. That's it.
3
                So yeah.
                Ms. Miller, do you have anything to close us
4
5
    out on this part?
6
                MS. MILLER:
                             I don't. Other than, you know,
7
    just to kind of reiterate that this is a great opportunity
    to have your voice heard to get it put into the public
8
9
    record. We want to support the BLM as they support
    crafting this legislation to send to congress. You write
10
    what all the information we want to have captured and
11
    forward so the right decision is made. And for us,
12
13
    ultimately, that would be withdrawing the lands for
    however amount of years that they want to give them to us.
14
15
    But the presence of the military here in Interior Alaska
    is important, and I think directly tied to the
16
    availability of these lands.
17
18
                MS. HOLFUS: So if anyone does want to provide
    a comment and you don't want to email it or tell us now,
19
    the comment cards are over there in a stack. So feel free
20
21
    to write it down there, and then you can mail it or just
22
    hand it over to us.
23
                And then I thought the website was on here but
24
    it's not, so it's right there on that poster board if you
25
    want to reference that later. You can also just Google
```

```
U.S. Army Garrison, I believe, LEIS, and it should come
1
2
         It should be the first thing in your search engine.
    up.
                So I think that's everything.
3
                MR. HENSZEY: I wonder if you could have a
4
    general discussion about the authority going directly to
5
6
    the DOD and essentially eliminating the BLM. I think that
7
    BLM element has been very critical in the past, and they
    provided another kind of view to these things that I'm not
8
9
    sure of the expertisewise, otherwise.
                MR. SPRAU: Yeah.
10
11
                MS. HOLFUS: I see --
                            I can start, if that's all right.
12
                MR. SPRAU:
                So yeah, we did consider that. And a lot of
13
    these alternatives got -- they had input from the
14
15
    headquarters office in D.C., and the headquarters office
    in the Army as well, the Pentagon level. And that was, I
16
    quess, considered not feasible at this time.
17
18
    administrative control over to the Army from Department of
    the Interior.
19
                They, I guess, thought it not feasible that
20
21
    Congress would consider transferring ownership. And I
    think partly because of the management oversight of the
22
23
    Army and the BLM's current relationship on managing these
24
    lands.
            So that's at least why it was determined not to be
25
    feasible at this point in time.
```

```
1
                So I don't know if Tim has any more to add on
2
    that.
3
                MR. HAMMOND: Not really. I mean, ultimately
    Congress can make whatever decision they want. I think
4
    it's pretty well-known that the BLM and the Army cooperate
5
    well in the management of these lands. We permit
6
7
    activities like communication sites on Donnelly Dome.
                                                            The
    Army has authority through the Sikes Act for resource
8
9
    management as well. And, you know, things tend to work
    pretty well. But if Congress decided they wanted to
10
    transfer the land to DOD, there's nothing that would stop
11
    them from doing that. And I don't know that the BLM would
12
13
    necessarily have any objection.
                MS. MILLER: But that's not our
14
15
    recommendation.
16
                MR. SPRAU: Not our recommendation at this
17
    point, yeah.
18
                MR. MUNRO: I can add a bit to that. So under
    the current management arrangement between BLM and the
19
    Army, the BLM has resource management plans in place that
20
21
    are there to protect natural resources, cultural
    resources, water quality, and et cetera. And that
22
23
    works -- that arrangement works well.
24
                If the land were given over strictly to the
25
    DOD, the DOD would need to come up with its own resource
```

```
management plans or something similar, which would be a
1
2
    huge undertaking. It would be a lot of years even to
    develop the resource management plans, and then they
3
    would -- then there would have to be a new infrastructure
4
5
    for implementing the resource management plans.
6
    lot of what BLM does, is implement the RMPs for some of
7
    these lands.
                So it really would create a much different
8
9
    infrastructure. And in this case, it seems to be working
    well to have the BLM and the Army cooperating on managing
10
    these plans, so it didn't seem to be a viable alternative
11
    to not have BLM involved.
12
                MR. SPRAU: Yeah, and I'll just --
13
14
                ATTENDEE:
                           It appears to me that that
15
    inclusiveness is really valuable at a local level here.
    And that's where the expertise lies with a lot of the BLM
16
    folks. If you lose that, I'm not sure you're going to
17
18
    incorporate the current structure.
19
                MR. SPRAU: So I will add a correction.
    do have our own cultural and natural resource management
20
21
    plans. So we do have our own Army experts. We have
    cultural anthropologist, Elizabeth Cook. We have
22
23
    foresters. We have natural resource managers. So
24
    physical scientists.
25
                And so they do -- we do have integrated
```

```
natural resource management plans, cultural resource
 1
 2
    management plans. We do work closely with BLM on those to
    review and comment to make sure they're aligning with all
 3
    of our goals. And then BLM has their larger resource
 4
    management plans for, like, a larger regional area.
 5
 6
                So we do have the expertise in-house. We do
 7
    and can, you know, reach out to the BLM when we need
    additional, you know, expertise and insight on some of
 8
 9
    these documents. But I think we do work very closely
    with, you know, their archeologist and our archeologist.
10
    And we're always sharing information. That's part of our
11
    current agreement, is we provide annual reports to the BLM
12
    on all the activities we do on the land. So all our
13
    cultural resource surveys, investigations, our natural
14
15
    resources, you know, the different types of activities.
16
    So we provide all that to the BLM annually at least.
17
    yeah.
18
                MAYOR WARD: You mentioned resource management
    plans for these particular sites. And they're integrated,
19
    you said, with the BLM. Where would those be located at?
20
21
                MR. SPRAU: Oh, yeah. They're on our
22
    project -- they're on our website for Fort Wainwright. We
23
    can easily send those.
24
                So they're called integrated. I'm not really
25
    sure why they're called "integrated." But they're called
```

```
"integrated." It's an Army term across the country.
1
2
    Integrated cultural resources, integrated natural. I
    think integrated with the training mission is maybe where
3
    they started. You know, because the Army has evolved over
4
    the years to where environmental is not a threat, but it's
5
    welcomed. You know, the environmental component of the
6
7
    training mission is welcomed and seen as an asset. So I
    think from that perspective, the integrated is like
8
9
    integrated to the mission needs and the training.
                And so we do have those -- all of our
10
11
    management plans on our Fort Wainwright website. But we
    can easily send those out if folks want them.
12
13
                MAYOR WARD: So they're integrated with a
    mission set, not with agencies?
14
15
                MR. SPRAU: No. I'm sorry. So they're
16
    integrated with everybody. But I think the term
    "integrated" goes to the mission side. But they are -- by
17
18
    law we're required to, you know, work with all of our
    agency partners to make sure that we're capturing
19
20
    comments. So for the Natural Resource Management Plan,
21
    our Sikes Act partners are the BLM and the Alaska
    Department of Fish & Game. So we make sure that we are
22
23
    fully reviewing and developing those plan -- that plan, in
24
    particular, with those two agencies.
25
                For our cultural resources plan, we're working
```

```
with the SHPO, we're with the Tanana Yukon Historical
1
2
    Society. So integrated from -- yeah, integrated as -- in
    the greatest sense of the word.
3
                MS. ROED:
                           So many ways.
4
5
                MR. SPRAU: In so many ways.
6
                MS. ROED: It's so, so integrated.
7
                MR. SPRAU: Yeah.
                MR. HAMMOND: The BLM land use plans for the
8
9
    areas are written with an understanding of the age of
    withdraw and the military purposes, and the Army has
10
    overlapping authority through the Sikes Act. So they are
11
    integrated in that respect. And if you want to find the
12
    BLM plans, just Google the BLM National NEPA register, and
13
    you can find it in there.
14
15
                ATTENDEE: So one time from the Division of
16
    Forestry & Fire Protection. So historically there has not
    been a vehicle to protect values on the landscape off of
17
18
    military lands. And in recent years we've had the Good
    Neighbor Authority to the BLM to be able to do that, which
19
    has worked well. So I would just -- I guess the one
20
21
    comment would be that there continue to be funding made
    available through the Good Neighbor Authority to do fuels
22
23
    or fire mitigation projects off the installation ground to
24
    protect communities and values.
```

Okay.

MR. SPRAU:

25

Yes, sir.

```
I notice that the Tanana Training
 1
                ATTENDEE:
 2
    Area, the gray area from here on the west, just south of
    town is not included in this particular study? Does that
 3
    happen on the schedule as well?
 4
                MR. SPRAU: That's an indefinite withdrawal.
 5
 6
    So that is -- that's been withdrawn indefinitely, so it's
 7
    not part of this current action.
 8
                MR. MUNRO: Matt, can I add a response to the
 9
    previous comment.
                MR. SPRAU: Oh, yeah, sure.
10
11
                MR. MUNRO: Regarding the wildland fire
    management, there is a section in the LEIS, Section 3.14,
12
    that discusses current wildland fire management, as you
13
    were discussing. And then in the corresponding section in
14
15
    Chapter 4, 4.14, describes what would occur under both
    alternatives, either the no-action alternative or what the
16
    proposed action is. Just for reference.
17
18
                ATTENDEE: Appreciate it.
19
                MR. INOUYE: Somebody with the U.S. Fish &
20
    Wildlife, and so I appreciate these people would
21
    (indiscernible). Anyway, I want to go back to that
    (indiscernible) for Integrated Natural Resource Management
22
23
    lands. Is that part of the LEIS? Just referenced in the
24
    LEIS?
25
                MR. SPRAU:
                            It is, yeah.
```

```
1
                MR. INOUYE: It's part of the LEIS?
 2
                MR. SPRAU: Yeah, it's part of the LEIS.
                                                          Ιt
    establishes the baseline. So it's a -- yeah, it like a
 3
    baseline document that establishes the impacts expected
 4
    from the use of the land for military training.
 5
 6
                MR. INOUYE: Okay.
                                    So comments on the
 7
    Internet would be fair game for the comments for the LEIS?
                MR. SPRAU: Not necessarily. That's a good
 8
 9
    question, though. We can look into that. So comments on
    the Internet. Because we're not updating the NRMP. We're
10
    using the NRMP as a reference, as a resource to frame the
11
    analysis for the EIS. But if you provide a comment on the
12
    EIS, we will consider it for the NRMP as well. So . . .
13
14
                MR. INOUYE: Okay. Because I think
15
    (indiscernible) schedule this for every five years.
16
                MR. SPRAU: It's moved away from five years to
    only significant updates. So it gets an annual review of
17
18
    any changes that need to happen. But if there's a
    significant change, then we would just go through the
19
    process to update it completely.
20
21
                MR. INOUYE: Okay. Because I think a lot of
22
    our concern is every year rather than the 25 years in the
23
    statute.
24
                MR. SPRAU:
                            Right.
25
                MR. INOUYE: Up to greater than 25 years.
```

```
1
                MR. SPRAU: More greater than, yeah. Yep.
2
                ATTENDEE: But, Matt, isn't the Fish &
    Wildlife Service a signator on it?
3
                MR. SPRAU: They are. And I apologize.
4
                                                          Ι
5
    said the wrong thing. So the Sikes Act partner. I was
6
    looking at the Tanana instead of BLM. Fish & Wildlife
7
    Service and Fish & Game, Sikes Act partners. So yes, the
    Fish & Wildlife Service is a signatory on our NRMP, our
8
9
    Natural Resources Management Plan.
10
                ATTENDEE:
                           Okay.
                                  Thank you.
11
                MR. SPRAU: Yes, sir.
12
                MR. PRAX: Do you answer comments?
13
    somebody submits a comment before the 16th, you will
    provide an answer to that individual?
14
15
                MR. SPRAU: The 11th is when the comment
16
    period ends, yeah.
                We will not provide a response to the
17
18
    individual. We will be providing a response, you know, to
    all comments later in the process.
19
                                         So --
                MR. PRAX: And the reason I ask that is I
20
21
    think that many of the comments will be to other matters,
    and then it would be helpful to direct to whomever is
22
23
    concerned about Fish & Wildlife or hunting access or this
24
    or that.
              Thank you for the comment to go talk to somebody
25
    else somewhere else.
```

```
1
                MR. SPRAU: Okay.
 2
                MS. ROED: We can definitely -- like, you can
    contact Matt directly or I, and we could also do that,
 3
    like, outside of the official comments. If you're looking
 4
    for a specific contact or information, we could address
 5
    that outside of the -- I mean, that's part of the
 6
 7
    conversation that's happening now, so if we need to find
 8
    resources or direct you to a resource, the contact
 9
    information on there might be a good way to go about that.
                           That would be all. Because I think
10
                MR. PRAX:
    that happens a lot, and I'm finding that it's sometimes
11
    hard to get through government processes.
12
13
                MS. ROED:
                           Sure.
                MR. PRAX: Not only within --
14
15
                MS. ROED: Yeah. And we're not -- this is not
16
    going to go to a final document, so it would be kind of --
    it's not going to be like we would be having a
17
18
    conversation with that response. So it would be good to
    do that, like, just an email maybe or --
19
20
                MR. PRAX: Uh-huh.
21
                MR. SPRAU: Yeah, and I'd say that if you --
    it's helpful to have these conversations as you develop
22
23
    your comments, because you very well, through your
24
    conversation, might have your question answered.
25
                MR. PRAX:
                           Right.
```

```
And so, yeah, like Melanie said,
 1
                MR. SPRAU:
 2
    submit your areas that you might be interested in and we
    can link you up with the proper subject matter expert so
 3
    you can talk with them as well.
 4
 5
                MR. PRAX: Uh-huh.
 6
                MR. SPRAU: And any other concerns or
 7
    questions you might have on this.
 8
                And I didn't get your name, sir. I'm sorry.
 9
                MR. PRAX: I'm Mike Prax. I represent the
    North Pole area.
10
11
                MR. SPRAU: Oh, okay.
                           The state legislature. And I'm on
12
                MR. PRAX:
    the military something or other. As I say, the process is
13
    really hard to figure out.
14
15
                MR. SPRAU: Okay.
                                   Thank you. Jeremy is deep
16
    in thought over here.
                            I was -- and maybe you can just
17
                MR. DOUSE:
18
    answer this. So more and more access, particularly in the
    DTA west is crossing state land. Is there any thoughts
19
    of -- you had socioeconomic, and maybe transportation is
20
21
    involved in that section, but is there any analysis into
    access to new parts of training lands that would cross
22
23
    non-federal -- or state ground or, you know, non-federal
24
    ground?
25
                MR. SPRAU:
                            No.
```

```
1
                MR. DOUSE: No. All right. And so --
 2
                MR. SPRAU: Yeah, okay.
 3
                MR. DOUSE: And it's not a huge issue, just
 4
    maybe something that should be considered. Where the
    military would need to cross state land to get access to
 5
    more training lands. As you move to more of a light
 6
 7
    infantry kind of a training regime.
                MR. SPRAU: So if I understand correctly,
 8
 9
    where you might be accessing military lands from
    nonfederal properties. Specifically around Delta Junction
10
    or all of them?
11
                            I would do it around all of them,
12
                MR. DOUSE:
13
    but Delta Junction seems to be the one right in front of
14
    us.
15
                MR. SPRAU: Right. So are you talking, like,
    ice bridges and that area down there by the --
16
                MR. DOUSE: And this by easements three,
17
18
    like --
                MR. SPRAU: Okay.
19
20
                MR. DOUSE: -- our logging roads.
21
                MR. SPRAU: Okay. Any other questions or
22
    thoughts or --
23
                MS. ROED:
                           I actually have a question that I'm
24
    a little unclear on. Are we recording for -- are we
25
    considering -- are people thinking that we're considering
```

```
these as official comments right now? I just want to make
1
2
    sure we're all on the same page as far as --
                           I don't think so.
3
                ATTENDEE:
                Ms. ROED: So, like, anything you said that
4
5
    you want to have on the docket, so to speak, we would need
6
    to get with the court reporter or a comment card to give
7
    the actual words on paper that we want. We're definitely
8
    hearing you, but as far as the official.
9
                MR. SPRAU:
                            Yeah.
                MR. MUNRO: Or submit it through the website
10
11
    as well.
12
                MS. ROED:
                           Yeah.
                                   I was unclear on that, so I
    was, like, I'm probably not the only one.
13
14
                MS. MILLER: So the notes you've taken down
    won't be officially submitted into the comments?
15
16
                MR. SPRAU:
                            No.
                                 They're just things to follow
    up on with people, like making sure everybody's got the
17
18
    plans, that they want to see them, making sure we can set
    up further time to discuss or go through comments or, you
19
    know, questions, and things like that.
20
                                             So yeah.
21
                MS. MILLER:
                             Okay.
                MR. PRAX: Is there an official notification
22
23
           "We sent emails to this group of people"? Or this
24
    individual, this specific department, rather than the
25
    groups?
```

```
1
                MR. SPRAU: Yeah. It's in the back of your
2
    document there.
3
                MR. PRAX:
                           In the back.
                MR. SPRAU: So yeah.
4
5
                MR. PRAX:
                           Okay. Great.
6
                MR. MUNRO: You're in good company there.
7
    90 percent of the people just read the executive summary.
8
                MS. ROED:
                           Yeah, it's a little heavy.
9
                MR. PRAX:
                           There's only so much time in a day.
10
                MR. SPRAU: There is, yeah. That will give
    you a really good -- obviously a good indication of
11
    everyone that we reached out to, which was quite an
12
13
    exhaustive list.
                MS. HOLFUS: Yeah.
                                     It was, like, 143
14
15
    contacts.
                                     It's a difficult project
16
                MR. PRAX: Uh-huh.
    to figure out public involvement. Typically we get
17
18
    involved when it's too late, and that just creates
    frustration. And so I'm trying to figure out how to help
19
    people figure out how to get through these documents for a
20
21
    focus, and when to make the comment, and then how to stay
    on point so that our time is used more effectively.
22
23
                MS. MILLER: Are you tracking the public
24
    comments to this evening? You mentioned that there's a
25
    public --
```

```
MR. SPRAU: Public meeting tonight.
1
                MS. MILLER: -- meeting tonight.
2
3
                MR. SPRAU:
                            Yep.
                                    Here in --
4
                MS. MILLER: Yep.
5
                MR. SPRAU: Yeah.
                                    In Fairbanks, yeah.
6
                MS. MILLER: Yep.
7
                MR. SPRAU:
                             So yeah, we utilize the resources
    available to us through the federal register. We know we
8
9
    raised that, but that's an official requirement that we
    put it out there. And we do local newspapers, advertise
10
11
    around town. We advertise on the website, on Facebook.
                MS. HOLFUS: Radio.
12
13
                MR. SPRAU: We do radio, yep. KUAC.
                MR. MUNRO: And then I believe directly to
14
15
    anybody that comments if we're in the scoping period as
16
    well.
                MR. SPRAU: And then a letter to all the
17
18
    agencies, representatives, again, informing them of the
    process and time period, so . . .
19
                But if you have other ideas, please let us
20
21
    know on how to reach out and be more -- you know, capture
22
    more audience members.
23
                Yes, Bob.
24
                MR. HENSZEY: I apologize, I might have missed
25
    the time line or schedule.
```

```
1
                MR. SPRAU:
                            Yep.
 2
                MR. HENSZEY: When we go through this process,
    what are the next steps before approval? What are the
 3
    plans?
 4
 5
                MR. SPRAU: Yeah.
                                   So --
 6
                MR. HENSZEY: Maybe I did miss it because
 7
    that's too small to read.
 8
                MR. SPRAU: Yeah.
                                   This is a paired-down
 9
    version.
              So the EIS is only one part of this. This is
    ultimate -- you know, there's a real estate portion of
10
    this; there's a legislation portion of this. But after
11
    this is done, we package up the EIS, the document, all the
12
    comments received, and we submit that to our higher
13
    headquarters, who then will work with BLM. The Army and
14
15
    the BLM headquarters will work together to consider all
    the information in the case file so in the -- the LEIS and
16
    the comments received -- and prepare and draft
17
18
    legislation.
19
                So that is at least a yearlong process. We
    have until 2026, so November 6, 2026, when it expires.
20
21
    And you think there's, you know, a lot of time there, but
    there's not because of staffing time lines of the
22
23
    legislation, actually drafting it, and then making sure
24
    you're meeting Congress's time lines as well.
25
    really only kind of moves everything down to a year of
```

drafting legislation.

We haven't done this in 25 years, so none of us at this table are really intimately familiar with that part of the process. We're just making sure the EIS gets done and gets done well and on time so that we can submit it to the folks that will start crafting legislation.

MAYOR WARD: Bryce Ward with the North Star
Borough. To what degree do you guys coordinate with the
Air Force on their land use needs? I know there's air
space, which is a separate kind of process, but I know
we've been engaged with some conversations with Eielson
about additional sites in support of their air mission
that includes land Outside. So have you had conversations
in regards to Eielson's needs?

MR. SPRAU: Yes, we do. So we coordinate with them pretty regularly when it comes to actions that happen on the training lands. So Eielson is one of our major users on the training lands, so they utilize the Ester Creek and the Oklahoma impact areas. They have a lot of their assets across the training lands.

I think the project you're talking about, we're also working with them on sites on the training land. So yeah. So we incorporate their considerations, their concerns into this process as well. We make sure that, you know, the land is managed appropriately. So our

```
NRMP and (indiscernible) account for their activities on
 1
 2
    the training lands as well. And so, yeah, ultimately the
    withdrawal of these lands supports the Air Force mission
 3
    as well, since they are such a major user. And, yeah, a
 4
 5
    major user in conjunction with the Army.
 6
                MS. MILLER: Yeah. And we have agreements in
 7
    place with the Air Force that we review annually that
 8
    speaks to some of that support that we provide.
                                                      So . . .
 9
                And I don't know if Clint is (indiscernible)
    here from -- manages the lands.
10
                MR. BAKER: Yeah. I don't work closely with
11
    the (inaudible) over on Eielson, and they're pretty
12
    intimately involved with the (inaudible) needs. We were
13
    working on a (indiscernible) agreement for some time the
14
15
    past couple years now. Really closely getting that
    completed. So yeah, they're (inaudible) pretty good
16
    partners on the deal. And then they are big users.
17
18
    very important to them. This arguably is just isn't
    important to the Air Force, it is to all of them.
19
20
                                   A great question.
                MS. MILLER: Yes.
21
                MR. MUNRO: Not to make you end up with a copy
22
    of the LEIS, but just in case you do have it on hand, we,
    meaning Tetra Tech, we have an airspace division who was
23
24
    involved in this, and they wrote a pretty comprehensive
25
    section on current airspace use and management.
```

```
Section 3.7, and then the actual effects of the no-action
 1
 2
    or the proposed action are analyzing a pretty good detail
    of Section 4.7. And then that also provides additional
 3
    resources where -- you know, where management is further
 4
 5
    described.
 6
                MR. PRAX: How much extra time do you guys
 7
    have in the evenings, probably?
                MR. SPRAU: In the evenings? I'm sorry?
 8
 9
                MR. PRAX: Yes.
                                 It would be valuable, or it
    could be valuable, I would say, to get the word out so
10
    that the public is more aware of and involved with the
11
    process and talking, not really to me, because I don't
12
    know beans about it, but to the folks that know something
13
    about it. And that might help two years down the road or
14
15
    five years down the road so that the different groups that
    are concerned about this -- I can think of a couple
16
    offhand that you probably wouldn't get pertinent comments
17
18
    on point -- I think it's a legal term -- but you -- there
    would be an opportunity to explain to people what the hell
19
    is going on here. Case in point, that bridge across the
20
21
    Tanana will generate some comments, but it probably
    doesn't have anything to do with this particular task, but
22
23
    can be viable still.
24
                MR. HAMMOND: Are you talking about time this
25
    evening after the public meeting?
```

```
MR. PRAX: Well, it's -- unfortunately it's a
 1
 2
    little late for getting the word out to -- I got this
    notice, I don't know, a week or so ago. I didn't quite
 3
    know what I wanted to do to get the word out being it's
 4
 5
    time management as much as anything.
                                           That has to be your
    concern too. I appreciate your time.
 6
 7
                MR. SPRAU: Yep. Yeah, I would say if that is
 8
    a concern, you know, there's always of submitting a
 9
    request, an extension, or, you know, additional
    information. So you can send an email to the project, and
10
    it will be considered.
11
12
                MR. PRAX:
                           Okay.
13
                MR. SPRAU:
                            So yeah.
                MS. MILLER: And the website is pretty
14
15
    comprehensive.
                MR. SPRAU:
                            It is, yeah.
16
                MS. MILLER: There's videos and the printouts.
17
18
    And so I would -- if folks come to you, I would encourage
    you to direct them to the website first, and then
19
    certainly our team can make themselves available to answer
20
21
    questions.
22
                MR. SPRAU: Absolutely.
23
                MAYOR WARD: I would just maybe add from the
24
    borough's perspective, you know, most of the comments that
25
    we've received, if any, I would say very minimal. But
```

```
they're really in regards to management. You know, folks
1
2
    wishing to have access to certain areas and not. So I
    don't think any of them are really at the heart of the
3
    issue which is, you know, not extending or continuing with
4
    (indiscernible). I think it has to be more so with
5
6
    management. But again, they seem like, you know, they're
7
    pretty minimal in the context of the overall project and,
    you know, having -- I -- maybe I do need to walk out with
8
9
    a book, but having that information that we can pass off,
    it's a -- you know, a good contact in regards to those
10
    issues to solve most of those problems.
11
                MR. SPRAU: Yeah. Yeah, we can figure out who
12
    the best person is. I mean, obviously if you send that to
13
    the project website or myself, Ms. Miller, we'll make sure
14
15
    the information gets to the right people. And pull in our
    experts as well for additional conversations you can have.
16
                MR. MUNRO:
                            There will be additional SMEs at
17
18
    the meeting tonight.
19
                MR. SPRAU: Right.
20
                MR. MUNRO:
                            Yeah.
21
                MR. SPRAU:
                            Yep.
22
                       Any thoughts or questions?
                Okay.
23
                MS. HOLFUS: Did everyone get a chance to sign
24
    the sign-in sheet? If not, there's -- we also have more
25
    if you've run out of room, but --
```

```
Okay. Well, that's -- I
 1
                MR. SPRAU:
                            Yeah.
 2
    quess that will conclude this meeting here. I appreciate
 3
    everybody's time and input, and we look forward to hearing
 4
    from you as well. And feel free to email or get in touch
    with one of us. And we'll be hanging around for at least
 5
 6
    another hour or so, so we can have more conversations if
 7
    needed.
 8
                MS. ROED: And take comments officially on
 9
    record.
                MR. SPRAU: Take comments officially if you
10
11
    would like to as well.
                MS. HOLFUS: Yeah.
                                     Speak with Crystal.
12
                And reminder, we have the public meeting
13
    tonight, 5:00 to 7:00 at Pioneer Park Centennial Center,
14
15
    Blue Room.
                So yeah.
16
                MR. SPRAU: All right.
                                         Thank you.
                MS. HOLFUS: All right. Thanks, everyone.
17
18
                MR. MUNRO: All right.
                                         Thank you.
19
    11:00 A.M.
20
           (End of Public Meeting.)
21
           (No public comments recorded.)
22
23
24
25
```

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Attachment 4: Comments Received

Tanana-Yukon Historical Society P. O. Box 71336

Fairbanks, Alaska 99707 -1336 Phone: (907) 456-8947 e-mail: tyhs@alaska.net

Web: tananayukonhistory.org



03 July 2023

Matt Sprau, Environmental Planning Branch Chief 1046 Marks Road #4500 Fort Wainwright, AK. 99703-4500

> Re: DRAFT Legislative Environmental Impact Statement Addressing Land Withdrawal Extension at Ft. Wainwright, Alaska

Dear Mr. Sprau:

The Tanana Yukon Historical Society of Fairbanks, Alaska, recommends the continued inclusion of the U.S. Bureau of Land Management in future Department of Defense decision making concerning the Yukon training Areas, and Donnelly training Areas, East and West.

Bureau of Land Management personnel have historic and current "on the ground" knowledge of the lands under consideration, expertise which may otherwise not be known or lacking through intentional or inadvertent exclusive DOD subcontracting. Local familiarity with indigenous tribes and historic land and structures must be ensured.

Thank you for the opportunity to comment on this important issue.

Sincerely,

Ronald K Inouye President of the Board

Tanana-Yukon Historical Society

Donald W. Inounge





Department of Natural Resources

DIVISION OF MINING, LAND & WATER
Program Support Section

550 West 7th Avenue, Suite 1070 Anchorage, Alaska 99501-3579 Main: 907.269.8511 TTY: 711 or 800-770-8973 Fax: 907.269.8904

Via email and USPS

July 11, 2023

Mr. Matt Sprau
Directorate of Public Works
Attn: AMIM-AKP-E (M. Sprau)
1046 Marks Road #4500
Fort Wainwright, AK 99703-4500
usarmy.wainwright.id-pacific.mbx.lwe-leis@mail.mil

Dear Mr. Sprau:

The Department of Natural Resources (DNR) reviewed the Department of the Army's Legislative Environmental Impact Statement (LEIS) evaluating the potential environmental impacts on land currently withdrawn from the public under Public Law 106-65 for military use in interior Alaska. The following comments represent the consolidated views of DNR's Division of Forestry & Fire Protection and Division of Mining, Land and Water.

DNR understands that the Donnelly Training Areas West (DTAW) and East, and the Yukon Training Area have a long history of use for military purposes. We also understand that future military activities conducted on the withdrawn lands would be consistent with those conducted since the previous withdrawal in 1999 (LEIS, p. xi).

DNR is aware that the withdrawn areas contain hazardous materials, solid and hazardous waste accumulation zones, storage tanks, RCRA permitted facilities, potentially contaminated sites, and numerous structures. We agree that "cleanup and decontamination at the existing high hazard impact areas would be expensive and technologically challenging" (LEIS, p. 2-7) and that "remediation would likely take several decades. Hazardous materials would remain onsite and access to contaminated areas would be restricted, pending remediation, posing moderate adverse impacts on visitors and wildlife" (LEIS, p. xiv). Addressing these items likely cannot be completed in three years' time if the non-action alternative is chosen.

Extending the current withdrawal will allow for current remedial work such as the munitions response site FTWW-008-R-01 which is not specifically mentioned in this LEIS. The site investigation report was determined to be incomplete and additional fieldwork needs to be completed. There are two areas recommended for further investigation the Blair Lakes and Carla Lakes Fire areas. Extending the withdrawal will allow for continued assessment of current and historic ranges as well as other hazards on state-selected lands.

Finally, DNR provides page-specific comments below:

Comment Number	Page	Comment
1	3-174	We request clarification for the statement: "fires may be allowed to burn off post when there are no risks to people or property." Fires burning off post are under the State of Alaska's protection area. Even if the fires are burning in a limited management option, such as would be the case north of the DTAW, the State monitors those fires very closely because chinook winds from the Alaska Range can quickly push fires toward communities.
2	4-58	Under the "no action alternative" the draft LEIS states that "the risk of wildfire resulting directly from the military use of the withdrawn lands would no longer exist." Certainly, the risk of wildfire would be significantly reduced but the presence of unexploded ordnance (UXO) within the impact area would still pose an ignition risk. The LEIS should disclose this risk in the no-action alternative.
3	4-61	Regarding forest fuels management: Historically there was no way to spend money off the installation for mitigation of wildfire to protect communities and values on the landscape. Since the 2019 Oregon Lakes fire, the BLM has provided the State with fuels money, through the Good Neighbor Authority, to create fuel breaks and access/egress points on State land to fight fires that spread off military land. This program has worked well and improved the relationship between the Army, BLM, and the State. If the preferred alternative (Alternative 1) is selected, it would be beneficial to continue to fund the fuels projects through the Good Neighbor Authority.
4	4-16	Regarding the transportation section under Alternative 1: This scenario may include some additional military traffic on State land to access inaccessible sections of military land.

Sincerely,

Marcella Dent

Natural Resources Specialist

marcellaBot

Governmental Coordination Unit



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

1200 Sixth Avenue, Suite 155, 14-D12 Seattle, WA 98101-3144

REGIONAL ADMINISTRATOR'S DIVISION

July 11, 2023

Matt Sprau
Directorate of Public Works
ATTN: AMIM–AKP–E (M. Sprau)
1046 Marks Road #4500
Fort Wainwright, Alaska 99703–4500

Dear Matt Sprau

The U.S. Environmental Protection Agency has reviewed the Department of Army, U.S. Army Garrison - Alaska's Draft Legislative Environmental Impact Statement Addressing Public Law 106–65 Land Withdrawal Extension near Fort Wainwright, Fairbanks North Star Borough, Alaska (CEQ No. 20230062, EPA Project Number 21-0055-USA). EPA has conducted its review pursuant to the National Environmental Policy Act and our review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to EPA and requires EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirements.

The DLEIS evaluates the environmental impacts associated with extending land withdrawal of the Yukon Training Area, the Donnelly Training Area East, and the Donnelly Training Area West for 25 years or more. These training areas are federal lands managed by the Bureau of Land Management. Congress has withdrawn and reserved these lands for military use pursuant to Public Law 106-65. The LEIS will inform proposed legislation provided to Congress regarding a decision to extend land withdrawal.

In reviewing the DLEIS, EPA has identified environmental concerns and deficiencies in the NEPA analysis that should be addressed in a Final LEIS. EPA highlights the following key recommendations:

Greenhouse Gases and Climate Change Recommendations:

- Provide estimates of direct and indirect Greenhouse Gas emissions including emissions from biological sources like organic peat soils. Apply these estimates when calculating the Social Costs of GHGs.
- Evaluate mitigation measures, including enhanced energy efficiency, renewable energy generation and energy storage, lower-GHG-emitting technology, carbon capture and sequestration, sustainable land management practices, carbon offsets, etc.
- Identify adaptation strategies to offset or reduce climate change related risks and hazards, and to build project resilience.

Environmental Justice Analysis Recommendations:

- Utilize EPA's EJScreen Tool as a first step in identifying and understanding areas of potential EJ concerns, which may be candidates for further review and/or outreach.
- Evaluate traditional subsistence and cultural resource impacts, affected communities, and outreach to be performed to engage these communities, which can include incorporation of traditional indigenous knowledge.

• Ensure meaningful engagement and involvement for communities with EJ concerns in agency decisions regarding this project. Consider establishing an Advisory Group to monitor and address potential EJ concerns throughout the extended land withdrawal.

The attached Detailed Comments include additional recommendations for improving the NEPA analysis that include mitigating for impacts to water and air quality, hazardous materials and contaminated areas, reporting on accidental spills and providing for adaptive management and resilience of military infrastructure.

Thank you for the opportunity to review the DLEIS for this project. If you have any questions about this review, please contact Mark Jen in the Anchorage, Alaska Office at (907) 271-3411 or at jen.mark@epa.gov or me at (206) 553-1774 or at chu.rebecca@epa.gov.

Sincerely,

Rebecca Chu, Chief Policy and Environmental Review Branch

U.S. Environmental Protection Agency Detailed Comments on the Public Law 106–65 Land Withdrawal Extension Draft Legislative Environmental Impact Statement Fort Wainwright, Alaska

July 2023

Programmatic NEPA Reviews

The DLEIS¹ analyzes actions occurring within the withdrawn lands at a qualitative level due to the large scale and wide range of current and ongoing training actions that occur at the Yukon Training Area, Donnelly Training Area East and the Donnelly Training Area West (collectively "Training Areas"). New types of training and management measures will likely be needed as the military responds to changing conditions around the world, but will not be analyzed in this DLEIS. These activities will be the subject of separate NEPA analysis when proposed actions are described well enough to be analyzed.

As the DLEIS appears to represents a programmatic NEPA review, EPA recommends reviewing the Council on Environmental Quality's *Guidance on the Effective Use of Programmatic NEPA Reviews*², which describes how programmatic NEPA reviews can be utilized for proposed plans or projects for which future decisions on proposed actions can be evaluated either based on subsequent NEPA reviews (e.g., categorical exclusions or environmental assessments) tiered³ to the programmatic EIS or the information and analysis incorporated by reference⁴ or as an Appendix.⁵

Final LEIS

The DLEIS indicates that the Army will not issue a Record of Decision following completion of the LEIS. Instead, the Army and the U.S. Department of Interior/Bureau of Land Management will prepare and submit draft legislation to Congress. ⁶ CEQ requires that a LEIS is to be included in an agency's recommendation or report on a legislative proposal to Congress and considered part of the formal transmittal, which may be transmitted up to 30 days later in order to allow time for completion of an accurate statement (i.e., Final LEIS) that can serve as the basis for public and Congressional debate. The Army can also decide to prepare a Final LEIS. ⁷ EPA recommends and encourages the Army to prepare a FLEIS that addresses public comments on the DLEIS and provides meaningful public disclosure, involvement, and comment consistent with CEQ requirements. ⁸

Range of Alternatives

The DLEIS indicates that the Proposed Action, which is the withdrawal for 25 years or for a longer period (to include an indefinite withdrawal) will be treated as a single action alternative, as the management and uses of the withdrawn lands would be the same for either duration. ⁹ The range of

¹ DLEIS; Page 1-18.

² Council on Environmental Quality (December 18, 2014). *Guidance on Effective Use of Programmatic NEPA Reviews*. Accessible at: https://www.energy.gov/nepa/downloads/final-guidance-effective-use-programmatic-nepa-review. Accessed July 10, 2023.

³ 40 CFR § 1502.20. Tiering

⁴ 40 CFR § 1502.21. Incorporation by reference. (Information incorporated by reference should be "reasonably available" to the public for consideration during review and comment periods.

⁵ 40 CFR § 1502.18. Appendix.

⁶ DLEIS; page x.

⁷ 40 CFR § 1506.8. Proposals for Legislation.

⁸ 40 CFR §§ 1503.1 and 1506.11.

⁹ DLEIS; page 1-1.

alternatives should cover a full spectrum¹⁰ and present the environmental impacts of the proposed action and the alternatives in comparative form based on the information and analysis presented in the affected environment and the environmental consequences.¹¹ EPA recommends the FLEIS evaluate the Proposed Action (withdrawal for 25 years) and an additional Action Alternative (indefinite withdrawal) to compare with the No Action Alternative, which serves as the baseline enabling decision-makers and the public to compare the magnitude of environmental effects.

Cumulative Effects

EPA has developed guidance on the assessment of cumulative impacts, *Consideration of Cumulative Impacts in EPA Review of NEPA Documents*¹². In addition, CEQ has guidance to federal agencies on *Considering Cumulative Effects Under the National Environmental Policy Act.*¹³ EPA recommends the FLEIS include a cumulative effects analysis that: identifies resources that may be adversely impacted during the Proposed Action; discusses the appropriate geographic area (within natural ecological boundaries); evaluates past, present, and reasonably foreseeable future actions that have been affected, are affecting, or would affect resources of concern; describes a benchmark or baseline; and includes scientifically defensible threshold levels. Include in the cumulative effect analysis consideration of impacts both within and outside the Training Areas.

Hazardous and Toxic Materials

The DLEIS identifies the hazardous and toxic materials used during training activities on the withdrawn lands to include petroleum, oil and lubricants (POLs), solvents, paint, batteries, and other chemicals. ¹⁴ The public may have concerns regarding the risk of accidental releases of hazardous and toxic materials to the environment. EPA recommends the FLEIS disclose the safety data sheets and/or the list of hazardous chemicals and annual inventory report of known hazardous chemicals transported, stored, managed, used, and/or disposed in the Training Areas. In addition, identify and describe mitigation measures that would be taken to minimize the risks of accidental releases of hazardous and toxic materials, and the emergency response measures that would be taken should an accidental release occur.

Reporting Spills

EPA recommends the FLEIS identify all military personal engaged with military training activities within the Training Areas be aware that accidental spills must be reported to the State of Alaska¹⁵ and the EPA National Response Center. ¹⁶ EPA recommends the FLEIS identify the number spills reported and the volume of the spills occuring in the Training Areas during the past 25 years to summarize the types of accidental spills that occur during military activities on the withdrawn lands. This information would support improved planning, management, and response actions to accidental spills.

Toxic Release Inventory

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¹⁰ Council on Environmental Quality (1981). Forty Most Asked Questions Concerning the CEQ's National Environmental Policy Act Regulations. Question 1b. Range of Alternatives. Accessible at: https://www.energy.gov/nepa/articles/forty-most-asked-questions-concerning-ceqs-national-environmental-policy-act. Accessed on July 10, 2023.

^{11 40} CFR § 1502.14.

¹² EPA. Consideration of Cumulative Impacts in EPA Review of NEPA Documents. Accessible at: https://www.epa.gov/sites/default/files/2014-08/documents/cumulative.pdf. Accessed on July 5, 2023.

¹³ Council on Environmental Quality (January 1997). Considering Cumulative Effects Under the National Environmental Policy Act. Accessible at: https://ceq.doe.gov/docs/ceq-publications/ccenepa/exec.pdf. Accessed on July 5, 2023.

¹⁴ DLEIS; page 3-67.

¹⁵ ADEC Spill Reporting. Accessible at: https://dec.alaska.gov/spar/ppr/spill-information/reporting/. Accessed on July 10, 2023

¹⁶ EPA National Response Center. Accessible at: https://www.epa.gov/emergency-response/national-response-center. Accessed on July 10, 2023.

The Emergency Planning and Community Right-to-Know Act Toxic Release Inventory (TRI) program provides the public with information about toxic chemicals in the community. EPA recommends the FLEIS include the annual TRI reporting information specific to the Training Areas and the withdrawn lands to inform the public and decision-makers regarding past releases of hazardous and toxic materials.

Contaminated Areas

The long-term military training and related activities in the withdrawn lands could result in contamination of certain areas. EPA recommends the FLEIS include an inventory and/or summary and identify the locations on a map of the current areas that may potentially be contaminated to serve as a baseline for the next 25 years. EPA recommends the FLEIS identify short and long-term plans to collect, sample, and monitor the soils, surface and groundwater within the areas of contamination, and to evaluate potential risks to human health and the environment. This monitoring information would support future clean-up and/or decontamination efforts in these contaminated areas.

Water Quality Resources

Per- and Polyfluoroalkyl Substances (PFAS)

The Government Accountability Office has identified elevated levels of two emerging contaminants found in firefighting foam, Perfluorooctane sulfonate (PFOS) and Perfluorooctanoic acid (PFOA), in drinking water at or near military installations. ¹⁷ PFAS refers to a class of man-made chemicals, including PFOS and PFOA, which are long lasting, move and persist in the environment, and breaks down very slowly over time. Certain fire extinguishing foam, known as aqueous film-forming foam (AFFF) contain PFAS, as well as other commercial and industrial products, may result in potential release of PFAS-containing materials into the environment (e.g., air, soils, subsistence foods, etc.) and migrate through surface water and groundwater.

EPA recommends the FLEIS discuss and evaluate these emerging contaminants (e.g., PFOS, PFOA, perchlorate, RDX5, and nitroglycerin); identify products containing PFAS used in the Training Areas; how they may pose risks to human health through exposure (e.g., skin absorption, drinking water, and/or consumption of subsistence foods) and to the environment within and outside the Training Areas. In addition, EPA recommends the FLEIS include mitigation measures to reduce potential risks, such as identifying alternatives to AFFF (e.g., PFAS free fire suppression agents, etc.) and incorporating long-term monitoring of soils, and surface and groundwater to evaluate the level of potential contamination, extent of migration, and persistence in the environment.

Sampling and Monitoring Network

Due to the potential for contamination of surface and groundwater, and soils from the Proposed Action, EPA recommends establishing a long-term water quality sampling and monitoring station network to collect water quality samples at least annually to develop baseline information and evaluate changes in water quality in surface waters and groundwaters over the Proposed Action timeframe. In particular, include long-term monitoring of streams, rivers, and lakes that are identified on the Alaska Department of Fish and Game's anadromous waters catalog and those that are seasonally stocked for recreational fishing. In addition, macroinvertebrate monitoring may serve as biological indicators of water quality degradation and fish habitat conditions. EPA also recommends biological monitoring of fish, wildlife, vegetation, etc. (e.g., tissue sampling and testing) to evaluate potential long-term bioaccumulation of contaminants in subsistence resources and the potential risk of human exposure through consumption.

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¹⁷ U.S. General Accountability Office (October 2017). Report to Congressional Committees: Drinking Water - DOD Has Acted on Some Emerging Contaminants but Should Improve Internal Reporting on Regulatory Compliance. GAO-18-79. Accessible at: https://www.gao.gov/assets/gao-18-78.pdf. Accessed on July 5, 2023.

Listed Bird and Wildlife Species

The proposed military activities within the Training Areas may affect species listed under the Endangered Species Act. The withdrawn lands lie within the Pacific Flyway, a major water fowl migration route. Certain species are protected under the Migratory Bird Treaty Act. In particular, the Training Areas provide important rearing, feeding, breeding, and nesting habitat for migratory birds.

EPA recommends the FLEIS include a list of ESA and MBTA listed species – endangered, threatened, and/or candidate and designated Critical Habitat, if any, which may require formal consultation under Section 7 of the ESA with the U.S. Fish and Wildlife Service. Include the Biological Assessment, Biological Opinion, and/or formal consultation and/or concurrence for the listed species in the FLEIS, if available. Identify important nesting and breeding periods within the Training Areas to avoid conflicts between migratory birds and active land based military training, active aircraft flyovers, and other activities to ensure their protection. Based on the ESA consultation and/or coordination with the Services (USFWS and NMFS), include conservation measures to avoid and minimize adverse impacts to listed species. EPA recommends the FLEIS identify and discuss opportunities to support the recovery of the listed species.

Air Quality

National Ambient Air Quality Standards (NAAQS) Emissions

The NAAQS include six criteria pollutants, such as carbon monoxide, sulfur oxides, nitrogen oxides, particulate matter (2.5 and 10 microns), ozone, and lead. EPA recommends the FLEIS include a detailed discussion of ambient air conditions (baseline conditions), NAAQS, and criteria pollutant non-attainment areas in the analysis area and vicinity. EPA recommends the FLEIS include quantitative emissions estimates of NAAQS criteria pollutants for specific pollutant sources, such as mobile (land and air), stationary, and ground disturbances, etc. to inform the public and decision-makers. Include an emissions inventory of all stationary and mobile emissions sources, fugitive dust sources, etc. used in the NAAQS emissions estimates, including sources associated with the transportation of military assets by air, highway, railroad, etc. to and from the Training Areas. Summarize and compare the NAAQS emissions estimates for the Proposed Action to the No Action Alternative.

Non-Attainment and Maintenance Areas

Since December 2009, a portion of the Fairbanks North Star Borough, including the City of Fairbanks and the City of North Pole, is designated as a Nonattainment Area for Particulate Matter 2.5 (PM_{2.5} - particulate matter with a diameter of 2.5 microns or less). Emissions sources include wood stoves, burning distillate oil, industrial sources, and mobile emissions which contribute to particulate pollution and is a primary concern during the winter months (October through March) when extremely strong temperature inversions are frequent and human-caused air pollution impacts increase. The urban portion of the FNSB was designated a nonattainment area for carbon monoxide in 1990. In 2004, the area was redesignated to attainment and is considered a carbon monoxide maintenance area in the State Implementation Plan.

EPA recommends the FLEIS evaluate the Proposed Action's impacts to the FNSB's nonattainment area for particulate matter and maintenance area for carbon monoxide to human health and the environment. Identify and evaluate mitigation measures to ensure that military actions associated with the Proposed Action are consistent with the SIP. EPA recommends the FLEIS discuss anticipated coordination and planning efforts with various federal and state agencies (e.g., ADOT&PF, ADEC, etc.), City of Fairbanks and North Pole, and the FNSB, Tribes, and other organizations to ensure compliance with the

NAAQS, the non-attainment and maintenance areas. Include identification of the potential effects from air pollutants, including air toxics, to military personnel, ground crews, nearby residents, businesses, and any sensitive receptor locations, such as, schools, and outdoor recreation areas (e.g., state parks, public lands, etc.).

The DLEIS indicates that the Proposed Action would result in a continued (but not necessarily increased) level of troop, equipment, and material transit through the FNSB non-attainment and maintenance areas. EPA recommends the FLEIS include an air quality analysis, which could include hotspot air quality modeling to identify appropriate mitigation measures and areas in need of the greatest attention. Include an Equipment Emissions Mitigation Plan that identifies actions to reduce diesel particulate, carbon monoxide, hydrocarbons, and oxides of nitrogen (NOx) associated with armor, infantry, and aviation missions.

Fugitive Dust

Military training, transportation of military assets, and other related activities would contribute to fugitive dust emissions within and outside the Training Areas, which have the potential to adversely affect human health and the environment. Fugitive dust includes particulate matter that is generated or emitted from open air operations (emissions that do not pass through a stack or a vent). Particular matter is classified as one of the six criteria pollutants and consists of solid particles and liquid droplets suspended in the air.

Fugitive dust and particulate matter emissions reduce visibility, create "haze", cause aesthetic property damage, and impact surface waters, and can contribute to hazardous driving conditions and interfere with scenic views. Fugitive dust have been linked to asthma, emphysema, chronic obstructive pulmonary disease, chronic bronchitis, and heart disease.

EPA recommends the FLEIS include evaluation of fugitive dust emissions to human health and the environment, and identify mitigation measures to avoid and/or minimize such emissions through the development of a Fugitive Dust Control Plan for all aspects of fugitive dust emission sources and activities associated with the Proposed Action within and outside the Training Areas.

Greenhouse Gases and Climate Change

GHG and Climate Change Guidance

On January 9, 2023, Council on Environmental Quality published interim guidance to assist federal agencies in assessing and disclosing climate change impacts during environmental reviews. ¹⁸ CEQ developed this guidance in response to E.O. 13990 on *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis*. ¹⁹ CEQ indicated that agencies use this interim guidance to inform the NEPA review for all new proposed actions and may use it for evaluations in process, as agencies deem appropriate, such as informing the consideration of alternatives or helping address comments raised through the public comment process. EPA recommends the FLEIS apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues.

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https://www.federalregister.gov/documents/2023/01/09/2023-00158/national-environmental-policy-act-guidance-on-consideration-of-greenhouse-gas-emissions-and-climate. Accessed on June 27, 2023.

¹⁸ Council on Environmental Quality (January 9, 2023) National Environmental Policy Guidance on Consideration of Greenhouse Gas Emissions and Climate Change. Accessible at:

¹⁹ Executive Order 13990 (January 20, 2021). Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. 86 FR 7037. Accessible at: https://www.federalregister.gov/documents/2021/01/25/2021-01765/protecting-public-health-and-the-environment-and-restoring-science-to-tackle-the-climate-crisis. Accessed on June 27, 2023.

GHG Emissions

CEQ has compiled GHG estimating tools and related resources for estimating GHG emissions. ²⁰ NEPA requires federal agencies to analyze and consider the climate change effects prior to making decisions. Estimating GHG emissions or the reduction in emissions is a key element in considering the relationships between the Proposed Action and climate change. EPA recommends the FLEIS consider these GHG tools and resources to estimate GHG emissions for the Proposed Action and the No Action Alternative, as appropriate.

On April 13, 2023, EPA released the 30th Annual Inventory of U.S. Greenhouse Gas Emissions and Sinks, which presents a national-level overview of annual greenhouse gas emissions from 1990 to 2021.²¹ The GHG Inventory covers seven key greenhouse gases: carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride. EPA recommends the FLEIS quantify both the direct and indirect GHG emissions for the Proposed Action and the No Action Alternative based on the recently released GHG Inventory, as appropriate. Include GHG emissions associated with the past 25 years of military activities, training, mobilization/demobilization of assets, equipment, aircrafts, etc. to serve as the baseline (No Action Alternative) and compare these estimates to Proposed Action (next 25 years). The quantification should include both annual average GHG emissions as well as cumulative total over the next 25 years or more land withdrawal.

Biological Sources

The withdrawn lands are underlain by discontinuous permafrost soils, which can vary in thicknesses from less than one foot to more than 150 feet. Numerous training ranges, test centers, impact areas and drop zones on the withdrawn lands overlap areas underlain by permafrost. Ranges and facilities closer to surface waters such as the Delta River and developed areas such as the Fort Greely cantonment area are more likely to have greater variability in underlying permafrost.²²

Peat soils store large amounts of organic matter and function as sources and sinks for GHGs.²³ Emissions from drained peatlands are estimated at 1.9 gigatons of CO₂-e annually.²⁴ The Proposed Action would result in disturbance to organic peat soils. EPA recommends the FLEIS include quantitative estimates of GHG emissions (CO₂-e) from the disturbance of peat soils. Include estimates of peat as biological sources of GHG emissions to the overall summary estimates comparing the Proposed Action to the No Action Alternative.

Social Costs of GHGs (SC-GHG)

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²⁰ Council on Environmental Quality GHG Tools and Resources. Accessible at: https://ceq.doe.gov/guidance/ghg-tools-and-resources.html. Accessed on June 27, 2023.

²¹ U.S. Environmental Protection Agency (2023). Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990 – 2021. EPA 430-R-23-002. Accessible at: https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2021. Accessed on June 27, 2023.

²² DLEIS; Page 3-106.

²³ International Peatland Society. Accessible at https://peatlands.org/peatlands/peatlands-and-climate/. Accessed on June 27, 2023.

²⁴ International Union for Conservation of Nature (November 2021). Issues Brief. Peatlands and Climate Change. Accessible at: https://www.iucn.org/sites/default/files/2022-04/iucn_issues_brief_peatlands_and_climate_change_final_nov21.pdf. Accessed June 27, 2023.

EPA recommends the FLEIS include monetization of the incremental GHG emissions of the Proposed Action by applying the social cost of greenhouse gases (SC-GHG).²⁵ Agencies should use estimates of the SC-GHG that reflect the best available science and methodologies to monetize the value of net changes in direct and indirect GHG emissions resulting from the Proposed Action. The SC-GHG estimates provide decision-makers and the public with meaningful information on the impacts of the project's GHG emissions for comparison with the No Action Alternative. This type of comparative analysis would illustrate the costs and benefits to society associated with the Proposed Action, and the significance of GHG emissions and climate change effects.

GHG Reduction Strategy and Goals

EPA recommends the FLEIS report and evaluate GHG emissions in the context of the national GHG emission reduction strategy for net-zero GHG emissions by 2050 and comparison to relevant reduction goals and targets. In addition, EPA recommends consideration and evaluation of alternatives and mitigation measures to avoid, minimize, and/or compensate for GHG emissions and climate change effects when those measures are reasonable and consistent with achieving the purpose and need for the project. Mitigation measures could include enhanced energy efficiency, renewable energy generation and energy storage, lower-GHG-emitting technology, carbon capture and sequestration, sustainable land management practices, carbon offsets, etc.

Climate Adaptation and Resilience

DOD reports climate change will continue to degrade installations and infrastructure, increase health risks to our service members, and could require modifications to existing and planned equipment.²⁶

Consistent with DOD's *Climate Adaptation Plan*, EPA recommends the FLEIS include an analysis of climate impacts to infrastructure, installations, equipment, operations, etc. associated with Proposed Action activities on the withdrawn lands. Consider and evaluate climate hazards including changes in temperature regimes, extreme heat, storm events, heavy precipitation, flooding, droughts, wildfires, etc. Additionally, identify mitigation measures and adaptation strategies to offset or reduce these climate change related risks and hazards, and to incorporate climate resilience into the Proposed Action.

Environmental Justice

On April 21, 2023, E.O. 14096 on Revitalizing Our Nation's Commitment to Environmental Justice for All²⁷ was issued to build upon E.O. 12898 on Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, ²⁸ and directs federal agencies to make achieving EJ part of its mission. This includes NEPA environmental reviews that contains actions to identify, analyze, and as available and appropriate, consider adopting or requiring mitigation measures to avoid, minimize, or mitigate disproportionate and adverse human health and environmental effects, including risks and hazards of federal

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²⁵ Interagency Working Group on Social Cost of Greenhouse Gases, United States Government (February 2021). Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates under Executive Order 13990. Accessible at: https://www.whitehouse.gov/wp-content/uploads/2021/02/TechnicalSupportDocument. SocialCost of Carbon Methane Nitrous Oxide pdf. Accessed on June 27

<u>content/uploads/2021/02/TechnicalSupportDocument_SocialCostofCarbonMethaneNitrousOxide.pdf.</u> Accessed on June 27, 2023.

²⁶ Department of Defense (September 1, 2021). Climate Adaptation Plan. Report Submitted to the National Climate Task Force and Federal Chief Sustainability Officer. Accessible at: https://www.sustainability.gov/pdfs/dod-2021-cap.pdf. Accessed on July 5, 2023.

²⁷ Executive Order 14096 (April 21, 2023). *Revitalizing Our Nation's Commitment to Environmental Justice for All* (88 FR 25251). Accessible at: https://www.federalregister.gov/documents/2023/04/26/2023-08955/revitalizing-our-nations-commitment-to-environmental-justice-for-all. Accessed on June 28, 2023.

²⁸ Executive Order 12898 (February 11, 1994). Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (59 FR 7629). Accessible at: https://www.govinfo.gov/content/pkg/FR-1994-02-16/html/94-3685.htm. Accessed June 28, 2023.

activities on communities with EJ concerns, such as communities of color, Tribes, and low-income, underserved and vulnerable populations. Evaluating impacts to communities with EJ concerns includes consideration of the direct, indirect, and cumulative effects of environmental and other burdens already experienced by such communities (e.g. climate change-related risks, exposure to pollution, or other environmental hazards). The NEPA process provides for early and meaningful public engagement and involvement of communities with EJ concerns in agency decision-making.

In March 2016, the Federal Environmental Justice Interagency Working Group developed the *Promising Practices for EJ Methodologies in NEPA Reviews*, ²⁹ which includes a compilation of methodologies of integrating EJ considerations throughout the NEPA process as summarized from current agency practices. Consistent with the report, EPA recommends the NEPA document describe how to identify where EJ concerns exist within the project area and how to analyze the direct, indirect, and cumulative impacts from the project (including any impacts from local pollution, disproportionate impacts from climate change, and socioeconomic impacts). EPA recommends the following additional resources for incorporating EJ into the NEPA analysis:

- CEQ Environmental Justice Guidance Under the National Environmental Policy Act. 30
- EPA Guidance for Incorporating EJ Concerns in EPA's NEPA Compliance Analysis. 31
- EPA Guidance for Consideration of Environmental Justice in Clean Air Act 309 Reviews. 32

EJ Screening Tool

To identify where EJ concerns may exist within the proposed project area, EPA recommends utilizing the EPA EJ Screening and Mapping Tool, Version 2.2 (EJScreen Tool).³³ The EJScreen Tool is a useful first step in identifying EJ communities and understanding areas of potential EJ concerns, which may be candidates for further EJ review or outreach. Areas of impact can be a single block group or span across several block groups and communities. EPA considers a project to be in an area of potential EJ concern when an EJScreen Tool analysis for the project area shows one or more of the thirteen EJ Indexes is at or above the 80th percentile in the nation and/or the state.

As the EPA EJScreen Tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location and/or proposed project, consider additional information in an EJ analysis to supplement the EJScreen Tool outputs. Further review and/or outreach to the EJ communities may be necessary to complete the NEPA analysis. In addition, BLM has developed a web-based EJ analysis tool, which may provide additional information to complement the EPA EJScreen Tool outputs.

Meaningful Community Engagement and Involvement

E.O. 14096 requires the consideration of meaningful public engagement and involvement in agency decision-making under NEPA. This includes, and is not limited to: sharing of information and

²⁹ Federal Interagency Working Group on Environmental Justice & NEPA Committee (March 2016). Promising Practices for EJ Methodologies in NEPA Reviews (March 2016). Accessible at: https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf. Accessed on June 28, 2023.

³⁰ Council on Environmental Quality (December 10, 1997). Accessible at: https://ceq.doe.gov/docs/ceq-regulations-and-guidance/regs/ej/justice.pdf. Access on June 28, 2023.

³¹ U.S. EPA/Office of Federal Activities (April 1998). Guidance for Incorporating EJ Concerns in EPA's NEPA Compliance Analysis. Accessible at: https://www.epa.gov/sites/default/files/2015-02/documents/ej_guidance_nepa_epa0498.pdf. Accessed on June 28, 2023.

³² U.S. EPA/Office of Federal Activities (July 1999). Final Guidance for Consideration of Environmental Justice in Clean Air Act 309 Reviews. Accessible at: https://www.epa.gov/sites/default/files/2014-08/documents/enviro_justice_309review.pdf. Accessed on June 28, 2023.

³³ EPA EJ Screening and Mapping Tool. Accessible at: https://www.epa.gov/ejscreen. Accessed on June 28, 2023.

identifying and addressing barriers to participation; fully considering public input; seeking out and encouraging involvement by potentially affected communities, such as those related to disability, language access, and lack of resources; and providing technical assistance, tools, or other resources to facilitate participation.

EPA recommends the FLEIS include additional information describing how E.O. 14096 is being integrated into the Proposed Action and NEPA analysis to identify and address communities with EJ concerns; inform communities about the project and the potential impacts; input received to date from the communities; and how that input will be used in agency decision-making.

DOD's EJ Strategy includes goals to improve opportunities for communities with EJ concerns to participate in, and have access to, information on policies and practices that affect human health and the environment.³⁴ These goals include identifying stakeholder groups and their EJ concerns and interests; encouraging stakeholder participation in the implementation of the E.O.; improving existing outreach and communication systems to include EJ stakeholders; enhancing existing, or as appropriate, developing new mechanisms to encourage stakeholder participation in DOD activities that affect human health and the environment; and providing translation of crucial public documents and conducting interpretation of hearings, where practicable and appropriate. EPA recommends the FLEIS incorporate DOD's EJ goals to address meaningful community engagement and involvement with EJ communities for this Proposed Action.

EPA recommends the FLEIS consider a mitigation measure to monitor for EJ concerns during active military activities and operations, and implement adaptive management strategies to address EJ concerns, where possible. EPA recommends the FLEIS consider the establishment of an EJ Citizen's Advisory Group to include impacted local communities to monitor and address potential EJ concerns throughout the extension of the withdrawn lands. Consider involving the EJ Citizen's Advisory Group in evaluating studies and reports regarding the subsistence and cultural resources, and to discuss other matters, as appropriate, providing technical assistance, tools, or other resources to facilitate participation.

Subsistence and Cultural Resources

The Training Areas includes areas that supports subsistence and cultural resources. EPA recommends the FLEIS examine the potential impacts to subsistence and cultural resources and discuss how to avoid and/or mitigate potential adverse effects, especially to tribal communities that have been historically overburdened and unrepresented. EPA recommends the FLEIS include anticipated subsistence and cultural resource impacts, impacted communities, and outreach to be performed to engage these communities, which can include traditional indigenous knowledge. EPA recommends the FLEIS describe how cultural resources impacts will be identified, managed, and protected, and how communities can access information related to those activities.

Pursuant to the National Historic Preservation Act of 1966 and the Alaska Historic Preservation Act of 1971, EPA recommends coordinating with the Alaska State Historic Preservation Office to identify, preserve, protect, and interpret the state's cultural, historic, and archaeological resources that may be impacted by the Proposed Action on the withdrawn lands. Disclose the results of the coordination efforts with SHPO in the FLEIS. Identify the need for a Programmatic Agreement between the Army and SHPO under Section 106 of the NHPA, if appropriate.

³⁴ Department of Defense (March 24, 1995). Strategy on Environmental Justice. Accessible at: https://www.denix.osd.mil/ej/denix-files/sites/95/2023/04/DoD-Environmental-Justice-Strategy-24-Mar-1995 508.pdf. Accessed on July 5, 2023.

<u>Indigenous Knowledge</u>

On November 30, 2022, the White House published Guidance on Indigenous Knowledge.³⁵ EPA recommends the FLEIS include the identification, inclusion, and integration of Traditional Indigenous Knowledge into the NEPA analysis, where appropriate. The guidance includes promising practices to apply when considering indigenous knowledge in decision-making processes. Indigenous Knowledge can include the collection of local and traditional knowledge concerning the affected environment, anticipated impacts from the Proposed Action, as well as traditional hunting and land use patterns in the area. In addition to reviewing any pertinent traditional indigenous knowledge currently available, additional studies and outreach may be conducted as necessary to clearly identify concerns and potential impacts, including cumulative impacts, from the Proposed Action.

Tribal Consultation and Coordination

EPA encourages the Army to consult and coordinate with all potentially affected Tribes in the area, and incorporate feedback from the Tribes when making decisions regarding the project. EPA recommends the FLEIS describe the issues raised during the consultations and how those issues were addressed through additional mitigation and monitoring measures, if applicable.

Monitoring and Adaptive Management

The Proposed Action extends the public land withdrawal for 25 years or longer. EPA recommends that the extension include annual environmental/human health monitoring and reporting requirements to assess effectiveness and ensure compliance with the mitigation and conservation measures; including an adaptive management program to adjust the actions as needed to achieve the environmental objectives. EPA also recommends that the annual reports evaluate and discuss the short-term (5 years) and long-term (25-years) cumulative effects resulting from military activities within the Training Areas, and that the reports be made available to the public.

EPA recommends the FLEIS include any lessons learned from the past 25-years of military training/activities within the Training Areas regarding evaluation of resource impacts, which account for new challenges, such as climate change, and can influence future stewardship and management of the Training Areas and mitigation measures implemented to reduce impacts.

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³⁵ Office of the President, Office of Science and Technology Policy, Council on Environmental Quality (November 30, 2022). Memorandum for Heads of Federal Departments and Agencies, *Guidance for Federal Departments and Agencies on Indigenous Knowledge*. Accessible at: https://www.whitehouse.gov/wp-content/uploads/2022/12/OSTP-CEQ-IK-Guidance.pdf. Accessed on July 5, 2023.



United States Department of the Interior

OFFICE OF THE SECRETARY Washington, DC 20240

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July 12, 2023

IN REPLY REFER TO: ER 23/0193

Matt Sprau
Environmental Planning Branch Chief
Directorate of Public Works
ATTN: AMIM-AKP-E (M. Sprau)
1046 Marks Road #4500
Fort Wainwright, AK 99703-4500

Subject: Draft Legislative Environmental Impact Statement Addressing Land Withdrawal

Extension at Fort Wainwright, Alaska

Dear Matt Sprau:

The Department of the Interior (Department) has reviewed the Draft Legislative Environmental Impact Statement Addressing Land Withdrawal Extension at Fort Wainwright, Alaska prepared by the Department of the Army (Army). The Department has general comments and recommendations for consideration when the Army prepares environmental analysis for its own future actions, and when it conducts each required 5-year review and updates Fort Wainwright's Integrated Natural Resource Management Plan (INRMP), as required by the Sikes Act. The U.S. Fish and Wildlife Service (FWS) is the Department's lead agency for the INRMP review, and specific comments will be directed to the Army by the FWS during INRMP reviews.

The Department offers the following recommendations for consideration to aid in avoiding and minimizing potential environmental impacts to trust resources in the three Fort Wainwright training areas currently withdrawn from the public under Public Law 106-65 for military use in interior Alaska, and for which the Army has requested extension of the withdrawal.

- Environmental assessments should cover the overall area of impact, rather than just those areas immediately surrounding the training areas. The area of impact should extend to include relevant trans-boundary issues where natural and cultural resources are also present outside the withdrawal area. Specific attention should be given to avoiding impacts to the Chena River and chinook salmon spawning and rearing habitat.
- Additional data collection, especially monitoring data, would improve the environmental
 assessments for future Army actions on the installation. Spatial and temporal sampling for
 contaminants and pollutants do not appear robust enough to support necessary analyses for
 on-the-ground actions, especially regarding groundwater. We recommend designating areas

¹ The Sikes Act of 1960, 16 USC §670a-670f.

of influence more specific to potential impacts and based on contaminant migration characteristics, as well as more comprehensive consideration of potential sources of contaminants. Additionally, more complete surface water mapping would contribute to improved assessments.

• Identification and assessment of the impacts of tenant activities should be considered. These activities may include construction and maintenance of infrastructure, defense-related training and testing activities, mineral extraction (if any), authorized recreation activities, pesticide application, etc.

The Department appreciates efforts to delineate bald and golden eagle nests and nesting habitat, as well as the Army's survey and monitoring efforts for other migratory birds and their associated habitats.

Thank you for the opportunity to review and comment. We would welcome an opportunity to discuss our comments. For questions or further information regarding this response, please contact Louis Brueggeman at 202-208-7116, louis_brueggeman@ios.doi.gov, or Bob Henszey at bob henszey@fws.gov.

Sincerely,

Stephen G. Tryon
Director
Office of Environmental Policy and
Compliance

Electronic distribution: usarmy.wainwright.id-pacific.mbx.lwe-leis@army.mil

From: Roed, Melanie S CIV USARMY IMCOM PACIFIC (USA)

To: <u>Holfus, Corinna</u>; <u>Munro, David</u>

Cc: Sprau, Matthew H CIV USARMY IMCOM PACIFIC (USA)

Subject: FW: LEIS comments

Date: Monday, July 24, 2023 1:38:57 PM

Hello Corinna & David,

Okay, here's the straggler comments. Little bit strange in the wording that these aren't ADF&G, evidently they're personal then? Matt chime in if you have some thought on this, otherwise feel free to reach out if you'd like clarification.

Thank you, Melanie

From: Baker, Brandy L (DFG)
 sbrandy.baker@alaska.gov>

Sent: Monday, July 24, 2023 6:52 AM

To: Sprau, Matthew H CIV USARMY IMCOM PACIFIC (USA) <matthew.h.sprau.civ@army.mil> **Cc:** Roed, Melanie S CIV USARMY IMCOM PACIFIC (USA) <melanie.s.roed.civ@army.mil>

Subject: [URL Verdict: Neutral][Non-DoD Source] RE: LEIS comments

Hi Matt,

I was out Tuesday through Thursday. I don't have time to go back through the sections of the document but here's my quick short hand notes from skimming through to look for fish information 3-127 Donnelly Creek ground water. Donnelly Creek is spring fed and so is the no name creek on the opposite side of the river which grayling and other fish utilize for rearing and spawning.

3-147 add in the other stocked species of fish which can be obtained from the Alaska Lake Database.

3-61 Fisheries update the stocking information, update wild fish information, Jarvis Creek contains Arctic grayling and long nose suckers, sculpin, and the Delta River contains more fish species than

3-34 add additional lakes that are stocked.

3-113 The Delta River has tributaries.

3-116 mapping of lakes and streams information

3-122 and 123 water testing.

I am out again today through Wed and don't have time to revisit the sections to give better comments. These are not ADF&G comments since I couldn't get clarification on if the Department was coordinating with the various divisions and submitting comments.

The Delta River drainage has multiple resident species that pass through to the upper and lower sections and is an important chum salmon spawning area at the mouth down stream from the military boundary. Coho salmon also spawn in the lower section. Testing the water and ground water on the downstream boundary of the bombing area should be a priority.

Thanks, Brandy From: Sprau, Matthew H CIV USARMY IMCOM PACIFIC (USA) <matthew.h.sprau.civ@army.mil>

Sent: Friday, July 21, 2023 9:42 AM

To: Baker, Brandy L (DFG)
 brandy.baker@alaska.gov>

Cc: Roed, Melanie S CIV USARMY IMCOM PACIFIC (USA) < melanie.s.roed.civ@army.mil>

Subject: RE: LEIS comments

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Brandy,

Are you still planning on submitting comments? Our contractor is compiling the comments and would like to include ADFG's.

v/r Matt

Matthew H Sprau
Chief, Planning Branch
DPW Environmental Division
USAG Alaska

Email: matthew.h.sprau.civ@army.mil

Cell: (907) 482-7264

How am I doing?

ICE Home (disa.mil)

From: Sprau, Matthew H CIV USARMY IMCOM PACIFIC (USA)

Sent: Wednesday, July 12, 2023 2:05 PM

To: Baker, Brandy L (DFG) < <u>brandy.baker@alaska.gov</u>>

Cc: Roed, Melanie S CIV USARMY IMCOM PACIFIC (USA) < melanie.s.roed.civ@army.mil>

Subject: Re: LEIS comments

Hi Brandy,

Yes, please submit your comments. We'll need them within a week so we can get them to the contractor for inclusion.

Thanks

Matt

From: "Baker, Brandy L (DFG)" < brandy.baker@alaska.gov>

Date: Wednesday, July 12, 2023 at 3:37:26 PM

To: "Sprau, Matthew H CIV USARMY IMCOM PACIFIC (USA)" < matthew.h.sprau.civ@army.mil>

Subject: [Non-DoD Source] LEIS comments

Hi Matt,

I was unable to get clarification from our department on if there was a lead for submitting department comments.

I reviewed a couple of pages briefly and had some comments and wondering if I could submit them to you still?

Please let me know if its too late or if I can give you a couple by the end of today.

Thanks,

Brandy

Attachment 5: Comment Responses

						USAG LWE LEIS: Draft Public Comments and Responses	
No.	Name of Commenter	Affiliation	Comment Topic	Method of Submittal	Date of Submittal	Comment / Summary	Response
1	Ronald Inouye	Tanana- Yukon Historical Society	BLM Cooperating Agency	Letter	7/3/2023	The Tanana Yukon Historical Society of Fairbanks, Alaska, recommends the continued inclusion of the U.S. Bureau of Land Management in future Department of Defense decision making concerning the Yukon training Areas, and Donnelly training Areas, East and West. Bureau of Land Management personnel have historic and current "on the ground" knowledge of the lands under consideration, expertise which may otherwise not be known or lacking through intentional or inadvertent exclusive DOD subcontracting. Local familiarity with indigenous tribes and historic land and structures must be ensured. Thank you for the opportunity to comment on this important issue.	Thank you for your comment. USAG Alaska and BLM have a Memorandum of Understanding that outlines cultural resources and Government to Government responsibilities of each agency and ensures that BLM is a consulting partner for all activities. The BLM has been and will continue to be included in DoD decisions concerning the YTA and DTA training areas.
2	Marcella Dent	Alaska Department of Natural Resources (DNR)	Hazmat	Letter	7/11/2023	We agree that "cleanup and decontamination at the existing high hazard impact areas would be expensive and technologically challenging" (LEIS, p. 2-7) and that "remediation would likely take several decades. Hazardous materials would remain onsite and access to contaminated areas would be restricted, pending remediation, posing moderate adverse impacts on visitors and wildlife" (LEIS, p. xiv). Addressing these items likely cannot be completed in three years' time if the non-action alternative is chosen. Extending the current withdrawal will allow for current remedial work such as the munitions response site FTWW-008-R-01 which is not specifically mentioned in this LEIS. The site investigation report was determined to be incomplete and additional fieldwork needs to be completed. There are two areas recommended for further investigation the Blair Lakes and Carla Lakes Fire areas. Extending the withdrawal will allow for continued assessment of current and historic ranges as well as other hazards on state-selected lands.	Remediation at these sites is not contingent on the PL 106-65 action or on any Army land withdrawal. Thank you for your comment.
3	Marcella Dent	DNR	Wildfire (Section 3 page 174)	Letter	7/11/2023	We request clarification for the statement: "fires may be allowed to burn off post when there are no risks to people or property." Fires burning off post are under the State of Alaska's protection area. Even if the fires are burning in a limited management option, such as would be the case north of the DTAW, the State monitors those fires very closely because chinook winds from the Alaska Range can quickly push fires toward communities.	Section is saying that under current management, fires are monitored and those that pose a low risk to life, property, or sensitive resources may be allowed to burn subject to monitoring. Fires are managed according to Alaska's Fire Interagency Management Plan. After initial attack it is standard practice to coordinate oversight with all potentially affected land managers. The Alaska Division of Forestry and Fire Protection would be involved in any decisions that may result in fires burning off post.
4	Marcella Dent	DNR	Wildfire (Section 4 page 58)	Letter	7/11/2023	Under the "no action alternative" the draft LEIS states that "the risk of wildfire resulting directly from the military use of the withdrawn lands would no longer exist." Certainly, the risk of wildfire would be significantly reduced but the presence of unexploded ordnance (UXO) within the impact area would still pose an ignition risk. The LEIS should disclose this risk in the no-action alternative.	Thank you for your comment.
5	Marcella Dent	DNR	Wildfire (Section 4 page 61)	Letter	7/11/2023	Regarding forest fuels management: Historically there was no way to spend money off the installation for mitigation of wildfire to protect communities and values on the landscape. Since the 2019 Oregon Lakes fire, the BLM has provided the State with fuels money, through the Good Neighbor Authority, to create fuel breaks and access/egress points on State land to fight fires that spread off military land. This program has worked well and improved the relationship between the Army, BLM, and the State. If the preferred alternic (Alternative 1) is selected, it would be beneficial to continue to fund the fuels projects through the Good Neighbor Authority.	Comment noted, thank you.
6	Marcella Dent	DNR	Transportation (Section 4 page 16)	Letter	7/11/2023	Regarding the transportation section under Alternative 1: This scenario may include some additional military traffic on State land to access inaccessible sections of military land.	The USAG notifies the state prior to the use of state lands for training operations. AK DOT is notified for large convoys.
7	Stephen Tryon	U.S. Department of the Interior (DOI)	Water resources and wildlife	Letter	7/12/2023	Environmental assessments should cover the overall area of impact, rather than just those areas immediately surrounding the training areas. The area of impact should extend to include relevant trans-boundary issues where natural and cultural resources are also present outside the withdrawal area. Specific attention should be given to avoiding impacts to the Chena River and chinook salmon spawning and rearing habitat.	Thank you for your comment. The area of effect was expanded well beyond the boundaries of the training lands for resource types that extend beyond the training lands or which influence conditions beyond the training lands. The region of influence for each resource topic is described at the beginning of each subsection in Section 3. Also, although there is salmon spawning habitat in the withdrawn lands, the USAG abides by all regulations to avoid impacts.
8	Stephen Tryon	DOI	Hazmat and Water Resources	Letter	7/12/2023	Additional data collection, especially monitoring data, would improve the environmental assessments for future Army actions on the installation. Spatial and temporal sampling for contaminants and pollutants do not appear robust enough to support necessary analyses for on-the-ground actions, especially regarding groundwater. We recommend designating areas of influence more specific to potential impacts and based on contaminant migration characteristics, as well as more comprehensive consideration of potential sources contaminants. Additionally, more complete surface water mapping would contribute to improved assessments.	Due to the size of the project area and the extensive resources within it, the LEIS cannot describe all data that is being developed by the Army for specific resources. The data recommended by the commenter is included in various monitoring reports and management plans developed on an ongoing basis by the Army. All such data was provided to the preparers of the LEIS and used to develop the impact assessment.
9	Stephen Tryon	DOI	Hazmat?	Letter	7/12/2023	Identification and assessment of the impacts of tenant activities should be considered. These activities may include construction and maintenance of infrastructure, defense-related training and testing activities, mineral extraction (if any), authorized recreation activities, pesticide application, etc.	Tenant activities are considered in the preferred alternative. If the Army takes on new tenants to the training installations, or current tenants change their practices, such situations will be considered in separate, project-level NEPA studies. Tenant activities are also included in the Integrated Resources Management Plan.
10	Rebecca Chu	U.S. Environment al Protection Agency (EPA)	Greenhouse Gases and Climate Change	Letter	7/11/2023	Provide estimates of direct and indirect Greenhouse Gas emissions including emissions from biological sources like organic peat soils. Apply these estimates when calculating the Social Costs of GHGs. Evaluate mitigation measures, including enhanced energy efficiency, renewable energy generation and energy	The USAG AK is aware of the benefits that peat and forestlands provide in terms of carbon sequestration, and that much such land is found within the withdrawn area. The Army is addressing GHG emissions and climate change in coordination with other federal government agencies. The Army's existing SRP ITAM component is specifically tasked with sustainable land management including GHG considerations. USAG Alaska is committed to
11	Rebecca Chu	EPA	Greenhouse Gases and Climate Change Greenhouse Gases	Letter	7/11/2023	storage, lower-GHG-emitting technology, carbon capture and sequestration, sustainable land management practices, carbon offsets, etc. Identify adaptation strategies to offset or reduce climate change related risks and hazards, and to build project	implementing the US Army Climate Strategy (Feb 2022) as well as all other guiding U.S. Government issued polices and DoD directives.
12	Rebecca Chu	EPA	and Climate Change	Letter	7/11/2023	resilience.	Please see response to previous comment.
13	Rebecca Chu	EPA	Environmental Justice	Letter	7/11/2023	Utilize EPA's EJScreen Tool as a first step in identifying and understanding areas of potential EJ concerns, which may be candidates for further review and/or outreach.	The most recent Census data was used to identify EJ communities. This evaluation used the same methods and data to identify EJ communities as is used to develop the EJ Screen. The EJ screen tool was run and did not provide results substantially different than the method used in the LEIS to identify potential EJ communities.

						USAG LWE LEIS: Draft Public Comments and Responses	
No.	Name of Commenter	Affiliation	Comment Topic	Method of Submittal	Date of Submittal	Comment / Summary	Response
14	Rebecca Chu	EPA EPA	Environmental Justice	Letter	7/11/2023	Evaluate traditional subsistence and cultural resource impacts, affected communities, and outreach to be performed to engage these communities, which can include incorporation of traditional indigenous knowledge. Ensure meaningful engagement and involvement for communities with EJ concerns in agency decisions regarding this project. Consider establishing an Advisory Group to monitor and address potential EJ concerns	Appendix 7 includes a subsistence evaluation consistent with ANILCA Section 810. The Army held hearings in Fairbanks and Delta Junction to allow subsistence users to comment on the evaluation. Cultural resources are managed through implementation of the Army's Integrated Cultural Resources Management Plan and through consultation with tribal subject matter experts, which is updated on a regular basis and which is referenced extensively in this LEIS. The Ft. Wainwright Commander meets regularly with tribal representatives, and the USAG is part of the Esatern Interior Subsistence Advisory Group. Appendix 7 includes a subsistence evaluation consistent with ANILCA Section 810. The Army held hearings in Fairbanks and Delta Junction to allow subsistence users to comment on the evaluation, but no members of the public provided testimony at
15	Rebecca Chu	EPA	Environmental Justice Overall	Letter Letter	7/11/2023	environmental assessments) tiered to the programmatic EIS or the information and analysis incorporated by reference or as an Appendix.	the hearings. The DLEIS represents a project-level analysis, meaning that the analysis is specific to the proposed action of extending the lnad withdrawal. If the Army or tenants propose to implement future actions not addressed in this LEIS, such actions will be evaluated in project-specific NEPA documentation.
17	Rebecca Chu	EPA	Final LEIS	Letter	7/11/2023	The DLEIS indicates that the Army will not issue a Record of Decision following completion of the LEIS. Instead, the Army and the U.S. Department of Interior/Bureau of Land Management will prepare and submit draft legislation to Congress. CEQ requires that a LEIS is to be included in an agency's recommendation or report on a legislative proposal to Congress and considered part of the formal transmittal, which may be transmitted up to 30 days later in order to allow time for completion of an accurate statement (i.e., Final LEIS) that can serve as the basis for public and Congressional debate. The Army can also decide to prepare a Final LEIS. EPA recommends and encourages the Army to prepare a FLEIS that addresses public comments on the DLEIS and provides meaningful public disclosure, involvement, and comment consistent with CEQ requirements	USAG AK is committed to a transparent public process and has engaged public involvement in the preparation of the Draft LEIS in accordance with regulations and the spirit of NEPA. A final document that addresses public comments has been prepared for Congress.
18	Rebecca Chu	EPA	Alternatives Selected	Letter	7/11/2023	spectrum and present the environmental impacts of the proposed action and the alternatives in comparative form based on the information and analysis presented in the affected environment and the environmental consequences. EPA recommends the FLEIS evaluate the Proposed Action (withdrawal for 25 years) and an	The LEIS includes a single action alternative and a No Action Alternative. Additional alternatives were developed, including moving training actions to a different location and reduing the size of the training area, and all were found deficient in meeting the project's purpose and need. An indefinite withdrawal alternative was discussed by the project development team, but was not evaluated as it is assumed that conditions will change substantially over the next 25 years to warrant a subsequent NEPA evaluation at the end of that period to assess impacts of continued withdrawal.
19	Rebecca Chu	EPA	Cumulative Effects	Letter	7/11/2023	EPA has developed guidance on the assessment of cumulative impacts, Consideration of Cumulative Impacts in EPA Review of NEPA Documents. In addition, CEQ has guidance to federal agencies on Considering Cumulative Effects Under the National Environmental Policy Act. EPA recommends the FLEIS include a cumulative effects analysis that: identifies resources that may be adversely impacted during the Proposed Action; discusses the appropriate geographic area (within natural ecological boundaries); evaluates past, present, and reasonably foreseeable future actions that have been affected, are affecting, or would affect resources of concern; describes a benchmark or baseline; and includes scientifically defensible threshold levels. Include in the cumulative effect analysis consideration of impacts both within and outside the Training Areas.	Thank you for your comment. A comprehensive cumulative effects analysis based on the CEQ guidance identified in the comment is provided in Section 4.18 of the LEIS.
20	Rebecca Chu	EPA	Hazmat	Letter	7/11/2023	The DLEIS identifies the hazardous and toxic materials used during training activities on the withdrawn lands to include petroleum, oil and lubricants (POLs), solvents, paint, batteries, and other chemicals. The public may have concerns regarding the risk of accidental releases of hazardous and toxic materials to the environment. EPA recommends the FLEIS disclose the safety data sheets and/or the list of hazardous chemicals and annual inventory report of known hazardous chemicals transported, stored,	Thank you for your comment. The requested information is included in the various control and response plans described in Sections 3.9 and 4.9. These plans, as well as records of their implementation, are available to the public upon request. Military personnel are provided training for spill response through a variety of means including unit trainings prior to field exercises, Soldier Field Cards, Garrison
21	Rebecca Chu	EPA EPA	Hazmat Hazmat	Letter Letter	7/11/2023	Response Center. EPA recommends the FLEIS identify the number spills reported and the volume of the spills occuring in the Training Areas during the past 25 years to summarize the types of accidental spills that occur during military activities on the withdrawn lands. This information would support improved planning, management, and response actions to accidental spills. The Emergency Planning and Community Right-to-Know Act Toxic Release Inventory (TRI) program provides the public with information about toxic chemicals in the community. EPA recommends the FLEIS include the annual TRI reporting information specific to the Training Areas and the withdrawn lands to inform the public and	Policy #36, and the Spill Prevention, Control, and Countermeasure Plan. FWA uses a spill response hotline to capture all spills for spill reporting and response. FWA DPW Environmental is responsible for reporting to regulatory agencies when applicable, in general other personnel do not report directly to regulatory agencies. All reported spills occurring on FWA managed property are tracked and databased. The level of detail requested in the comment is beyond the Scope of the LEIS but spills data is used to inform management on FWA. The requested data is beyond the level of detail of what can be addressed in the LEIS, the applicable data can be found at https://enviro.epa.gov/ids/st/riform r search.html
22	venerna run	LFA	⊓a∠IIIat	Lettel	11111/2023	decision-makers regarding past releases of hazardous and toxic materials.	mupa.//emviro.epa.gov/iacia/ii/i/omi_i_sediCH.Htilli

						USAG LWE LEIS: Draft Public Comments and Responses	
No.	Name of Commenter	Affiliation	Comment Topic	Method of Submittal	Date of Submittal	Comment / Summary	Response
23	Rebecca Chu	EPA	Hazmat	Letter	7/11/2023	The long-term military training and related activities in the withdrawn lands could result in contamination of certain areas. EPA recommends the FLEIS include an inventory and/or summary and identify the locations on a map of the current areas that may potentially be contaminated to serve as a baseline for the next 25 years. EPA recommends the FLEIS identify short and long-term plans to collect, sample, and monitor the soils, surface and groundwater within the areas of contamination, and to evaluate potential risks to human health and the environment. This monitoring information would support future clean-up and/or decontamination efforts in these contaminated areas.	Fort Wainwright participates in the Department of Defense's Operational Range Assessments in accordance with Department of Defense Directive (DoDD) 4715.11, Environmental and Explosives Safety Management on Operational Ranges Within the United States, May 10, 2004 and Department of Defense Instruction (DoDI) 4715.14, Operational Range Assessments, November 15, 2018. ORA is a proactive Department of Defense program to identify releases of munitions constituents (MC) from operational ranges. Releases identified during an assessment are evaluated to determine if a release poses a potential unacceptable risk to human health or the environment. Re-assessments are executed every five (5) years per the DoDI. ORA report summaries, including documentation of findings, are available to relevant stakeholders and regulators when the assessment is finalized.
24	Rebecca Chu	EPA	Hazmat and Water Resources	Letter	7/11/2023	air, soils, subsistence foods, etc.) and migrate through surface water and groundwater. EPA recommends the FLEIS discuss and evaluate these emerging contaminants (e.g., PFOS, PFOA, perchlorate, RDX5, and nitroglycerin); identify products containing PFAS used in the Training Areas; how they may pose risks to human health through exposure (e.g., skin absorption, drinking water, and/or consumption of subsistence foods) and to the environment within and outside the Training Areas. In addition, EPA recommends the FLEIS include mitigation measures to reduce potential risks, such as identifying alternatives to AFFF (e.g., PFAS free fire suppression agents, etc.) and incorporating long term monitoring of soils, and surface and groundwater to evaluate the level of potential contamination, extent of migration, and persistence in the environment.	The Department of Defense (DoD) respects and values the public comment process on a proposed nationwide drinking water rule and looks forward to the clarity that a final regulatory drinking water standard for PFAS will provide. In anticipation of the final standard that Environmental Protection Agency (EPA) expects to publish, the DoD is assessing what actions DoD can take to be prepared to incorporate the EPA's final regulatory standard into our current cleanup process, such as reviewing existing data and conducting additional sampling where necessary. In accordance with the DoD and Headquarters Department of Army direction and guidance, Fort Wainwright continues to evaluate PFAS according to these requirements. On-going remedial activities are being conducted under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), and information and data collected are incorporated into the existing remedial program work efforts underway on Fort Wainwright. The latest DoD information regarding PFAS policies can be found at: https://www.acq.osd.mil/eie/eer/ecc/pfas/tf/policies.html
25	Rebecca Chu	EPA	Water Resources	Letter	7/11/2023	Due to the potential for contamination of surface and groundwater, and soils from the Proposed Action, EPA recommends establishing a long-term water quality sampling and monitoring station network to collect water quality samples at least annually to develop baseline information and evaluate changes in water quality in surface waters and groundwaters over the Proposed Action timeframe. In particular, include long-term monitoring of streams, rivers, and lakes that are identified on the Alaska Department of Fish and Game's anadromous waters catalog and those that are seasonally stocked for recreational fishing I addition, macroinvertebrate monitoring may serve as biological indicators of water quality degradation and fish habitat conditions. EPA also recommends biological monitoring of fish, wildlife, vegetation, etc. (e.g., tissue sampling and testing) to evaluate potential long-term bioaccumulation of contaminants in subsistence resources and the potential risk of human exposure through consumption.	Thank you for your comment. Water and soils sampling and monitoring are integral components of the Sustainable Range Program and are addressed in the Integrated Resources Management Plan, the Range Complex Master Plan and Army regulations for maintaining training lands.
26	Rebecca Chu	EPA	Wildlife	Letter	7/11/2023	The proposed military activities within the Training Areas may affect species listed under the Endangered Species Act. The withdrawn lands lie within the Pacific Flyway, a major water fowl migration route. Certain species are protected under the Migratory Bird Treaty Act. In particular, the Training Areas provide important rearing, feeding, breeding, and nesting habitat for migratory birds. EPA recommends the FLEIS include a list of ESA and MBTA listed species – endangered, threatened, and/or candidate and designated Critical Habitat, if any, which may require formal consultation under Section 7 of the ESA with the U.S. Fish and Wildlife Service. Include the Biological Assessment, Biological Opinion, and/or formal consultation and/or concurrence for the listed species in the FLEIS, if available. Identify important nesting and breeding periods within the Training Areas to avoid conflicts between migratory birds and active land based military training, active aircraft flyovers, and other activities to ensure their protection. Based on the ESA consultation and/or coordination with the Services (USFWS and NMFS), include conservation measures to avoid and minimize adverse impacts to listed species. EPA recommends the FLEIS identify and discuss opportunities to support the recovery of the listed species.	No ESA-listed species have been identified as occurring in the withdrawn lands. The LEIS addresses other special status species, including those protected by the state of AK, those considered sensitive by BLM, or those protected under other statutes such as the MBTA or BGEPA. The installation's Integrated Natural Resources Management Plan (INRMP), referenced in the LEIS, includes the information requested by the commenter.
27	Rebecca Chu	EPA	Air Quality	Letter	7/11/2023	The NAAQS include six criteria pollutants, such as carbon monoxide, sulfur oxides, nitrogen oxides, particulate matter (2.5 and 10 microns), ozone, and lead. EPA recommends the FLEIS include a detailed discussion of ambient air conditions (baseline conditions), NAAQS, and criteria pollutant nonattainment areas in the analysis area and vicinity. EPA recommends the FLEIS include quantitative emissions estimates of NAAQS criteria pollutants for specific pollutant sources, such as mobile (land and air), stationary, and ground disturbances, etc. to inform the public and decision-makers. Include an emissions inventory of all stationary and mobile emissions sources, fullytive dust sources, etc. used in the NAAQS emissions estimates, including sources associated with the transportation of military assets by air, highway, railroad, etc. to and from the Training Areas. Summarize and compare the NAAQS emissions estimates, including sources.	Ambient AQ conditions, including crieria pollutants of concern in the region, are described in Section 3.10.3. A quantitative analysis was deemed unnecessary for the DLEIS since the preferred alternative maintains current conditions, and the No Action alternative would result in reduced training actions and subsequently reduced emissions.

						USAG LWE LEIS: Draft Public Comments and Responses	
No.	Name of Commenter	Affiliation	Comment Topic	Method of Submittal	Date of Submittal	Comment / Summary	Response
						Since December 2009, a portion of the Fairbanks North Star Borough, including the City of Fairbanks and the City of North Pole, is designated as a Nonattainment Area for Particulate Matter 2.5 (PM2.5 - particulate matter with a diameter of 2.5 microns or less). Emissions sources include wood stoves, burning distillate oil, industrial sources, and mobile emissions which contribute to particulate pollutionand is a primary concern during the winter months (October through March) when extremely strong temperature inversions are frequent and human-caused air pollution impacts increase. The urban portion of the FNSB was designated a nonattainment area for carbon monoxide in 1990. In 2004, the area was redesignated to attainment and is considered a carbon monoxide maintenance area in the State Implementation Plan.	
						EPA recommends the FLEIS evaluate the Proposed Action's impacts to the FNSB's nonattainment area for particulate matter and maintenance area for carbon monoxide to human health and the environment. Identify and evaluate mitigation measures to ensure that military actions associated with the Proposed Action are consistent with the SIP. EPA recommends the FLEIS discuss anticipated coordination and planning efforts with various federal and state agencies (e.g., ADOT&PF, ADEC, etc.), City of Fairbanks and North Pole, and the FNSB, Tribes, and other organizations to ensure compliance with the NAAQS, the non-attainment and maintenance areas. Include identification of the potential effects from air pollutants, including air toxics, to military personnel, ground crews, nearby residents, businesses, and any sensitive receptor locations, such as, schools, and outdoor recreation areas (e.g., state parks, public lands, etc.).	
28	Rebecca Chu	EPA	Air Quality	Letter	7/11/2023	The DLEIS indicates that the Proposed Action would result in a continued (but not necessarily increased) level of troop, equipment, and material transit through the FNSB non-attainment and maintenance areas. EPA recommends the FLEIS include an air quality analysis, which could include hotspot air quality modeling to identify appropriate mitigation measures and areas in need of the greatest attention. Include an Equipment Emissions Mitigation Plan that identifies actions to reduce diesel particulate, carbon monoxide, hydrocarbons, and oxides of nitrogen (NOx) associated with armor, infantry, and aviation missions.	Sections 3.10 and 4.10 of the LEIS provide a qualitative analysis of the air quality issues and impacts identified by the commenter. Because the preferred alternative would allow for current practices to continue, air quality modeling was not deemed necessary to determine the level of potential impact. Although the PL 106-65 withdrawn lands are outside the FNSB PM 2.5 NAA, the NAA has been included in the area of pontential affect.
						Military training, transportation of military assets, and other related activities would contribute to fugitive dust emissions within and outside the Training Areas, which have the potential to adversely affect human health and the environment. Fugitive dust includes particulate matter that is generated or emitted from open air operations (emissions that do not pass through a stack or a vent). Particular matter is classified as one of the six criteria pollutants and consists of solid particles and liquid droplets suspended in the air.	
						Fugitive dust and particulate matter emissions reduce visibility, create "haze", cause aesthetic property damage, and impact surface waters, and can contribute to hazardous driving conditions and interfere with scenic views. Fugitive dust have been linked to asthma, emphysema, chronic obstructive pulmonary disease, chronic bronchitis, and heart disease.	
29	Rebecca Chu	EPA	Air Quality	Letter	7/11/2023	EPA recommends the FLEIS include evaluation of fugitive dust emissions to human health and the environment, and identify mitigation measures to avoid and/or minimize such emissions through the development of a Fugitive Dust Control Plan for all aspects of fugitive dust emission sources and activities associated with the Proposed Action within and outside the Training Areas.	Any project or federal action within the training lands is reviewed by FWA DPW Environmental, and fugitive dust mitigation is taken into consideration. FWA has a Fugitive Dust Management Plan (2019) in place.
						On January 9, 2023, Council on Environmental Quality published interim guidance to assist federal agencies in assessing and disclosing climate change impacts during environmental reviews. CEQ developed this guidance in response to E.O. 13990 on Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. CEQ indicated that agencies use this interim guidance to inform the NEPA review for all new proposed actions and may use it for evaluations in process, as agencies deem appropriate, such as informing	
30	Rebecca Chu	EPA	Greenhouse Gases and Climate Change	Letter	7/11/2023	the consideration of alternatives or helping address comments raised through the public comment process. EPA recommends the FLEIS apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues.	Evaluation of impacts associated with climate change is presented in Section 4.10.2.2 of the DLEIS. Because the preferred alternative would carry on current training and management practices, no adverse impacts were identified.
						CEQ has compiled GHG estimating tools and related resources for estimating GHG emissions. NEPA requires federal agencies to analyze and consider the climate change effects prior to making decisions. Estimating GHG emissions or the reduction in emissions is a key element in considering the relationships between the Proposed Action and climate change. EPA recommends the FLEIS consider these GHG tools and resources to estimate GHG emissions for the Proposed Action and the No Action Alternative, as appropriate.	
31	Rebecca Chu	EPA	Greenhouse Gases and Climate Change	Letter	7/11/2023	On April 13, 2023, EPA released the 30th Annual Inventory of U.S. Greenhouse Gas Emissions and Sinks, which presents a national-level overview of annual greenhouse gas emissions from 1990 to 2021. The GHG Inventory covers seven key greenhouse gases: carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride. EPA recommends the FLEIS quantify both the direct and indirect GHG emissions for the Proposed Action and the No Action Alternative based on the recently released GHG Inventory, as appropriate. Include GHG emissions associated with the past 25 years of military activities, training, mobilization/demobilization of assets, equipment, aircrafts, etc. to serve as the baseline (No Action Alternative) and compare these estimates to Proposed Action (next 25 years). The quantification should include both annual average GHG emissions as well as cumulative total over the next 25 years or more land withdrawal.	Modeling GHG emissions was beyond the scope of the LEIS. The Army's SRP ITAM component is specifically tasked with sustainable land management including GHG considerations. USAG Alaska is committed to implementing the US Army Climate Strategy (Feb 2022) as well as all other guiding U.S. Government issued polices and DoD directives.
31		/1	- Samuel Orlange	20101	.,2020	The withdrawn lands are underlain by discontinuous permafrost soils, which can vary in thicknesses from less than one foot to more than 150 feet. Numerous training ranges, test centers, impact areas and drop zones on the withdrawn lands overlap areas underlain by permafrost. Ranges and facilities closer to surface waters such as the Delta River and developed areas such as the Fort Greely cantonment area are more likely to have greater variability in underlying permafrost.	
32	Rebecca Chu	EPA	Greenhouse Gases and Climate Change	Letter	7/11/2023	Peat soils store large amounts of organic matter and function as sources and sinks for GHGs. Emissions from drained peatlands are estimated at 1.9 gigatons of CO2-e annually. The Proposed Action would result in disturbance to organic peat soils. EPA recommends the FLEIS include quantitative estimates of GHG emissions (CO2-e) from the disturbance of peat soils. Include estimates of peat as biological sources of GHG emissions to the overall summary estimates comparing the Proposed Action to the No Action Alternative.	Comment is correct that peat is an important sink for GHGs. Within the study area, peat is degrading to a cerain extent from Army training activities as well as being an effect of climate change. The Army's planning process seeks to avoid degradation of peat and tundra soil resources by scheduling training activities to occur during winter when the ground is frozen, to the degree possible.

						USAG LWE LEIS: Draft Public Comments and Responses	
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33	Rebecca Chu	EPA	Greenhouse Gases and Climate Change	Letter		EPA recommends the FLEIS report and evaluate GHG emissions in the context of the national GHG emission reduction strategy for net-zero GHG emissions by 2050 and comparison to relevant reduction goals and targets. In addition, EPA recommends consideration and evaluation of alternatives and mitigation measures to avoid, minimize, and/or compensate for GHG emissions and climate change effects when those measures are reasonable and consistent with achieving the purpose and need for the project. Mitigation measures could include enhanced energy efficiency, renewable energy generation and energy storage, lower-GHG-emitting technology, carbon capture and sequestration, sustainable land management practices, carbon offsets, etc. DOD reports climate change will continue to degrade installations and infrastructure, increase health risks to	Please see responses to previous comments.
34	Rebecca Chu	EPA	Greenhouse Gases and Climate Change	Letter	7/11/2023	our service members, and could require modifications to existing and planned equipment. Consistent with DOD's Climate Adaptation Plan, EPA recommends the FLEIS include an analysis of climate impacts to infrastructure, installations, equipment, operations, etc. associated with Proposed Action activities on the withdrawn lands. Consider and evaluate climate hazards including changes in temperature regimes, extreme heat, storm events, heavy precipitation, flooding, droughts, wildfires, etc. Additionally, identify mitigation measures and adaptation strategies to offset or reduce these climate change related risks and hazards, and to incorporate climate resilience into the Proposed Action.	Please see responses to previous comments.
						On April 21, 2023, E.O. 14096 on Revitalizing Our Nation's Commitment to Environmental Justice for All was issued to build upon E.O. 12898 on Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, and directs federal agencies to make achieving EJ part of its mission. This includes NEPA environmental reviews that contains actions to identify, analyze, and as available and appropriate, consider adopting or requiring mitigation measures to avoid, minimize, or mitigate disproportionate and adverse human health and environmental effects, including risks and hazards of federal activities on communities with EJ concerns, such as communities of color, Tribes, and low-income, underserved and vulnerable populations. Evaluating impacts to communities with EJ concerns includes consideration of the direct, indirect, and cumulative effects of environmental and other burdens already experienced by such communities (e.g. climate change-related risks, exposure to pollution, or other environmental hazards). The NEPA process provides for early and meaningful public engagement and involvement of communities with EJ concerns in agency decision-making. In March 2016, the Federal Environmental Justice Interagency Working Group developed the Promising Practices for EJ Methodologies in NEPA Reviews, which includes a compilation of methodologies of integrating EJ considerations throughout the NEPA process as summarized from current agency practices. Consistent with the report, EPA recommends the NEPA document describe how to identify where EJ concerns exist within the project area and how to analyze the direct, indirect, and cumulative impacts from the project (including any impacts from local pollution, disproportionate impacts from climate change, and socioeconomic impacts). EPA recommends the following additional resources for incorporating EJ into the NEPA analysis: **CEQ Environmental Justice Guidance Under the National Environmental Policy Act. **EPA Guidance for Incorporating EJ Co	A robust evaluation of potential EJ impacts was performed, including an evaluation of subsistence uses. The findings of that evaluation, which indicated that the preferred alternative would not result in a disproportionate impact on EJ
35	Rebecca Chu	EPA	Environmental Justice			EPA Guidance for Consideration of Environmental Justice in Clean Air Act 309 Reviews. To identify where EJ concerns may exist within the proposed project area, EPA recommends utilizing the EPA EJ Screening and Mapping Tool, Version 2.2 (EJScreen Tool). The EJScreen Tool is a useful first step in identifying EJ communities and understanding areas of potential EJ concerns, which may be candidates for further EJ review or outreach. Areas of impact can be a single block group or span across several block groups and communities. EPA considers a project to be in an area of potential EJ concern when an EJScreen Tool analysis for the project area shows one or more of the thirteen EJ Indexes is at or above the 80th percentile in the nation and/or the state. As the EPA EJScreen Tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location and/or proposed project, consider additional information in an EJ analysis to supplement the EJScreen Tool outputs. Further review and/or outreach to the EJ communities may be necessary to complete the NEPA analysis. In addition, BLM has developed a web-based EJ analysis tool, which may provide additional information to complement the EPA EJScreen Tool outputs.	Communities, are provided in Sections 4.16 and 4.17. The most recent Census data was used to identify EJ communities. This evaluation used the same methods and data to identify EJ communities as are used to develop the EJ Screen.

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						E.O. 14096 requires the consideration of meaningful public engagement and involvement in agency decision- making under NEPA. This includes, and is not limited to: sharing of information and identifying and addressing barriers to participation; fully considering public input; seeking out and encouraging involvement by potentially affected communities, such as those related to disability, language access, and lack of resources; and providing technical assistance, tools, or other resources to facilitate participation.	
						EPA recommends the FLEIS include additional information describing how E.O. 14096 is being integrated into the Proposed Action and NEPA analysis to identify and address communities with EJ concerns; inform communities about the project and the potential impacts; input received to date from the communities; and how that input will be used in agency decision-making.	
						DOD's EJ Strategy includes goals to improve opportunities for communities with EJ concerns to participate in, and have access to, information on policies and practices that affect human health and the environment. These goals include identifying stakeholder groups and their EJ concerns and interests; encouraging stakeholder practicipation in the implementation of the E.O.; improving existing outreach and communication systems to include EJ stakeholders; enhancing existing, or as appropriate, developing new mechanisms to encourage stakeholder participation in DOD activities that affect human health and the environment; and providing translation of crucial public documents and conducting interpretation of hearings, where practicable and appropriate. EPA recommends the FLEIS incorporate DOD's EJ goals to address meaningful community engagement and involvement with EJ communities for this Proposed Action.	
37	Rebecca Chu	EPA	Environmental Justice	Letter	7/11/2023	EPA recommends the FLEIS consider a mitigation measure to monitor for EJ concerns during active military activities and operations, and implement adaptive management strategies to address EJ concerns, where possible. EPA recommends the FLEIS consider the establishment of an EJ Clitzen's Advisory Group to include impacted local communities to monitor and address potential EJ concerns throughout the extension of the withdrawn lands. Consider involving the EJ Clitzen's Advisory Group in evaluating studies and reports regarding the subsistence and cultural resources, and to discuss other matters, as appropriate, providing technical assistance, tools, or other resources to facilitate participation.	The Army and BLM performed a robust public outreach effort which included preparation of a dedicated website where members of the public could receive regular updates on project status and access methods of commenting and attending public meetings. The public involvement program, which included hearings to discuss the findings of BLM's subsistence analysis, is described and recorded in Appendices 1.0 and 2.0.
						The Training Areas includes areas that supports subsistence and cultural resources. EPA recommends the FLEIS examine the potential impacts to subsistence and cultural resources and discuss how to avoid and/or mitigate potential adverse effects, especially to tribal communities that have been historically overburdened and unrepresented. EPA recommends the FLEIS include anticipated subsistence and cultural resource impacts, impacted communities, and outreach to be performed to engage these communities, which can include traditional indigenous knowledge. EPA recommends the FLEIS describe how cultural resources impacts will be identified, managed, and protected, and how communities can access information related to those activities.	
38	Rebecca Chu		Subsistence and Cultural Resources	Letter		Pursuant to the National Historic Preservation Act of 1966 and the Alaska Historic Preservation Act of 1971, Enveronment of coordinating with the Alaska State Historic Preservation Office to identify, preserve, protect, and interpret the state's cultural, historic, and archaeological resources that may be impacted by the Proposed Action on the withdrawn lands. Disclose the results of the coordination efforts with SHPO in the FLEIS. Identify the need for a Programmatic Agreement between the Army and SHPO under Section 106 of the NHPA, if appropriate.	The information requested in this comment is provided in the installation's Integrated Cultural Resources Management Plan (ICRMP), which is incorporated into the LEIS by reference. The ICRMP is regularly updated and is done so in coordination with the AK SHPO, and is subject components of the MOU between BLM and the Army, described in section 3.15.2 of the DLEIS.
	Rebecca Chu	EPA	Indigenous			On November 30, 2022, the White House published Guidance on Indigenous Knowledge. EPA recommends the FLEIS include the identification, inclusion, and integration of Traditional Indigenous Knowledge into the NEPA analysis, where appropriate. The guidance includes promising practices to apply when considering indigenous knowledge in decision-making processes. Indigenous Knowledge can include the collection of local and traditional knowledge concerning the affected environment, anticipated impacts from the Proposed Action, as well as traditional hunting and land use patterns in the area. In addition to reviewing any pertinent traditional indigenous knowledge currently available, additional studies and outreach may be conducted as necessary to	A culturally significant site survey of Donnelly Training Area (DTA) was done in 2007-2008 and yielded no significant information about the traditional use of the area. USAG Alaska has robust government-to-government relationships with 6 tribes in the area and, through this interaction, has learned that these lands were a traditional travel-through area where casual use continues today. Anecdotal information from tribal citizens and has been collected about specific sites in the DTA that has shaped resource management. Additionally the archaeological record and academic research on the indigenous use of DTA has contributed to the
39	Rebecca Chu	EPA	Knowledge Tribal Consultation	Letter		clearly identify concerns and potential impacts, including cumulative impacts, from the Proposed Action. EPA encourages the Army to consult and coordinate with all potentially affected Tribes in the area, and incorporate feedback from the Tribes when making decisions regarding the project. EPA recommends the FLEIS describe the issues raised during the consultations and how those issues were addressed through additional mitigation and monitoring measures, if applicable.	management and interpretation of those resources. Letters offering consultation on the LEIS were sent to leaders of twenty-six tribes throughout the NEPA process. Additionally, the document, process, and action alternatives were discussed with 7 of these tribes who are regular consulting parties during meetings held on 1/14/2021, 6/22/2021, 10/8/2021, and 4/14/2022 with command and staff. No substantive input was received from the tribes during the meetings or in response to the letters
						The Proposed Action extends the public land withdrawal for 25 years or longer. EPA recommends that the extension include annual environmental/human health monitoring and reporting requirements to assess effectiveness and ensure compliance with the mitigation and conservation measures; including an adaptive management program to adjust the actions as needed to achieve the environmental objectives. EPA also recommends that the annual reports evaluate and discuss the short-term (5 years) and long term (25-years) cumulative effects resulting from military activities within the Training Areas, and that the reports be made available to the public. EPA recommends the FLEIS include any lessons learned from the past 25-years of military training/activities	Thank you for your comment. As suggested, the LEIS does incorporate lessons learned by members of USAG AK since the EIS for the previous withdrawal (1998) was prepared and reflects advances in resource management since that time. All aspects of the Army's natural and cultural resources programs have evolved extensively since that time, and are reflected in the regular updates to the INRMP and ICRMP. Regarding human health monitoring, the USAG's range control officers
41	Rebecca Chu	EPA	Monitoring and Adaptive Management	Letter		within the Training Areas regarding evaluation of resource impacts, which account for new challenges, such as climate change, and can influence future stewardship and management of the Training Areas and mitigation measures implemented to reduce impacts.	prepare annual reports on use of ranges and efforts made to remediate damage caused by munitions and training actions. The USAG will consider request to evaluate cumulative effects at regular intervals. Thank you for your comment. This level of detail is greater than we can address in
42	Brandy Baker	Private Citizen	Section 3 page 127	Email	7/24/2023	Donnelly Creek ground water. Donnelly Creek is spring fed and so is the no name creek on the opposite side of the river which grayling and other fish utilize for rearing and spawning.	Thank you for your comment. This level of detail is greater than we can address in the LEIs, but the information will be retained for inclusion in the Army's Integrated Natural Resources Management Plan.
43	Brandy Baker	Private Citizen	Section 3 page 147	Email	7/24/2023	Add in the other stocked species of fish which can be obtained from the Alaska Lake Database.	Same response as for previous comment
44	Brandy Baker	Private Citizen	Section 3 page 61	Email	7/24/2023	Fisheries update the stocking information, update wild fish information, Jarvis Creek contains Arctic grayling and long nose suckers, sculpin, and the Delta River contains more fish species than listed.	Same response as for previous comment

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45	Brandy Baker	Private Citizen	Section 3 page 34	Email	7/24/2023		Although this information has not been added to the LEIS, it is available on the iSportsman website, as stated in section 3.8.3.
46	Brandy Baker	Private Citizen	Section 3 page 113	Email	7/24/2023	The Delta River has tributaries.	Comment noted.
47	Brandy Baker	Private Citizen	Section 3 page 116	Email	7/24/2023	Mapping of lakes and streams information.	Comment noted.
48	Brandy Baker		Section 3 page 122 and 123	Email	7/24/2023	Water testing.	Comment noted.
49	Brandy Baker	Private Citizen	Wildlife and Fish	Email		salmon also spawn in the lower section. Testing the water and ground water on the downstream boundary of	Thank you for your comment. Sampling and monitoring is an important component of USAG AK's resource management program, and is included in the garrison's Integrated Natural Resources Management Plan.