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March 1, 2013

Mr. Allen Richmond
AFCEC/CZN
2261 Hughes Ave, Ste. 155,
Lackland AFB, TX 78236-9853

Re: F-16 Relocation Environmental Impact Statement Scoping Comments

Dear Mr. Richmond:

I write in response to the Air Force's solicitation of public comment on the scoping of an Environmental Impact Statement (EIS) analysis addressing the proposed move of the 18th Aggressor Squadron from Eielson Air Force Base, Alaska, to Joint Base Elmendorf-Richardson, Alaska and Rightsizing Remaining Overhead/Base Operating Support at Eielson Air Force Base. These comments build upon and supplement the comments I offered telephonically at the Fairbanks Scoping Meeting on February 6, 2013.

1. It is inappropriate for the Air Force to issue an Environmental Impact Statement and a Record of Decision on the Proposed Action Before the Commission on the Status of the Air Force has reported to Congress.

At the outset, I must register strong concern about the appropriateness of conducting an EIS at this point in time. The National Defense Authorization Act for Fiscal Year 2013 establishes the Commission on the Structure of the Air Force whose mission is to "undertake a comprehensive study of the structure of the Air Force to determine whether, and how, the structure should be modified to best fulfill current and anticipated mission requirements for the Air Force in a manner consistent with available resources." The Commission's report is due February 1, 2014.¹

The Senate Appropriations Committee, on which I serve, has prohibited the Air Force from using funds made available by the Fiscal Year 2013 Defense Appropriations Act "to make proposed force structure adjustments, unless the Committee has approved the Air Force proposal elsewhere in [the Defense Appropriations Act], until after the National Commission [on the Structure of the Air Force] recommendations are provided to the congressional defense committees."²

In spite of the Senate Appropriations Committee's direction, the Air Force intends to complete the Final EIS and enter a Record of Decision in Fall, 2013, months before the

¹ Pub. L. 112-239 §363 (2012).

² S. Rep. 112-196, 112th Cong. 2d Sess. 7 (2012)

Commission must submit its report to Congress.³ In my judgment it is inappropriate for the Air Force to proceed with this EIS, a legally required step to implement its force structure proposal, and then issue a Record of Decision, evidencing a final and binding conclusion on the proposal, during the moratorium period prescribed by the Senate Appropriations Committee.⁴

The Air Force freely admits that the only reason it is advancing the proposed action is to save money.⁵ This is true of many of the other Air Force structure proposals offered in 2012. However, most of these proposals, including the Eielson proposal, did not sit well with the Senate Appropriations Committee.

In fact, the Committee, in its report on the Fiscal Year 2013 Defense Appropriations Bill, severely criticized the Defense Department overall, and the Air Force specifically, for addressing its financial challenges through force structure reductions. It is useful to consider the Committee's comments in this regard.

Due to budget reductions mandated by the Budget Control Act, the Department of Defense was required to reduce its planned spending over the next decade. The Committee fully supports efforts to bring down the Nation's deficit but is concerned about the Department's approach to meet the targets set in the Budget Control Act. The Committee believes that instead of correcting years of poor fiscal discipline, the Department chose to make substantial reductions in force structure and take risk in meeting U.S. military commitments around the globe. Over the past several years,

³ Air Force Civil Engineer Center, Briefing Slides for Alaska Scoping Meetings, 4-7 Feb 2013, accessed at <http://www.afcec.af.mil/shared/media/document/AFD-130205-003.pdf>. (Viewed on February 25, 2013)

⁴ Although the 2013 Defense Appropriations Act for Fiscal Year 2013 has not been signed into law, Deputy Secretary of Defense Ashton Carter assured the Senate Appropriations Committee on February 14, 2013 that the Department of Defense would respect the committee's viewpoint on this matter in response to my comments on Eielson Air Force Base. Secretary Carter said, "I understand that -- that there was disagreement this year about a number of the adjustment[s] that the Air Force made, and that's why there is going to be a commission on the future of the Air Force. We understand that. We're absolutely committed to working with that commission. And the Air Force understands that, and we're not going to take actions that contravene the decisions that were made earlier this year." See, U.S. Senate Committee on Appropriations, The Impact of Sequestration, transcript available at <http://www.cq.com/doc/congressionaltranscripts-4220882> (viewed February 25, 2013).

⁵ Air Force Civil Engineer Center, Briefing Slides for Alaska Scoping Meetings, 4-7 Feb 2013, viewed at <http://www.afcec.af.mil/shared/media/document/AFD-130205-003.pdf> on February 25, 2013. (Proposed Action is being considered for these reasons: Support congressionally mandated Budget Control Act deficit reductions...Reduce Air Force expenditures in Pacific Air Forces...). This office does not concede that implementation of the Air Force proposal will in fact achieve either of these objectives or the broader national security objectives referred to in the briefing slides. Nor does this office understand why reduction of Air Force expenditures in Pacific Air Forces is an imperative at a time when our national defense strategy focuses to Asia and the Pacific.

Congress has sustained the current force structure while finding tens of billions of dollars in annual savings by scrutinizing the budget request and removing funds from troubled programs, duplicative requests, and overstatement of certain funding requirements...The Committee strongly urges the Secretary of Defense to address these issues when building future budget requests to ensure the Department is utilizing funds efficiently and not requesting funds that cannot be spent in the year of execution, instead of proposing reductions to needed force structure.⁶

The Committee's chosen remedy for shortcomings in the Air Force's budgeting process was to refer unapproved force structure proposals to the Commission for independent evaluation.

By rushing to complete an EIS and issue a Record of Decision on the proposed action months before the completion of the Commission's report the Air Force overtly disregards the intentions of the Senate Appropriations Committee. It also closes the book on the proposed action without consideration of feasible alternatives which may be identified in the Commission's analytic process. The alternatives may, in fact, better achieve the Air Force's financial objectives with fewer environmental impacts, while retaining stronger support to the Asia-Pacific shift, than the proposed action under consideration.

I respectfully submit that the Air Force ought to suspend preparation of the Environmental Impact Statement and revisit the question of whether to proceed with the proposed action, if at all, with a fresh pair of eyes after the Commission has reported to Congress. If the Air Force decides to reoffer the proposal at that time, an EIS would still be required to implement it. That would be the appropriate time to prepare the EIS. This solution, and only this solution, respects the judgment of the Senate Appropriations Committee and the role Congress intended for the Commission on the Structure of the Air Force.⁷

2. The Air Force Draft "Description of Proposed Action and Alternatives" Inappropriately Characterizes the Effect of Adopting the "No Action Alternative."

In January 2013 the Air Force released a draft document entitled "Description of the Proposed Action and Alternatives" pertaining to the proposed action.⁸ The following comments pertain to that document.

⁶ S. Rep. 112-196 , 112th Cong. 2d Sess. 6 (2012)

⁷ In my oral testimony before the Fairbanks EIS Scoping Hearing on February 6th, I also raised questions about whether the Air Force's decision to fund its EIS consultant using FY12 funds is appropriate. Another witness at the Fairbanks scoping hearings questioned whether FY13 funds are being used to pay for the salaries and travel expenses of Air Force personnel engaged on the EIS project contrary to the Senate Appropriations Committee's intention. Moreover, my staff has questioned Air Force Budget Liaisons about whether travel and other costs associated with preparation of this EIS are "mission critical" in light of concerns about the impact of Budget Control Act sequestration and the risk of a full year Continuing Resolution on Air Force budgets.

⁸ This document was mailed to my office. However, my staff has noted that the document does not appear on the website the Air Force has set up to provide the public with information on the

The document indicates that the EIS will consider three alternatives. Two of the alternatives provide for the relocation of the 18th Aggressor Squadron to JBER and the downsizing of remaining overhead and base operating support at Eielson. The “No Action Alternative” maintains the status quo, but at a cost, according to the draft document.

Section 2.3.3 of the draft document states that the “No Action Alternative” would not achieve the *required* cost savings. It goes on to state that the “No Action Alternative would be expected to result in across the board reductions at both JBER and [Eielson],” and “cost-cutting measures would be expected to reduce availability of support and missions at [Eielson] and JBER. Section 2.4 states that the other two alternatives “would meet the purpose and need of achieving cost savings outlined in the Air Force Budget Request contained in the FY13 President’s Budget.”

I respectfully submit the Air Force’s FY13 budget request, as incorporated in the President’s FY13 budget is no longer relevant to the task at hand. Congress failed to approve the President’s FY13 budget. And as previously noted, the Senate Appropriations Committee expressly rejected the Air Force FY13 budget request as it pertains to Eielson, suspending the implementation of Air Force proposed force structure reductions not approved by the Committee until after the Commission on the Status of the Air Force reports in February 2014. We are now five months into FY13 and the Air Force continues to operate under a Continuing Appropriations Resolution that does not require any change to the mission of Eielson Air Force Base or Air Force operations in Alaska. The President’s FY14 budget request has not been released.

The discussion in Section 2.3.3, on the other hand, is grossly misleading. While it is the President’s prerogative to propose appropriations to the Congress, the Constitution vests the Congress with the exclusive power to appropriate funds.⁹ The best that can be said of the “No Action Alternative” is that if adopted the Air Force might be forced to make up the savings it believes will be lost from other sources. The draft document fails to explain why those savings would necessarily have to be made up from Air Force operations in Alaska. Given that it is Congress’ prerogative to determine where cuts will be made¹⁰, it is inappropriate for the Air

Eielson EIS process. *See*, www.afcec.af.mil/f-16_eielson_eis/. (Accessed February 26, 2013). This omission is not explained.

⁹ Republicans quickly reject Obama budget proposal, Los Angeles Times, February 14, 2011. Accessed at <http://articles.latimes.com/2011/feb/14/news/la-pn-budget-reaction-20110215> (Viewed on February 27, 2013) (“The old Washington axiom — the president proposes and Congress disposes — is never truer than on budget day...”) *See also*, Senate minority leader: President’s budget is ‘dead on arrival’, The Hill, February 13, 2012. Accessed at: <http://thehill.com/blogs/floor-action/senate/210329-mcconnell-obama-budget-a-charade-and-campaign-document#ixzz2M7K1FP34> (Viewed on February 27, 2013). (“The inconvenient truth that President Obama and his own top advisers don’t want to admit is that this budget isn’t going anywhere because the president’s own party doesn’t want to have anything to do with it,” said McConnell. “Indeed, the Democratic majority leader here in the Senate has already declared it dead on arrival.”)

¹⁰ U.S. Constitution, Article I, §§8, 9.

Force to definitively state that adoption of the “No Action Alternative” would adversely affect operations in Alaska.

A key criticism of the proposed action identified during the Scoping Meetings is that the Air Force does not appear to have balanced the value of continued operations at Eielson against the costs of continued less critical operations elsewhere. On January 5, 2012, the President released a new Strategic Guidance document that directed a rebalancing of military forces and national security efforts across the government toward the Asia Pacific region.

The Air Force’s decision to downsize Eielson is on its face inconsistent with the new strategy, in light of Eielson’s geographic proximity to Asia and the Pacific.¹¹ It also stands in stark contrast to the Army’s March 2012 representation that it would not significantly alter force structure at Alaska bases in light of the strategic rebalance to Asia and the Pacific.¹²

3. The Air Force Should Conduct an Enterprise-Wide Analysis of Cost Savings Alternatives.

Since the key driver of the Air Force’s proposed action is purportedly cost savings it is critical that an EIS consider other reasonable alternatives which might achieve similar cost savings while avoiding adverse environmental impacts associated with the proposed action. In support of this proposition, one witness questioned at the Scoping Hearings why the Air Force failed to follow its own regulations which provide for an enterprise-wide strategic basing analysis before decisions like the proposed action are undertaken. Other witnesses identified

¹¹ An independent analysis of Asia-Pacific force structure undertaken by the Center for Strategic and International Studies at the request of Congress suggests that efficiencies may be gained in consolidating combat coded F-16 aircraft based in Misawa, Kunsan and Eielson. Center for Strategic and International Studies, US Force Posture Strategy in the Asia-Pacific Region: An Independent Assessment (August 2012). Accessed at http://csis.org/files/publication/120814_FINAL_PACOM_optimized.pdf (Viewed on February 26, 2013). Before “warm basing” Eielson or demolishing facilities which might be useful to implementing consolidation of these capabilities at Eielson, the Air Force should fully evaluate this suggestion.

¹² On March 18, 2012, Army Chief of Staff Gen. Ray Odierno told the Senate Appropriations Committee, “I think as we look at the plans, I think, as you know, that U.S. Army-Alaska is in fact part of Pacific Command. And -- and we're looking at -- for the most part, it'll be very close to what it is today. Now, we'll continue to look at that. But our plan is not to do much changes to the forces that are in the Pacific. So I would say in general terms it will be pretty close to what it is today. General Odierno went on to say, “The training facilities [in Alaska] are incredible. The -- what they're able to do and how they're able to prepare not matter what mission they go on, it gives them a great advantage. And I would just also point out, is that the families are taken care of very well up in Alaska. They love living there. It's a great base for us because of its location and its ability to respond to the Pacific and other areas as well if needed. So it's a key component of our Army of the future. U.S. Senate Appropriations Subcommittee on Defense, Hearing on the Proposed Fiscal 2013 Appropriations for the U.S. Army (March 21, 2012) Accessed at <http://www.cq.com/doc/congressionaltranscripts-4049978>. (Viewed on February 26, 2013).

alternatives which the Air Force might consider to avoid sacrificing the value of Eielson. The Air Force has thus far elected not to consider enterprise-wide alternatives that would possibly deliver superior cost savings to the proposed action, reduce environmental impacts in Alaska and better fit national security objectives in the Asia-Pacific region than the proposed action. This failure, in my judgment, undermines the credibility and sufficiency of the EIS.

In response to concerns like these General Herbert J. Carlisle, the Commander of Pacific Air Forces was directed by the Secretary of the Air Force to “undertake a complete review of both the potential relocation of the F-16 Aggressor Squadron as well as a more strategic assessment of mission needs and opportunities [at Eielson].” As explained by General Carlisle in a letter dated January 3, 2013, “This strategic assessment will take into account all Eielson Air Force Base missions, address the Strategic Value of Eielson AFB to meet National Military Strategy objectives, and will identify upfront implementation costs and long-term cost savings.”

General Carlisle indicated that the strategic analysis will be “closely synchronized” with the EIS and will be completed in the fall of 2013. Given the close relationship between the issues that must be considered in the strategic analysis and those that are germane to the EIS process, substantial arguments can be advanced that the strategic analysis must be incorporated into the Draft EIS, rather than synchronized with the Final EIS. For example, the cost analysis which is to be incorporated into the strategic analysis bears directly on the evaluation of the “No Action Alternative” in the Draft EIS and should be open to public comment. I suspect that other aspects of the strategic analysis are similarly germane to the evaluation of alternatives. Accordingly it may not be possible to complete a legally sufficient DEIS before this work is completed and made public.

To ensure that possible alternatives to the proposed action are fully considered I have introduced the “America Needs Eielson Air Force Base Act of 2013”, S.152, which is cosponsored by Senator Begich. S.152 requires that the Air Force consider a range of possible additional missions for Eielson and report to congressional defense committees before implementing the proposed action or any similar action. In my view the EIS must consider the issues raised by S.152, both in the formulation and the analysis of alternatives.

4. The Air Force Should Consider the Alternative of Relocating the F-16 Squadron Based in Spangdahlem, Germany to Eielson.

There is no dispute that the nation’s financial issues require that the Air Force seek ways to operate with greater efficiency. There is substantial dispute over whether the Air Force should approach this challenge using an enterprise strategic look or instead take the scattershot approach that has led to the proposed action. Given Eielson’s significant geographic advantages,¹³

¹³ AQP Publishing, Eielson Air Force Base Guide 2012 at 36-37. Accessed at <http://ebooks.aqppublishing.com/publications/g31/Eielson%20AFB%20Base%20Guide/#page36> on February 27, 2013. See also, 354th Fighter Wing Public Affairs, SecAF Visits Eielson Airmen (May 24, 2012). Accessed at <http://www.af.mil/news/story.asp?id=123303542> (Viewed on February 27, 2013) (Quoting Secretary Donley as follows, “Alaska is ... quite possibly the most strategically positioned (state for America),” he said. “It is a key toehold for the U.S.

substantial arguments could be made that the Air Force should increase efficiency and mission effectiveness by repositioning aircraft currently stationed elsewhere to Eielson. This issue was never examined in formulating the proposed action. The impending withdrawal of A-10 aircraft from the Spangdahlem Air Base in Germany¹⁴ places that base in essentially the same position as Eielson – a wing supporting a single squadron of F-16 aircraft. This begs the question of why Eielson, and not Spangdahlem, has been singled out for downsizing and warm basing. The Alaska congressional delegation has joined with the Governor of the State of Alaska and the Mayors of the Fairbanks North Star Borough, the City of Fairbanks and the City of North Pole in suggesting that the F-16 aircraft presently stationed at Spangdahlem be transferred to Eielson and that the Draft EIS address the consequences of doing so. Bringing additional aircraft to Eielson would improve the overall economics and efficiency of the base while potentially creating savings equal to or greater than the proposed action. The proposed action unjustifiably throws Eielson under the bus and creates the potential for adverse environmental impact in Interior Alaska and elsewhere in Alaska without an adequate exploration of alternatives.

5. The EIS Should Heavily Weigh the Adverse Impact of the Proposed Action on Airmen and Military Families.

In remarks delivered to the 2012 Air Force Association Convention, the Secretary of the Air Force characterized airmen as “the living engine” of the Air Force. He went on to say, “Our success depends on our people, our airmen, and we must ensure that our great airmen have the tools, the support and the environment they need to succeed in the tasks that we give them...”¹⁵

The Air Force designated July 2009 to July 2010 as “Year of the Air Force Family.” On August 19, 2009, the Secretary of the Air Force indicated that the Air Force would use the designation to highlight its longstanding commitment to the four basic needs of Air Force families:

- Affordable and available family housing
- Safe and rigorous schools that challenge and prepare our children for college and adulthood
- Accessible, quality medical care for families, Wounded Warriors and those with special needs
- High quality, affordable childcare that meets the needs of working spouses and families with deployed members.¹⁶

presence in the Pacific region. Its location provides a vital link to the Pacific theater with the ability to reach any (Pacific Air Forces) location in only one leg.”)

¹⁴ 52nd Fighter Wing Public Affairs, 81st FS inactivation announced (January 31, 2013) Accessed at: <http://www.spangdahlem.af.mil/news/story.asp?id=123334517> (Viewed on February 27, 2013).

¹⁵ Claudine Ruolo, Air Force Secretary Calls Airmen Service’s ‘Living Engine’ (September 17, 2012). Accessed at <http://www.defense.gov/News/NewsArticle.aspx?ID=117897> (Viewed on February 27, 2013).

¹⁶ Hon. Michael Donley, Remarks to the Air Force Sergeants Association, August 19, 2009. Accessed at: <http://www.af.mil/information/speeches/speech.asp?id=497> (Viewed on February 27, 2013).

In addition to the factors that the National Environmental Policy Act requires be considered in the Draft EIS, I would suggest that the Air Force evaluate the impact of the proposed action on relocating airmen and their families using these and other relevant standards.

JBER is by all measures an exemplary base. However, the testimony at the scoping meeting amply demonstrated that it is a base stretched to capacity. This should be evaluated in the EIS. Even if there is space to physically site the 18th Aggressor Squadron's assets on JBER, one must seriously question whether the base and its surrounding communities can support airmen and their families in the manner they are presently supported at Eielson.

By all accounts, Eielson is a military community that works well and unlike JBER has room to grow. Adequate housing is available on base and in the community, and firm plans have been laid to improve the base housing through funded construction of new dormitories and a military housing privatization contract. The base hosts three public schools – two elementary schools and a high performing Junior-Senior High School. Affordable quality medical care is available from the 354th Medical Group, the new Bassett Army Community Hospital at Fort Wainwright and community providers. In recent years, TRICARE Management Activity and its West Region Contractor have paid special emphasis to enrolling Interior Alaska providers into the TRICARE network following policy changes that charge the contractor with the responsibility for network development.¹⁷ The Eielson Child Development Center (CDC) provides available, affordable, quality child care for children ages 6 weeks to 5 years. The CDC is nationally accredited by the National Association for the Education of Young Children (NAEYC) and certified by the Air Force.¹⁸

Eielson's location outside of a congested metropolitan area is one of the key factors distinguishing it from JBER. While those assigned to Eielson do not suffer from any lack of big city amenities, they are freed of the longer commute times that characterize congested metropolitan areas. One of the most controversial aspects of the proposed action is the question of where military families relocating from Eielson to JBER will live. The Site Activation Task Force which first evaluated this issue has been widely criticized for using sources like "Craigslis" to determine housing availability. Better structured studies have documented severe housing shortages within the Municipality of Anchorage. There was no dispute at the scoping meetings in Palmer and Anchorage that housing is not generally available in Anchorage to accommodate expansion at JBER. However, community leaders from the Matanuska-Susitna Valley communities of Palmer, Wasilla and Houston indicated that there is land available for housing in their communities¹⁹, although as noted in the Palmer scoping meeting, residential

¹⁷ Tricare Operations Manual 6010.56-M, Chapter 21, Section 1, ¶11.1 (February 1, 2008, as amendment by C-28 on December 16, 2010).

¹⁸ Eielson Child Development Center Description. Accessed at: http://www.eielsonforcesupport.com/index.php?option=com_content&view=category&layout=blog&id=41&Itemid=101 (Viewed on February 27, 2013).

¹⁹ Alaska Department of Transportation and Public Facilities, Project 11CR3: Glenn Highway Moose-Vehicle Crash Mitigation. Accessed at:

development could come at the expense of the historically important agricultural sector of Mat-Su's economy.²⁰

The Matanuska-Susitna Valley is the fastest growing community in Alaska. It is home to large numbers of Anchorage commuters due in large part to affordable housing.²¹ However, these communities are more than 20 miles away and can be more than an hour's drive from the gates airmen use to access JBER. JBER is connected to the Mat-Su Valley by a single six lane divided road, the Glenn Highway, which is heavily congested during commute hours and is prone to closure following serious motor vehicle accidents, as was discussed in the North Pole scoping meeting. The Alaska Department of Transportation and Public Facilities has noted an unacceptable number of vehicle-moose collisions on sections of the Glenn Highway that would be traveled by airmen commuting from the Matanuska-Susitna Valley and is planning to construct mitigation measures in 2013.

While the Matanuska-Susitna Borough recently bonded for school improvement and construction, there is some dispute over whether new or improved school facilities will be sufficient to accommodate an increment of population growth over and above what was anticipated prior to announcement of the proposed action.

The EIS team should proceed cautiously in its assessment of whether housing, school and transportation infrastructure is readily available in the Matanuska-Susitna Valley to accommodate the proposed action. It should also evaluate the cumulative impacts of growth at JBER as a result of the proposed action and other anticipated growth in the Matanuska-Susitna Valley, particularly as these factors affect commute times. Overall, the quality of life enjoyed by airmen and their families may not be improved, and could decline, if the proposed action is implemented.

6. Impacts Identified By the Alaska Department of Military and Veterans Affairs.

The Commissioner of Military and Veterans Affairs spoke eloquently about the impacts of the proposed action on the responsibilities of his agency, including the Alaska Air National Guard, at scoping meetings throughout the state. The Commissioner's testimony was supplemented by other leaders of his agency. A key issue in the downsizing of Eielson Air Force Base is the level of support which will be provided to the 168th Air Refueling Wing. While promises of 24 hour support when necessary to the mission have been made in the Site

<http://www.dot.alaska.gov/stwddes/dcstraffic/crhisip/projectANC11CR3GlennMooseshtml.shtml>
(Viewed on February 27, 2013).

²⁰ See, generally, TIP Strategies, Matanuska-Susitna Borough Alaska Economic Development Strategic Plan, 27-29 (April 10, 2010). Accessed at:
<http://www.matsugov.us/economicdevelopment/> (under "Economic Development Plan tab")
(Viewed on February 27, 2013).

²¹ Patty Sullivan, Mat-Su grew by 50 percent in past decade (March 16, 2011). Accessed at:
<http://www.matsugov.us/publicaffairs/press-releases/news/953-mat-su-grew-by-50-percent-in-past-decade> (Viewed on March 1, 2013).

Activation Task Force process, it is not clear whether the cost of keeping these promises has been fully accounted for. This issue deserves closer scrutiny.

The 168th Air Refueling Wing plays a critical role in maintaining the North Pacific refueling bridge, a role which is of great interest to the NORTHCOM and PACOM combatant commanders. The views of these combatant commanders with respect to the proposed action should be solicited during the EIS process.

7. Impacts Identified by the Aviation Community and Impacts on Hunting and Fishing.

The general aviation community has also contributed to the EIS scoping process and their comments are worthy of deference. Specifically, the general aviation community has raised safety concerns about the increase in high speed jet traffic in and around Anchorage which would result from adoption of the proposed action. Additional scrutiny should be given to the question of whether an increase in high speed jet operations in the skies above Anchorage could adversely affect growth prospects at Ted Stevens Anchorage International Airport, which like JBER is a major economic engine for southcentral Alaska.

These impacts on air traffic congestion, potential hazards, and airspace restrictions range far beyond the Anchorage area. Little has been said about the relationship of this EIS to the pending Joint Pacific Alaska Range Complex EIS. The potential for cumulative impacts between the two actions must be explored.

The impacts on the Matanuska-Susitna Borough and on flight corridors lining JBER, the flight training areas, and Eielson Air Force Base must be thoroughly analyzed in the EIS due to increased, high-speed air traffic back and forth across the state. This could increase jet noise in areas of significance to wildlife.

Subsistence, sport and guided hunting and fishing occur throughout the parts of Alaska which might see increased over flights if any action other than the “No Action Alternative” is adopted. The interests of rural Alaska residents to hunt and fish on federal public lands for subsistence uses are protected by Title VIII of the Alaska National Interest Lands Conservation Act.²² Sport hunting and fishing is likewise an integral part of the Alaska lifestyle. Guided hunting and fishing is an important sector of Alaska’s economy. The EIS should not only consider potential environmental impacts on wildlife but also on the availability of species for hunting and fishing by all user groups. It must also be noted that many popular hunting and fishing areas are accessible only by air so preemptions on airspace for military operations will have an adverse impact on hunting and fishing, as well as general aviation. These potential impacts must be assessed in the EIS.

²² 16 U.S.C. §§ 3111-3126.

8. Tribal Consultation and Environmental Justice.

Although Alaska is home to 229 federally recognized Indian tribes it does not appear that any were included on the distribution list for the Draft Description of the Proposed Action and Alternatives and none delivered live testimony in the scoping meetings. The apparent absence of tribal participation in the scoping meetings may be the result of a lack of notice.

Among these tribes which may be significantly affected by the proposed action is the Native Village of Eklutna which sits just outside the boundaries of JBER. However other tribes which are more distant from JBER may also have interests in the proposed action. For instance, many Native villages are accessible only by air. These villages rely on the availability of air corridors to and from Anchorage for food, medicine, supplies and travel. The impact of the proposed action on these villages, their safety and traditional lifestyles should be thoroughly assessed in the EIS. This analysis should consider the possibility that these villages may be adversely affected by additional high-speed jet traffic and air restrictions.

Closely related to the discussion in Section 5 of these comments addressing the impact of Anchorage's housing shortage on airmen and military families is the question of whether an influx of additional military personnel and their families will exacerbate the difficulty lower income Anchorage families have in finding and keeping affordable housing. Many of these lower income families are members of minority groups, including Alaska Natives, African Americans, Hispanic Americans and Asia-Pacific Islanders. It would indeed be tragic if the proposed action were to increase homelessness in Anchorage.

STAFF CONTACT

The staff contact for these comments is Nathan Bergerbest, Senior Counsel and Military Legislative Assistant in my Washington office. Mr. Bergerbest may be reached at (202) 224-2839.

Thank you for your consideration of these comments.

Respectfully submitted,



Lisa Murkowski
United States Senator