

Washington Outdoor Alliance

Access Fund • American Alpine Club • American Whitewater • El Sendero
Backcountry Ski and Snowshoe Club • Evergreen Mountain Bike Alliance • The Mountaineers
Washington Climbers Coalition • Washington Trails Association

July 29, 2015

Department of the Army
Directorate of Public Works
Attn: Environmental Division (NEPA)
2012 Liggett Ave. Box 339500 MS 17
Joint Base Lewis-McChord, WA 98433-9500

RE: Scoping comments for JBLM Off-base Helicopter Training Areas

Dear Directorate of Public Works:

The Washington Outdoor Alliance is a coalition of recreation enthusiasts representing more than 34,000 members who recreate on public lands in Washington State. We come together as a group on issues relating to recreation, access, conservation and the environment. We have helped contribute over \$8 million to the Pacific Northwest Region in recreation user fees and helped maintain thousands of miles of trails, supported leveraging grant money for recreation, and volunteered at recreation sites for activities such as outdoor education and youth programs. In addition, the outdoor recreation economy in Washington State generates \$22.5 billion in annual consumer spending and \$1.6 billion in state and local tax revenue and directly employs 227,000 people in our state.

We are writing in response to the Aviation Division within the Directorate of Plans, Training, Mobilization, and Security at Joint Base Lewis-McChord (JBLM) proposal to establish three off-base helicopter training areas and one mountain training area in Washington State.

Training operations would be conducted using aircraft to include the MH/UH-60 Black Hawk, AH-64 Apache, and MH/CH-47 Chinook. Our understanding is that the training areas would be available for use day and night, 24 hours a day, 365 days a year, with the exception of Federal holidays and with the majority of flights taking place at night.

As representatives of recreation enthusiasts across Washington State, we are primarily concerned with the Mountain Training Area (MTA) within the Okanogan-Wenatchee National Forest (OWNF). All seven of the MTA Helicopter Landing Zones (HLZ) (MTA 1-1 to MTA 1-7) identified are in well-known recreation areas and will greatly impact human-powered recreation experiences on the Forest. In addition, the Mountain Training Area encompasses a significant portion of the North Cascades, which will have noise and visual impacts beyond the HLZs.

Due to the significant impacts that would occur as a result of the Proposed Action, we believe that further analysis is needed regarding the proposed MTA and HLZs before a draft Environmental Assessment (EA) or Draft Environmental Impact Statement (EIS) is released.

We understand that Recreation and Visual Resources and Noise will be analyzed through the EA/EIS process. We recommend the following for inclusion in your analysis:

- Proximity of HLZs to trail, campgrounds and other recreation sites;
- Proximity of HLZs to Wilderness areas;
- Historical use of HLZ areas;
- Impact of noise in HLZs and surrounding area;
- Impact of viewshed in HLZs and surrounding area;
- Safety within HLZs beyond Airspace Safety

In addition, we provide the following information regarding the HLZs:

MTA 1-1 (Stormy Mountain, Section 29)

The proposed site is located less than a mile from FS road 8410 (Slide Ridge road), as well as less than one mile from the Windy Camp Campground. There is also a nearby scenic roadside viewpoint SE of Stormy Mountain in section 33. The site is directly on top of FS trail #1448, the Devil's Backbone trail, used by hikers, motorized users, and mountain bikers. During the winter months Stormy Mountain is a popular backcountry ski area.

MTA 1-2 (Devil's Backbone, Section 24)

The proposed site is located directly on top of the Devil's Backbone trail #1448, and between Stormy Mountain and Angle Peak. Angle Peak is a beautiful, scenic high country ridgetop with views North to Chelan Lake and South into the Entiat valley. In Section 13, less than two miles from MTA 1-2, the Devil's Backbone trail joins the Pot Peak trail #1266. Pot Peak is a popular day hike destination for hikers camping at Ramona Park Campground and Twenty-Five Mile State Park Campground on Lake Chelan. Pot Peak is approximately three miles as the crow flies from MTA 1-2.

MTA 1-3 (Two-Little Lakes, Section 7)

The proposed site located directly on top of Blue Creek trail #1426 and less than a mile from Mad Lake and the Mad River trail #1409. It is also located less than two miles from Blue Creek Meadow Campground and the Lost Lake trail #1421. MTA 1-3 is also less than two miles from East Blue Creek Meadow trail #1424 and approximately 2.5 miles from the North Tommy trail #1425. In addition, there are two existing hunters shelters, one at Two-Little Lakes meadow, the proposed site for MTA 1-3, and another approximately 2.5 miles distance at Whistling Pig Meadow.

MTA 1-4 (Ida Lake, Alpine Lakes Wilderness, Section 27)

The proposed site is within the Alpine Lakes Wilderness boundary, on Icicle Ridge, less than one mile from Ida Lake and approximately 1.5 miles from Carter Lake and Lake Augusta, both within the Alpine Lakes Wilderness (ALW). The site is on top of Big Lou Mountain, a popular rock

scramble and surrounded by numerous trails and campgrounds. Access via helicopter to this HLZ would be either over the ALW or above and around the town of Leavenworth. Aircraft landings are prohibited in Wilderness areas.

MTA 1-5 (Rock Mountain, Section 23)

The proposed site is located less than two miles from Tiffany Lake, Little Tiffany Lake and the Tiffany Lake trail #373 and approximately two miles from Freezeout Ridge trail #345. The HLZ is roughly two miles from Tiffany Springs Campground and the popular Parachute Meadow winter recreation area. The area around Tiffany Mountain is a popular destination for snowmobile recreation out of the town of Conconully. Rock Mountain is a popular rock scramble and the area is unique on the Okanogan-Wenatchee National Forest for its accessible high elevation meadows.

MTA 1-6 (Azurite Peak, Pacific Crest Trail, Section 4)

The iconic Pacific Crest Trail #2000 is less than two miles east of this HLZ. Three trails (Mill Creek #755, East Creek #756 and West Fork Methow #480) are less than one mile to two miles away. The popular Harts Pass road and scenic destination area are approximately 4.5 miles to the NE and the spectacular North Cascades Scenic Highway Corridor (Highway 20) from the town of Winthrop to beyond Ross Lake passes just five miles to the South.

MTA 1-7 (Sawtooth Ridge, Section 16)

The proposed site is located directly on top of the Martin Creek trail #429 and less than a mile from Cooney Lake and the Cooney Lake trail #434 and Martin Lakes and the Martin Lakes trail #429B. It is also located less than two miles from Merchants Basin trail #417 and three miles from the Lake Chelan-Sawtooth Wilderness. This is a highly popular recreation destination known as the "Golden Lakes Loop."

Finally, we also have concerns that the scope of the analysis to date includes only two proposed alternatives. The National Environmental Policy Act (NEPA) requires that there be an evaluation and consideration of a wide range of alternatives of the proposed action. Considering the possible adverse effects on soils, vegetation, wildlife, recreation, water and cultural resources the proposed two alternatives do not meet the NEPA requirements and we request a broader scope of analysis that includes more than two alternatives. As mentioned in the scoping document numerous laws, regulations and Executive Orders (EO) designed to protect environmental values potentially affect the proposed training operations. While the scoping document mentions a few of these regulations there is no mention of the 1964 Wilderness Act, which specifically prohibits any motorized or mechanized transport within a designated Wilderness area, nor EO 11644 which mandates that areas for motorized use be located to minimize conflicts with other users and to ensure the compatibility of such uses with existing conditions taking into account noise and other factors.

We request that several other alternatives be added addressing the following points of concern:

1. A training schedule that does not include 24/7, 365 days a year access to the OWNF.

2. Designated flight paths to and from the proposed training areas that are not discretionary. That is, a designated flight path used in adverse weather and a designated flight path used in good weather.
3. Alternatives with varied training frequencies of the JBLM aviation units and that specifically address the potential impacts of other military units requesting the use of the proposed MTAs.
4. Existing use of the Yakima training center and shifting of priority usage by the Brigade Combat Teams to accommodate low level training operations at JBLM.
5. A split use of the proposed MTAs on the OWNF and the existing facilities in Colorado and Texas. Combining training areas would reduce the need for all of the proposed MTAs and also the need for 24/7 365 days a year access.
6. Alternatives that avoid flights over and eliminates use of designated Wilderness areas and scenic recreation corridors.

Thank you for considering these comments and please include Washington Outdoor Alliance on the distribution list for all public documents regarding this proposal. We understand the need for training locations and look forward to more alternatives that allow operating Mountain Training Areas that protect the resource values that we have identified, address public safety and minimize conflicts with other users of the OWNF.

Sincerely,

Joe Sambataro, Northwest Regional Director, Access Fund
Eddie Espinosa, Northwest Regional Manager, American Alpine Club
Thomas O'Keefe, Pacific Northwest Stewardship Director, American Whitewater
Gus Bekker, President, El Sendero Backcountry Ski and Snowshoe Club
Glenn Glover, Executive Director, Evergreen Mountain Bike Alliance
Martinique Grigg, Executive Director, The Mountaineers
Matt Perkins, Washington Climbers Coalition
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