



February 23, 2024

Katherine Jesser, Environmental Planner
 Naval Facilities Engineering Systems Command Northwest, EV23
 1101 Tautog Circle
 Silverdale, WA 98315

RE: U.S. Navy Eastern Washington Airspace Extension Environmental Assessment

Dear Ms. Jesser:

Thank you for the opportunity to provide comments to the U.S. Navy's Eastern Washington Airspace Extension Environmental Assessment. The 38 undersigned organizations represent local businesses and conservation, recreation, wildlife and civic groups that are heavily invested in the decades of hard-fought investment in the recreation opportunities, wildlife habitat, and economic benefits and quality of life for local communities in and near the proposed Okanogan D Military Operation Area (MOA).

As Americans we all understand and appreciate the need for our military to provide the quality training necessary to defend our country when the time for deployment arrives. Moreover, we support the need of the Navy to provide this training to ensure that our troops are ready and prepared to serve their country.

We also feel strongly that we can and should be able to ensure that we can achieve military readiness through appropriate training exercises while at the same time honoring the significant investment that the American public, the U.S. Congress, federal agencies and local residents have made over the past several decades in conservation, recreation, wildlife and habitat, local economies and the quality of life of rural communities in or around the existing and proposed MOAs.

We submit the following comments to the draft environmental assessment and hope that they will be considered and influence the nature of the Final Environmental Assessment (EA) or Environmental Impact Statement (EIS) that will need to be prepared in the coming months. We have significant concerns about the proposed new Okanogan D MOA in both Alternatives 1 and 2.

I. Call for Development of an Environmental Impact Statement (EIS)

The nature of the proposed Okanogan D MOA expansion includes several potential negative impacts to significant portions of federally designated Wilderness Areas, critical habitat for threatened and endangered species, world class recreational opportunities, key elements of the local economy, quality of life and safety for the Methow Valley. Because

of these factors we believe that this proposal is considered a major federal action and that a full Environmental Impact Statement (EIS) is required to be prepared under the National Environmental Policy Act.

II. The Range of Alternatives is too Limited

An important requirement of NEPA is to provide and analyze the range of reasonable alternatives. The scoping document only identifies a No Action Alternative, the preferred Alternative (Alternative #1 and a more expansive alternative (Alternative #2). Both Alternative #1 and #2 include the same proposed Okanogan D MOA and only differ in increased frequency of flights they allow. They do not however differ in the floor elevation for training or the geographic location of the proposed expansion. Both of these factors would mitigate the concerns that we express in this letter. We hope that the Navy will be open to expanding the number of alternatives as part of the final EA/EIS based on feedback received during this comment period.

III. Significant concerns with the Proposed Okanogan D MOA

Impacts on Wilderness Character

According to the draft EA, the Okanogan D MOA includes significant portions of the Pasayten and Lake Chelan/Sawtooth Wilderness Areas.

A Wilderness designation is the highest level of protection on federal lands and is guided by the Wilderness Act of 1964 which stated the following purpose in Section 2(a):

“In order to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States..., leaving no lands designated for preservation and protection in their natural condition, it is hereby declared to be the policy of Congress to secure for the American people of present and future generations the benefits of an enduring resource of wilderness.” Section 2(a)

We are concerned that the only expansion of airspace considered by the Navy was in an area that included designated Wilderness areas, the highest level of protection on federal lands. Additionally, these areas are mountainous and high elevation creating a smaller vertical distance to noise and disturbance of aircraft from the ground than the mean sea level (MSL) elevation would suggest (See discussion later in this document).

It appears that no attempt was made to avoid impacting these hard-fought protections. Both the proposed Okanogan D MOA and the Mazama ATCCA have upper limits (18,000 ft MSL and 25,000 ft. MSL, respectively) that are well below the altitude range that commercial planes fly over the North Cascades Mountains (between 30,000 ft. and 42,000 ft. MSL). The result is a significant increased impact to Wilderness character and values for the Pasayten and Lake Chelan/Sawtooth Wilderness Areas.

Impacts on Recreational Opportunities

The various MOAs discussed in the EA include the Okanogan Wenatchee National Forest (OWNF) and the Colville National Forest. These federal lands provide important recreational opportunities that support public health and local economies in rural areas. The proposed Okanogan D MOA is almost entirely located within the OWNF.

The OWNF is well known and prized by locals and visitors alike for its diverse and myriad recreational opportunities. The forest boasts more than 2,000 miles of recreation trails, more than 20 developed campgrounds and recreational rental cabins. More than 8,000 miles of roads traverse the forest, many of which provide access to recreational opportunities.

The OWNF offers a range of world class and family oriented recreational opportunities to hunt, fish, camp, hike, mountain bike, paddle, horsepack, climb, ski, watch wildlife, take nature photographs and a host of other activities. According to the U.S. Forest Service, the Forest receives 2,130,800 visits roughly split in half between day and overnight visits.¹

A significant number of hours have been invested by volunteers, organizations and local residents to build, maintain and market this considerable recreational infrastructure. In addition, decades of financial investment from federal, state and local sources in conservation and protection have resulted in natural amenities which are second to none in the world. We are concerned that the analysis around potential impacts to recreational opportunities done prior to scoping was not sufficient to protect this substantial investment.

Impacts on Wildlife Habitat

The North Cascades ecosystem is critically important for plants and animals in Washington State. Anchored by federal Wilderness, national park and national forest lands as well as Department of Natural Resource lands – these landscapes have significant ecological importance for long-term viability of Pacific Northwest species. The lands serve as population and habitat strongholds for a number of endangered and threatened species, including salmon, steelhead and bull trout, northern spotted owl, Canada lynx, wolverine, wolf, and grizzly bear. Some imperiled species, like wolves and wolverine are returning to the pristine North Cascades on their own, while grizzly bears are to be reintroduced and recovered by state, federal, and provincial agencies, and First Nations.

The proposed training and flights, which may occur within as few as 2,500 feet above of the ground at the higher elevations within the Okanogan D MOA, may significantly impact high elevation plants and animal communities, birds with seasonal or daily migrations, and threatened, endangered, sensitive, and other wildlife and their habitat. Depending on flight and training intensity, these impacts may be significant and controversial, warranting deeper and broader review under an EIS. For example, noise disruption from aircraft travel can disrupt behavior and render habitat unsuitable during critical breeding periods and at other times, increasing mortality risk and threatening viability. In a public meeting (2/13/24) the Navy indicated that noise levels could reach as high as 90-100 decibels at certain times. Aircraft collisions with airborne birds are fatal.

The proposed Okanogan D MOA is located in areas inhabited by Canada lynx and wolverine, and within the North Cascades Grizzly Bear Recovery Area where recovery efforts are underway. These animals use high elevation areas for denning, reproduction, and foraging. Mountain goats, which have declined statewide, also occur and overwinter in these high-elevation environments. Spotted owls, whose range is collapsing from the north, inhabit forests adjacent to training areas within travel zones. Disturbance near dens or other habitat areas has been shown to displace or disrupt grizzly bears, wolverines, mountain goats and spotted owls, and should be avoided.

Proposed training actions, including overflights may impact, degrade or render inhospitable habitat within the Okanogan-Wenatchee National Forest protected within; (1) designated Wilderness areas; (2) Late-Successional and Riparian Reserves within the Northwest Forest Plan; (3) Spotted owl nest sites; (4) critical habitat or recovery areas designated under the Endangered Species Act; (5) lands identified as Priority Habitat by the state (6) Inventoried Roadless Areas; and (7) suitable mountain goat habitat. These areas are essential to the protection and recovery of Washington s wildlife and should be avoided by aircraft and excluded from training activities.

Impacts to local communities within the Methow Valley

Many local rural communities such as Winthrop, Mazama, Twisp and many others rely on visitation to the Okanogan-Wenatchee National Forest to support an important part of their local economies. These visitors include hikers,

¹ Proposed Action for Forest Plan Revision Okanogan-Wenatchee National Forest, USDA, 2011

paddlers, climbers, skiers, horseman and other recreationists as well as those seeking to get away from the urban areas in search of the relative peace and quiet of the woods.

The draft EA should consider not only the direct impact to recreational opportunities from the proposed Okanogan D MOA but also the indirect impact the proposed activities may have on economic inputs to local communities.

As helicopter training exercises increased on the Joint Base Lewis McChord (JBLM) site due to consolidation from other bases elsewhere in the country, impacts to local residents from off base training exercises became an issue resulting in scores of complaints and periods of stopping training flights.² The residents of the Methow Valley have the very same concerns related to noise and uncertainty of the timing of training exercises. The draft EA/EIS should address specific actions that would help mitigate any potential impact on these local residents from overflights such as disruption of their quality of life or sleep during night activities. Prior notice to local communities and predictability of when and where training missions would occur should be included in the draft EA/EIS.

Concerns About Using Mean Sea Level (MSL) as Sole Metric for Impacts from Flights

The Draft EA uses mean sea level (MSL) as the sole metric to determine the floor and upper limits of the existing and proposed MOAs. For example:

| <u>Proposed Okanogan D MOA</u> | <u>Existing Okanogan A MOA</u> |
|--------------------------------|--------------------------------|
| Floor: 11,500 ft MSL | Floor: 9,000 ft MSL |
| Upper Limit: 18,000 ft MSL | Upper Limit: 18,000 ft MSL |

The proposed Okanogan MOA covers an area of mountainous terrain with peaks as high as 9,000 ft compared to some other MOAs which cover flat terrain that might be as low as 700 ft MSL. As a result, the vertical distance from potential aircraft flights and the ground in the Okanogan D MOA is considerably less (perhaps as little as 2 – 3,000 ft) compared to other areas in the existing MOAs (perhaps 8,000 or more ft.)

The final EA/EIS should include measurements that indicate the vertical distance from the ground to the MOA floor in addition to MSL to be clear about the increasing impacts in a high elevation landscape characterized by the Okanogan D MOA.

Concerns About Increased Wildfire Ignitions in Remote Areas

The area within the Okanogan D MOA is a dry forest ecosystem that, due to fire suppression, increasing fuel loads and several years of drought is highly susceptible to catastrophic wildfires that pose a threat to local residents lives, homes and personal property. In fact, on July 24, 2023, the Washington State Department of Ecology formally issued a drought emergency declaration for the Okanogan watershed.³

In recent years, wildfires in the Methow Valley have had an enormously disruptive impact on local residents and the economy including the Cedar Creek and Cub Creek Fires (2021), Carlton Complex Fire (2014) and Tripod Complex Fire (2006).

Military aircraft can be challenging to operate in the best conditions but the proposed activities include flying at high altitudes in difficult terrain during simulated combat exercises. It would seem reasonable that the probability for

² Tacoma News Tribune, August 2013, "Flying low, loud, late and illegal near JBLM"
<http://www.thenewstribune.com/news/local/military/article25861411.html>

³ Methow Valley News, July 27, 2023 "Drought emergency officially declared for Methow, Okanogan watersheds by DOE"
<https://methowvalleynews.com/2023/07/27/drought-emergency-officially-declared-for-methow-okanogan-watersheds-by-doe/>

accidents in this environment is elevated. If a crash ignited a fire in the summer of a drought year in a remote location inaccessible by roads, a wildfire could become a serious threat to life, property and wildlife.

The Draft EA/EIS should analyze the probability of aircraft accidents (associated with the proposed training activities) igniting, the probability of containing wildfires in the Okanogan D MOA and any mitigation that might apply.

Request for Continuous Monitoring of Flight Activities

As indicated in the Environmental Assessment, very significant Navy operations are already being conducted in this region of North Central Washington (Okanogan A MOA, Okanogan B MOA, Okanogan C MOA, Molson ATCAA, Methow ATCAA, Roosevelt A MOA, Roosevelt B MOA, Republic ATCAA). To fully comprehend the cumulative effect of all of these operations (including the newly proposed Okanogan D MOA and Mazama ATCAA), the public deserves to see actual flight data which documents altitudes and noise levels on a continuous basis. We request that the Navy commit to the installation of flight recording devices to provide this information. Such information will go a long way toward building understanding and enabling assessment of both short- and long-term impacts.

Request for Analysis of Impacts of Transit Flights to and from the MOAs

There is no analysis of the jet noise resulting from transit from Whidbey Island to the MOAs. In fact, no useable information on the transit routes (outbound and inbound) is included in the EA but these routes certainly pass over tens of thousands of people and remote wilderness areas. The noise will certainly impact them as it already does for those that live under the existing routes. This is a significant omission that should be rectified.

Thank you for the opportunity to comment on the proposal during scoping. We hope that our input and the other feedback you will get early on in this process will help to inform a draft EA/EIS that will better address a number of the related concerns and issues discussed in this letter.

Sincerely,

Tom Uniack
Executive Director
Washington Wild

Peter Bahls
Executive Director
Northwest Watershed Institute (Port Townsend)

Arthur (R.D.) Grunbaum
President
Friends of Grays Harbor (Westport)

Arthur Campbell
President
North Central Washington Audubon Society
(Wenatchee)

Sarah Kliegman
Co-Executive Director
Okanogan Highlands Alliance (Tonasket)

Tom Jones
Board Chair
Methow Valley Citizens Council (Twisp)

Robert Kaye
Conservation Committee Chair
North Cascades Audubon Society (Bellingham)

Jesse Swedlund
Club President
Paddle Trails Canoe Club

Gus Bekker
President/Founder
El Sendero Backcountry Ski and Snowshoe Club
(Wenatchee)

Timothy Coleman
Executive Director
Kettle Range Conservation Group (Republic)

Marine and Erik Bjornsen
Owner
Winthrop Mountain Sports (Winthrop)

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Olympic Park Advocates (Sequim)

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Rob Smith
Northwest Regional Director
National Parks Conservation Association

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Dennis J Doyle
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Cindy Custer
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Sound Defense Alliance

Sarah Dyrdaahl
Northwest Region Director
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Jeff Kish
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Pacific Northwest Trail Association

Larry Goldie
Owner
North Cascades Mountain Guides (Mazama)

Sarah Brooks
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Methow Conservancy (Winthrop)

Timothy Manns
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Skagit Audubon Society (Mount Vernon)

J Michelle Swope
Owner
Oly Women on the Fly Guide Service (Olympia)

Bob Wilbur
Chair
Citizens of Ebey's Reserve (Coupeville)

Brian Silverstein and Christine Kerlin
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Quiet Skies Over San Juan County (Lopez Island)

Janet Strong
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Renée C Paradis
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Washington Kayak Club

Lance Reif
Owner
Wildwater River Guides (Leavenworth)

Betsy Robblee
Conservation & Advocacy Director
The Mountaineers

Rick McGuire
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Alpine Lakes Protection Society

Matt Perkins
Founder
Washington Climbers Coalition

John McGlenn
President
Washington Wildlife Federation

Joseph Brown and Julie Muyliaert
Owners
Methow Cycle & Sport (Winthrop)

Harry Romberg
 Co-Chair, National Forest Committee
 WA Chapter of the Sierra Club

Andrea Imler
 Advocacy Director
 Washington Trails Association

CC: U.S. Senator Patty Murray (WA)
 U.S. Senator Maria Cantwell (WA)
 U.S. Representative Dan Newhouse (WA-04)
 U.S. Representative Adam Smith (WA-09)
 U.S. Representative Marilyn Strickland (WA-10)

APPENDIX A: Map of Proposed Okanogan D MOA including the Pasayten and Lake Chelan/Sawtooth Wilderness Areas

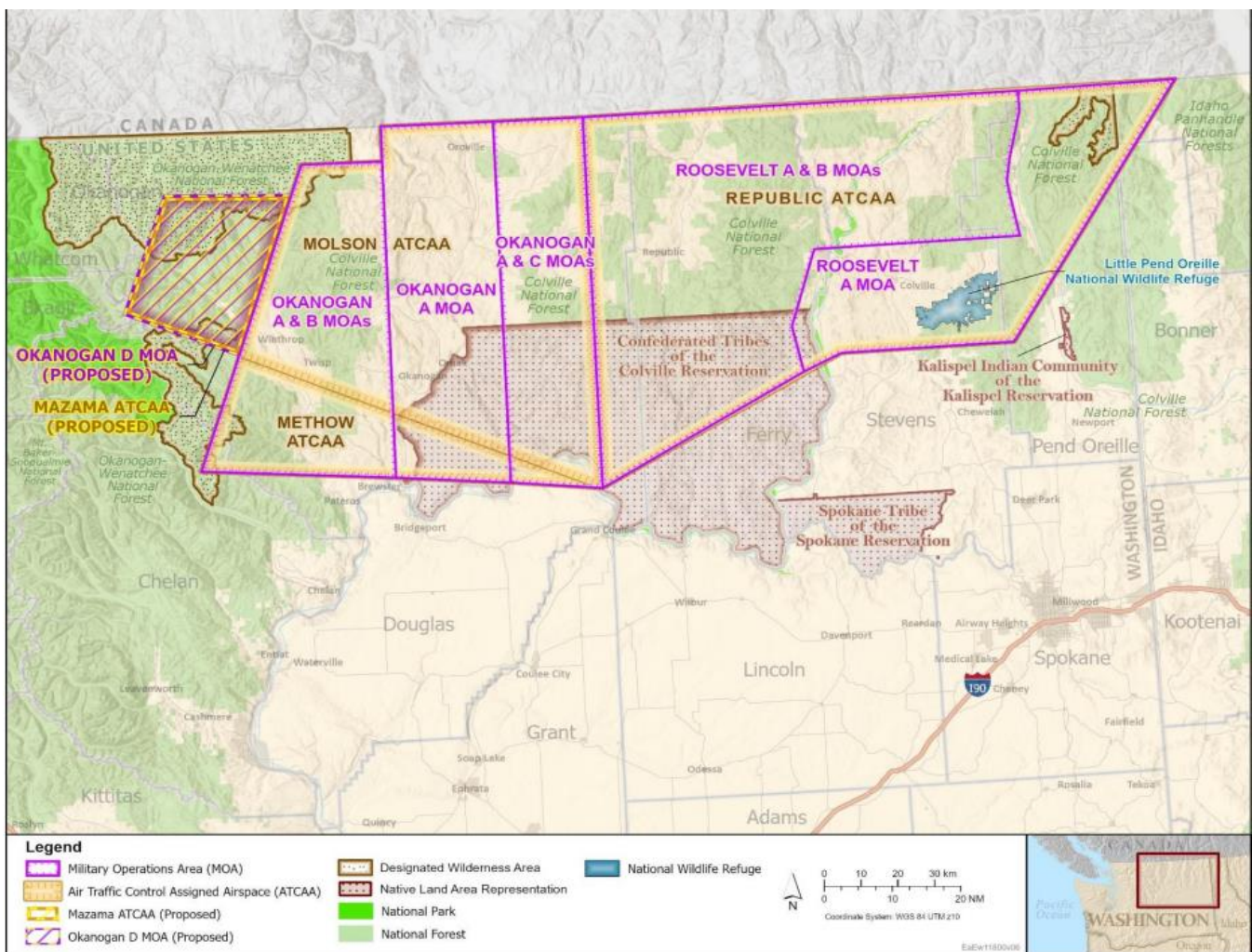


Figure 1.1-1: Existing and Proposed MOAs and ATCAAs in the Action Area