

APPENDIX D. LIST OF AGENCIES AND INDIVIDUALS CONSULTED



DEPARTMENTS OF THE ARMY AND THE AIR FORCE
ALASKA ARMY NATIONAL GUARD ELEMENT, JOINT FORCES HEADQUARTERS
PO BOX 5800
JOINT BASE ELMENDORF - RICHARDSON AK 99505-0800

NGAK-FMO-EV

29 January 2015

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Environmental Assessment (EA) Bryant Army Airfield Bird-Wildlife Aircraft Strike Hazard (BASH) Plan Implementation.

1. The Alaska Army National Guard (AKARNG) is preparing an environmental assessment (EA) to evaluate alternatives for implementing a BASH plan at Bryant Army Airfield and the environmental consequences of those alternatives. The EA will be prepared to meet requirements of regulations for implementing the National Environmental Policy Act of 1969, as amended. The EA also will document compliance with other environmental permitting and coordination requirements.
2. The proposed action would implement a plan to report and respond to bird-wildlife activity by modifying aircraft operations and with hazing or dispersal actions. The proposed action also would improve visual surveillance of the runway environment by clearing vegetation and leveling terrain. Habitat near the airfield would be modified to reduce its attractiveness to birds and wildlife. Additional fencing would be installed to keep wildlife off the runways.
3. You are invited to participate in the scoping for this EA. If you have questions or want additional information, please contact HDR Alaska, Guy McConnell at 907-232-8402 or GuyMcConnell@hdrinc.com. We appreciate your comments and related to issues, concerns, alternatives, or any other facet of this action. To ensure that you comments effective in helping us develop the EA, please submit them by 16 February 2015 of the date of this letter. Thank you for your assistance in this process.

Ms. Jennifer Nutt
Second Lieutenant, AKARNG
Environmental Program Manager

DISTRIBUTION:
(see next page)

NG-AK-EV

SUBJECT: Environmental Assessment (EA) Bryant Army Airfield Bird-Wildlife Aircraft Strike Hazard (BASH) Plan Implementation.

DISTRIBUTION:

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Federal Aviation Administration Alaska Region
U.S. Environmental Protection Agency- Region 10 / EPA Alaska Operations Office
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Alaska Dept. of Environmental Conservation
Alaska Dept. of Fish & Game - Division of Wildlife Conservation
Alaska Dept. of Natural Resources Office of the Commissioner
Alaska Dept. of Natural Resources Division of Mining, Land and Water
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U.S. Dept. of Agriculture Natural Resources Conservation Service
800 W Evergreen Ave Suite 216
Palmer, AK 99645

U.S. Dept. of Interior - Bureau of Indian Affairs Anchorage Agency
3601 C Street, Suite 1100
Anchorage, AK 99503

U.S. Fish & Wildlife Services- Fisheries & Ecological Services
Anchorage Fish & Wildlife Field Office
605 W 4th Ave, Room G-61
Anchorage, AK 99501

Alaska Resources Library & Information Services
Library Building, Ste 111
3211 Providence Drive,
Anchorage, AK 99508

Alaska Dept. of Natural Resources
Office of the Commissioner
550 W 7th Ave, Ste 1400
Anchorage, AK 99501

Alaska Dept. of Trans & Public Facilities
Ted Stevens International Airport
John Parrot & John Johansen
PO Box 196960
Anchorage, AK 99519

Congressman Don Young
2314 Rayburn House Office Building
Washington, D.C. 20515

Chugiak-Eagle River Branch Library
12001 Business Blvd., Ste 176
Eagle River Town Center
Eagle River, AK 99577

Anchorage Assembly
Assembly Members
PO Box 196650
Anchorage, AK 99519-6650

Congressman Don Young
2314 Rayburn House Office Building
Washington, D.C. 20515

U.S. Dept. of Interior Bureau of Land Management / Anchorage
Field Office
Alan Bittner
4700 BLM Road
Anchorage, AK 99507

Federal Aviation Administration
Alaska Region
Kerry Long
222 W 7th Ave #14
Anchorage, AK 99513

Alaska Department of Environmental Conservation
Michelle Bonnet
5550 Cordova
Anchorage, AK 99501

Alaska Dept. of Natural Resources
Division of Mining, Land and Water
Brent Goodrum
550 W 7th Ave, Ste 1070
Anchorage, AK 99501

Community Council Center
1057 West Fireweed Lane, Suite 100
Anchorage, AK 99503

Alaska State Court Law Library
303 K Street
Anchorage, AK 99501

Joint Base Elmendorf-Richardson Library
123 Chilkoot Avenue
JBER, AK 99505

Congressman Don Young
4241 B Street, Ste. 203
Anchorage, AK 99503

Senator Lisa Murkowski
709 Hart Senate Building
Washington, D.C. 20510

Anchorage Assembly
Ernie Hall
144 East Potter Drive
Anchorage, AK 99518

Senator Lisa Murkowski
510 L Street, Ste. 600
Anchorage, AK 99501

Alaska State Library
PO Box 110571
Juneau, AK 99811

Alaska Department of Environmental Conservation
Kristin Ryan
5550 Cordova
Anchorage, AK 99501

Z-J Loussac Public Library
3600 Denali Street
Anchorage, AK 99503

U.S. Dept. of Interior Office of Environmental Policy & Compliance
Anchorage Regional Office
Philip Johnson
philip_johnson@ios.doi.gov
1689 C Street, Room 119
Anchorage, AK 99501

Mayor Dan Sullivan
632 W 6th Ave, Ste. 840
Anchorage, AK 99501

U.S. Environmental Protection Agency-
Region 10 / EPA Alaska Operations Office Dianne Soderlund
222 W 7th Ave #19
Anchorage, AK 99513

Senator Dan Sullivan
B40A Dirksen Senate Office Building
Washington, D.C. 20510

Alaska Dept. of Fish & Game - Division of Wildlife Conservation
Jessica Coltrane
333 Raspberry Road
Anchorage, AK 99518

Governor Bill Walker
550 West 7th Ave, Suite 1700
Anchorage, AK 99501

Alaska Dept. of Natural Resources
Office of History & Archaeology
Judith Bittner
550 W 7th Ave, Ste 1310
Anchorage, AK 99501

Municipality of Anchorage
Community Planning & Development
Jerry Weaver, Jr.
4700 Elmore Rd
Anchorage, AK 99507



**DEPARTMENT OF THE ARMY
ALASKA ARMY NATIONAL GUARD
POST OFFICE BOX 5800
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99505**

July 24, 2015

U.S. Fish and Wildlife Service
Anchorage Operations Office
Ms. Ellen Lance, Branch Chief
4700 BLM Road
Anchorage, Alaska 99507

Dear Ms. Lance:

The Alaska Army National Guard (AKARNG) is preparing an environmental assessment (EA) in accordance with the National Environmental Policy Act (NEPA) to analyze the possible impacts related to land clearing, bird and wildlife hazing, habitat modification, and other actions necessary to implement the Bird-Wildlife Aircraft Strike Hazard (BASH) program.

Implementation of a BASH plan is required to protect aircraft and personnel operating at and near Bryant Army Airfield on Joint Base Elmendorf-Richardson in Anchorage, Alaska. The proposed action also is required to meet Department of Defense mandatory requirements for airfield operation.

The BASH plan encompasses Bryant Army Airfield and the area surrounding it, a total area of approximately 1,700 acres. The proposed action would clear approximately 210 acres of woodland in the Airfield Zone. This plan proposes intensive management of habitat and potential food sources as well as employing hazing methods in the Airfield Zone and Clear Zone to remove birds and wildlife. The surrounding Cantonment Zone and Wildlife Extraction Zone Remainder will be managed to exclude geese and other waterfowl.

We request your participation in the NEPA process, and your assistance in meeting our obligations under the Migratory Bird Treaty Act, The Bald and Golden Eagle Protection Act, and the Endangered Species Protection Act. The following notes identify our present status regarding those four obligations and the coordination we request from you:

a. **NEPA:** We are developing a draft EA and would appreciate a designated point of contact in your office. Please make any comments regarding the project and any potential environmental consequences.

b. **Migratory Birds:** We have worked with USFWS Anchorage office for several years to coordinate hazing and other potential take activities, and to establish and review those activities conducted by the US Department of Agriculture personnel on our behalf. We expect to continue those relationships and to address this in the EA. We would welcome any comments or questions you or your staff might have regarding this program and your confirmation that the USFWS Anchorage will continue to work with us in this important action.

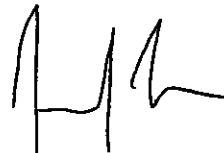
c. **Bald and Golden Eagle Protection Act:** We have conducted eagle nest survey in the past year and would conduct another survey prior to any construction activities. We understand that nest location data is no longer available on your website. We would appreciate any comments you may have regarding our approach and your concurrence with our approach if you agree.

d. **Endangered Species Protection Act:** Our review indicates that there are no threatened or endangered species in the vicinity of our proposed action. We expect to note this in our EA and will review species status prior to conclusion of the EA process; as well as immediately prior to any construction activity. We are copying this letter to Ms. Ellen Lance in your office for her consideration. We would appreciate your comments or concurrence with this approach.

We would appreciate your initial questions and comments regarding those four areas so that we can address them in the draft EA. We would prefer written comments, but we recognize your office's heavy workload and will accommodate any other communication that would work for you. We expect to complete the first draft of the EA in early September and would very much like to have your response by the end of August so that it can be included in the EA.

We sincerely appreciate the assistance we have received from your office in this important program and look forward to continuing this relationship. Please contact me directly if you have any questions or need any further information. Additionally, please identify any of your staff we should contact directly.

Sincerely,

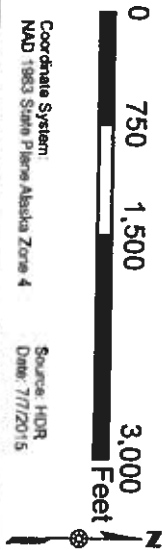
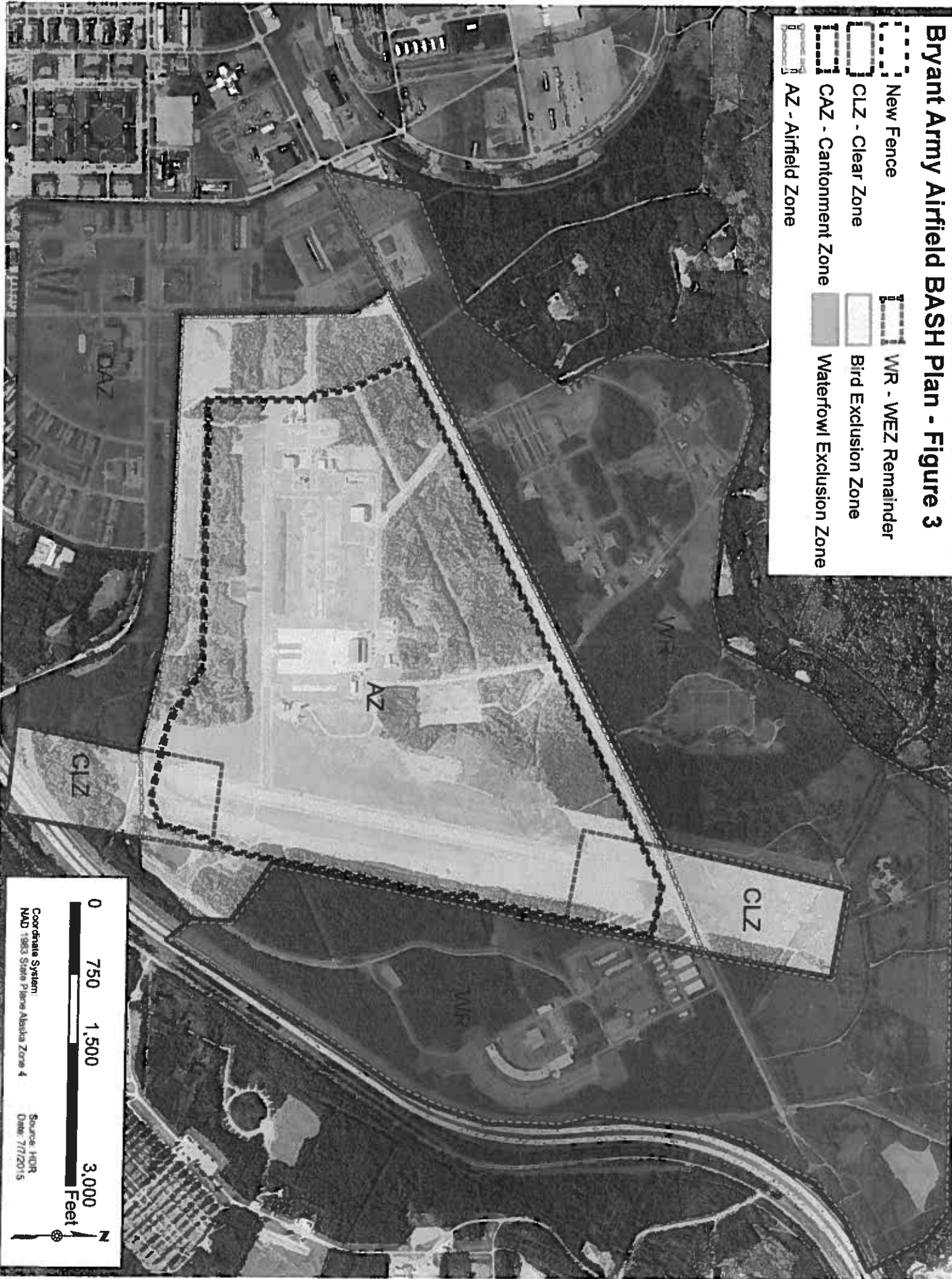
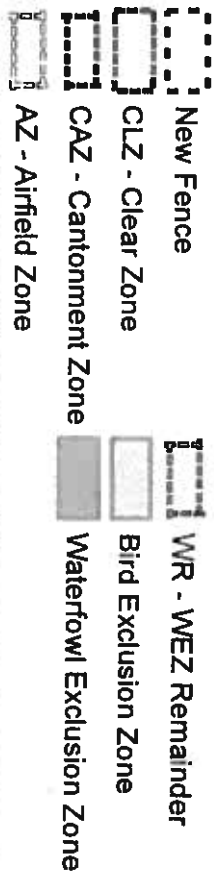
A handwritten signature in black ink, appearing to read 'JNutt', with a stylized flourish at the end.

Jennifer N. Nutt
First Lieutenant, Alaska Army National Guard
Environmental Program Manager

Enclosure

CF:
Socheata Lor, Field Supervisor

Bryant Army Airfield BASH Plan - Figure 3





DEPARTMENT OF THE ARMY
ALASKA ARMY NATIONAL GUARD
POST OFFICE BOX 5800
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99505

July 24, 2015

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Anchorage Operations Office
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4700 BLM Road
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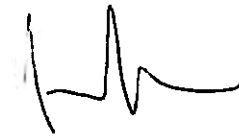
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We sincerely appreciate the assistance we have received from your office in this important program and look forward to continuing this relationship. Please contact me directly if you have any questions or need any further information. Additionally, please identify any of your staff we should contact directly.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jennifer N. Nutt', with a stylized, flowing script.

Jennifer N. Nutt
First Lieutenant, Alaska Army National Guard
Environmental Program Manager

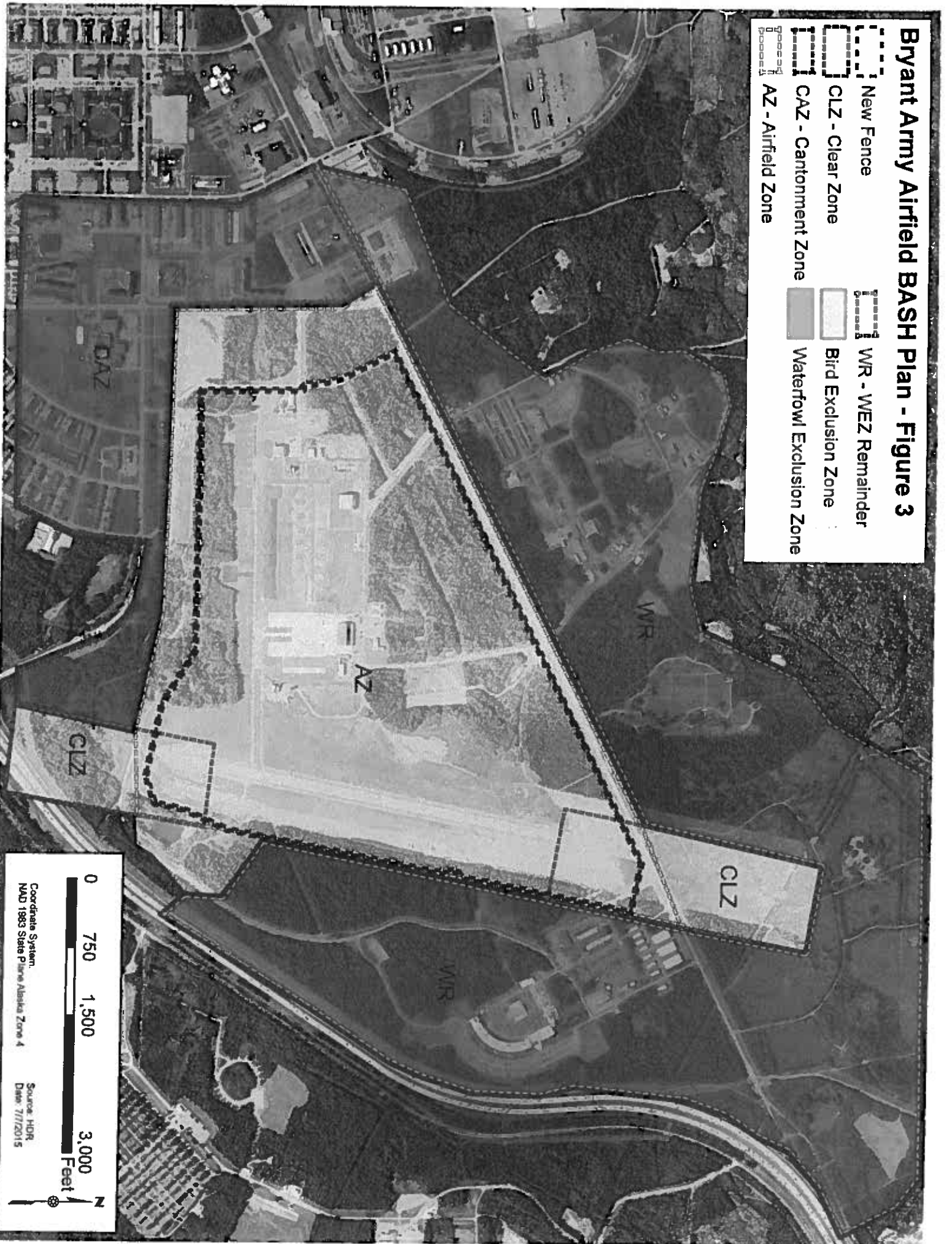
Enclosure

CF:

Socheata Lor, Field Supervisor

Bryant Army Airfield BASH Plan - Figure 3

- New Fence
- CLZ - Clear Zone
- CAZ - Cantonment Zone
- AZ - Airfield Zone
- WR - WEZ Remainder
- Bird Exclusion Zone
- Waterfowl Exclusion Zone



Coordinate System:
NAD 1983 State Plane Alaska Zone 4

Source: HDR
Date: 7/17/2015



**DEPARTMENT OF THE ARMY
ALASKA ARMY NATIONAL GUARD
POST OFFICE BOX 5800
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99505**

July 24, 2015

US Environmental Protection Agency-Anchorage Operations Office

Ms. Dianne Soderlund, Director
222 W. 7th Ave. #19
Anchorage, AK 99513-7588

Dear Ms. Soderlund:

The Alaska Army National Guard (AKARNG) is preparing an environmental assessment (EA) in accordance with the National Environmental Policy Act (NEPA) to analyze the possible impacts related to land clearing, bird and wildlife hazing, habitat modification, and other actions necessary to implement the Bird-Wildlife Aircraft Strike Hazard (BASH) program.

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We request your participation in the NEPA. We would appreciate any comments or concerns you or your staff may have that should be addressed in the EA. We would prefer written comments, but we recognize your office's heavy workload and will accommodate any other communication that would work for you. We expect to complete the first draft of the EA in early September and would very much like to have your response by the end of August so that it can be included in the EA.







We sincerely appreciate the assistance we have received from your office in this important program and look forward to continuing this relationship. Please contact me directly if you have any questions or need any further information. Also, please identify any of your staff we should contact directly.

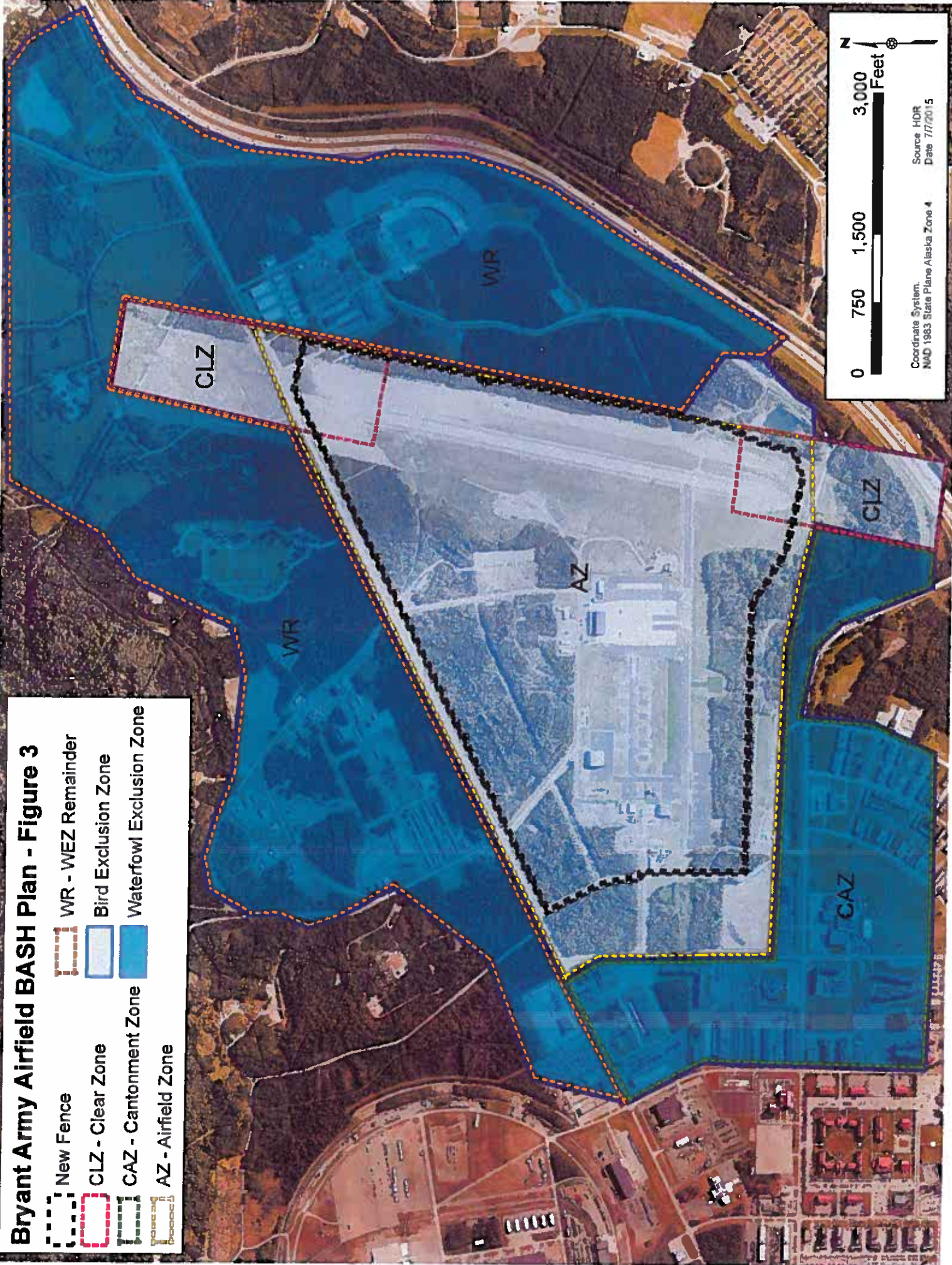
Sincerely,

Jennifer N. Nutt
First Lieutenant, Alaska Army National Guard
Environmental Program Manager

Enclosure

Bryant Army Airfield BASH Plan - Figure 3

-  New Fence
-  CLZ - Clear Zone
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-  AZ - Airfield Zone
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-  Bird Exclusion Zone
-  Waterfowl Exclusion Zone



Source: HDR
Date: 7/7/2015

Coordinate System:
NAD 1983 State Plane Alaska Zone 4



**DEPARTMENT OF THE ARMY
ALASKA ARMY NATIONAL GUARD
POST OFFICE BOX 5800
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99505**

July 24, 2015

Alaska Department of Fish and Game

Anchorage Area

Cynthia Gardner, Wildlife Biologist
Alaska Department of Fish and Game
333 Raspberry Road
Anchorage, AK 99518-1599

Dear Ms. Gardner:

The Alaska Army National Guard (AKARNG) is preparing an environmental assessment (EA) in accordance with the National Environmental Policy Act (NEPA) to analyze the possible impacts related to land clearing, bird and wildlife hazing, habitat modification, and other actions necessary to implement the Bird-Wildlife Aircraft Strike Hazard (BASH) program.

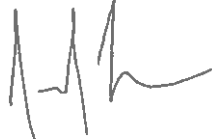
Implementation of a BASH plan is required to protect aircraft and personnel operating at and near Bryant Army Airfield on Joint Base Elmendorf-Richardson in Anchorage, Alaska. The proposed action also is required to meet Department of Defense mandatory requirements for airfield operation.

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We request your participation in the NEPA. We would appreciate any comments or concerns you or your staff may have that should be addressed in the EA. We would prefer written comments, but we recognize your office's heavy workload and will accommodate any other communication that would work for you. We expect to complete the first draft of the EA in early September and would very much like to have your response by the end of August so that it can be included in the EA.

We sincerely appreciate the assistance we have received from ADF&G in this important program and look forward to continuing this relationship. Please contact me directly if you have any questions or need any further information. Also, please identify anyone else in your agency we also should contact directly.

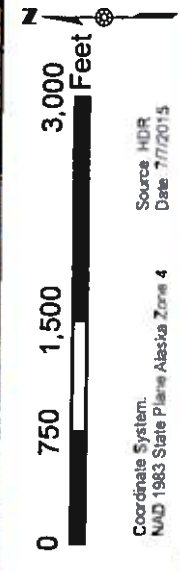
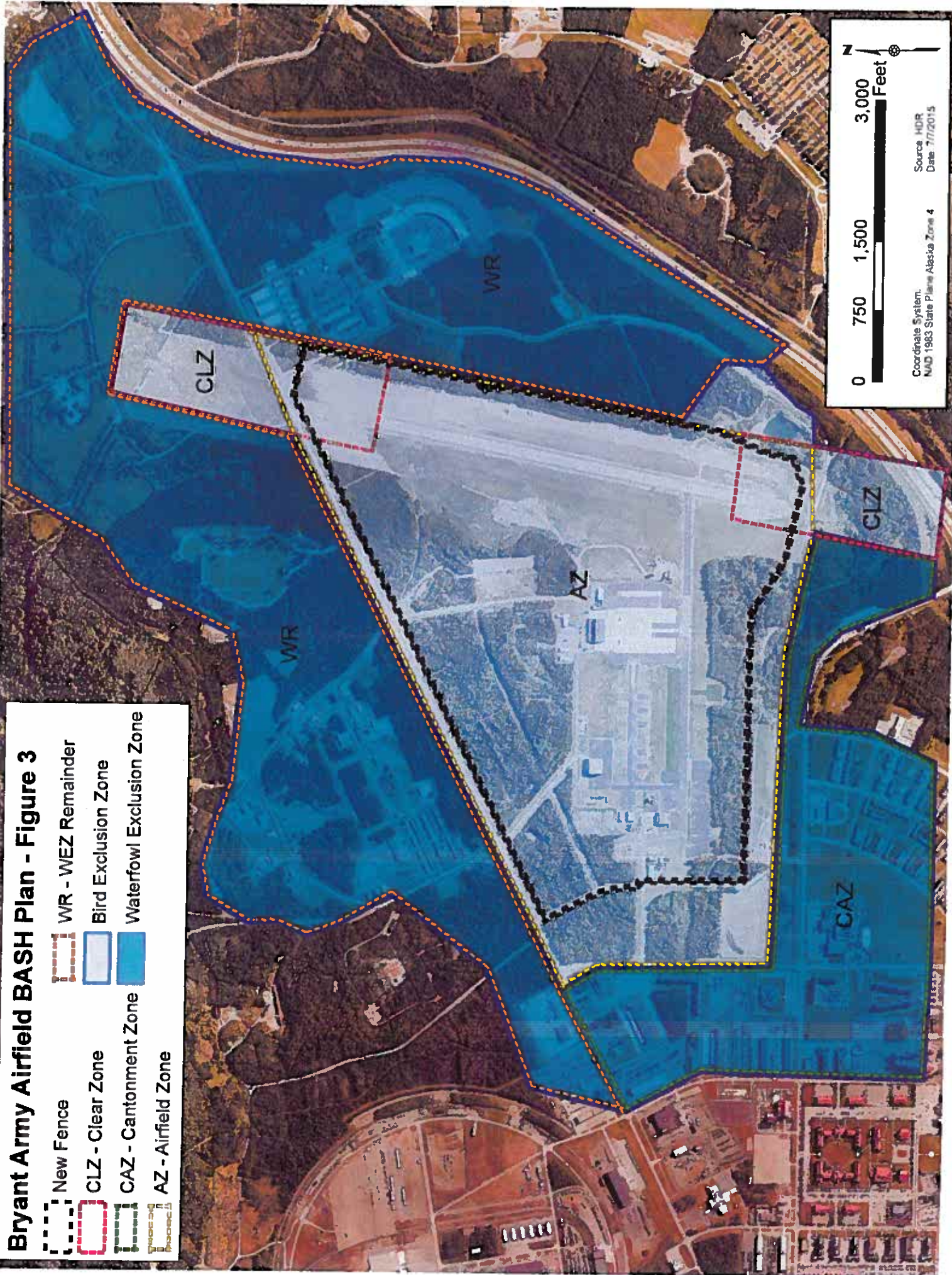
Sincerely,

A handwritten signature in black ink, appearing to read 'J. Nutt', with a stylized flourish at the end.

Jennifer N. Nutt
First Lieutenant, Alaska Army National
Guard
Environmental Program Manager

Enclosure

Bryant Army Airfield BASH Plan - Figure 3



Coordinate System:
NAD 1983 State Plane Alaska Zone 4
Source: HDR
Date: 7/7/2015



**DEPARTMENT OF THE ARMY
ALASKA ARMY NATIONAL GUARD
POST OFFICE BOX 5800
JOINT BASE ELMENDORF-RICHARDSON, ALASKA 99505**

July 24, 2015

**US Army Corps of Engineers – Alaska District
Mr. Shane McCoy, South Section Chief
P.O. Box 6898
JBER, Alaska 99506-0898**

Dear Mr. McCoy:

The Alaska Army National Guard (AKARNG) is preparing an environmental assessment (EA) in accordance with the National Environmental Policy Act (NEPA) to analyze the possible impacts related to land clearing, bird and wildlife hazing, habitat modification, and other actions necessary to implement the Bird-Wildlife Aircraft Strike Hazard (BASH) program.

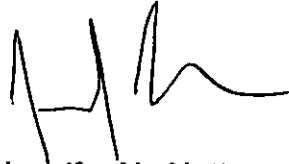
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We request your participation in the NEPA process and continued assistance from your staff toward meeting our obligations under the Clean Water Act. We would appreciate a staff contact which we can work with to review potential jurisdictional wetlands in our project area and any comments or concerns you or your staff may have that should be addressed in the EA. We would prefer written comments, but we recognize your office's heavy workload and will accommodate any other communication that would work for you. We expect to complete the first draft of the EA in early September and would very much like to have your response by the end of August so that it can be included in the EA.

We sincerely appreciate the assistance we have received from your office in this important program and look forward to continuing this relationship. Please contact me directly if you have any questions or need any further information. Also, please identify any of your staff we should contact directly.

Sincerely,

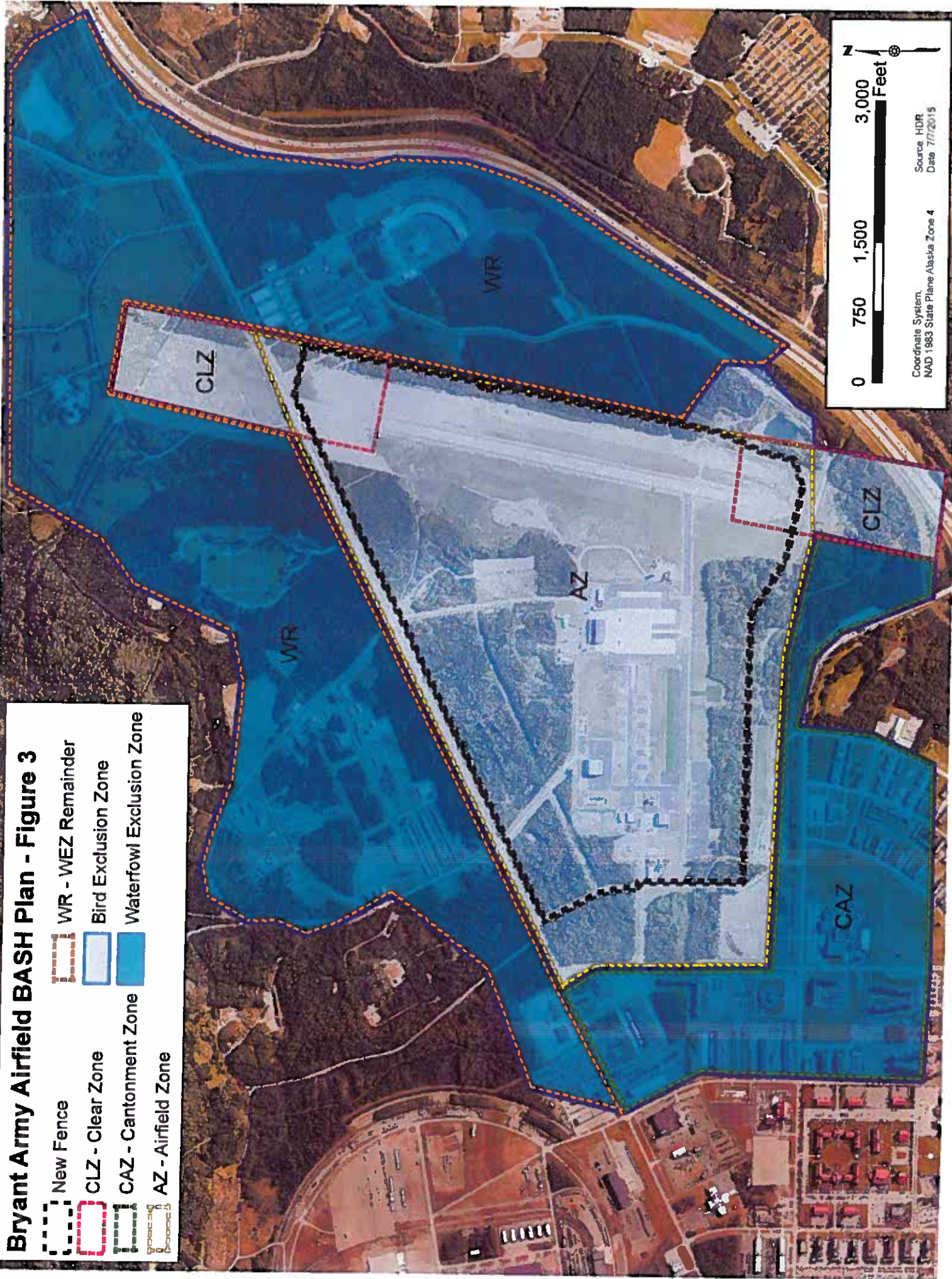
A handwritten signature in black ink, appearing to read 'J. Nutt', with a stylized flourish at the end.

Jennifer N. Nutt
First Lieutenant, Alaska Army National
Guard
Environmental Program Manager

Enclosure

Bryant Army Airfield BASH Plan - Figure 3

- | | | | |
|---|-----------------------|---|--------------------------|
|  | New Fence |  | WR - WEZ Remainder |
|  | CLZ - Clear Zone |  | Bird Exclusion Zone |
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|  | AZ - Airfield Zone | | |





THE STATE
of **ALASKA**

GOVERNOR BILL WALKER

Department of Military and
Veterans Affairs

Office of Facilities Management

P.O. Box 5800
JBER, AK 99505-0800
Main: 907.428.6752
Fax: 907.428.6757

Ms. Judith Bittner
State Historic Preservation Officer
Department of Natural Resources
Office of History and Archaeology
550 West 7th Avenue, Suite 1310
Anchorage, AK 99501

July 24, 2015

Dear Ms. Bittner:

The Alaska Army National Guard (AKARNG) is preparing an environmental assessment (EA) in accordance with the National Environmental Policy Act (NEPA) to analyze the possible impacts related to land clearing, bird and wildlife hazing, habitat modification, and other actions necessary to implement the Bird-Wildlife Aircraft Strike Hazard (BASH) program.

Implementation of a BASH plan is required to protect aircraft and personnel operating at and near Bryant Army Airfield on Joint Base Elmendorf-Richardson in Anchorage, Alaska. The proposed action also is required to meet Department of Defense mandatory requirements for airfield operation.

The BASH plan encompasses Bryant Army Airfield and the area surrounding it, a total area of approximately 1,700 acres. The proposed action would clear approximately 210 acres of woodland in the Airfield Zone (see attached figure). This plan proposes intensive management of habitat and potential food sources as well as employing hazing methods in the Airfield Zone and Clear Zone to remove birds and wildlife. The surrounding Cantonment Zone and Wildlife Extraction Zone Remainder will be managed to exclude geese and other waterfowl.

We request your participation in the NEPA process, and your assistance in meeting our obligations under the National Historic Preservation Act. The following identifies our present status regarding this obligation and the coordination we request from you.

We are developing a draft EA and would appreciate a designated point of contact in your office. Please make any comments regarding the project and any potential impacts to historic properties. AKARNG is conducting inventory, evaluation, and consultation pursuant to Section 106 of the National Historic Preservation Act for the proposed undertaking.

We would appreciate your initial questions and comments regarding these procedures so that we can address them in the draft EA. We would prefer written comments, but we recognize your office's heavy workload and will accommodate any other communication that would work for you. We expect to complete the first draft of the EA in late September and would very much like to have your response by the end of August so that it can be included in the EA.

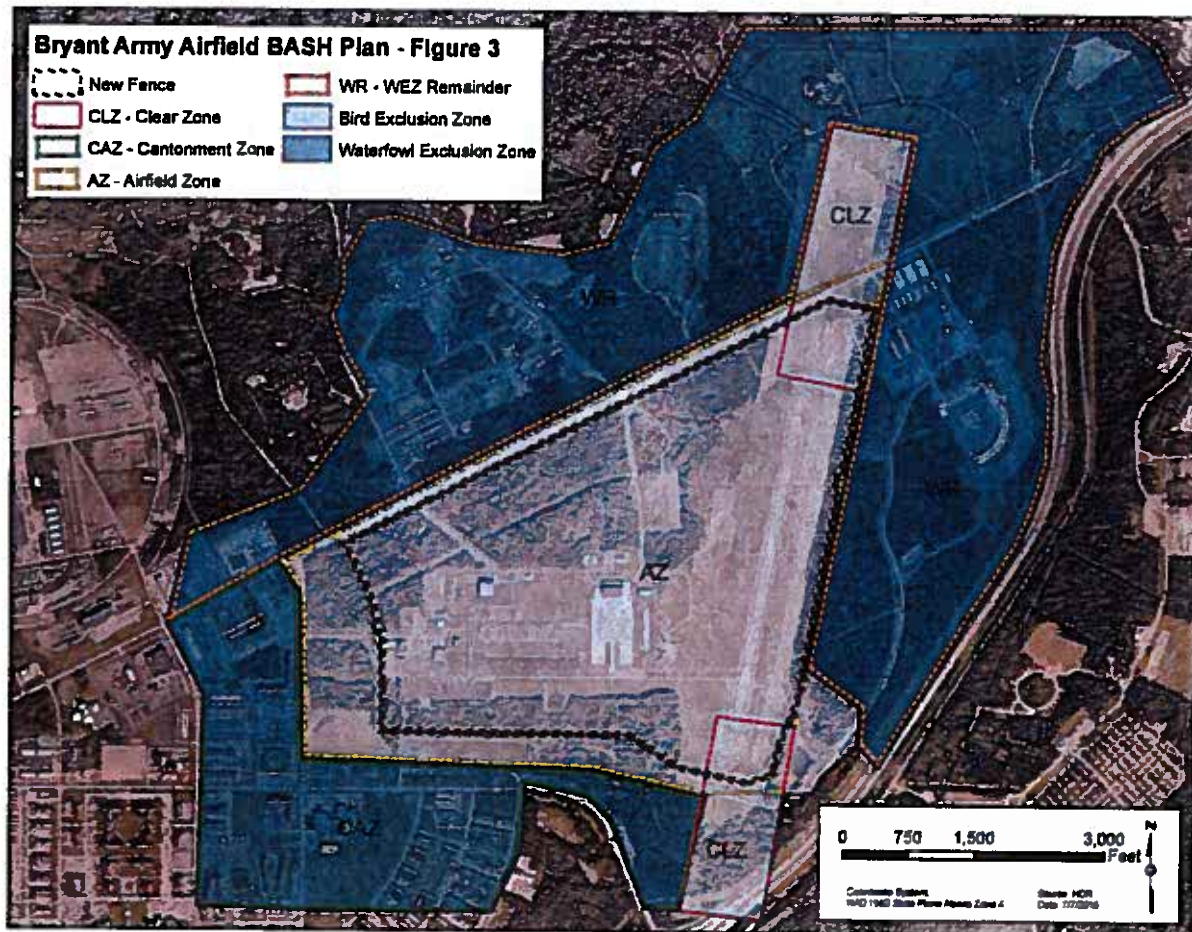
We sincerely appreciate the assistance we have received from your office in this important program and look forward to continuing this relationship. Please contact me or Lt Jennifer Nutt directly at (907) 428-6769, Jennifer.n.nutt2.mil@mail.mil if you have any questions or need any further information. Additionally, please identify any of your staff we should contact directly.

Sincerely,



Thomas R. Wolforth
Cultural Resource Manager
Alaska Army National Guard

Enclosure



From	Duvall, Shina A (DNR)	Date	Thursday, August 06, 2015 3:27:50 PM
To	Wolforth, Tom R (MVA); Nutt, Jennifer N 2LT USARMY NG AKARNG (US) (jennifer.n.nutt2.mil@mail.mil) (jennifer.n.nutt2.mil@mail.mil)		
Cc			
Subject	Bird-Wildlife Aircraft Strike Hazard EA		

Hi Tom & Jennifer,

Thank you for notifying our office of your intent to prepare the subject EA. At this time, we don't have any specific comments since your correspondence notes that the Guard is planning to conduct inventory, evaluation, and consultation pursuant to Section 106.

I would be the appropriate first point of contact here in our office. Please let me know if you have any questions or would like to discuss this further as you move forward.

Best regards,
Shina

Shina duVall, RPA
Archaeologist, Review and Compliance Coordinator
Alaska State Historic Preservation Office / Office of History and Archaeology
550 W. 7th Ave., Suite 1310
Anchorage, Alaska 99501
907-269-8720 (phone) 907-269-8908 (fax)
shina.duvall@alaska.gov



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Natural Resources
DIVISION OF PARKS AND OUTDOOR RECREATION
OFFICE OF HISTORY AND ARCHAEOLOGY

550 West 7th Avenue, Suite 1310
Anchorage, AK 99501-3565
Main: 907.269.8721
Fax: 907.269.8908

November 13, 2015

File No.: 3130-2R Department of Military and Veterans Affairs
2015-01759

Thomas Wolforth, Cultural and Tribal Resource
State of Alaska Department of Military and Veterans Affairs
Office of Facilities Management
PO Box 5800
JBER, Alaska 99505-0800

Subject: Proposed activities associated with implementation of the BASH Plan on Joint Base Elmendorf-Richardson

Dear Mr. Wolforth:

The Alaska State Historic Preservation Office (AK SHPO) received your letter on November 10, 2015, concerning implementation of the Bird-Wildlife Aircraft Strike Hazard (BASH) Plan on Joint Base Elmendorf-Richardson. We reviewed the undertaking for potential impacts to historic and archaeological resources in the undertaking's Area of Potential Effects (APE)—the Bird Exclusion and Waterfowl Exclusion zones surrounding Bryant Army Airfield—pursuant to Section 106 of the National Historic Preservation Act.

Following our review of the documentation provided—2014 BASH Plan and the 2012 and 2014 Cultural Resource Assessments of Bryant Army Airfield—we concur that a finding of **no historic properties affected** is appropriate for this undertaking. However, should unidentified archaeological resources be discovered during removal of trees and plants within the APE, work must be interrupted until the resources have been evaluated in terms of the National Register of Historic Places eligibility criteria (36 CFR 60.4) or the Alaska Landmarks Register in consultation with our office.

Please note that as stipulated in 36 CFR 800.3, other consulting parties such as the local government and Tribes are required to be notified of the undertaking. Additional information provided by the local government, Tribes, or other consulting parties cause our office to re-evaluate our comments and recommendations. Receipt of our comment letter does not end the 30-day review period provided to other consulting parties.

We appreciate the opportunity to comment on this project. Please contact Sylvia Elliott at 269-8724 or sylvia.elliott2@alaska.gov if you have any questions or if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Judith E. Bittner".

Judith E. Bittner
State Historic Preservation Officer
JEB: she

Deputy

9.26.2012

3130-2R DMVA



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

Department of Military and
Veterans Affairs

Office of Facilities Management

P.O. Box 5800
JBER, AK 99505-0800
Main: 907.428.6003
Fax: 907.428.6767

September 10, 2012

Ms. Judith Bittner
State Historic Preservation Officer
Department of Natural Resources
Office of History and Archaeology
550 West 7th Avenue, Suite 1310
Anchorage, AK 99501

No Historic Properties Affected
Alaska State Historic Preservation Officer
Date. 9.26.2012
File No. 3130-2R DMVA

RECEIVED

SEP 11 2012

OHA

Re: Request for concurrence of finding of *No Historic Properties Affected* for the removal of trees around the flight path at the Bryant Army Airfield on Joint Base Elmendorf-Richardson, Alaska

Dear Ms. Bittner:

The Alaska Army National Guard (NGAK) proposes to remove trees around the runway, taxiway, and support buildings at the Bryant Army Airfield (BAAF), on Joint Base Elmendorf-Richardson (JBER), Alaska. This activity is designed to meet compliance with safety issues associated with the 673rd Wing Instruction 91-212 Bird Aircraft Strike Hazard (BASH). Removal of the trees will create a safer air traffic zone by removing avian habitat, and thus reduce potentially lethal accidents resulting from plane-bird impacts. This action constitutes an undertaking pursuant to Section 106 of the National Historic Preservation Act.

The Bryant Army Airfield facility is located at JBER in South Central Alaska, approximately seven air miles from downtown Anchorage (Figure 1). Map coordinates for the installation are latitude 61°15'50" north, longitude 149°40'9" west. The outer limits of the BASH boundary area are 300 meters from the edges of existing runways and taxiways. Approximately 222 acres of trees will be removed to comply with BASH requirements (Figure 2).

The Area of Potential Effect is the approximately 380 acres within the outer limits of the BASH area. Approximately 222 acres of that area is wooded, and those trees will be removed.

Air photographs from 1965 (Figure 3) and 1974 (Figure 4) indicate that the majority of the proposed BASH tree removal area has been previously disturbed by post-World War II construction and land alterations (most often tree removal and quarry areas). Much of the proposed BASH area was cleared of trees and modified during the commencement of the construction of the Bryant Army Airfield in the late 1950s.

There are several buildings on the AHRS within the proposed BASH area. The recordation of the AHRS numbers for these resources (based on Blythe 1998) are in several instances incorrect (Table). The NGAK is currently working to rectify all AHRS and buildings on BAAF.

Building Name	Correct Building #	Current AHRS # (ANC-)	Accurate description of building is under AHRS # (ANC-)	Correct Year Built
Hangar #1	47430	1091	1091	1958
Hangar #2	47433	1092	1094	1962
Hangar #3	na	1094	There is no Hangar #3	na
Hangar #4	47431	None	1092	1996
Flight Operation Tower	48000	1095	1095	1961
Flight Operation Center	47420	1093	1093	1991
Hanger #6	4742	None	None	1976

The Flight Operation Tower has been determined to be not eligible for listing on the National Register of Historic Places (NRHP) under standard criteria (Gomez 2010; SHPO concurrence letter 2010). The other Bryant Airfield buildings listed above have been determined to not be eligible under Consideration Criterion G (Blythe 1998; SHPO concurrence letter 1999). The NGAK is consulting with the Native Village of Eklutna regarding this undertaking.

The majority of the trees slated for removal for BASH compliance have grown up since the construction of the BAAF in the late 1950s and early 1960s. These are in areas where trees were previously removed and the land altered for construction of the BAAF complex. The few areas within the BASH project area that are not in recent regrowth forest are in areas that have also not been disturbed by earlier historical developments associated with Army and/or Army National Guard use, which is a fair indication that there are no historical features in those areas.

The soils in the area are generally sandy silt loam typical to the loess covered outwash plains in this area. The project area is over 200 yards from permanently running water (McVeigh Creek to the east), and over one mile from any notable elevation change. There is a low probability that any subsurface remains of historical or prehistoric cultural resources are present in this area. Indeed, early 20th century homesteads in the region were focused to the east along McVeigh Creek over 0.25 miles away, and further away to the northwest in the Eagle River delta (Hollinger, Kristy 2001 *Homesteads on Fort Richardson, Alaska*. Prepared by CEMML, for U.S. Army Alaska).

It is opinion of NGAK that the proposed removal of 222 acres of trees, most of which are relatively recent regrowth forest, for the BASH program will have no effect on historic properties. The NGAK requests your concurrence in this determination. As always, procedures outlined in the NGAK Integrated Cultural Resource Management Plan will be invoked should any potential cultural resources be encountered during the implementation of this undertaking.

Sincerely,

Thomas R. Wolforth
Cultural Resource Manager

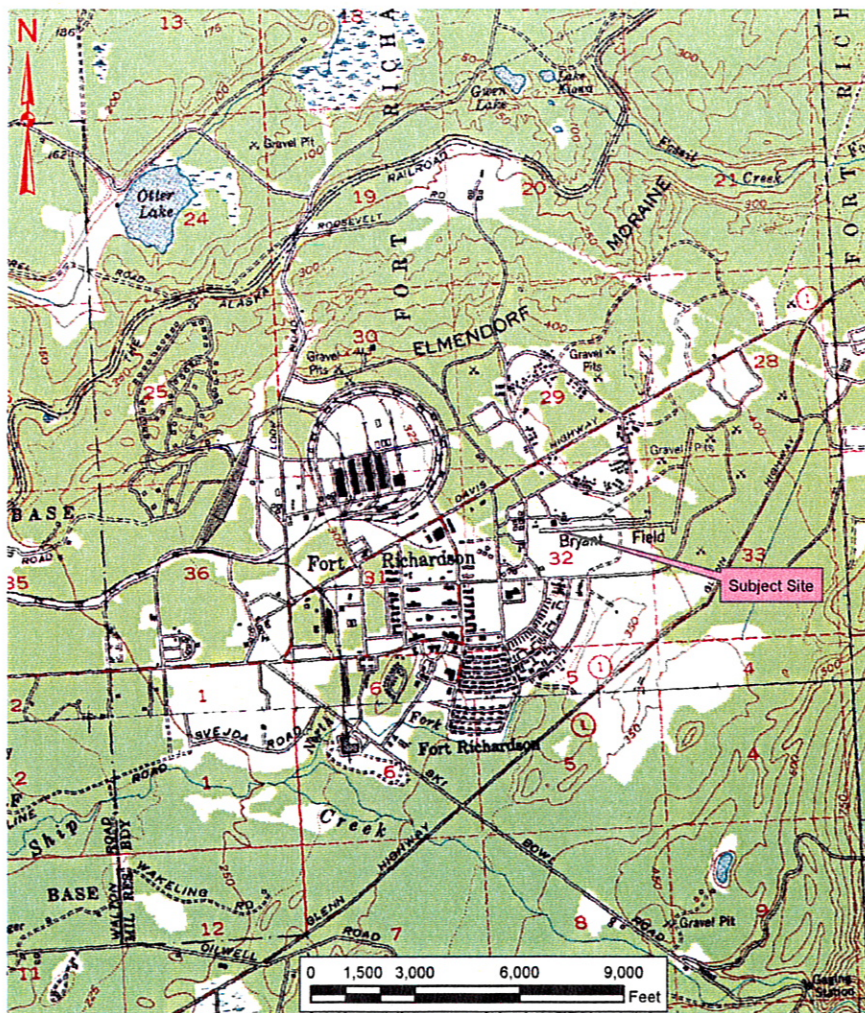


Figure 1. Project Location (USGS Quadrangles Anchorage 7-A, 7-B, 8-A, 8-B).

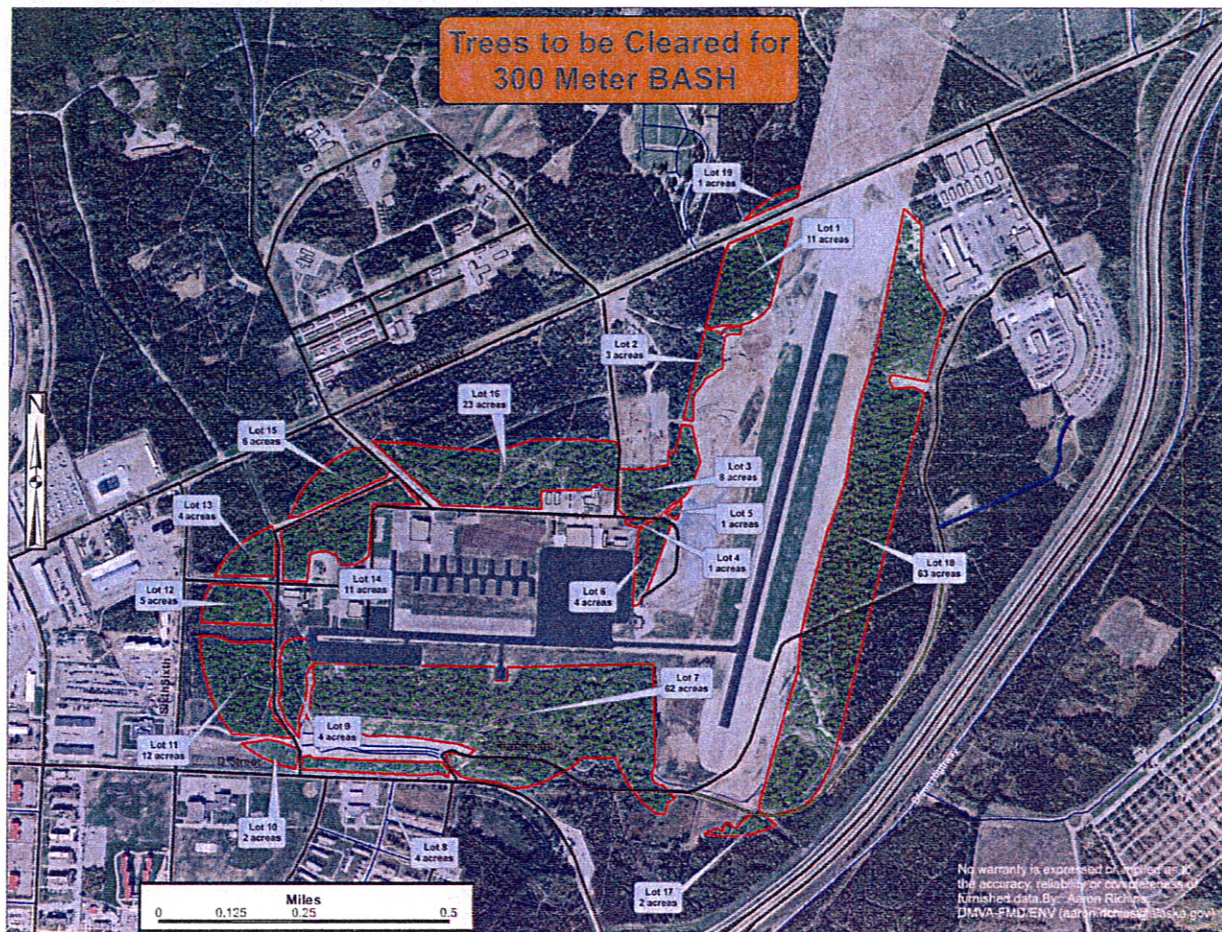


Figure 2. Locations and sizes of areas where trees will be removed for the BASH project.

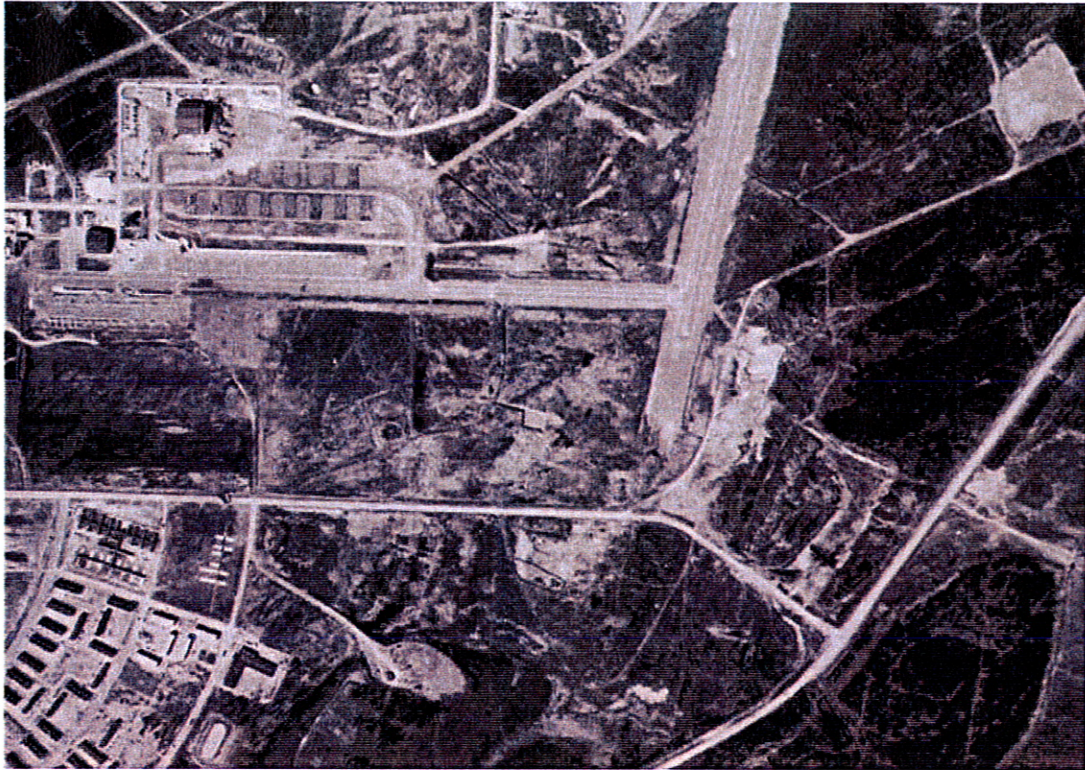


Figure 3. Air photograph from 1965 showing southern 2/3 of project area. Yellow is BASH boundary, and blue are areas of previous disturbance including tree removal and other construction.



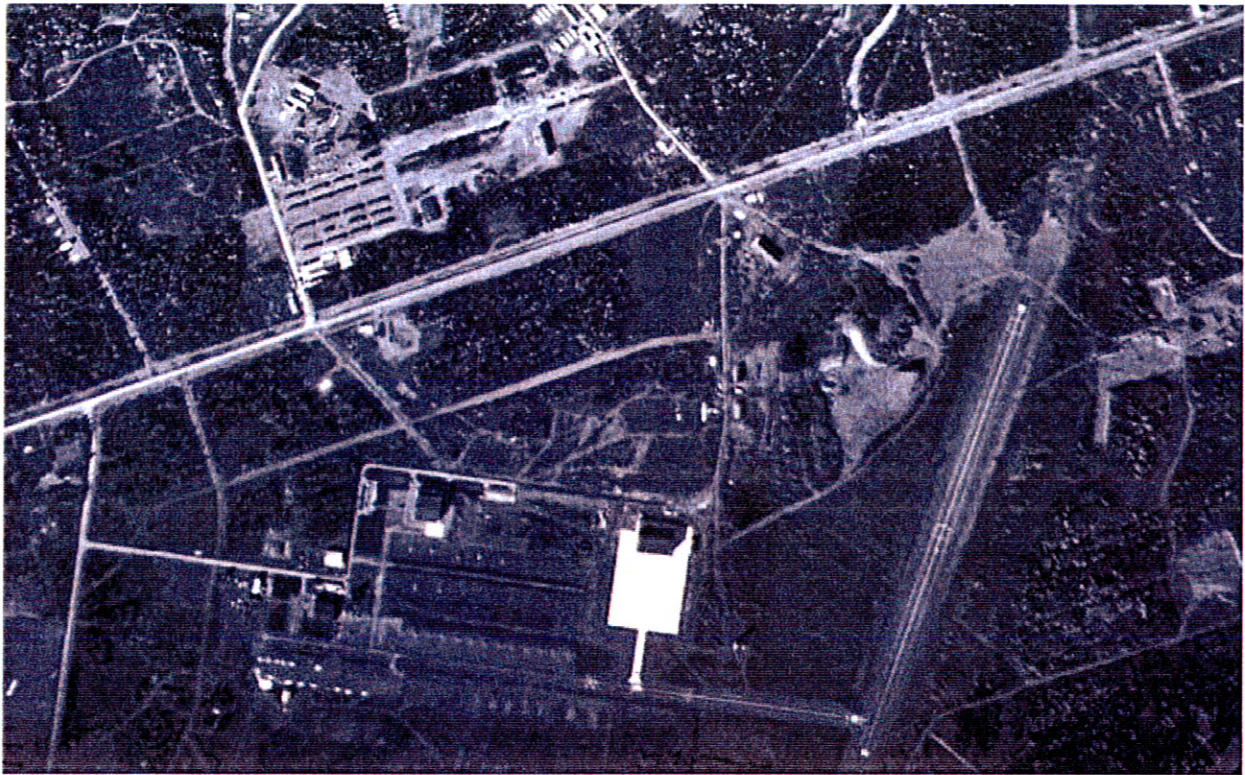
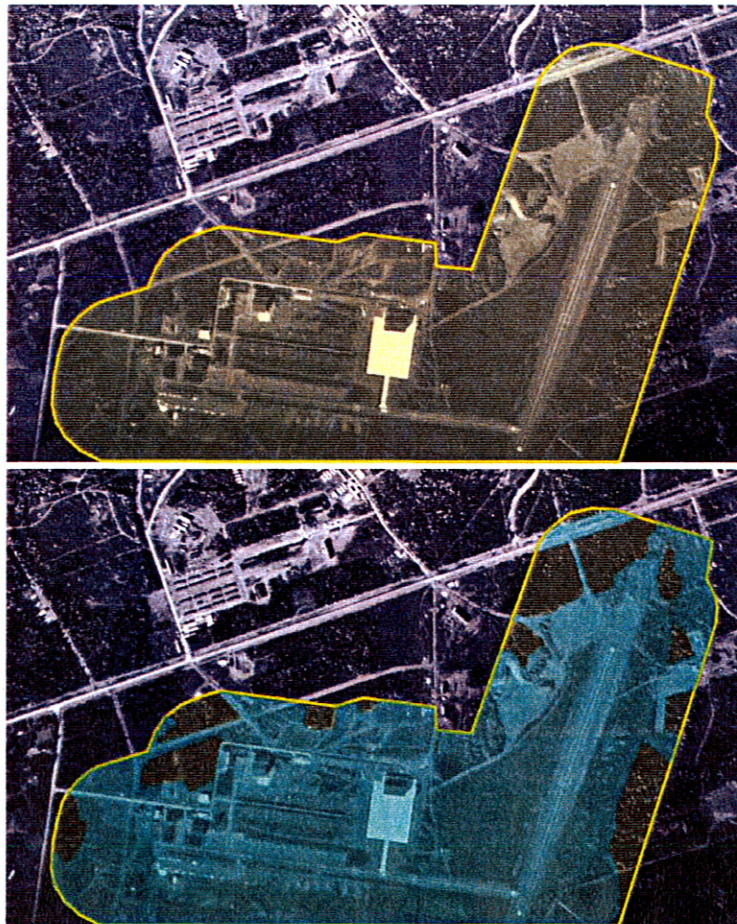


Figure 4. Air photograph from 1974 showing northern 2/3 of project area. Yellow is BASH boundary, and blue are areas of previous disturbance including tree removal and other construction.



Memorandum of Record

Date: August 17, 2015

Re: Native Village of Eklutna comments on BASH EA invitation to consult

Marc Lemoreaux phoned me (Tom Wolforth) on August 17 in response to the AKARNG letter (dated July 27, 2015) to the Native Village of Eklutna: invitation to consult on the proposed activities associated with BASH Environmental Assessment at Bryant Army Airfield for the Alaska Army National Guard on JBER. Mr. Lemoreaux is the Director of the Land and Environment Department for the Native Village of Eklutna. We spoke about the BASH EA and some other items.

Mr. Lemoreaux mentioned that the Native Village of Eklutna receives many notices from many agencies similar to the one that we sent. Consequently, those get filtered and only a limited number get presented to the council for consideration. The BASH EA invitation to consult was not brought before the council. Based on Mr. Lemoreaux's knowledge, experience, and position in the tribe, he provided these comments:

- They are always against cutting trees, especially when that resource is wasted.
- Trees are not merely natural resources. They are integrated into the cultural fabric of native peoples, and considered a cultural resource, too. As is wildlife.
- It would be good if AKARNG could collect felled trees and distribute that resource to those that could use it.
- Other than pointing out the cultural element of the flora and fauna, there was no mention of cultural resources that might be present within the BASH EA impact area.
- Mr. Lemoreaux added that if AKARNG is proposing to shoot birds as part of the BASH program, then please consider working with Native Village of Eklutna members to do that.

From: Nutt, Jennifer N 1LT USARMY NG AKARNG (US)
<jennifer.n.nutt2.mil@mail.mil>
Sent: Tuesday, August 25, 2015 11:24 AM
To: McConnell, Guy
Subject: FW: EPA scoping comments regarding BASH EA

Please review and we can discuss further

-----Original Message-----

From: Curtis, Jennifer [<mailto:Curtis.Jennifer@epa.gov>]
Sent: Thursday, August 13, 2015 3:08 PM
To: Nutt, Jennifer N 1LT USARMY NG AKARNG (US) <jennifer.n.nutt2.mil@mail.mil>
Subject: EPA scoping comments regarding BASH EA

Dear Lieutenant Nutt,

Thank you for the opportunity to provide early comments on the proposed Alaska Army National Guard Environmental Assessment for the BASH program for the Bryant Army Airfield. Our primary concern at this time is the future investigation and potential action for AT029 Ruff Road Fire Training Area, which appears to be located in the proposed northern Clear Zone area. AT029 is a former fire training area where POLs, brake fluid, and solvents were burned within a 50-ft. diameter unlined, earthen pit. A 2013 Site Characterization confirmed GRO/DRO but also higher than expected VOC concentrations. In addition, the cumulative carcinogenic risks were determined to be above the State of Alaska risk standard for indoor air pathway. The primary risk drivers were identified as trichloroethylene (TCE), ethylbenzene, xylenes, and 1,2,4-trimethylbenzene (1,2,4-TMB). Additionally, AT029 Ruff Road Fire Training Area will undergo investigation for the presence of perfluorinated compounds (aqueous firefighting foams) within the next few years. We request that the Army National Guard consider these potential contaminated areas when developing the proposed project and alternatives.

If you have any questions concerning our scoping comments, please do not hesitate to contact me. We look forward to working with you on this Environmental Assessment and any CERCLA-related issues if they arise.

Jennifer Curtis, NEPA Reviewer

US EPA-Alaska Operations Office

222 West 7th Avenue, #19

Anchorage, Alaska 99513

Phone: 907-271-6324

Fax: 907-271-3424



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Department of Military and
Veterans Affairs**

Office of Facilities Management
P.O. Box 5800
JBER, AK 99505-0800
Main: 907.428.7158
Fax: 907.428.7192

Aaron Leggett, President
Native Village of Eklutna
26339 Eklutna Village Road
Chugiak, AK 99567

July 10, 2018

Additional consultation regarding the Bird-Wildlife Aircraft Strike Hazard Environmental Assessment at Bryant Army Airfield for the Alaska Army National Guard on Joint Base Elmendorf-Richardson, Alaska

Dear President Leggett:

Several years ago the Alaska Army National Guard corresponded with the Native Village of Eklutna regarding plans to develop a BASH EA (Bird-Wildlife Aircraft Strike Hazard Environmental Assessment). Implementation of a BASH Plan is required to protect aircraft and personnel operating at and near Bryant Army Airfield on Joint Base Elmendorf-Richardson in Anchorage, Alaska. The proposed action also is required to meet Department of Defense mandatory requirements for airfield operation.

The BASH Plan encompasses Bryant Army Airfield and the area surrounding it, a total area of approximately 1,700 acres. The proposed action would clear up to 212 acres of woodland in the Airfield Zone (see attached figure). This plan proposes intensive management of habitat and potential food sources as well as employing hazing methods in the Airfield Zone and Clear Zone to remove birds and wildlife. The surrounding Cantonment Zone and Waterfowl Exclusion Zone Remainder will be managed to exclude geese and other waterfowl.

Some changes have been made to the EA over that last couple of years. The revised EA will be published online for a final public comment period in the next few months. If you would like, we can notify you when it is available for review".

Marc Lemoreux spoke with me about Native Village of Eklutna concerns associated with this project and the earlier EA version. He expressed these views on behalf of the tribe:

- They are always against cutting trees, especially when that resource is wasted.
- Trees are not merely natural resources. They are integrated into the cultural fabric of native peoples, and considered a cultural resource, too. As is wildlife.
- It would be good if AKARNG could collect felled trees and distribute that resource to those that could use it.
- Other than pointing out the cultural element of the flora and fauna, there was no mention of cultural resources that might be present within the BASH EA impact area.
- Mr. Lemoreaux added that if AKARNG is proposing to shoot birds as part of the BASH program, then please consider working with Native Village of Eklutna members to do that.

These concerns have been taken into consideration as the BASH Plan has developed. Here is how those are now incorporated into the plan.

Cutting trees

The process for felling trees within the BASH zones has not been finalized. The felling process could include: 1) dropping trees individually; 2) using a hydro-axe to mulch the trees in place; or 3) some combination. Decisions regarding how best and most efficiently remove the trees will be made in the future.

Collecting trees

Should trunks and branches of trees remain intact during the felling operation, those parts would be either: 1) salvaged by the tree removing contractor, or 2) moved to an outdoor storage area somewhere on Joint Base Elmendorf Richardson (JBER). Decisions regarding who will retain the tree remains will be made in the future.

Salvaged by contractor

If it is determined that the contractor retains the trees, AKARNG will make sure to notify the Native Village of Eklutna and provide the name and contact information for that contractor. The Native Village of Eklutna could at that time negotiate any arrangement that suits both parties regarding access to those trees. AKARNG will not be able to facilitate any such arrangement.

Removed to a JBER tree lot

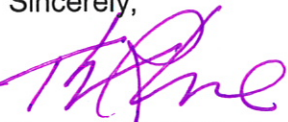
If it is determined that the contractor will move tree parts to a JBER tree lot, AKARNG will make sure to notify the Native Village of Eklutna. JBER has an on-going set of tree lots. Trees felled on JBER are transported to those locations. Military personnel and the public are welcome to retrieve trees from those locations. The process for collecting these is provided on the helpful and clear JBER website: <https://jber.isportsman.net/Firewood.aspx>. It would be the responsibility of the Native Village of Eklutna to arrange for collecting tree parts from the tree lots in accordance with the procedures set forth by JBER.

Shooting birds

I spoke with Brandon Streadbeck regarding how animals that encroach on the BAAF are handled. He works for the United States Department of Agriculture, and he and his crew are on-site everyday around the runway to assist with flight safety issues associated with a variety of animals. That crew will relocate, move nests, and sometimes eradicate animals that cannot be handled otherwise. They have a process to get those animals (birds and eggs included) into the hands of Alaska Native elders. There is no fee involved, but there is a form filing requirement. To participate in this program, please phone Brandon Streadbeck at 907.862.2473, and/or contact him at Brandon.a.streadbeck@aphis.usda.gov.

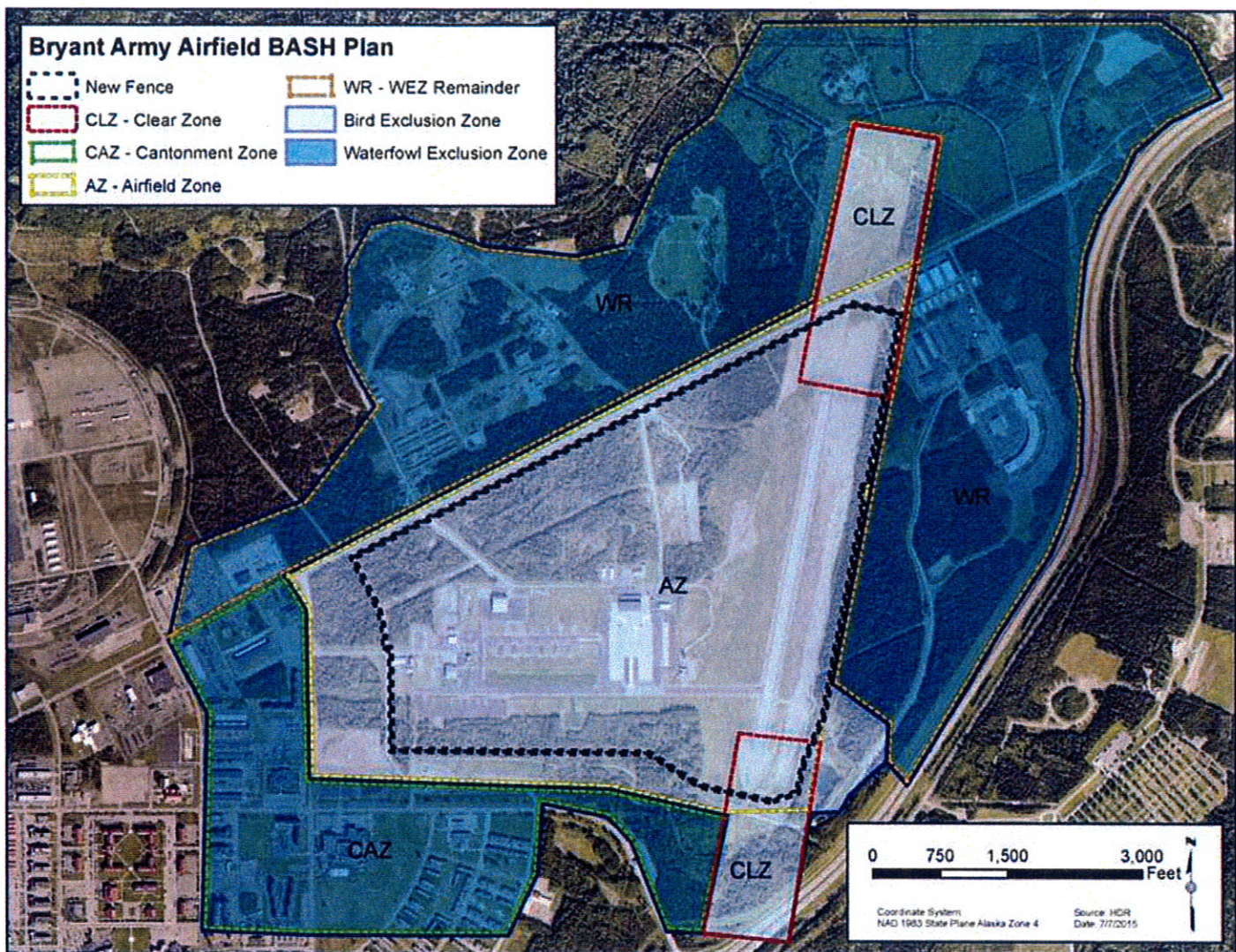
We encourage you to seek out the people and programs that administer the tree lot and animal sharing programs outlined above. In addition, we will be incorporating these into the EA by ensuring that AKARNG personnel are aware of the programs with the goal of continued communication with the Native Village of Eklutna as tree and animal issues arise.

Sincerely,



Thomas R. Wolforth
AKARNG Tribal Liaison

Encl: Figure



The BASH Plan calls for clearing up to 212 acres of woodlands and associated vegetation in the AZ (the area within the yellow dotted line). This would include all trees within 300 meters of Runway 17-35 and other aircraft operation areas. In the CLZ (the red dotted line), 67 acres of woodlands and shrubs would be cut short to promote growth of low brushy vegetation.

MEMORANDUM FOR RECORD

Actions taken by AKARNG with regard to both Section 106 and tribal consultation conducted in association with the Bird-Wildlife Aircraft Strike Hazard Environmental Assessment at Bryant Army Airfield, Joint Base Elmendorf-Richardson

Tom Wolforth, AKARNG Cultural Resources Manager and Tribal Liaison
July 11, 2018

Consultation with Alaska State Historic Preservation Office

AKARNG conducted and contracted to be conducted archaeological and historical architectural surveys for the Bryant Army Airfield. Information from those surveys and evaluations were used to make a determination that the actions associated with the Bird-Wildlife Aircraft Strike Hazard at Bryant Army Airfield, Joint Base Elmendorf-Richardson would not adversely affect historic properties. AKARNG consulted with the Alaska State Historic Preservation Office (AKSHPO), and the AKSHPO concurred with this determination, with one stipulation:

“However, should unidentified archaeological resources be discovered during removal of trees and plants within the APE, work must be interrupted until the resources have been evaluated in terms of the National Register of Historic Places eligibility criteria (36 CFR 60.4) or the Alaska Landmarks Register in consultation with our office.”

AKARNG actions taken

The AKARNG Integrated Cultural Resource Management Plan (ICRMP) identifies modes of operation for activities such as the one identified as a concern of AKSHPO above: inadvertent discoveries. In addition to following those protocols, AKARNG is conducting these additional actions for the Bird-Wildlife Aircraft Strike Hazard Plan:

- The AKARNG Cultural Resource Manager will attend the Bryant Army Airfield management meetings on a regular basis to ensure awareness of BASH Plan activities.
- The BAAF Management will ensure that contract stipulations and internal maintenance and development actions associated with BASH Plan will include review and discussion with the AKARNG Cultural Resource Manager.
- The AKARNG Cultural Resource Manager will assist BAAF Management in writing work plans for BASH Plan actions. These will focus on ensuring that archaeological monitoring of these actions will be conducted appropriately and pursuant to state and federal laws referenced in the Bird-Wildlife Aircraft Strike Hazard Environmental Assessment at Bryant Army Airfield, Joint Base Elmendorf-Richardson.
- The AKARNG may conduct those monitoring actions, or that may be contracted out.
- If cultural resources are identified during that monitoring, actions taken will be in full compliance with state and federal cultural resources laws.
- Reports on the reasons, methods, and results of that monitoring will be submitted to the Alaska State Historic Preservation Office, and included in routine documentation with the National Guard Bureau.

Consultation with Native Village of Eklutna

AKARNG consulted with the Native Village of Eklutna regarding potential concerns on the historically native lands for the Bird-Wildlife Aircraft Strike Hazard Environmental Assessment at Bryant Army Airfield, Joint Base Elmendorf-Richardson. The Native Village of Eklutna expressed these concerns:

- They are always against cutting trees, especially when that resource is wasted.
- Trees are not merely natural resources. They are integrated into the cultural fabric of native peoples, and considered a cultural resource, too. As is wildlife.
- It would be good if AKARNG could collect felled trees and distribute that resource to those that could use it.
- Other than pointing out the cultural element of the flora and fauna, there was no mention of cultural resources that might be present within the BASH EA impact area.
- They added that if AKARNG is proposing to shoot birds as part of the BASH program, then please consider working with Native Village of Eklutna members to do that.

AKARNG actions taken

AKARNG researched opportunities to distribute felled trees and spent animals and eggs that may occur during the Bird-Wildlife Aircraft Strike Hazard process. That information was provided to the Native Village of Eklutna in a letter dated July 10, 2018 (included elsewhere in the Bird-Wildlife Aircraft Strike Hazard Environmental Assessment at Bryant Army Airfield, Joint Base Elmendorf-Richardson). The AKARNG Cultural Resource Manager will work with BAAF Management to ensure these activities will be carried out.