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January 12, 1996

William E. Chord  
Federal Aviation Administration  
System Management Branch, AAL-530  
222 West 7th Avenue, #14  
Anchorage, AK 99513-7587

Re: Aeronautical Study No. 95-AAL-057NR

Dear Mr. Chord:

The State of Alaska has reviewed the Notice of Proposal to Establish Special Use Airspace referenced above. This letter represents the consolidated comments of the State's resource agencies.

The State has reviewed the 11th Air Force proposal to establish temporary special use airspace areas to conduct joint military training exercises (MFEs) in various portions of Alaska. Four (4) MFEs are proposed for March 7-22, May 2-17, June 6-21, and July 11-26, 1996, for jet, propeller, and rotor blade aircraft within nine Temporary Military Operations Areas (TMOAs). The proposed altitude floors range from 100 feet above ground level (Eielson Bravo, Yukon 1"A", Viper, and NACS 1 TMOAs) to 3,000 feet above ground level (Fox 1 and Yukon 3 TMOAs).

The State has concerns regarding Aeronautical Study No. 95-AAL-057NR in two categories of interest: threats to the safety of Alaska Department of Fish and Game (ADF&G) staff members conducting aerial wildlife research within proposed Eielson Bravo and Fox1 TMOAs, and potential impacts to wildlife and associated subsistence and recreational users at TMOAs with altitude floors less than 3,000 feet.

## Human Safety

The State requests that the 11th Air Force coordinate and cooperate with ADF&G biologists to eliminate or at least minimize life threatening conflicts to both Air Force and ADF&G staff during joint airspace use. ADF&G research and management programs currently scheduled, and where conflicts are expected, are located within Eielson Bravo and Fox 1 TMOAs. The enclosed ADF&G memorandum dated December 21, 1995 provides more specific information regarding these research projects and potential conflicts.

## Impacts to Wildlife and Associated Subsistence and Recreational Users


The Air Force acknowledges the potential for adverse impacts to wildlife as a result of noise from low altitude aircraft flights (*see* Final Environmental Impact Statement, Alaska Military Operations Areas, Volume II, Section 4.5, dated August 1995). Also, in Volume IV of this FEIS, page 3-67, Mr. Bill Ham and Colonel Hassan both state, "3,000 feet and above (aircraft altitude) and 85 decibels or less (noise)" are the apparent criteria to prevent long-term effects on wildlife. The State concurs that these minimal criteria - minimum 3,000 feet altitude and maximum 85 decibels - should be met during flights over wildlife populations, subsistence use activities, and recreational areas.

## Conclusion

The State recommends that the FAA issue conditional authorization for TMOAs with minimum floors of 3,000 feet above ground level and a requirement that the Air Force coordinate activities during Cope Thunder 96-02 and 96-03 with Mr. Dan Reed, ADF&G Division of Wildlife Conservation, 1300 College Road, Fairbanks, AK 99701 (phone 459-7213), in order to reduce life threatening conflicts between aircraft in joint-use airspace.

The State of Alaska appreciates the opportunity to provide these comments and looks forward to FAA response to these concerns. If you have any questions please do not hesitate to contact me at 269-7476.

Sincerely,

  
Alan Phipps  
Project Review Coordinator

encl.

cc: John Katz, Governor's Office, Washington D.C.  
Marilyn Heiman, Governor's Office, Juneau  
Diane Mayer, Director, Division of Governmental Coordination  
John Shively, Commissioner, Department of Natural Resources  
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# STATE OF ALASKA

TONY KNOWLES, GOVERNOR

## DEPARTMENT OF FISH AND GAME

### DIVISION OF WILDLIFE CONSERVATION

1300 College Road  
Fairbanks, AK 99701-1599  
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#### MEMORANDUM

TO: Al Townsend  
Habitat Biologist

THRU: Dan Reed  
Acting Regional Supervisor

FROM: Bruce Dale *BWD*  
Acting Area Biologist

DATE: December 21, 1995

SUBJECT: Portions of the Proposed Temporary  
MOA's Conflict with Fairbanks Area  
Wildlife Research and Monitoring Activities

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Ongoing wildlife projects involve extensive use of fixed and rotor wing aircraft during periods of temporary MOA activity. The high-speed, low-level military exercises pose significant safety hazards to aircraft involved in wildlife survey and capture efforts.

Game Management Unit 20(A) supports intensively managed and extremely popular wildlife resources. Areas suitable for intensive research into GMU 20(A) wildlife populations are already limited by the presence of restricted areas R-2211 and R-2202.

Monitoring of wildlife is an integral part of sound management of state wildlife resources. Timing of research and monitoring activities depends on the life histories of wildlife and is largely beyond the control of biologists. In addition, consistency in methodology is crucial to success of ongoing research projects.

The entire Eielson BRAVO Temporary MOA and that part of the Fox 1 Temporary MOA north of the Denali Highway specifically conflict with state activities. Ongoing studies of wolves, sheep and caribou are planned to continue and a study of moose will begin in 1996. The proposed MOAs encompass the central portions of the study areas. Cope Thunder 96-02 and 96-03 particularly conflict with essential state activities. These exercises, as scheduled, will absorb most of the daylight working time and airspace.

Research projects conflicting with these exercises include 1) the second year of research into Dall Sheep lamb mortality, 2) the second year of caribou calf mortality research and, 3) the first year of moose calf mortality research. These ungulate populations are monitored intensively from approximately May 10 through the end of June from fixed-wing aircraft. Helicopters are used to capture neonates and investigate mortalities. Additional fixed-wing and helicopter surveys to monitor populations occur throughout the study period, including parturition and twinning surveys for caribou and moose. Low level flights from the surface to 500 feet AGL are routine and radio-tracking flights to 5000 feet MSL are common with occasional flights to 9000 feet MSL.

Expansion of Cope Thunder exercises into this area creates safety concerns significant enough to threaten accomplishment of these projects.