

DRAFT ENVIRONMENTAL IMPACT STATEMENT for RESUMPTION OF YEAR-ROUND FIRING OPPORTUNITIES ON FORT RICHARDSON

Written Comments:

Comments are due Monday June 14th, 2010

Ms. Carrie McEnteer

Directorate of Public Works

Attn: IMPC-FWA-PWE (C. McEnteer)

1060 Gaffney Road, #4500

Fort Wainwright, AK 99703-4500

Fax: (907)361-9867

Email: carrie.mcenteer@us.army.mil

Talking Points

- Alternative #1 is a No Action Alternative

ACE supports the No Action Alternative. This alternative allows the Army to continue to use the Eagle River Flats for weapons training during the winter months. The frozen ground reduces the risks of toxic substances being exposed from previous contamination. Winter-only firing restrictions protect soil and vegetation from disturbance limiting erosion and sedimentation. Additionally, wildlife activity during the winter months is lower and marine mammals are not likely to be present.

- Alternative #2 would allow year-round Live Fire Training at Eagle River Flats. This is the Army's preferred alternative. In their purpose and need statement, they cite that troop readiness and soldiers' quality of life issues justify the proposed changes. While we support the Army's need for training opportunities for our soldiers, we also have concerns about a rich and productive wetlands area being used for weapons training, as well as the potential impacts to neighboring communities. The Army has facilities in Alaska that accommodate troop readiness without impacting the watersheds and communities of Anchorage. Alternative 2 would result in further damage to the Eagle River Flats estuary,

harming water quality, and impacting birds, fish, the endangered Cook Inlet beluga whale and other wildlife. A likelihood remains of white phosphorus being redistributed into the ERF through disturbances to the soil from explosions. Impacts of this redistribution of white phosphorus on waterfowl, fish, belugas and other mammals which rely on the ERF for food and shelter is still unknown and of concern. Aerial surveys conducted by Fish and Wildlife in 2006 clearly demonstrates that the ERF is a crucial habitat for birds- with counts of over 2,000 ducks, more than 1,000 geese and over 100 swans during a given month. Additionally, the noise impacts would be felt by many residents. Having a firing range in the backyard of such a large urban area creates a huge impact on the quality of life of the communities surrounding Fort Richardson.

- Alternative # 3 The Eagle River flats area would continue to be used under frozen-only conditions AND a new, 2,000 acre South Post Impact Area would be developed, located in the Snowhawk Valley drainage. This proposal would impact 2,000 acres of land in close proximity to Chugach State Park and surrounding neighborhoods. Approximately 15 miles of new roads would be constructed and 8 miles of fire breaks as well as multiple firing and observation points. Over 400 acres would be clear cut and access into popular destinations in Chugach State park may be frequently or permanently restricted. High levels of noise would impact the neighborhoods of Muldoon and Stuckagain Heights. Munitions containing white phosphorous, now restricted at ERF, would again be used. The munitions weapons systems would include 60, 80 and 120mm mortars and 105mm howitzers. Wildlife habitat and vegetation would be destroyed from the significant clearing to develop roads, firing and observation points.

For more information:

http://www.usarak.army.mil/conservation/NEPA_DEIS_Year-Round_Firing.asp

Background:

- The live-fire bombing of Eagle River Flats has resulted in severe physical and toxic damage to the estuary of the Eagle River. Contamination from the use of white phosphorus has resulted in the deaths of thousands of waterfowl each year.

- Although the Army discontinued the use of white phosphorus, it failed to address the contamination from the more than 10,000 unexploded bombs and other munitions at Eagle River Flats, harm to water quality, salmon habitat, and the Cook Inlet beluga whale population.
- Eagle River Flats is an important feeding area for the endangered Cook Inlet beluga whale. According to their Draft Environmental Impact Statement, 5-30 beluga whales were spotted per month in the Eagle River Flats area in 2007 and 2008. Belugas have been spotted by the USGS as far as 1.5 miles upriver from the mouth of Eagle River. Belugas are known to be extremely sensitive to noise.
- After the Army restricted firing on Eagle River Flats to the winter months, the waterfowl population in the area markedly increased. Resuming year round firing would threaten waterfowl and migratory birds who use this coastal estuary.
- The Environmental Protection Agency has only held the U.S. Army accountable for white phosphorus and not for the numerous other toxins that are still poisoning our waterfowl, fish, wildlife and possibly humans who consume wild foods that could be contaminated.
- Among numerous other toxic substances found in munitions:
 - o Lead, a serious nervous system toxin;
 - o Other dangerous heavy metals, including cobalt, chromium, beryllium;
 - o Dinitrotolulene, a known carcinogen in people;
 - o RDX, also known to be carcinogenic to people
 - o Lindane, a dangerous pesticide that is extremely toxic and is internationally banned by the Stockholm Convention on Persistent Organic Pollutants, a global treaty to protect human health and the environment from chemicals that remain intact in the environment for long periods.