

SJR

6

<TARGET><BILL>SJR 6</BILL><SUBJECT>SJR
6</SUBJECT><COMM>SCRA27</COMM></TARGET>

David Scott

From: Sen. Donny Olson
Sent: Friday, February 25, 2011 2:34 PM
To: David Scott
Subject: FW: Our concerns over JPARC expansions

From: Mary Odden [mailto:mail@copperriverrecord.com]
Sent: Friday, February 25, 2011 12:15 PM
To: Sen. John Coghill; Sen. Albert Kookesh; Sen. Donny Olson; Rep. Alan Dick; Rep. Eric Feige
Cc: Mary Odden; Bruce & Druce Dickerson
Subject: Our concerns over JPARC expansions

February 25, 2011

Dear Senator John Coghill, Senator Al Kookesh, Representative Alan Dick, Representative Eric Feige, and Senator Donny Olson:

We are very concerned about the Joint Pacific Range Complex (JPARC) military operations area proposed geographic and operational expansions.

We have written to our U.S. Senators, receiving no response from Senator Murkowski, and receiving an indirect response from Senator Begich which says he believes the changes in Alaskan communities that would come from the JPARC expansions are justified in the interest of national defense.

We believe that there are overriding human and wildlife concerns not visible to Sen. Begich or the proposers, and these are easily brushed off when politicians contemplate our "empty spaces" in rural Alaska.

Please help us by turning your attention to these concerns and helping them to be evaluated fairly through the NEPA process or in any other way they can be heard.

There are numerous statewide operational and geographic expansions in this proposal. We are especially concerned with the Proposed Fox 3 MOA Expansion and the new Paxon [sic] MOA that would be established, changing the flight operations area from 5000' Above Ground Level in the current MOA (often violated) down to a permitted 500' AGL for supersonic flight.

Please look at the JPARC expansion website at www.iparceis.com

The two MOAs as proposed would cover the entire Copper River Basin from about the latitude of Old Man Lake north.

Thanks to the concern of Senator Olson and others, the scoping period has been extended until March 4, 2011, but we still believe the EIS contractors are not adequately collecting expert testimony about wildlife issues. Govt. biologists are commenting as private citizens, perhaps have not been allowed to comment as agency representatives. So the wildlife concerns are not being documented as well as the other concerns, in our opinion.

The following is our basic letter of concern about the JPARC proposed expansions in this area. We apologize for its length – this is a huge matter for Alaskans.

To Whom it May Concern:

We ask you turn your attention to the proposal of the Alaskan Command (ALCOM) to expand the Joint Pacific Alaska Range Complex, which is now in scoping comment process for its Modernization and Enhancement Environmental Impact Statement.

The extension of the Fox-3 MOA and the creation of the Paxon MOA will be dangerous to residents and visitors in our Copper Basin area, and destructive to wildlife values we have sought for many years to protect through the public processes of state and federal management plans. Wildlife managers oppose the expansions here on the basis of caribou and moose calving areas, Trumpeter Swan nesting and migration concerns, other wildlife disruptions, and the disruption of necessary aerial wildlife management activities.

There are many residents and part-time residents in the proposed MOA extension and creation areas of which the proposers are unaware. The extension of the operations area, the lowering of the active airspace to 500' AGL, and the planned supersonic activity will greatly impact those residents and landowners, many of whom travel to their homes and cabins via air. It will also of course directly impact air taxi services who must by law maintain above 500' AGL.

We have lived here for 30 years and have joined with other Alaskans to limit human activity and impacts in areas critical for caribou, moose, waterfowl, and furbearers. The planned airspace activities-- the ceilings and the noise -- will undo decades of maintaining the integrity of this habitat. When ALCOM calls our area "undeveloped" and therefore appropriate for these proposed expansions and changes in activity, they are undoing our efforts to maintain this habitat for all Alaskans and all Americans.

We know that the proposed changes will save gas for the military. We are taxpayers and we are buying the gas. The cost of the gas is worth not destroying the wildlife habitat and endangering the lives of the people who live here. Many extensive MOAs exist already throughout Alaska, and although some are more remote and less convenient to "midway" operations between the bases at Elmendorf and Eielson, they are also further from an already heavily used recreation and subsistence area, and the wildlife populations impacted are not already so compromised and over-claimed as the Nelchina Caribou herd.

We are not just saying "Not in Our Backyard," but asking the military to use already established areas and activity levels in Alaska. We have some knowledge of these operations and reason to believe that existing areas are adequate even for the advanced technologies military trainers wish to test and practice.

Slightly below the belt are suggestions by ALCOM officers that any who object to the MOA expansions and lowered AGL flight areas are not patriotic citizens. Army Colonel Greg Bell of ALCOM who spoke at the scoping meeting held in Glennallen on January 18, said that "China and North Korea" do not have to ask citizen-permission to acquire training space or conduct military activities. The implied threat in this statement, made by Colonel Bell two or three times in various constructions at the meeting, was noted by several of those present.

Subsequent public communications from ALCOM, such as the January 25 statewide-distributed Letter to the Editor from Lieutenant General Dana T. Atkins, USAF, have also framed the acceptance of these expansions in terms of patriotism.

While encouraging comments during the scoping period, the Atkins letter also appealed directly to Alaskan citizens to accept the preferred alternatives in the EIS:

"To clarify some important points, the proposed enhancements are designed to modernize and improve Alaska's land, sea and air training spaces. If the JPARC enhancements take place, the Army, Air Force, Navy, Marine Corps, and Coast Guard will be able to practice the way we jointly fight together, ultimately contributing to saving lives during real-world conflicts like the War on Terrorism. Alaska will be unique in the United States for offering state-of-the-art joint training space large enough to replicate realistic large-scale engagements and leverage the fifth generation capabilities of all of our Services."

And he also praised Alaskans for their support of the military in a rather question-begging compliment to our compliance:

"I would like you to know how much pride we have being able to serve in the great state of Alaska. The unparalleled support of the community is what helps make this a truly unique and positive experience for our uniformed service members. We honor and appreciate this support and you have our promise that we will do everything we can to maintain it."

What is being maintained here is our support, as the letter suggests. I appeal to you to examine whether these public appeals, made from a bully-pulpit position of power able to create and distribute such communications, suggest that those who resist or object to the disruptions and major reassigning of established land values are people who disrespect the soldiers and airmen who fight for our freedoms.

Some people have accordingly risen in this area to urge compliance with the expansion proposals on the basis of its benefit to our defense. This is without consideration that fighting for our freedoms is an enterprise also shared by other Americans who understand lessons from our history, value our civil culture, and strive to protect our resources from undue militarism.

Of great concern to us is the fact that Native Corporations, and in particular the Ahtna Regional Corporation, were sent early notification packages of the JPARC expansion proposals, "as Sovereign Nations," as EIS contractor John Mathers of SEIC told several of us at the scoping meeting. Ahtna, which has definite conflict of interest in its subsidiary contracts for maintenance and repair at the firing ranges of Elmendorf and Eielson AFBs, accordingly sent out packages to its member villages with communication that the JPARC expansions would not unduly affect them, thus quieting objection from Native Elders and others that might have arisen on the basis of wildlife values or subsistence.

This, if not illegal in some way, is certainly unethical and abrogates the rights of some people who might have been given the chance to weigh the economic well-being of Ahtna shareholders against their hopes for continued traditional activities, access to public lands, and conservation of valuable habitat.

The scoping period for the JPARC EIS ends on March 4, 2011. It is our fear that the combination of strong-arm patriotism and behind the scenes notifications will prevail in silencing some of the voices that might have been able to bring real concerns about these expansions to the NEPA EIS process.

Sincerely,

Jim and Mary Odden
Nelchina, Alaska
(HC 01 Box 2520 Glennallen, AK 99588 907-822-3727)



DEPARTMENT OF DEFENSE
REGIONAL ENVIRONMENTAL COORDINATOR, REGION 10
50 Fremont Street, Suite 2450
San Francisco, California 94105-2196

Senator Donald Olson
State Capitol
Room 508
Juneau, AK 99801-1182

Dear Senator Olson

I am the Department of Defense (DoD) Regional Environmental Coordinator for the states within EPA Region 10 (AK, WA, OR and ID) and represent the military interests for the Services with installations in those states. On behalf of the military services within Alaska, I would like to express our interest in working together on environmental and encroachment matters affecting the military services in Alaska.

DoD and Alaska have a long and proud history of cooperation. The military installations and training range areas within the state are crucial to DoD's worldwide mission. Alaska offers vital capabilities for sustainable military readiness training for our outstanding service members. The military continues to be one of the largest sectors of the state's diverse economy. In FY 2009, military presence in Alaska included over 33,000 active duty military, Reserve, National Guard, and civilian employees, with expenditures of over \$4.9 billion. The military is Alaska's largest employer.

Alaska's military installations are confronted with numerous challenges. Our installations, inland and offshore training areas, airspace, and frequency spectrum requirements-- essential components to our missions-- face compatible-use and other environmental challenges. We welcome the opportunity to provide you with information as you consider legislation this year that has the potential to impact DoD installations.

I look forward to working with you to continue the mutually beneficial relationship between DoD and Alaska. I can be reached at (415) 977-8849.

Sincerely

A handwritten signature in black ink, appearing to read "Clare R. Mendelsohn", is written over a horizontal line.

CLARE R. MENDELSON
DoD Regional Environmental Coordinator
Region 10

STATE CAPITOL
PO Box 110001
Juneau, Alaska 99811-0001
907-465-3500
fax: 907-465-3532



550 West 7th Avenue #1700
Anchorage, Alaska 99501
907-269-7450
fax 907-269-7463
www.Gov.Alaska.Gov
Governor@Alaska.Gov

Governor Sean Parnell
STATE OF ALASKA

February 17, 2011

The Honorable Mike Chenault
Speaker of the House
Alaska State Legislature
State Capitol, Room 208
Juneau, AK 99801-1182

Dear Speaker Chenault,

I have read the following resolution passed by the First Session of the Twenty-Seventh Alaska State Legislature, and am transmitting the engrossed and enrolled copies to the Lieutenant Governor's Office for permanent filing:

CSSJR 6(TRA) AM H

“Urging the United States Army and United States Air Force to extend the public comment period for the scoping phase of the Joint Pacific Alaska Range Complex Modernization and Enhancement Environmental Impact Statement, which is set to end February 18, 2011, for a minimum of 30 days to allow for effective communication and full state and user involvement during the comment period.”

Legislative Resolve No. 2

Sincerely,

A handwritten signature in black ink that reads "Sean Parnell".

Sean Parnell
Governor

**STATE OF ALASKA
THE LEGISLATURE**

2011

Source

CSSJR 6(TRA) am H

**Legislative
Resolve No.**

2



Urging the United States Army and United States Air Force to extend the public comment period for the scoping phase of the Joint Pacific Alaska Range Complex Modernization and Enhancement Environmental Impact Statement, which is set to end February 18, 2011, for a minimum of 30 days to allow for effective communication and full state and user involvement during the comment period.

BE IT RESOLVED BY THE LEGISLATURE OF THE STATE OF ALASKA:

WHEREAS Alaska's Military Operations Areas, including in the air and on the land and sea, are necessary to replicate realistic conditions for training and testing of combat systems; and

WHEREAS expanded weapons and sensor capabilities, extended mobility, and improved communications have driven the need for larger training areas; and

WHEREAS the federal Environmental Impact Statement for the actions and projects identified by the United States Army and the United States Air Force in a proposal known as Joint Pacific Alaska Range Complex Modernization and Enhancement was released for public scoping comment on December 10, 2010, preceding the holiday season; and

WHEREAS the proposals involve expanding and establishing new Military Operations Areas, restricted airspace, and airspace corridors, expanding access to training areas, and developing new ranges and facilities to provide adequate resources to conduct training and testing under realistic and varied conditions; and

WHEREAS the proposed significant expansion of those Military Operations Areas will have far-reaching effects across multiple segments of the state's communities, industries, and activities, including hunting, tourism, commerce, and aviation; and

WHEREAS aviation represents approximately \$3,500,000,000 in economic activity in the state and supports an estimated 47,000 jobs, constituting a significant component of the state's economy; and

WHEREAS proposals for Joint Pacific Alaska Range Complex Modernization and Expansion may greatly affect aviation in the state; and

WHEREAS the aerospace needs of the civil aviation community have evolved significantly since the last major expansion of Military Operations Areas in the mid-1990s, and the emergence of new technologies has changed how aviation uses airspace; and

WHEREAS a complete review of existing and proposed airspace uses is needed to consider which alternatives may best suit the overall aviation needs of all users now and in the future; and

WHEREAS it is vital to ensure that citizens are allowed access to their villages at all times and for all reasons; and

WHEREAS four villages in the state currently cannot be accessed by air during military operations; and

WHEREAS proposed military expansion into air corridors will significantly interfere with air traffic into and out of Fairbanks and will affect training operations conducted in the area by general aviation and commercial operators; and

WHEREAS all divisions and departments of state government must be given adequate time to evaluate thoroughly the effects from the proposed changes in military airspace; and

WHEREAS it is paramount that, for all potential contact between civilian and military operations involving both United States and foreign military aircraft, safety prevails;

BE IT RESOLVED that the Alaska State Legislature urges the United States Army

and United States Air Force to extend the public comment period for the scoping phase of the Joint Pacific Alaska Range Complex Modernization and Enhancement Environmental Impact Statement, which is currently scheduled to close on February 18, 2011, for a minimum of 30 days past that date to allow for effective communication and full state and user involvement during the comment period.

COPIES of this resolution shall be sent to the Honorable Robert M. Gates, United States Secretary of Defense; the Honorable John M. McHugh, United States Secretary of the Army; the Honorable Michael B. Donley, United States Secretary of the Air Force; and the Honorable Lisa Murkowski and the Honorable Mark Begich, U.S. Senators, and the Honorable Don Young, U.S. Representative, members of the Alaska delegation in Congress.

AUTHENTICATION

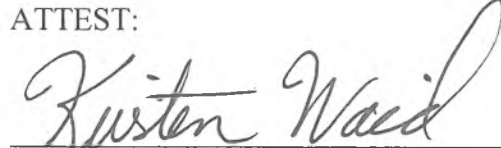
The following officers of the Legislature certify that the attached enrolled resolution, CSSJR 6(TRA) am H, consisting of 3 pages, was passed in conformity with the requirements of the constitution and laws of the State of Alaska and the Uniform Rules of the Legislature.

Passed by the Senate February 16, 2011



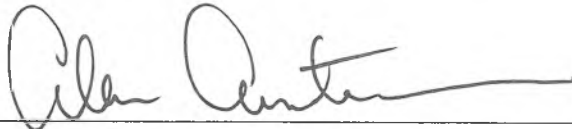
Johnny Ellis, President pro tempore of the Senate

ATTEST:



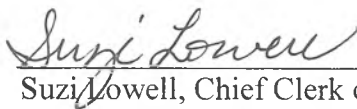
Kirsten Waid, Secretary of the Senate

Passed by the House February 16, 2011



Alan Austerman, Speaker pro tempore of the House

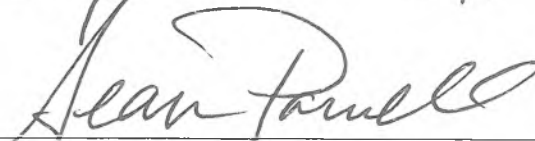
ATTEST:



Suzi Lowell, Chief Clerk of the House

Read by the Governor

February 17 20 11



Sean Parnell, Governor of Alaska

ALASKA STATE LEGISLATURE
SENATE JOINT RESOLUTION NO. 6

HISTORY IN THE SENATE

2011
2/4
2/9
2/9
2/9

Read first time and referred to:
TRA

TRA RPT CS(TRA) New Title
3 DP DNP NR AM
 FN / OFN / Prev: FN OFN
 To: RLS/CAL

 RPT CS() New Title
 DP DNP NR AM
 FN OFN / Prev: FN OFN
 To:

 RPT CS() New Title
 DP DNP NR AM
 FN OFN / Prev: FN OFN
 To:

Read second time
 CS(TRA) Adopted New Title
 Amended
 UC Advanced / 3rd Rdg.

Read third time
 Title Amendment
 Return to 2nd & amended

Passed Y 19 N 0 E 0 A 1
 EFD same or Y N E A

Reconsideration
 Reconsideration not taken up

Title Amendment
 Return to 2nd & amended

Passed/Rec Y N E A
 EFD same or Y N E A

2/9 Engrossed, signed by the President
 Transmitted to the House
Kristen Waid
 Secretary of the Senate

HISTORY IN THE HOUSE

2011
2/11
2/16
2/16
2/16
2/16
2/16

Read first time and referred to:
TRA

TRA RPT HCS() NT: HCR
7 DP 0 DNP 0 NR 0 AM
 FN OFN / Prev: FN OFN

 RPT HCS() NT: HCR
 DP DNP NR AM
 FN OFN / Prev: FN OFN

 RPT HCS() NT: HCR
 DP DNP NR AM
 FN OFN / Prev: FN OFN

 RPT HCS() NT: HCR
 DP DNP NR AM
 FN OFN / Prev: FN OFN

Read second time
 HCS() Adopted New Title
 HCR No.
 Amended changes title
 UC Advanced / 3rd Rdg.

Read third time
 Title Amendment
 Return to 2nd & amended

Passed Y 36 N 0 E 3 A 1
 EFD same or Y N E A

Reconsideration - Johnson
 Reconsideration ~~not~~ taken up

Title Amendment
 Return to 2nd & amended

Passed/Rec Y 36 N 0 E 3 A 1
 EFD same or Y N E A

2/16 Engrossed, signed by the Speaker
 Returned to the Senate
Supri Lowrie
 Chief Clerk of the House

SENATE-HOUSE HISTORY (continued)

2011 2/16	Version Received from the House: <u>CSSJR 6 (TRA) am H</u>
	Concur in House Amendment Y <u>18</u> N <u>0</u> E <u>2</u> A <u>0</u>
	[] EFD same or Y ___ N ___ E ___ A ___
	Failed concur in House amd., ask House recede Y ___ N ___ E ___ A ___
	House failed to recede from amendment Y ___ N ___ E ___ A ___
	CC appointed by Senate _____ Chair _____
	CC appointed by House _____ Chair _____
	(S) Granted Limited Powers of Free Conference
	(H) Granted Limited Powers of Free Conference

2011 2/16 2/16 2/16	(S) Adopted CC Rpt _____ Y ___ N ___ E ___ A ___ [] EFD same or Y ___ N ___ E ___ A ___
	(H) Adopted CC Rpt _____ Y ___ N ___ E ___ A ___ [] EFD same or Y ___ N ___ E ___ A ___
	Sent to enrolling Received from Enrolling _____ Manifest Error Legislative Resolve Number <u>2</u>
	Sent to Governor <u>read. 2/17</u> By Governor _____ Filed with Lieutenant Governor

FISCAL NOTE

STATE OF ALASKA
2011 LEGISLATIVE SESSION

Fiscal Note Number 1
Bill Version CSSJR 6(TRA)
(S) Publish Date 2/9/11

Identifier (file name) _____ Dept. Affected _____
Title SJR 6-MILITARY OPERATIONS AREAS EXPANSION Appropriation _____
Sponsor Senator Olson Allocation _____
Requester (S) Transportation OMB Component Number _____

Expenditures/Revenues (Thousands of Dollars)

Note: Amounts do not include inflation unless otherwise noted below.

OPERATING EXPENDITURES	Appropriation Required	Information					
	FY 2012	FY 2012	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017
Personal Services							
Travel							
Services							
Commodities							
Capital Outlay							
Grants							
Miscellaneous							
TOTAL OPERATING	0.0	0.0	0.0	0.0	0.0	0.0	0.0

CAPITAL EXPENDITURES							
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CHANGE IN REVENUES							
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FUND SOURCE (Thousands of Dollars)

1002 Federal Receipts							
1003 GF Match							
1004 GF							
1005 GF/Program Receipts							
1037 GF/Mental Health							
Other (please identify)							
TOTAL	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Estimate of any current year (FY2011) cost _____

POSITIONS

Full-time							
Part-time							
Temporary							

Why this fiscal note differs from previous version (if initial version, please note as such)

Prepared by Senate Transportation Committee
Division _____
Approved by /s/ Senator Kookesh, Chair

Phone _____
Date/Time 2/8/11 12:00 AM
Date _____

FISCAL NOTE #1

STATE OF ALASKA
2011 LEGISLATIVE SESSION

BILL NO. CSSJR 6(TRA)

Analysis

No Fiscal Impact

CS FOR SENATE JOINT RESOLUTION NO. 6(TRA) am H

IN THE LEGISLATURE OF THE STATE OF ALASKA

TWENTY-SEVENTH LEGISLATURE - FIRST SESSION

BY THE SENATE TRANSPORTATION COMMITTEE

Amended: 2/16/11

Offered: 2/9/11

Sponsor(s): SENATOR OLSON

A RESOLUTION

1 **Urging the United States Army and United States Air Force to extend the public**
2 **comment period for the scoping phase of the Joint Pacific Alaska Range Complex**
3 **Modernization and Enhancement Environmental Impact Statement, which is set to end**
4 **February 18, 2011, for a minimum of 30 days to allow for effective communication and**
5 **full state and user involvement during the comment period.**

6 **BE IT RESOLVED BY THE LEGISLATURE OF THE STATE OF ALASKA:**

7 **WHEREAS** Alaska's Military Operations Areas, including in the air and on the land
8 and sea, are necessary to replicate realistic conditions for training and testing of combat
9 systems; and

10 **WHEREAS** expanded weapons and sensor capabilities, extended mobility, and
11 improved communications have driven the need for larger training areas; and

12 **WHEREAS** the federal Environmental Impact Statement for the actions and projects
13 identified by the United States Army and the United States Air Force in a proposal known as
14 Joint Pacific Alaska Range Complex Modernization and Enhancement was released for public
15 scoping comment on December 10, 2010, preceding the holiday season; and

1 **WHEREAS** the proposals involve expanding and establishing new Military
2 Operations Areas, restricted airspace, and airspace corridors, expanding access to training
3 areas, and developing new ranges and facilities to provide adequate resources to conduct
4 training and testing under realistic and varied conditions; and

5 **WHEREAS** the proposed significant expansion of those Military Operations Areas
6 will have far-reaching effects across multiple segments of the state's communities, industries,
7 and activities, including hunting, tourism, commerce, and aviation; and

8 **WHEREAS** aviation represents approximately \$3,500,000,000 in economic activity
9 in the state and supports an estimated 47,000 jobs, constituting a significant component of the
10 state's economy; and

11 **WHEREAS** proposals for Joint Pacific Alaska Range Complex modernization and
12 expansion may greatly affect aviation in the state; and

13 **WHEREAS** the aerospace needs of the civil aviation community have evolved
14 significantly since the last major expansion of Military Operations Areas in the mid-1990s,
15 and the emergence of new technologies has changed how aviation uses airspace; and

16 **WHEREAS** a complete review of existing and proposed airspace uses is needed to
17 consider which alternatives may best suit the overall aviation needs of all users now and in the
18 future; and

19 **WHEREAS** it is vital to ensure that citizens are allowed access to their villages at all
20 times and for all reasons; and

21 **WHEREAS** four villages in the state currently cannot be accessed by air during
22 military operations; and

23 **WHEREAS** proposed military expansion into air corridors will significantly interfere
24 with air traffic into and out of Fairbanks and will affect training operations conducted in the
25 area by general aviation and commercial operators; and

26 **WHEREAS** all divisions and departments of state government must be given
27 adequate time to evaluate thoroughly the effects from the proposed changes in military air
28 space; and

29 **WHEREAS** it is paramount that, for all potential contact between civilian and
30 military operations involving both United States and foreign military aircraft, safety prevails;

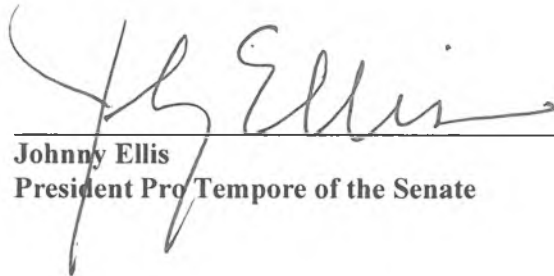
31 **BE IT RESOLVED** that the Alaska State Legislature urges the United States Army

1 and United States Air Force to extend the public comment period for the scoping phase of the
2 Joint Pacific Alaska Range Complex Modernization and Enhancement Environmental Impact
3 Statement, which is currently scheduled to close on February 18, 2011, for a minimum of 30
4 days past that date to allow for effective communication and full state and user involvement
5 during the comment period.

6 **COPIES** of this resolution shall be sent to the Honorable Robert M. Gates, United
7 States Secretary of Defense; the Honorable John M. McHugh, United States Secretary of the
8 Army; the Honorable Michael B. Donley, United States Secretary of the Air Force; and the
9 Honorable Lisa Murkowski and the Honorable Mark Begich, U.S. Senators, and the
10 Honorable Don Young, U.S. Representative, members of the Alaska delegation in Congress.

PASSED BY THE SENATE

February 16, 2011



Johnny Ellis
President Pro Tempore of the Senate

ATTEST:



Kirsten Waid
Secretary of the Senate

PASSED BY THE HOUSE

February 16, 2011



Alan Austerman
Speaker Pro Tempore of the House

ATTEST:



Suzi Lowell
Chief Clerk of the House



421 Aviation Way
Frederick, Maryland 21701

T. 301-695-2000
F. 301-695-2375

www.aopa.org

January 25, 2011

ALCOM Public Affairs
9480 Pease Avenue
Suite 120
JBER, AK 99506

Re: Notice of Intent to prepare and Environmental Impact Statement for the modernization and enhancement of ranges, airspace and training areas in the Joint Pacific Alaska Range Complex

Dear Sir or Madam:

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the Notice of Intent to prepare an Environmental Impact Statement (EIS) for the modernization and enhancement of ranges, airspace and training areas in the Joint Pacific Alaska Range Complex (JPARC). The large scale of this initiative will result in substantial impacts on general aviation operations in the affected area. AOPA supports the United States (US) military and their need to train realistically and submits the following comments in an effort to offer alternatives that will meet the need of the US military while reducing the impact on general aviation.

Opportunity for ad hoc user group

As the largest Special Use Airspace (SUA) area in the United States, the JPARC initiative is unique and necessitates an original, out-of-the-box approach to mitigating the impacts on general aviation and other national airspace users. The US military must consider all possible solutions to minimizing the aeronautical impacts of this proposal. The JPARC initiative represents an opportunity for early engagement with the user community and AOPA would like to see an ad-hoc group established consisting of airspace stakeholders, the Department of Defense (DoD), and Federal Aviation Administration (FAA). This group would meet informally to discuss the military's goals, educate one another on the concerns and impacts of the proposal, and develop a solution that meets the military's needs without unnecessary impacts on general aviation and other civil airspace users. Ideally, this group would have convened as early in the concept phase as possible but could still be utilized as an excellent opportunity for engagement and collaboration. AOPA contends that early engagement at the concept phase of an initiative will reduce the overall time spent during the National Environmental Policy Act (NEPA) and aeronautical process and would ultimately lead to a more desirable and mutually agreeable solution for all parties.

Insufficient comment period

AOPA is disappointed that our December 15, 2010 request to extend the public scoping comment period was denied. While we recognize that the deadline exceeded the minimum requirement of NEPA regulations, it does not meet the spirit or intent of the regulation which is to encourage the submission of substantive comments. AOPA questions how the general public can be expected to attend a public meeting, research the proposal, formulate, and submit substantive comments in as little as 9 days. We also recognize there will be future opportunity for public comment. However, early input is truly the key to working collaboratively and striking a balance in establishing needed airspace for military training and readiness while mitigating the impact the proposal has on other airspace users.

AIRCRAFT OWNERS AND PILOTS ASSOCIATION

Special Use Airspace Information Service

The creation of the Special Use Airspace Information Service (SUAIS) in the 1990's for portions of the JPARC has had a very positive impact on Visual Flight Rules (VFR) usage of this airspace complex that extends across an area over 300 miles wide. In areas where there is adequate communication and surveillance, this has greatly improved the situational awareness for both civil and military airspace users. Recently, pilots have reported that in the eastern portions of the complex, communications are not adequate and users are experiencing difficulties with this shared airspace. An evaluation of this situation is required to provide adequate SUAIS in the existing airspace.

Instrument Flight Rules (IFR) access is needed to access the communities underneath and around this mega-complex since aircraft provide the only year-around means of transportation to these communities. Real-time coordination for IFR use of Military Operations Areas (MOA) is necessary to improve access and safety into these remote locations served almost exclusively by air transportation.

AOPA urges the expansion of the SUAIS program to include all SUA within the JPARC complex. To be most successful, AOPA urges full integration of Air Force and Army participation in the Special Use Airspace Information Service. This would help to avoid confusion regarding who to contact in the various segments of the airspace complex.

Remotely Piloted Aircraft/Unmanned Aerial Vehicle corridors

The Notice of Intent announcement in the December 8, 2011 Federal Register provides a brief mention of consideration for establishing restricted airspace corridors for the purpose of navigating Remotely Piloted Aircraft (RPA)/Unmanned Aerial Vehicles (UAV) from military airfields into various restricted airspace areas. The FAA has consistently gone on record denying the addition of new restricted airspace areas for the sole purpose of RPA/UAV operations. Restricted airspace is for containment of hazardous operations. En-route RPA/UAV flights transitioning between an Air Force base and existing restricted airspace is not a hazardous operation. The proposed establishment of restricted airspace corridors for this purpose is an attempt to circumnavigate the RPAs/UAVs inability to see-and-avoid participating traffic. AOPA cannot support an expansion of the accepted uses of restricted airspace when other, less drastic options such as ground observation and chase planes remain available.

Joint Combined Arms Live Fire (JCALF)

The proposed restricted area for the Joint Combined Arms Live Fire (JCALF) should have been anticipated during the EIS that concluded in June 2006. At the time, the US military assured stakeholders that no restricted airspace would be needed to protect the planned improvements to ground infrastructure. Further restrictions to airspace in this VFR corridor are not acceptable due to the combination of terrain, weather, and existing restricted airspaces that limit civil aviation access in the area. Further analysis is needed to evaluate alternative means of accommodating military training objectives relative to this complex that do not require restricted airspace.

Economic impact of civil aviation in Alaska

According to *The Economic Contribution of the Alaska Aviation Industry to Alaska's Economy*, Northern Economics, Inc., the aviation industry in Alaska contributes \$3.5 billion, or approximately 8%, of the gross state product. The fact that this is almost 40% greater than the industry's role in the national economy demonstrates the importance of the aviation industry to Alaska's economy. An estimated 47,000 jobs are directly and indirectly related to aviation in the state of Alaska.

ALCOM Public Affairs

January 25, 2011

Page 3

In addition, many communities in Alaska are not connected to the national highway system and depend on the aviation industry for movements of goods and people. The average number of enplanements per capita for off-road communities in Alaska is between eight and thirty times higher than in comparable communities in western rural states. Alaskans tend to rely on air freight 39 times more than comparable communities according to a 2009 study published by the Alaska Department of Transportation.

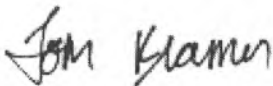
Summary

The JPARC initiative represents a tremendous opportunity for stakeholder education and engagement. The formation of an informal ad-hoc user group should be initiated to discuss the proposal and jointly develop aeronautical impact mitigation strategies. User engagement is a key to the success of this type of initiative and limiting the quantity and quality of scoping comments received by not extending the comment period deadline is counterproductive.

In addition, the SUAIS is a proven-effective system to reduce the impact on general aviation by providing SUA status information and consideration must be given to expanding this program. AOPA cannot support an expansion on the use of new restricted airspace for UAV transitions and instead urges the DoD to consider other means of mitigation the regulatory requirement of see and avoid. Further analysis is needed to evaluate alternate ways of accommodating the military's training objectives that do not require additional restricted airspace over the Battle Area Complex. Finally, the DEIS must evaluate the full scope of economic impacts on the general aviation industry caused by this initiative.

We appreciate the opportunity to submit comments on the scope of the upcoming EIS for the Joint Pacific Alaska Range Complex and look forward to working with the DoD on a solution that equitably accommodates both the military's need for realistic training, and the needs of the general aviation and civil airspace communities.

Sincerely,



Tom Kramer
Manager
Air Traffic Services

- The aviation industry contributes \$3.5 billion and 47,000 jobs to AK's economy
- The aviation industry is not only a major economic driver but the only lifeline many communities have
- As the bill went through the committee process it was amended from a 90-day extension to a 30-day extension.
 - I hope this means that the General Atkins recognizes the compromise that occurred here and takes this resolution to heart. Yesterday he stated to the Joint Armed Services Committee that he would ignore this resolution.



1 Proposed Fox 3 Military Operations Area (MOA) Expansion and New Paxon MOA

Proposed Action: The Army and Air Force propose to expand the Fox 3 MOA into a new proposed Fox 3, 4, 5, and 6 MOAs and to establish a new, adjacent Paxon MOA to provide the vertical and horizontal airspace structure needed to better accommodate low-altitude threat and multiple-axis mission activities during the JPARC training exercises.

Key Components: Expand the boundaries of the existing Fox 3 MOA, currently extending from 5,000 feet above ground level (AGL) up to, but not including, flight level (FL) 180 (18,000 feet above mean sea level [MSL]), to the south and east and subdivide it into four sectors, (proposed Fox 3, 4, 5, and 6 MOAs) with the newly expanded sectors extending from 500 feet AGL up to, but not including, FL180. Establish a new Paxon MOA, extending from 500 feet AGL up to, but not including, FL180, to adjoin the proposed expanded Fox 3 MOA to the east.

Alternative A - Includes the proposed expanded Fox 3 MOA (proposed Fox 3, 4, 5, and 6 MOAs) and the proposed new Paxon MOA with both the high- and low-altitude MOAs.

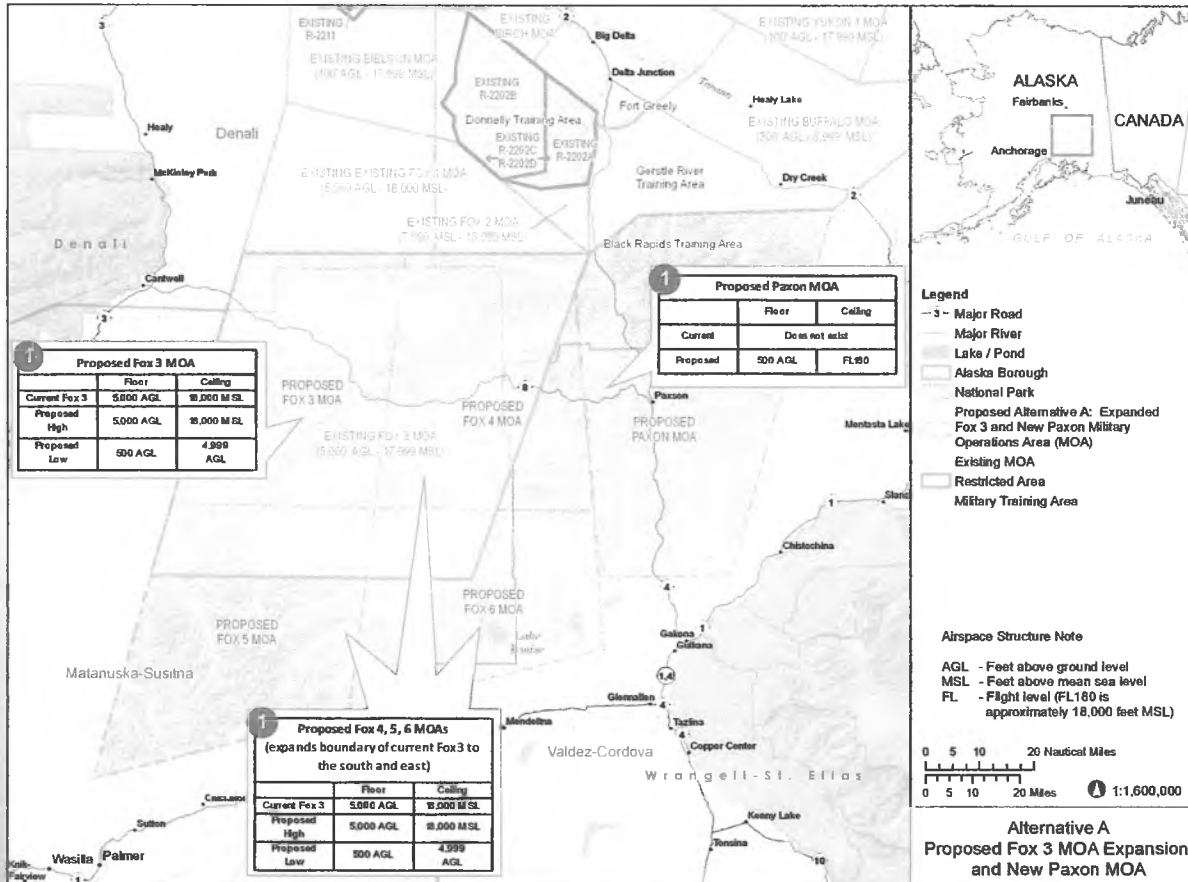
Alternative B - Includes only the Fox 3 MOA expansion (proposed Fox 3, 4, 5, and 6 MOAs as in Alternative A) but would not include the proposed new Paxon MOA.

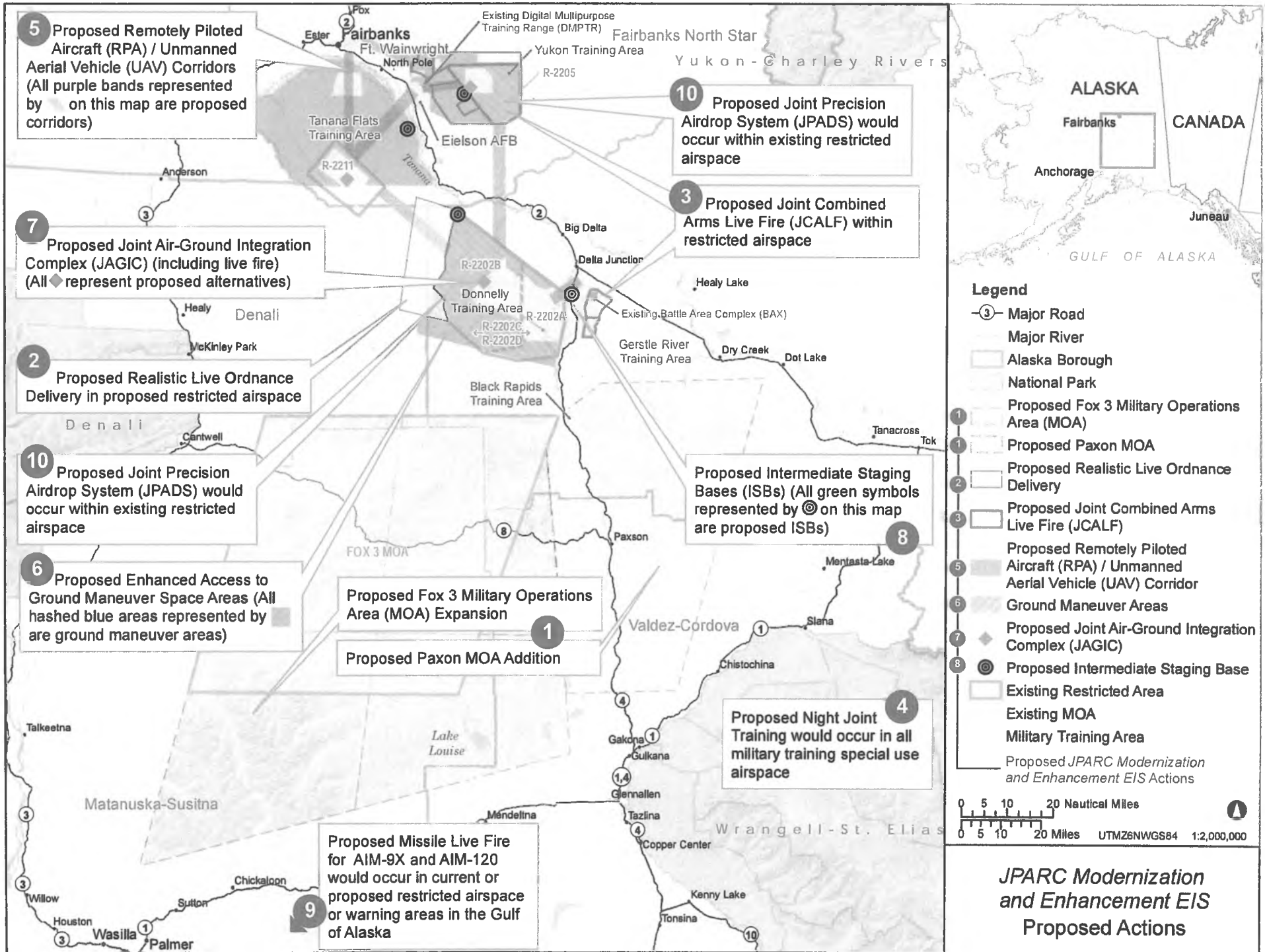
Alternative C - Includes the Fox 3 MOA expansion (proposed Fox 3, 4, 5, and 6 MOAs) without the low-altitude MOA.

Alternative D - Proposes keeping the Fox 3 MOA boundaries the same as they currently exist, but separating the MOA into four subdivided sectors and high- and low-altitude strata. The low-altitude MOA stratum would extend from 500 feet AGL up to, but not including, 5,000 feet AGL. The high-altitude MOA stratum would match what currently exists.

No Action - No changes to current Fox 3 MOA and no proposed addition of Paxon MOA. This would not satisfy the requirement for multiple-axis, low-altitude threat training that is needed to effectively train with fifth-generation fighter aircraft. This alternative would continue to require distant travel, which would negate opportunities for potential energy savings.

Proposed Fox 3 MOA Expansion and New Paxon MOA





Alcom Public Affairs
9480 Pease Ave
Suite 120
JBER, AK 99506

1-27-11

Dear Sir,

I SPEAK AGAINST ANY MORE AIRSPACE GRAB IN ALASKA!

I occasionally fly around the Mancomen Lake - Hoodoo Mountain area which is in the proposed new Paxson MOA, and may be affected. I thought you had enough air space after you grabbed the 40-Mile Buffalo and Yukon MOA's... apparently you need the entire State of Alaska! Where does it stop... or, does it?

What's with the 500' low-altitude floor?? I fly a super cub and you fly heavy metal... if you fly over me at 500' while I'm at 400', you'll roll me out of the sky! Why not just admit that you're commandeering from ground level up to any stated ceiling!

You have enough territory in Alaska already making recreational, sport, hunting etc. flying inconvenient at the least and downright onerous for one to follow MOA covenants! Go grab some more land at Nellis AFB... they have a live fire range and a pile of cactus!

As the American economy tanks and Congress looks for areas to cut, I'll suggest Military Training... cutbacks here could save big \$\$... and besides, who is the Air Force at war with right now besides us civilians?? One exercise per year, and every other year to be held in January!

It's My Sky Too!

David Parker
P.O. Box 382
Tok, AK 99780

I am opposed to any expansion of Military airspace in Alaska. Given the blatant lack of concern that has been shown by the Military in the existing Military Airspace, for Alaskan Civilian user's needs and safety there is no way I could support any expansion.

AREA AFFECTED

The current MOA's, a large percentage of which were established in the 1990's cover millions of acres of land in interior Alaska. These areas include a tremendous amount of big game habitat. These and some of the proposed expansions include areas that Alaskan's have historically used to support their subsistence lifestyles and economic livelihoods for generations. The current MOAs include the entire Alaskan portion of the 40-mile caribou and a big portion of the porcupine herd range. A large part of the area in the proposed Paxson MOA and the expansion of the Fox 3 MOA are intensely used by Alaskan's for hunting and outdoor recreation. This area would take in Lake Louise, Summit, Paxson, and the entire Delta controlled use Area which is a draw only trophy management area for Dall Sheep. A huge portion of this area is not only accessed by airplanes, but by boats, ATVs, highway vehicles, and snow machines.

IMPACT TO PEOPLE AND ANIMALS

The impact to any person or animal on the ground while in one of these MOAs during a two week Red Flag exercise is huge. The economic affect to Guides and transporters whose clients are going to subjected first hand to these exercise's will reverberate statewide. Due to the advent of the F-22 which can break the speed of sound without the use of an afterburner, the amounts of sonic booms have increased dramatically affecting hunter and game. A Person who has not spent time on the ground trying to interact with their environment, during these sonic booms, as they go off for hours at a time, from all directions, cannot fully be aware of the overall impact. Fall of 2010 a red flag exercise was held starting August 9. They currently have them scheduled during hunting season through 2013. When I asked them at a recent ACMAC meeting in Eielson if this could be changed the response was no. They explained that a large percentage of the aircraft involved in these exercise's are from foreign countries and they already have them scheduled for these time period's. Alaska is being used as a training ground for air forces from all over the world. When I asked why they couldn't do this during the winter months they explained that it was dark and cold. A strong military and there need for training is imperative to the survival of our great nation but equally important is Alaskans need to be able to keep their way of life and traditions alive. There is no reason that both of these needs cannot be met.

AVIATION SAFETY

When the large MOA's were established one of the key points that the general aviation community tried to establish was the importance of in flight communications with the military to ensure separation-air safety. To date even though millions of dollars have been spent for military installations throughout the MOA's, the vast majority of the area is uncovered by any medium to low level radio communication for general aviation. Since 1994 I have personally had three extremely close near misses with military

aircraft during hunting season, the time of by far the highest density of air traffic throughout the state. With the large red flag exercise's now being scheduled during the most active time for all general aviation aircraft in Alaska the potential for deadly conflict has increased dramatically. To knowingly continue to mix small slow aircraft with the high speed military aircraft in large numbers, with not as much as radio communication between the two is irresponsible and reckless with people's lives.

Submitted by Leif Wilson, Tok, Alaska

George W. Davidson PE,LS (retired)

2616 Douglas Hwy. #206

Juneau, Alaska 99801

Phone 907-789-7529

E-mail gdavid8174@aol.com

February 14, 2011

To: Honorable Governor Sean Parnell

From: George Davidson

Re: Military proposed MOA for Alaska - JPARC

Please find attached a copy of the testimony I submitted to the Military on the subject project. They requested the info to be submitted by e-mail -- which I did last week.

While I am personally impacted by some of the proposal I feel the impact goes far beyond me. My "cabin" is located in the heart of what we call the Nelchina Recreation Area. A large area set aside to remain in a wilderness setting. I just happen to be the only -- or at most - one of a very few private in-holdings in this wilderness area. The area is enjoyed by hundreds of hunters in the fall and snow machiners in the winter. While the proposals do not prevent the access and use of the area -- the proposed changes to the MOA will definitely discourage the use of the area.

I ask that you give this serious considerations to the impacts of the proposal and represent our view with the military on the issue.

Thanking you in advance.

George W. Davidson PE,LS (retired)

2616 Douglas Hwy. #206

Juneau, Alaska 99801

Phone 907-789-7529

E-mail g david8174@aol.com

I live in Juneau Alaska and since we are a long ways from the area where the proposal for a new MOA is taking place we were slow to hear about it. However, we own property -- a cabin with a short airstrip on patented land -- located just south of the south boundary of the current Fox 3 MOA on the south side of the Oshetna River. It is a fly in only cabin so we are very much impacted by your proposal. Our airstrip is located at -- N 62 degrees 22.73 minutes -- W 147 degrees 28.51 minutes.

I believe that most of the discussion that is now taking place in opposition to the proposed changes to Fox 3 MOA were made many years ago when you created Fox 3 MOA. The late Senator Ted Stevens worked with the military to create a boundary that would work for the military and the general public as well as the private land holders. We should honor that commitment and not change Fox 3 MOA.

Our private property and access to it will be greatly impacted by the boundary changes and especially the lower floor limits of the proposed MOA. With the proposed 500 foot floor -- flying access to our private property will become dangerous. In addition the vibrations and occasional sonic boom (while not permitted by you or your policies they do happen occasionally) from jets at 500 feet will -- in all probability -- break the glass windows of our cabin. New regular glass and thermo-panes windows (this is much more than a hunting cabin) will be required to be flown in for the repairs - a very expensive and time consuming venture. Broken windows would leave the cabin unsecured from critters and thus the interior could receive further damage from these critters like grizzlies, weasels, squirrels, porcupine, etc entering the cabin prior to repairs being discovered and made.

When we purchased this property 28 years ago we did so for the enjoyment of the peace and quiet of the wilderness. The current MOA already disrupts that peace and quiet but it is a livable and a tolerable compromise situation that we are willing to live with, however, the proposed MOA would be unbearable.

Access to our cabin is, as stated earlier, by small airplanes and as such your 500 foot AGL flying base is far too low for safety. A minimum of 2500 feet would provide some reasonable safety for private pilots utilizing our private airstrip at the cabin. Please keep in mind that communication is lacking in this area of Alaska where our cabin is located. Therefore a plane with pilot and passengers departing our airstrip will probably not know if the MOA is active or not and therefore be at risk of taking off and flying into the path of military aircraft.

I request that you do not expand the MOA to the south. Also if the existing 5000 foot AGL floor is to be lowered for the current MOA or the modified one, I recommend that it be moved no lower than to 2500 foot AGL.

I thank you for considering our comments and concerns.

Dear JPARK,

I am against the newly proposed MOA's and training areas in Alaska.

I currently fly between seven and eight hundred hours a year. Much of this is done in the 40-mile and upper Yukon River country. In the past 15 years I have had some close encounters with low flying fighter jets in these areas. There isn't any way to communicate with these aircraft, and to see and avoid is impossible in a cub.

Looking at my sectional charts and GPS, as I fly along it seems to me you have more than enough training areas in our state.

There is also a concern for wildlife and the effect these missions have on them.

I am all for our great country having the best prepared forces, but is this proposed land grab necessary?

Sincerely,

Paul S. Zaczkowski



Papa Zulu Air service Inc.

Phone#: 907-883-4554

Address: Papa Zulu Air service Inc.

PO Box 403

Tok, Alaska 99780

February 10, 2011

Dear Sir,

Regarding JPARCEIS proposed actions

I feel that enlarging the MOA at those low levels is a very high risk.

As a super cub pilot, most of our flying is at low altitude. We feel that 1500 feet AGL should be the bottom for all jet aircraft for the safety of everyone and the environment.

DuWayne and Mary Young
P.O. Box 308
Tok, Alaska 99780

February 8, 2011

Regarding JPARCEIS proposed actions and any future actions for airspace, lands and residents.

I have very high concerns for public safety as well as animal harassment issues.

My main concern is that a large portion of these proposed areas are very active with small aircraft all year around. The 500 ft. lower floor is unacceptable for the bullets that you are flying. Jet aircraft at super-cub altitude spells DISASTER !

After one public meeting with the air force, some years back, myself and others came away with the out look that we were being told what YOU were going to do and that our concerns meant nothing.

I am a Vet. from the 60's and have been flying these Alaskan skies since 1980 and as I recall the first duty of the armed forces is to protect it's citizens. That is all I am asking. Stop endangering our lives and **Dictating**. Raise the lower levels up to a level that we all can "LIVE" at !

Hopefully, you are willing to consider mine and others concerns today before someone is seriously injured or even killed.

Ron Sakalaskas
P.O. Box 147
Tok, Alaska 99780

Matthew Snyder

HC 72 Box 805

Tok, Alaska 99780

ALCOM Public Affairs

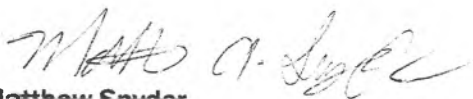
9480 Pease Avenue, Suite 120

JBER, AK 99506

To whomever it may concern,

January 25th, 2011 Statement regarding the JPARC EIS and future restrictions for residents or activities potentially creating human or animal safety or health concerns in the proposed areas (listed map http://www.jparceis.com/prop_actions.aspx) from a lifelong resident and active participant of recreation and subsistence activity in the area.

A large portion of the huge areas in the proposal are very active throughout the year with recreation, hunting, fishing and subsistence activities by Alaskans and other participants. Safety concerns arise with the number of small aircraft used during hunting season or for other yearlong activity (mining or exploration for an example). Impact on wildlife control or protection could be devastating as these areas become "no fly" zones, inhibiting the use of airspace available to the parties responsible for the wildlife and habitat. The blocks of land in the map could be some of the most active in the state. Are there other options available as far as land location, possibly further away from the entire area of the "main triangle" of transportation in the state? This proposal is not viable due to basic health and safety concerns as well as location and project scope.



Matthew Snyder

Alaska Hunting Adventures

Tok, Alaska

(907)883-3083 Home

(907)632-1666 Cell

Alaska Airmen's Association
4200 Floatplane Drive
Anchorage, AK 99502

2-11-11

Dear Sir,

RE: JPARC

As you are surely already aware, the US Air Force is proposing to grab significantly more air space in the Denali Hwy. - Paxson - Glenn Hwy. area: (Joint Pacific Alaska Range Complex - www.JPARCEIS.com/JPARC.ASPX).

This additional air space, plus changes to existing Military Operations Areas will be detrimental, disruptive, and even dangerous to civilian private and commercial flying.

Enclosed are several letters by individual pilots expressing their concerns. There is fear that these individual voices will not be heard, yet we do not wish to remain silent on this issue.

MAKE NO MISTAKE ABOUT THIS, THE AIR FORCE IS NOT ASKING OUR OPINION ON THEIR AIR SPACE PROPOSAL, THEY ARE TELLING US WHAT THEY ARE GOING TO DO!!

REMEMBER: IT'S OUR SKY TOO!!

David Parker (AAA # 8576)



P.O. Box 382
Tok, AK 99780

cc:

Governor Sean Parnell
P.O. Box 110001
Juneau, AK 99811

Representative Don Young
2111 Rayburn Bldg
Washington, DC 20515

Senator Lisa Murkowski
709 Hart Senate Bldg
Washington, DC 20510

Alcom Public Affairs
9480 Pease Ave Suite 120
JBER, AK 99506

Senator Mark Begich
144 Russell Senate Bldg
Washington, DC 20510

Senator Albert Kookesh
Alaska State Capital Room 11
Juneau, AK 99801

Representative Alan Dick
Alaska State Capital Room 114
Juneau, AK 99801

Representative Dan Saddler
Joint Armed Services Committee
Alaska State Capital Room 409
Juneau, AK 99801

Senator Donald Olson
Alaska State Capital Room 508
Juneau, AK 99801

AOPA
Tom George
P.O. Box 83570
Fairbanks, AK 99780

Fairbanks Flight Standard District Office
John Chalston
4419 Airport Way
Fairbanks, AK 99709

Alaska Aviation System Plan

Rural survey respondents emphasized the importance of air travel in rural Alaska. For many communities, especially in Alaska's West and Interior, air travel is the only means to get in and out of the communities; there are no roads or ferry service. These villages rely on air travel for emergencies, family visits, work-related travel, social and vacation trips, and transportation of supplies. Some communities do not offer medical services and residents need to travel for all medical visits. This situation is especially common in small communities and the survey data indicate that community airport respondents made more than twice as many family or personal business related and medical trips than those in larger communities.

Some rural communities in Western and Interior Alaska would be completely isolated in the winter without their rural airports. In parts of Central and Southeast Alaska, ferry or road transportation may be alternatives, but communities still rely heavily on their airports for swift and reliable travel and cargo transport.

By contrast, rural communities in the Lower 48 more often commented that their community would be less attractive for people visiting or doing business but that they could likely live without an airport.

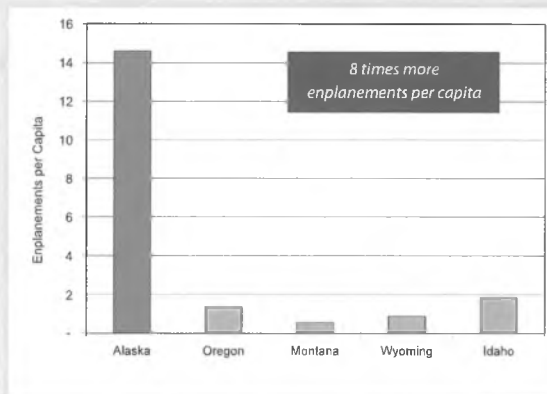


Figure 4 Comparison of Enplanements per 1,000 Persons for Selected Community Airports, 2007

Sources: Bureau of Transportation Statistics, 2008. U.S. Census Bureau, 2008.

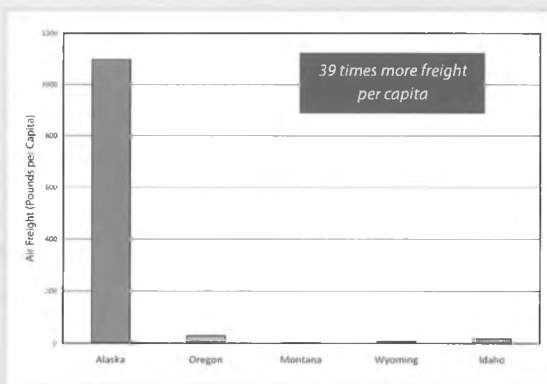


Figure 5 Air Freight per Capita for Selected Community Airports, 2007

Sources: Bureau of Transportation Statistics, 2008. U.S. Census Bureau, 2008.



The Economic Contribution of the Aviation Industry to Alaska's Economy

Alaska Aviation System Plan

Introduction

As an economic engine for the State of Alaska, Alaska's aviation industry contributes \$3.5 billion dollars and over 47,000 jobs to the state's economy. Aviation is a critical component of the state's economy and the vitality of Alaska's communities. The Alaska Department of Transportation & Public Facilities (ADOT&PF), Aviation Division recently embarked on updating the Alaska Aviation System Plan. An important part of that update is determining the value and contribution of Alaska's aviation industry to the state's economy. This determination was accomplished through an extensive survey effort targeting all public airports managed by ADOT&PF, public airports managed by other entities, private airports throughout the state, leaseholders located on ADOT&PF airports, and 600 residents in rural Alaska and the Railbelt who have flown within the last 12 months. The study included interviews with airport managers, city officials and other community leaders in 18 selected communities in Alaska, and four western states to evaluate the importance of airports to remote, rural communities.

Contributions to Alaska's State Economy

Airports and aviation-related businesses create significant economic value within the State of Alaska. In fiscal year (FY) 2007, the Alaska aviation industry contributed \$3.5 billion to the state economy and supported over 47,000 jobs statewide. The aviation industry contributed about 8 percent of Alaska's gross state product of \$44 billion in 2007 and supported almost 10 percent of 2007 statewide annual average employment. If compared to the primary economic sectors the aviation industry would be the fifth largest employer in Alaska.



Economic Activity

The aviation industry contributes to Alaska's economy by supporting local businesses and employing citizens in year round operations. The value of the economic activity generated by the operation of the airports, the businesses, and agencies operating within the airport premises in FY2007 amounted to more than \$2.1 billion.

This direct spending by airports, businesses located on the airports and their employees in turn creates additional employment and income in other sectors of the economy. The economic contribution of the aviation industry through those secondary (multiplier) expenditures is estimated to be \$1.4 billion in FY2007 resulting in a total of \$3.5 billion in economic activity. (See Figure 1)

This report was prepared by Northern Economics, Inc. For more information please call ADOT&PF Aviation Division at (907) 267-0730. www.dot.state.ak.us



This Alaska Aviation System Plan was conducted in accordance with FAA Advisory Circular 150/5070-7: The Airport System Planning Process. The economic analysis described in this brochure was conducted pursuant to Section 101.a(3) of that document.

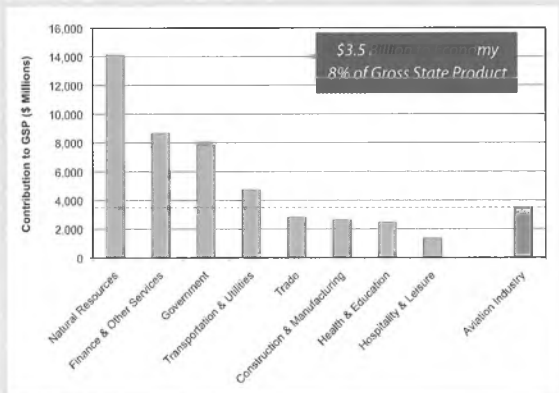


Figure 1 The Aviation Industry's Contribution to GDP Compared to Primary Economic Sectors, 2007

Source: Northern Economics estimates, 2008

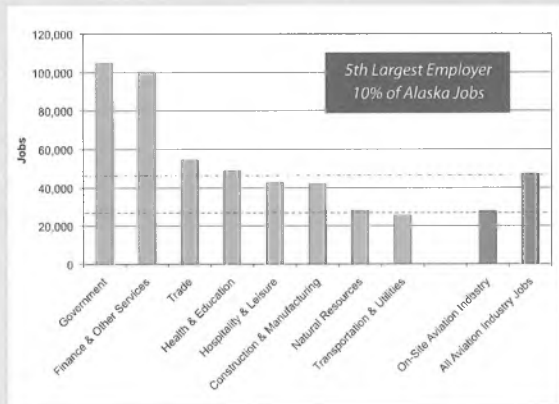


Figure 2 The Aviation Industry's Contribution to Available Jobs Compared to Primary Economic Sectors, 2007

Source: Northern Economics estimates, 2008

Employment

In 2007, the aviation industry provided over 47,000 on-site and off-site jobs across the state. The highest concentration of jobs are located at the international airports in Anchorage, Fairbanks, and the state's regional hubs. These jobs include more than 27,000 on-site jobs and nearly 20,000 off-site jobs created by this industry. (See Figure 2) The on-site jobs include more than 2,000 full-time and part-time jobs directly related to the operation and maintenance of public and private airports in Alaska as well as more than 25,000 jobs created by on-site businesses, organizations, and government agencies operating out of the airports. These businesses include commercial air carriers, fixed-base operators, fuel distributors, caterers, air taxis, charter operations, general aviation services, state agencies and other public agencies. The number of on-site jobs underscores the value of airport infrastructure in creating jobs in various businesses and communities across the state.

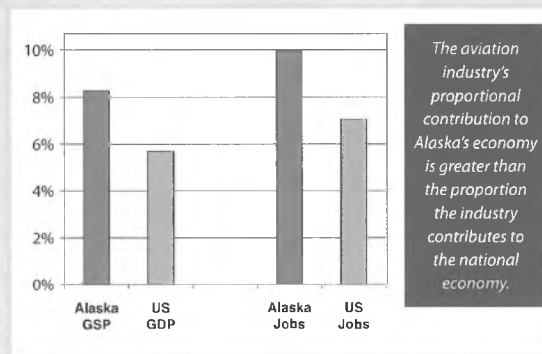
The nearly 20,000 off-site jobs are created when goods and services are purchased from other businesses in

the state to support the operations and maintenance of airports and businesses located at airports, and when on-site employees spend their wages on goods and services within the state.

Over 47,000 jobs generated by the firms, agencies and businesses that make up the industry provided approximately 10 percent of the total jobs in Alaska's economy in 2007, including the self-employed and the military. The aggregate aviation industry was smaller than the government, finance and other services, trade, and health & education sectors, but larger than the hospitality & leisure, construction & manufacturing, natural resources, and transportation & utilities sectors.

Figure 3 shows that the aviation industry's proportional contribution to Alaska's economy is greater than the proportion the industry contributes to the national economy. In actuality, the figure underestimates the relative importance of the aviation industry to Alaska as the true difference is even greater than shown; the national data include the expenditure of visitors and this study

Figure 3 Economy and Jobs: Importance in Alaska vs. the US



The aviation industry's proportional contribution to Alaska's economy is greater than the proportion the industry contributes to the national economy.

does not include this factor in the estimates for Alaska's economy.

Importance of Alaska's Airports to Alaska's Communities

Telephone surveys of 500 households were conducted in 18 selected communities throughout the state, 100 households within the Railbelt stretching from Fairbanks to the Kenai Peninsula, and also

with airport managers, community officials, and other leaders in these communities to evaluate the importance of Alaska's airports to state residents.

The study compared the importance of Alaska's airports to remote airports in other rural, western states. Interviews were made with airport managers and community officials for airports in Idaho, Montana, Oregon and Wyoming, for a comparison of enplanements and freight volumes per capita for the 18 airports in Alaska and the airports in the western U.S. Figures 4 and 5 show that enplanements and air freight loads are much higher per capita in Alaska than for airports in the western U.S. Enplanements for Alaska communities can exceed enplanements of other rural U.S. communities by eight times per person while air freight loads can be more than 39 times higher per person.

EMPLOYMENT

Jobs related to aviation:

- 2,000 jobs** to operate airports statewide, full and part time
- 25,000 jobs** due to on-site business, organizations and agencies
- 20,000 jobs** created due to multiplier effect from aviation jobs
- 47,000 total jobs** attributed to aviation in Alaska in 2007

This represents about **10% of all jobs** in Alaska



"If we didn't have the airport we wouldn't have anything. The airport is a fact of life for living out here in the villages. The airport is our roads, highway, ocean, our lifeline."



Alaska State Legislature

State Capitol
Juneau, AK
99801-1182

TALKING POINTS

CSSJR 6 (TRA)

- Requests a 30-day extension to a comment period re: military air expansion
- The sole purpose of having a comment period is to be proactive:
 - Bring the public into the decision making process
 - Identify areas of concern to the proposed action
- We recognize the need for training, especially in this day in age – the military has a serious job to do. And, they have been great friends to Alaska since before statehood.
 - But, the comment period began on December 10, 2010 at the height of the holiday season and asking for a 30-day extension is not unreasonable.
- We heard from Air Taxi operators on some real safety concerns.
 - The lowering of the “FLOOR” from 5000 feet to 500 feet.
 - The need for ‘corridors’
 - They were willing to work with the military, they just ask for a little more time to analyze the proposal
- We heard of Bush communities that would not be able to have air service during these times when the military is using the airspace for training.
 - Eagle
 - Chalkyitsik
 - Cirlce
 - Central
- In closing: This proposed action, JPARC, would have huge impacts on the affected areas. We have heard from those Alaskans who will be affected and they are asking for more time to comment. Let’s help them ask. I urge a yes vote.

ALASKA STATE LEGISLATURE

SENATOR DONALD C. OLSON



ALASKA
STATE CAPITOL
ROOM 508
JUNEAU, ALASKA 99801-1182

(907) 465-3707
FAX (907) 465-4821

SPONSOR STATEMENT

SENATE JOINT RESOLUTION 6

SJR 6 urges the U.S. Army and U.S. Air Force to extend the comment period on the environmental impact statement associated with the Joint Pacific Alaska Range Complex modernization and enhancement proposal.

The current comment period began at the height of the holiday season on December 10, 2010 and closes on February 18, 2011.

Alaskans rely heavily, and in many instances solely, upon the aviation industry and any significant expansion of Military Operations Areas may have a far-reaching impact across multiple segments of the state's communities, industries, and economic activities.

The aviation industry in Alaska creates approximately \$3,500,000,000 in economic activity and supports an estimated 47,000 jobs.

I respectfully urge you to support this resolution and allow a significant sector of Alaska's economy to weigh in on this proposal.

EAGLE

CIRCLE

CENTRAL

CHALKYITSIK

REX GOOLSBY / TOK
MIKE MORRIS / FBKS

No comment than max

Military Proposals: http://www.jparceis.com/prop_actions.aspx

General Flyer: <http://www.jparceis.com/Scoping%20Meeting%20Flyer.pdf>

Alaska Command will continue to accept comments through February 18, 2011

Please direct any comments, or requests for information to:

9480 Pease Avenue, Suite 120

JBER, AK 99506

907 552-2341

SOME POTENTIAL LANGUAGE

WHEREAS we acknowledge that Alaska's Military Operations Areas (MOAs) include air, land, and sea areas to replicate realistic conditions for training and testing of combat systems, and expanded weapons and sensor capabilities, expanded mobility, and improved communications have all driven the need for larger training areas.

WHEREAS the Army and Air Force identified actions and projects in a proposal known as the *JPARC Modernization and Enhancement EIS* and released this proposal for public comment on December 10th, preceding the holiday season.

WHEREAS the proposals involve expanding and/or establishing new Military Operations Areas, restricted airspace, airspace corridors, expanding access to training areas, and developing new ranges and facilities to provide adequate resources to conduct training and testing under realistic and varied conditions.

WHEREAS the proposed significant expansion of these Military Operations Areas (MOAs) will have far reaching effects across multiple segments of Alaska's communities and industries, which includes hunting, tourism, commerce, and aviation.

WHEREAS aviation represents about \$3.5B worth of economic activity in Alaska, and generates about 47,000 jobs. This is a significant component of Alaska's economy, and we need to be careful not to impact that with these proposals.

WHEREAS requirements of the civil aviation community have evolved significantly since the MOAs were significantly expanded in the mid-1990's and the availability of technology has changed how aviation uses airspace and we need a complete review of the existing as well as proposed airspace in order to consider alternatives which may better suit the overall aviation needs of the users for present as well as proposed airspaces.

WHEREAS it is vital to ensure that citizens are allowed access to their villages at all times and for all reasons. (Currently four villages CANNOT be accessed by air during military operations.

WHEREAS proposed expansion into air corridors will significantly interfere with access to and from Fairbanks, as well as training operations conducted in these areas by general aviation and commercial operators.

WHEREAS it is vital to ensure that ALL State of Alaska divisions and departments are allowed time to effectively evaluate the effects from the proposed changes in military air space.

WHEREAS large military training operations were once conducted in the spring during wildlife calving, it is vital to ensure that prime wildlife habitat is protected.

WHEREAS large military training operations are now scheduled late in the season and occur during prime hunting seasons, and include areas managed for trophy bighorn sheep, it is vital to ensure that effectively managed big game can be hunted and thus contribute to subsistence, tourism, and economies in rural Alaska.

WHEREAS noise issues have increased in recent years, which may be tied to changes in aircraft or military procedures, and have an impact on wildlife and on backcountry recreation.

WHEREAS during the significant expansions of the mid-1990s safety precautions and communication systems were promised but not fulfilled, it is vital that the military honors all commitments made from the last airspace acquisitions and those negotiated to be negotiated during this proposed action.
WHEREAS it is paramount that that safety prevails for all potential contact between civilian and military operations including both US and foreign military aircraft.

THEREFORE we demand that the public comment period that ends Feb 18th be extended a minimum of 90 days to allow for effective communication plus State and user involvement before the proposal is solidified.

POTENTIAL TALKING POINTS

SAFETY: We do not want to wait until an accident costs human life before this is addressed.

ECONOMY: The inability to hunt will affect communities, lodges, guides, aviation, and the reputation of the State of Alaska.

Villages cannot receive aviation access during military operations.

Emergency medical aircraft, promised passage through military airspaces during original designation of the airspaces, have instead been allowed one-way flights, and then not permitted to return to their communities to standby for other emergencies. These holds have been for multiple days.

Military Operations are scheduled during prime hunting season and will close all the area around the big game management areas for trophy big horn sheep.

Current US aircraft now routinely break the sound barrier, resulting in sonic booms that shatter hunters experiences and frighten wild game. The sonic booms are severe enough that they flex the windows of other civilian aircraft in the vicinity

One small air carrier from Tok had three near missed in one month this past season.

Military aircraft are routinely seen flying below the 5000' floor of some MOAs, threatening low flying civilian aircraft avoiding the MOAs and landing on river gravelbars, etc. Military aircraft are seen flying at tree top level and travel at speeds in excess of 500 and 600 mph, in areas for small aircraft moving at 100 mph.

Hunters and guides were informed that the air spaces would be closed for three weeks during prime hunting season this year, last year, and through 2011 and 2012. Last year and this year, air carriers, hunters, and guides had to cancel multiple trips carrying hunters because they could not cross the MOAs. These hunters were from out of state, and had already spent thousands of dollars each for licenses, tags, equipment and tickets.

Military aircraft often fly outside the MOAs. This season three large foreign aircraft buzzed the town of Delta, came across the school yard, and came across the Delta airport, in front, behind, and under a small civilian aircraft in the final downwind pattern to land at the airport.

One set of AACA records indicate these events have been taking place since 1997, and include near misses, inability to communicate between civilian pilots and military air operations,

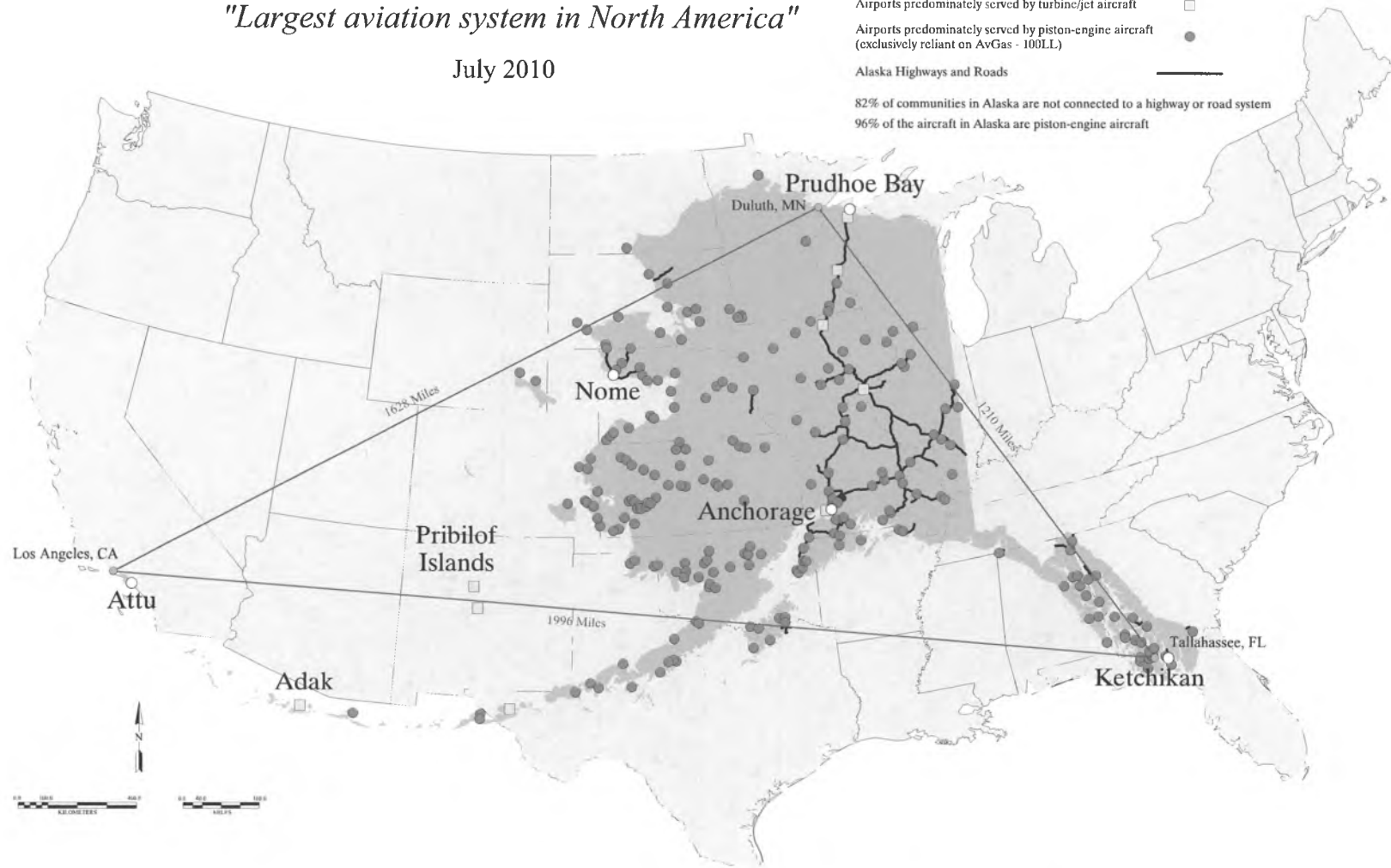
Alaska Aviation System

"Largest aviation system in North America"

July 2010

LEGEND

- 255 State Operated Airports
- Airports predominately served by turbine/jet aircraft
- Airports predominately served by piston-engine aircraft (exclusively reliant on AvGas - 100LL)
- Alaska Highways and Roads
- 82% of communities in Alaska are not connected to a highway or road system
- 96% of the aircraft in Alaska are piston-engine aircraft



Platinum Airport



Nanwalck Airport



Pilot Station Airport



Hooper Bay Mail Delivery

