

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.

I 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, I support the need of the Navy to provide this training to ensure that our troops are ready and prepared to serve their country. While I am willing to accept some level of noise disturbance from the training I feel like I, my neighbors and the Methow Valley residents are subjected to an excessive and undue noise burden from training.

Before offering some comments, I want to provide an impact statement describing how the current jet noise negatively impacts my life.

I moved to the beautiful and what I thought was the peaceful Methow Valley in North central Washington state about 10 years ago. On the best days (holidays and most weekends) it is very quiet with a background noise level considerably less than 30 dbA. On most week days I feel like I live near a major airport (like Sea-Tac) and on the worst days I feel like I live in a war zone with the very loud near tree top flights.

I live north of Winthrop on the Chewuch river which is in the western portion of the Okanogan MOA and I seem to be under the flight path used to access the MOA's. A typical day will have from 10-30 overflights plus some training sessions that can last up to an hour. The noise is a deep low frequency (50-200 Hz) rumble which is extremely penetrating (think thunder). Typical peak noise levels (LCpeak) in my house are about 70 dB (add 15-30 dB if outside). Outside noise levels as reported by dBA range from 60-75 dBA. I measure sound levels with my iPhone and the NIOSH sound level meter. Each overflight can be heard for 1-3 minutes. Flights typically start around 9 or 10 am each morning and continue into the evening with the latest I've heard being 11:20 pm (yes it woke me up). Of course the low near tree top flights are incredibly loud (90-100 dB). That's up to 10 million times the normal background noise level. I've measured a peak noise level of 119 dB at the Winthrop library parking lot. For comparison, a normal conversation is 60-70 dB while a chainsaw at 3 ft is 110 dB. The total number of flights over my house is in the thousands per year.

I find the noise incredibly disruptive and stressful. It interrupts my work, my dinners, TV watching, podcast listening, video listening, zoom meetings, meditation sessions and any naps I need to take (I have a sleep disorder so naps are often needed). I've been ill on several occasions and just wanted to sleep during the day which of course was continuously interrupted. I feel sorry for those that have babies, work shift work or are chronically ill and need to sleep during the day. There is no question that the noise greatly increases my stress levels and will likely damage my health at some point. To help cope, I bought the best noise canceling headphones I could find. While these help, I can still hear the jets passing overhead while wearing them.

Comments:

Some positive changes proposed: Given that my main concern is the noise in my bedroom/office from transits between Whidbey island and the MOA's, I find there are some positive aspects to the proposed expansion because it will result in fewer flights over my house. Even if the expansion does not go forward, I think the redistribution of flights to the Roosevelt MOA is a good idea in that it spreads the noise disruption over a wider area. I do not support alternative 2 which would lead to an increase in noise.

The Development of an Environmental Impact Statement (EIS) is needed. 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 I 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.

Provide more appropriate noise metrics. The drafted EA significantly understates (as have most previous assessments) the potential impacts of noise: The Navy uses a Day-Night average (DNL) to indicate an average sound impact, when it is likely to be experienced much more loudly at a given moment. A limited number of other noise metrics are discussed which are helpful. However, an octave band frequency analysis is also critical to understanding the intrusion of jet noise on Rural and Wilderness Soundscapes. The low frequency component of the jet noise travels further than the high frequency noise, and that noise is poorly captured using A-weighted decibel levels.

I know the averaging technique (DNL) is the Federally recommended noise metric and but I think the averaging technique really minimizes how intrusive, loud, low frequency intermittent noise can be. As an analogy lets assume you get punched in the face. You aren't going to like it and you will be injured. Then consider I come to your hospital bedside as the defense lawyer and say, yeah but averaged out over 24 hours that was nothing more than a love tap or a feather tickle. My guess is you won't accept that explanation.

As an aside, I find the characterizations of the noise impacts dismissive and insulting. The use of OSHA standards to imply there are no health impacts (section 3.5.3.2.2) is not persuasive in my opinion. OSHA standards are for work place environments, not quiet places where we attempt to live a peaceful life. OSHA standards are designed to prevent noise induced hearing loss and ignore the large impact of thousands of noise events during a year.

Include the number and type of sorties for the Okanogan D area. In general there is little detail on specifics of where the noise will be in the MOAs or along the transit routes between base and the MOAs. There is also little readily understood information on the location, frequency and duration of the noise for any of the alternatives. For example, the number of sorties destined for the proposed Okanogan D MOA is not broken out from the summaries. This makes it difficult to understand the impact of noise on any given location. Of particular concern are the low level flights down to 300 ft above ground level.

Please include a sound map showing the impact of flight operations. While there is a nice sound map (figure 4-1) on page 4-9 of appendix B, showing daytime ambient noise levels in the MOA's there are no similar noise maps showing the impact of flight operations. This is essential for understanding the impact of the noise on various locales. One of the maps should include the maximum noise levels at each location.

Appendix B, Section 4.4 Maximum Noise levels: The maximum noise levels of up to 108.7 dB are alarming for a rural setting where ambient noise levels are typically less than 30 dB and often much less. The lack of location, frequency and duration data to go along with these maximum noise levels makes it impossible to assess the impact of the noise.

Explain how loud noise levels are acceptable in a Wilderness area. The wilderness Act defines a wilderness as "an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions. Yet the maximum noise levels are estimated to be 108.7 dB (about the same as operating a chain saw at 3 feet).

Analyze the impact of the transit routes between Whidbey island and the MOAs. There is no analysis of the jet noise in transit from Whidbey Island to the MOA's. 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 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. The transit route options should be greatly expanded, the routes should be published and an analysis of the impacts included in the final EA or EIS.

Work with the FAA to expand the available transit routes in order to spread the noise impact to other areas. You note in appendix B Table 1-3 that the number of sorties can be up to 4330 per year. If the transit routes all follow the same path out and back then that is a total of 8660 noisy interruptions per year. Assuming each transit results in 1.5 minutes of noise (1-3 minutes at my place), that adds up to 216.5 hours of disruption per year. I think the actual transit disruptions are more on the order of 3500 at my location but that still results in about 87 hours of disruptive noise. I really don't appreciate this in my bedroom and office. Please work with the FAA to expand the available route options and send more flights to the north and south and spread the disruption. You can also send more flights to areas that avoid the towns of Twisp, Winthrop and Mazama. You have 60 or 70 miles north-south to spread transit flights over. It would also help if the elevation of the transit flights is as high as possible.

Examine more alternatives in an effort to reduce the noise impact on any given population. I am disappointed the draft EA did not look at real alternatives such as conducting this training elsewhere in the United States. Other bases that have been previously looked at before include El Centro and Lemoore in CA and potentially others. I've heard there used to be an option to go down to Mountain Home AFB in southern Idaho.

Another seemingly good alternative is to conduct more training off shore over the ocean where no one lives and there are fewer commercial air craft. During the Q&A session I asked why some of the training wasn't being done off shore. A summary of the answer is we do train over the ocean. I understand that some training needs to be done over land but it seems like much more could be diverted offshore. You state in Appendix B (Noise analysis): "ACM normally involves two aircraft operating with an average airspeed of 420 knots for 60 minutes in the 10,000 to 35,000 ft MSL altitude band." And Table 3.8 implies that all ACM training will be done above 10,000 feet. The elevation is well above the highest peaks so I can't understand how the terrain has any bearing on this training. It seems like this could all be moved off shore. It also seems like more of the electronic warfare training can be done off shore. There just needs to be some floating buoys with the electronics. Arguably there should be this kind of training at sea since this is a possibility in a conflict.

Another possibility for reducing the noise impact on any given possibility is to conduct some of the training over other federal property. I suggest the Yakima firing range and the Hanford site. Both of these areas have no permanent residents and it seems like these areas could be used for much of the training with minimal disturbance to residents

As defined in the EA, the day is too long and the night is too short. The Navy suggests it will follow Best Management Practices for low altitude training, including avoiding populated areas and only flying between 30 minutes after dawn and 30 minutes before sunset. However, Table 3-1 of appendix B (Noise Analysis for the Proposed Eastern Washington Airspace Extension) indicates the preferred alternative will include more than 100 jet flights at night.

Allowable times for low altitude training are too early and too late. As quoted in section 2.5.1 Low Altitude training: "Existing CVWP standard operating procedures address noise from aircraft overflights and provide BMPs to minimize noise impacts within the Action Area. Specifically, low altitude training must avoid populated areas to the maximum extent possible and must be performed during daylight no earlier than 30 minutes after sunrise and no later than 30 minutes before sunset." For much of the year and especially in the summer these times are too early and too late. By the stated standard, for part of the summer, low altitude flights could occur as early as 5:30 am and as late as 8:35 pm. Low altitude training should be restricted to 9-5. Indeed most training should be restricted to the hours of 9-5. This generally appears to be the case and its appreciated.

Assess the impact on recreation and tourism: I ask that the Navy document the potential economic impact of this proposal on high quality recreation in the Methow Valley: In recent decades, the Methow Valley has become a year round destination for recreationists from around the world. The EA dismisses potential impacts by saying noise would "cause minimal disturbance to land based recreational and tourism activities." (p. 3-53) Given its important as a primary driver of the local economy, this topic deserves much greater attention in an EIS. A basis for these conclusions also needs to be provided. I am not aware of any studies or surveys to support the conclusion that there will be minimal impacts.

DE Kurath, 2/23/24

Dean Kurath
Winthrop WA

Comments Regarding the U. S. Navy's Proposal to expand training flights of their Growler jets into the upper Methow Valley and North Cascades

We live outside the town of Winthrop, Wa. in the Methow Valley. We were frequent visitors to the Valley beginning in 1982. We came here because of the Valley's rural quietness and vast recreational opportunities, both winter and summer. We eventually bought a house in 2003 and moved permanently to the Valley.

The noise of jet over-flights was soon a part of our weekly experience to the point where our dog would immediately jump up and chase the jet(s) across the yard. What was exciting to her was extremely loud to us since the jets, usually two, would fly low enough that the windows in our house would rattle. Our house is at about 2,200 feet above sea level and the jets flying directly over our house or slightly to the West were at various altitudes. It was obvious that, at the speeds the jets maintained, being at a 'minimum floor' was impossible to achieve or maintain.

In our preparation for submitting these comments, we did a search for "history of U. S. Navy over-flights of the Methow Valley" and had my eyes opened by the following 2019 story: "The U.S. Navy is planning to increase training flights for their EA-18G "Growler" jets, some of the loudest aircraft in the world, over one of the quietest spots in America, Olympic National Park's Hoh Rain Forest." At that time the Navy's own analysis, in their final environmental study for their Northwest Training and Testing was found to be inadequate regarding the noise effects to, from and in the areas that the aircraft would be flying. This situation led Washington Attorney General Bob Ferguson to file a lawsuit in July 2019 against the U.S. Navy for bringing more jet noise to Whidbey Island without adequate study of impacts to communities, historic sites and wildlife. Ferguson's suit caused a congressional Conference Committee (made up of Senators and Representatives) to work out the language of a bill asking the Navy to monitor the noise made by the Growler jets, monitoring to mean measuring the "real-time noise" generated by the jets. At the time, information indicated that a Senate bill was introduced by Senator Maria Cantwell, the House bill by Representative Rick Larson. We could not find more information regarding the passage of these bills.

So, history is repeating itself with the Navy's proposal to expand the areas that training flights of their Growler jets may use. This time it's into the upper Methow Valley and North Cascades. **The issues that the Navy must address here are exactly the same issues that they were asked to address in the Olympic National Park:**

1) The impacts of Growler jet noise on our communities, historic sites and wildlife. In our case it's small rural communities, wilderness areas, wildlife and popular recreation areas that are a major economic source for the people of the Methow Valley.

2) We will add to that, a commitment by the Navy to the strict monitoring and enforcement of the "minimum floor" that must be maintained by pilots as they fly to, from and over any training area.

We request that the same amount of public and political attention and scrutiny that was focused on the Navy's Olympic National Park proposal be applied to Methow Valley and North Cascades.

Respectively Submitted by Jim and Carol Hoch

Winthrop, Washington

February 22nd, 2024

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

Dear Ms. Jesser,

I am submitting comments in regard to the Navy's plans to extend the training flights of the Growler Jets into the upper Methow Valley and North Cascades which includes the Pasayten and Lake Chelan Wilderness areas.

I am opposed to this expansion. The Methow Valley already experiences negative impacts of these quite loud jets. On a personal note, I live at 2200' and they have been seen at eye level from my deck blazing through the Twisp River drainage. When this happens, I have to cover my ears and cannot have a conversation.

I am requesting that an Environmental Impact Statement be conducted. Whenever a federal action is proposed and EIS must be prepared. There are more noise tests that need to be conducted. Many of the jet's sounds are instantaneous. When hiking in the woods and they fly over a ridge, it destroys the serenity and peace of the area. I am requesting the No Action Alternative for now until other future alternatives can be explored.

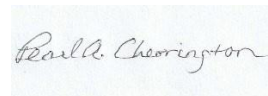
The Methow Valley and the Wilderness area are valued for the rural character, and the quiet from noise pollution. The Valley is also a destination for those seeking a quieter environment and recreational opportunities. The economy of the Valley does depend on the visitors that come here.

In Table 3-1, of the EA it says the preferred alternative will include more than 100 jet flights at night but defines "daytime" as lasting until 10 pm. There are many farmers, ranchers and early morning workers that go to bed well before 10 pm.

It is known that there is a lawsuit filed in 2019 that is still in court. Until this lawsuit is settled and questions are answered, there should be no expansion.

Thank you for the opportunity for me to comment and express my views on this important matter. The Valley deserves to be protected.

Sincerely,



Pearl Cherrington



Kettle Range

CONSERVATION GROUP

Protecting the forests and wildlife of the Columbia Highlands since 1976

February 17, 2024

Naval Facilities Engineering Systems Command Northwest
Attention: Code EV23
1101 Tautog Circle
Silverdale, WA 98315
By email: navfac-nw-NEPA@us.navy.mil

Re: Draft Environmental Assessment for Eastern Washington Airspace Extension

The following comments are submitted on behalf of the Board of Directors and membership of the Kettle Range Conservation Group (KRCG / Kettle Rangers) regarding Draft Environmental Assessment for Eastern Washington Airspace Extension (EA) and Finding of no Significant Impact (FONSI). KRCG has since 1976 a history of involvement in public lands management in Eastern Washington, especially the Colville and Okanogan-Wenatchee National Forest (national forest or NF).

KRCG supports the No Action Alternative, however, we have significant concerns about paucity of analysis, failure to fully analyze cumulative impacts and other concerns and questions enumerated below.

1. Need for an Environmental Impact Statement (EIS) The EA does not adequately evaluate cumulative impacts

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, including grizzly bear, wolverine and Canada lynx; world class recreational opportunities including the Pacific NW National Scenic Trail that are key elements of the local economy, quality of life and safety for rural residents and visitors of Northeast and Central Washington.

Expanded MOA significantly increase environmental impacts. Project NEPA failed to take a hard look at past, present and future cumulative environmental impacts associated with the Navy's proposal. Cumulative effects include foreseeable past, present and future impacts. These include the entire MOA/ATCAA area – "including aircraft training in the existing Okanogan and Roosevelt MOAs and the Molson, Methow, and Republic ATCAAs?"

Cumulative impacts also include environmental impacts to American citizens living in the affected area and those associated with other military-readiness training in military branches other than the U.S. Navy. U.S. Airforce also uses the Roosevelt MOA for its survival and air resources training. In 2014, the Navy completed the Pacific Northwest Electronic Warfare Range EA, which analyzed the operation of Mobile Electronic Warfare Training System vehicle-mounted emitters on U.S. Forest Service lands to facilitate training within the area underlying the Okanogan and Roosevelt MOAs.

The Navy's proposal reaches beyond the threshold of a finding of NO significant environmental impact. Its connected actions encompassing a wide geographic area seriously challenges a conclusion that a less rigorous examination of environmental consequences in an environmental assessment

framework does not meet necessary legal requirements. The Navy's Proposed Action of a "new military training airspace ... west of existing military training airspace and the redistribution of where current training flights occur within the overall airspace....extension would be approximately 393 square nautical miles." This is a HUGE land area that without a doubt cumulatively has significant environmental impacts. A Finding of No Significant Impact here is fundamentally untenable. Taken together, past, present and future will have dire environmental impacts on fish & wildlife, wilderness recreation, solitude, livestock and human communities. As such this Project must be more thoroughly examined more thoroughly in an Environmental Impact Statement.

In determining whether a proposed action may "significantly" impact the environment such that an EIS is required, both the context and intensity of the action must be considered. 40 C.F.R. § 1508.27. In evaluating intensity, the Navy must consider numerous "significance" factors. 40 C.F.R. §§ 1508.27(b)(1)-(b)(10). Because of these factors we believe that this proposal is a major federal action that will have significant and foreseeable environmental impacts, thus requiring a full Environmental Impact Statement (EIS) be prepared under the National Environmental Policy Act.

2. 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.

3. Significant questions & concerns re Proposed Action not addressed the draft EA, FONSI

- The EA states that the airspace of greatest value for Growler training is at high altitude. Why is the proposed extension at the lower altitude?
- Are Navy aircraft allowed to release fuel, aerosols or other materials into the atmosphere in any circumstance? If not and if so, please explain.
- Why does repeated evidence suggest EA 18G aircraft are attracted to and circle locations using satellite Internet and TV/video?
- Does Navy training include observing real-time private citizen electronic communications and/or electronic entertainment (such as video streaming, music, etc)?
- Does the Navy collect or interpret real-time citizen electronic (email, Internet, voice) communication?

4. Okanogan B & C and Roosevelt B 300' Floor AGL presents several environmental impacts and risks to the human environment

It should be no surprise to the Navy's 300 foot above ground level (AGL) is the bane of rural people. It is frankly absurd to subject rural communities to jet engine noise like urban residents experience who live near SeaTac. A sudden explosion of noisy Growler aircraft sends livestock stampeding, is a risk to people with heart disease, hearing loss, vision impairment and to on-the-job workers use power tools or working from ladder/scaffold at risk serious injury.

- Low flying (Growler) aircraft (300' agl) in the Roosevelt and Okanogan MOAs frighten people.
- Low flying aircraft have a significant impact on wildlife, including song birds, bats and other seclusion-dependent species.
- Low flying aircraft can trigger snow avalanche that can bury and kill winter recreationists.

- Low flying aircraft can cause injury to equestrians, skiers, snowshoers.
- Low flying aircraft could cause livestock to stampede could lead to injury and death.
- Low flying aircraft disrupt and diminish recreationists enjoyment of their federal and state public lands

5. Impacts of Noise on Wilderness Character

According to the draft EA, the Okanogan D MOA includes significant portions of the Pasayten and Lake Chelan/Sawtooth Wilderness Areas. Republic ATCAA and Roosevelt A MOA impact the Salmo Priest Wilderness.

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.” Section2(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 AGL noise and disturbance of aircraft 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.

6. Impacts of Noise on Recreational Opportunities

The various MOAs discussed in the EA include the Colville, Okanogan Wenatchee National Forest (COWNF) 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 COWNF.

The Pacific Northwest National Scenic Trail runs the length of the Kettle River Range in Roosevelt MOA B with an agl floor of 300'. PNWST traverses Salmo Priest Wilderness (Roosevelt A) and northern Ferry and Okanogan County (Roosevelt A & B, Okanogan A & C).

The COWNF is well known and prized by locals and visitors alike for its diverse and myriad recreational opportunities. These 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 COWNF 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 Okanogan-Wenatchee alone 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.

7. Impacts of Noise on Wildlife Habitat

The North Cascades and Upper Columbia (UC) 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, marbled murrelet, Canada lynx, wolf, and grizzly bear. Some imperiled species, like wolves, wolverine and lynx are returning to the pristine North Cascades/UC on their own, while fisher and grizzly bears are part of a process and to be reintroduced and recovered by state, federal, and provincial agencies.

Okanogan B & C and Roosevelt B 300' Floor AGL flight presents several environmental impacts and risks to the human environment. Proposed training and flights, which may occur within as few as 2500 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. Aircraft collisions with airborne birds are fatal.

The proposed Okanogan B, C & D and Roosevelt B MOA is located in areas inhabited by Canada lynx and wolverine, grizzly bear and within the North Cascades Grizzly Bear Recovery Area where recovery efforts are underway. These and other wildlife 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 Emphasis Areas and around 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

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

and recovery of Washington's wildlife and should be avoided by aircraft and excluded from training activities.

8. Impacts to local communities

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, 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.

9. 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:

Proposed Okanogan D MOA	Existing Okanogan A MOA
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 DMOA.

10. Concerns About Increased Wildlife 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

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

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 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.

11. 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 Northeast and 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. KRCG trusts that our input and other public comment received will help to further improve outcomes that address concerns, questions and issues discussed in this letter.

Sincerely,



Timothy Coleman
Executive Director

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/>



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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 comment on the Navy's Eastern Washington Airspace Extension Environmental Assessment.

Since 1976, the Methow Valley Citizens Council (MVCC) has raised a strong community voice to protect the natural environment and rural character of the Methow Valley. We are a member-based nonprofit organization with over 600 members who care deeply about the present and future impacts to this place. While we understand and appreciate the importance of military readiness and training, we have a number of concerns about this proposal.

MVCC has joined with local organizations and businesses, and statewide and national groups to express our concerns. You will receive a copy of a letter to the Navy signed by many of us, including Methow Valley Citizens Council, as part of this comment opportunity. We ask that our concerns be fully considered and that they influence the nature of the Final Environmental Impact Statement (EIS) that will need to be prepared in the coming months.

We request that the Navy conduct an Environmental Impact Statement (EIS).

According to the National Environmental Protection Act, an EIS must be prepared when a major federal action is proposed. In such a case, the public must have an opportunity to review a reasonable range of alternatives and a robust discussion of significant environmental effects. The Environmental Assessment (EA) for this proposed expansion of flight operations does not meet this standard in two significant ways:

- The Navy did not consider any alternative locations to conduct its training flights, such as conducting this training elsewhere in the United States. There are numerous other land and ocean-based

Methow Valley Citizens Council

locations that could be considered. The Methow Valley and the North Cascades already have significant negative impacts from military operations. This is not the place to expand training flights.

- The Navy did not provide an adequate analysis of significant environmental effects.

Noise

Noise impacts are at the heart of our concern about Navy flight operations in this geography.

- **We request greater clarity regarding actual potential noise levels.**
Methods of calculating noise levels understate potential actual noise: The Navy uses Day-Night Average (DNL) to indicate an average sound impact, when it is likely to be experienced much more loudly at a given moment. The Navy should indicate instantaneous levels of sound which could be experienced. The lack of loud human noise is a significant attribute drawing people to live or visit the Methow Valley and enjoy the surrounding North Cascades.

The Methow Valley is already subject to major noise impacts from numerous existing Naval operations which allow flights as low as 300 feet above the valley floor. The proposed expansion will add significantly to noise effects. Cumulative impacts should be analyzed in an EIS.

Wildlife

- **We request more in-depth analysis of potential noise impacts on wildlife.**
Wildlife, including many protected species, live at high altitudes in the North Cascades where they are more likely to both hear and see low level jet flights, especially in contrast to naturally low background noise. The EA recognizes the lack of good data on this topic. It is incumbent on the Navy to develop information on the real potential effects of noise on wildlife. The analysis should address in greater depth noise impacts on our diverse bird species. Of special note are potential implications of this proposal on areas where grizzly bears may be introduced in the near future.

Rural Character and Community Values

- **We ask that the Navy consider the impact of noise on the quality of life in the Methow Valley.**
The Navy suggests it will follow Best Management Practices for low altitude training, including avoiding populated areas and only flying after dawn and before sunset. However,

Methow Valley Citizens Council

Table 3-1 in the EA indicates the preferred alternative will include more than 100 jet flights at night. It also defines “daytime” as lasting until 10 pm, after bedtime for many.

There is no reference in the EA at all to a question of concern: “What is the impact on childhood learning of aircraft noise in the Methow Valley?” This potentially subtle impact has been highlighted as very important in other places where Navy growlers have operated.

Recreation

- **We ask that the Navy document the potential economic impact of this proposal on high quality recreation in the Methow Valley.**

In recent decades, the Methow Valley has become a year-round destination for recreationists from around the world. The EA dismisses potential impacts by saying noise would “cause minimal disturbance to land based recreational and tourism activities.” (p. 3-53) Given its important as a primary driver of the local economy, this topic deserves much greater attention in an EIS.

Climate

- **We request a detailed analysis of fuel emission impacts from Growler activity.**
We deserve a clear understanding of the consequences of this proposal from an emissions standpoint. This provides further justification for an EIS rather than an EA.
- **We request an analysis of the probability of aircraft accidents associated with the proposed training activities igniting wildfires.**

Overall Transparency

- **We request an analysis of the jet noise impacts in transit from Whidbey Island to conduct operations in North Central Washington.**
The EA includes no useful information on the transit routes (outbound and inbound). These routes pass over tens of thousands of people and thousands of acres of wilderness, with the same kinds of impacts highlighted above. This is a significant omission that should be addressed.
- **We ask for continuous monitoring of flight activity.**
As indicated in the Environmental Assessment, very significant Navy operations are already being conducted in this region of North Central Washington (Okanogan A Military Operations Area (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

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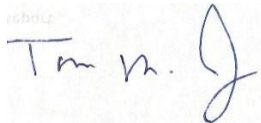
proposed Okanogan D MOA and Mazama ATCAA), the public deserves to see actual flight data which documents altitudes and noise levels on a continuous basis.

- **We request that the Navy commit to 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.

Once again, we thank you for this opportunity to express our views on this important topic.

Sincerely,

A handwritten signature in blue ink that reads "Tom M. Jones". The signature is written in a cursive style with a large, stylized "J" at the end.

Tom Jones
Board Chair
Methow Valley Citizens Council



February 22, 2024

Comments on Extension of Navy Airspace

From: Sound Defense Alliance

To: navfac-nw-NEPA@us.navy.mil

The Sound Defense Alliance (SDA) submits these comments and request two actions: A complete EIS on the proposed EA and a request to the FAA to wait on a final decision to grant the requested airspace extension until the Navy has completed their legal obligations to conclude a new EIS that must explore El Centro as an alternative flight training location for Growlers stationed at NASWI in Oak Harbor.

SDA is a coalition of regional organizations and individuals created to protect our communities and our natural environment from the harmful impacts of Growler jet activity around the Salish Sea, Puget Sound, and Olympic Peninsula. Our focus is on restoring the balance between the needs of the military and the safety, health and well-being of the residents, land, waters, and all living things in our local communities. Our organization's focus is on developing long term, sustainable solutions to the damaging impacts from Growler jets based at Naval Air Station Whidbey Island.

Prior to 2018, the Growlers on Whidbey Island conducted approximately 6,400 FCLP (Flight Carrier Landing Practice/touch-and-go) operations per year at their Outlying Landing Field in Coupeville. In 2018, the Navy began an increase in training operations to four-fold, from 6,400 to 24,000 a year and added 36 Growlers to the base over the objections of the community. The impacts of the Growlers now extend from the Olympic peninsula to the Methow Valley and beyond to the rest of Okanogan County, the Colville Reservation, and east to the Idaho border.

In 2023, a federal judge ruled that the Navy violated the National Environmental Policy Act (NEPA) by conducting an insufficient Environmental Impact Statement (EIS) as justification for adding the additional jet flights and operations to Whidbey Island. The Navy has been ordered by the courts to redo their EIS; however, they were not given a timeline to do so nor were they required to decrease flights and operations to pre-2018 levels. After reconsideration, the Navy was given one year to complete the new EIS. The Navy has now appealed this order.

The court documents indicate the need for vigilance and accountability in public processes. In the aforementioned case, the judge stated: "Here, despite a gargantuan administrative record, covering nearly 200,000 pages of studies, reports, comments, and the like, the Navy selected methods of evaluating the data that supported its goal of increasing Growler operations. The Navy did this at the expense of the public and the environment, turning a blind eye to data that would not support this intended result. Or, to borrow the words of noted sports analyst Vin Scully, "The Navy appears to have used certain statistics "much like a drunk uses a lamppost: for support, not illumination."

Despite the judge's ruling, the Navy, working in cooperation with the Federal Aviation Administration (FAA), has prepared a Draft Environmental Assessment (EA) to evaluate the potential environmental impacts associated with a new proposed military training airspace extension in northeastern Washington. This proposal would establish more military training airspace by the FAA in northeastern Washington State, adjacent to and west of existing military training airspace, to be identified as the Okanogan D Military Operations Area (MOA) and the overlying Mazama Air Traffic Control Assigned Airspace (ATCAA). The total area of the airspace extension would be approximately 393 square nautical miles. The Draft EA includes an extension of the horizontal and vertical area and a minor redistribution of where training flights occur within the overall airspace.

Recent studies and the comments and decisions made by federal court judges demonstrate the need for an Environmental Impacts Statement (EIS) for this latest expansion request for the Navy's EA-18G Growlers.

- The Navy has been ordered by the federal court to complete a new Environmental Impact Statement (EIS) for the NASWI expansion on four counts: *1) impact on classroom learning; 2) disclosure of the basis for greenhouse gas emissions calculations; 3) species-specific impacts on birds; 4) detailed consideration of an El Centro, California, alternative.* Until the new EIS is completed, the Navy should not be considering a military training airspace extension in Washington State.
- The Navy has been ordered by the court to consider an El Centro alternative for the Growlers to train — as the Navy has not completed this order.
- Subsequent to the Federal Court's finding in the above cited EIS matter, the Record of Decision has been supplemented with substantial data and analyses bearing on the adverse impacts of Growler noise on: human health, wildlife and wildlands, recreation and tourism, commercial and land use values, community economic valuation, socioeconomic stability, child education and emotional development, and intangible human welfare (e.g., Post-traumatic Stress Disorder). The Navy is in possession of, has access to, or is conducting research and data collection on all these aspects of Growler training activity within the present NAS Whidbey MOA. And yet, the subject Draft EA fails to acknowledge, cite to, or utilize these data and research results. Instead, the Draft EA summarily concludes “No Significant Impact” attributable to any of the alternatives. This is a fundamental **deficiency** of the subject Draft EA.

The Draft EA states “*While the NWTRC EIS/OEIS and Record of Decision (ROD) also analyzed the Chinook and Olympic MOAs in Washington State, no changes are proposed in those areas as part of the Proposed Action, and analysis of those areas are not included in this EA.*” This constitutes a significant **error** in design and scope of the subject Draft EA. NEPA mandates a **cohesive** and **comprehensive** analysis of the entire relevant potentially impacted environment, within which any proposed action is contemplated. Conjoint, concurrent, affiliated, and reasonably associated adjacent and contemporary actions must be accounted for within a NEPA compliant impact

analysis. The Federal Court-ordered revision of the NAS Whidbey EIS assuredly triggers this requirement within the subject Draft EA. Its omission is a serious **deficiency**.

- Citing NEPA requirements and Environmental Protection Agency policy and best practice, a draft EA **cannot be evaluated in a vacuum**, but must incorporate all relevant information, data, and research available within the full scope of the potential impact context. The Growler MOA Expansion EA cannot be regarded as **comprehensive**, absent full treatment of the entire NAS Whidbey's Growler Training Program, within which the MOA expansion is but one part. Failure to comprehensively acknowledge and incorporate the entirety of the 'Growler Program' impacts, fails, once again, the mandated requirements and clear purpose and intent of the National Environmental Policy Act. One must conclude that the subject Draft EA fails to fully account for the additional adverse impacts of the MOA expansion within the **comprehensive** scope of NAS Whidbey's EA-18G Management and Operational Program.
- NEPA disallows consideration of proposed actions in a vacuum. NEPA recognizes that, absent a full and coherent treatment of proposed actions which can reasonably be expected to have conjoint and/or concurrent impacts, the public interest is not served. Where are these impacts expressly addressed in the subject Draft EA? As previously observed, the proposed MOA expansion will not occur in isolation from the balance of the NAS Growler program.
- Like Whidbey Island, the Methow Valley has significant reliance on tourism as an economic driver. Increased jet activity may have significant economic, environmental, and community health implications for the Methow Valley. This Draft EA specifically choose not to address potential direct and indirect adverse **economic welfare** impacts. Substantial research exists directly pertaining to EA-18G Growler Noise Impacts on National Parks and Wilderness use and enjoyment (e.g., Olympic National Forest and National Wilderness Preserve; Deception Pass State Park and Campgrounds; Ebey's Landing National Historical Reserve). Despite this pertinent information, no analysis of comparable potential adverse impacts from Growler noise within the expanded MOA has been presented. Measurement of economic welfare impacts are required under NEPA. They must be described and qualitatively estimated, to the fullest extent practicable. This appears to be a significant **deficiency** in the Draft EA.
- The Draft EA asserts that a noise level exposure that may approach 110dB is not a significant adverse impact. No evidence is offered to support this conclusion of no significant impact of projected Growler sorties within the proposed expanded MOA.
- The Draft EA reports the increased EA-18G sorties would number between **4,300** and **4,800** under the two PAAs. Growlers operate in "multiple aircraft" configuration and overfly any given area in a concentrated pattern. The Draft EA projects a very significant increase in Growler sorties over the expanded MOAs, calling into doubt the assertion that intense exposure to potentially injurious decibel levels will be infrequent and of only momentary concern. Inclusion of noise impact analyses associated with value loss to wilderness users in, for example, the Olympic National Park and Wilderness should be

referenced and directly incorporated into the subject Draft EA noise impact analysis. These adverse impacts have not been found to be insignificant in the Federal Court-ordered revised NAS Whidbey EIS. Failure to expressly analyze these highly relevant data would presumably result in this Draft EA being found **deficient** under NEPA requirements.

- The Navy deflects critical analysis of jet noise impacts, specifically in regard to harm to both human and to environmental species health:
 - a) Growler jet noise has been reported between 70 dB - 130 dB at people's homes. Research on the impact of noise has found that noise between 40-55 dB can harm human mental health, concentration, memory, and cognition. Sound levels above 55 dB are associated with serious cardiovascular health effects, including hypertension, stroke, and risk of heart disease.
 - b) Research has also found that noise can cause wildlife to change their behavior, heighten stress, and even have fewer offspring.
 - c) We are concerned about the protentional impacts of expanded jet overflights on the reintroduction of the Grizzly bear.
 - d) The Navy has repeatedly stated that increased noise would have species-specific impacts on the many bird species in the affected area. Yet, they continue to decline doing species-specific research. Instead, the Navy simply concluded that certain species were not adversely affected and then extrapolated that all the other species would not be affected.
 - e) With respect to the impact of increased operations on childhood learning, the Navy acknowledged numerous studies that concluded that aircraft noise would measurably impact learning but then arbitrarily concluded that because it could not quantify exactly how the increased operations would interfere with childhood learning, no further analysis was necessary.

- Implying, as the Draft EA seems to, that there is any meaningful equivalency in the potential baseline impacts when EA-18G overflights are substituted for EA-6B sorties is disingenuous and inappropriate. The impact of an EA-6B overflight and that of an overflight of an EA-18G are in no way **equivalent** and should not be suggested as such by use of the simple **numeric** change in sortie frequency.

- Eastern Washington has become a region impacted by intense wildfire smoke. What restrictions will the Navy make to reduced or cancel flight operations when the air quality index falls below healthy state air quality standards?

- The EA states that the EA-18G "Growlers" need high level airspace, up to 50,000 feet, but the proposed extension is much lower, from 11,500 to 18,000 feet MSL. This will impact recreation areas like the Pasayten Wilderness and Pacific Crest National Scenic Trail and its use by the wildlife inhabiting this region and the public that access it.

- MSL (mean sea level) altitudes understate the potential noise impacts to a rugged terrain which starts at 2100 feet in Mazama and rises to more than 6200 feet at Hart's Pass Campground, only about 5300 feet away from the floor of fighter jet operations.

SDA considers, for all of the concerns listed, that this Draft EA is **deficient**.


SDA requests:

1. SDA requests that the Navy consider, and that our elected officials and the public demand, a full Environmental Impact Statement (EIS) be completed under the guidelines of the National Environmental Policy Act (NEPA) for this airspace extension request for the Navy's EA-18G Growlers to train over more of northeast Washington.

NEPA is a law that requires federal agencies to assess the environmental effects of their proposed actions and to provide opportunities for public review and comment. This process provides legal and Congressional accountability to the public, whereas an Environmental Assessment (EA) does not.

2. The FAA has the final approval for any airspace changes to military aircraft MOAs. The FAA's responsibility to public safety requires an understanding that Navy jet impacts and the Navy's activities on the western side of the state are interconnected to what happens on the eastern side of the state. Allowing the Navy to undermine the courts and the law will discredit yet another federal agency, the FAA.

We ask that the FAA **NOT** approve any new Naval airspace extension without first requiring the Navy to follow the law in its current NEPA case which requires the Navy to re-do its flawed EIS. The Navy has a legal obligation to the federal court order to examine El Centro as an alternative training facility **PRIOR** to allowing any extension of new airspace in northeastern Washington State (that would be identified as the Okanogan D Military Operations Area (MOA) and the overlying Mazama Air Traffic Control Assigned Airspace (ATCAA).

Signed:  02/23/2024
Cindy Custer, Chairperson, SDA Date



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)

John Bridge
President
Olympic Park Advocates (Sequim)

Chris Johnson
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Methow Salmon Recovery Foundation (Twisp)

Rob Smith
Northwest Regional Director
National Parks Conservation Association

Dave Werntz
Science and Conservation Senior Director
Conservation Northwest

Patricia A. Jones, PhD
Executive Director
Olympic Forest Coalition (Quilcene)

Marnie Jackson
Executive Director
Whidbey Environmental Action Network (Langley)

Dennis J Doyle
President
Mount Baker Club

Philip Fenner
President
North Cascades Conservation Council

Cindy Custer
Co-chair
Sound Defense Alliance

Sarah Dyrdaahl
Northwest Region Director
American Rivers

Jeff Kish
Executive Director
Pacific Northwest Trail Association

Larry Goldie
Owner
North Cascades Mountain Guides (Mazama)

Sarah Brooks
Executive Director
Methow Conservancy (Winthrop)

Timothy Manns
Conservation Chair
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
Coordinators
Quiet Skies Over San Juan County (Lopez Island)

Janet Strong
President
Grays Harbor Audubon Society (Montesano)

Renée C Paradis
Board Member
Washington Kayak Club

Lance Reif
Owner
Wildwater River Guides (Leavenworth)

Betsy Robblee
Conservation & Advocacy Director
The Mountaineers

Rick McGuire
President
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

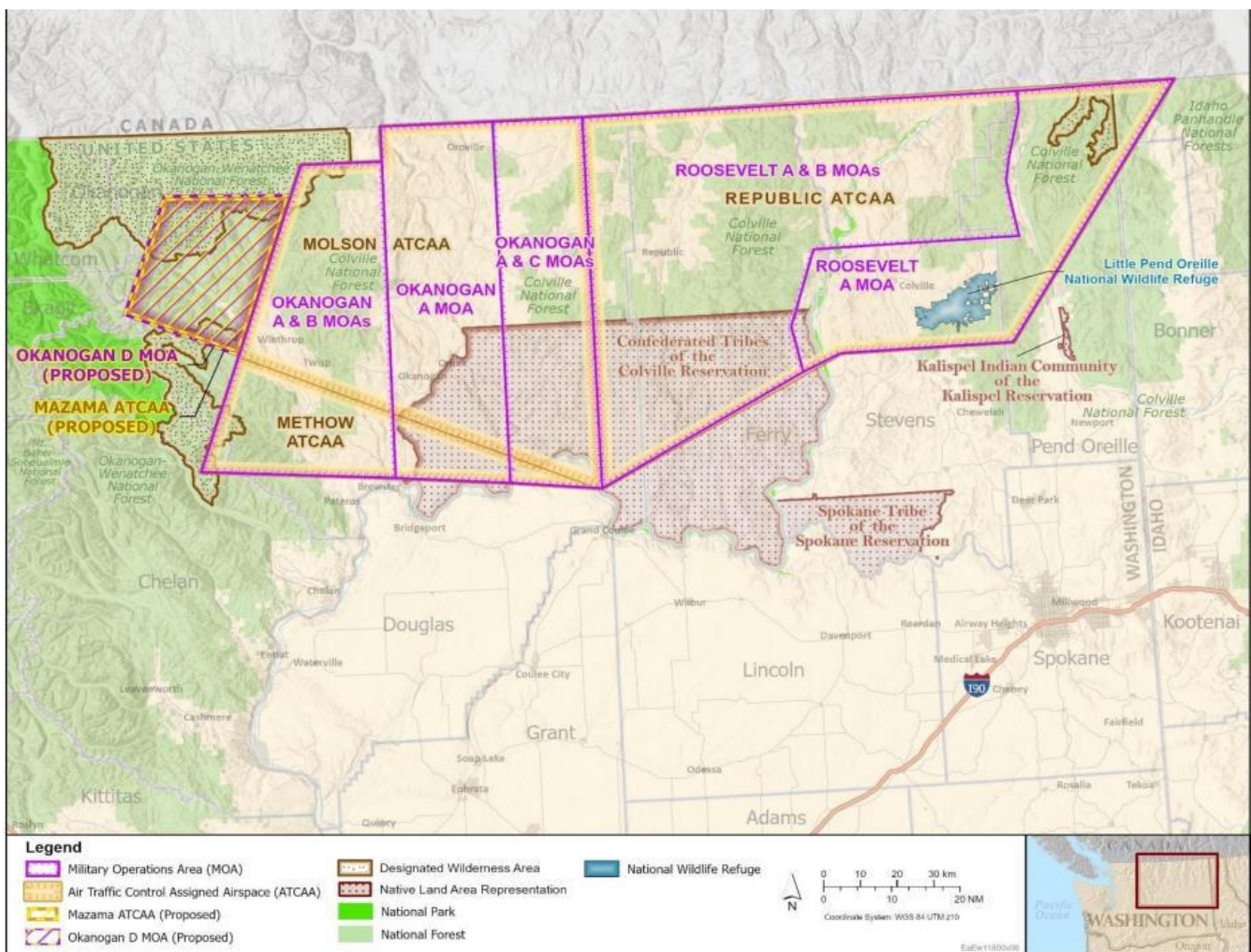


Figure 1.1-1: Existing and Proposed MOAs and ATCAAs in the Action Area



REGION 10

SEATTLE, WA 98101

February 22, 2024

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

Dear Katherine Jesser:

The U.S. Environmental Protection Agency has reviewed the United States Department of the Navy's January 2024 Draft Environmental Assessment for the Eastern Washington Airspace Extension Project (EPA Project Number 24-0008-USN). EPA has conducted its review pursuant to the National Environmental Policy Act and our review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to EPA and requires EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement.

The DEA evaluates the potential environmental impacts of a Navy proposal to extend military training airspace (520 square miles) in northeastern Washington state and northwestern Idaho. This action will enhance realistic training and readiness of EA-18G aircraft squadrons based at Naval Air Station Whidbey Island and other locations. Activities will involve establishing a new Okanogan D Military Operations Area and overlying Mazama Air Traffic Control Assigned Airspace.

The Navy's Preferred Alternative, Alternative 1, does not propose an increase in the number of overall training flights. The alternative includes a redistribution of where current training flights will occur within the existing Okanogan and Roosevelt MOAs from what was analyzed in the 2010 Northwest Training Range Complex Environmental Impact Statement/Overseas EIS.

EPA identified that the project has the potential to impact to air quality, noise, communities with environmental justice (EJ) concerns and biological resources. EPA recommends that the NEPA analysis include the following:

- Data regarding potential impacts to communities with EJ concerns utilizing EPA's EJScreen.
- Detail the methods used to ensure meaningful participation of communities with EJ concerns and in decisions being made about the proposed action.
- Establish a monitoring program for the project to verify that actual noise impacts do not exceed the maximum levels predicted in the DEA. Enhance outreach so that the public is aware on how

to submit noise complaint. Identify additional actions to reduce noise impacts that will be taken in response to noise complaints and to meet environmental objectives throughout the proposed project lifespan.

- Describe the methods for coordinating with federal and state agencies and affected tribes to ensure that this project is implemented in a manner protective of human health and the environment.

Enclosed are EPA's Detailed Comments. Thank you for the opportunity to review the DEA for this project. If you have questions about this review, please contact Theo Mbabaliye of my staff at (206) 553-6322 and mbabaliye.theogene@epa.gov, or me, at (206) 553-1774 and chu.rebecca@epa.gov.

Sincerely,

REBECCA
CHU

Digitally signed by
REBECCA CHU
Date: 2024.02.22
13:15:27 -08'00'

Rebecca Chu, Manager
Policy and Environmental Review Branch

Enclosure

**U.S. EPA Detailed Comments on the Draft EA for
Eastern Washington Airspace Extension Project
Okanogan, Skagit, and Chelan Counties in Washington State and
Bonner and Boundary Counties in Idaho
February 2024**

Impacts on Communities with Environmental Justice Concerns

Section 3.6 of the DEA discusses socioeconomic and environmental justice and provides 2020 census data for the action area. In addition, the DEA states that, “The U.S. EPA’s Environmental Justice Screening and Mapping Tool was considered when analyzing the impacts on environmental justice. However, based on the nature of the Proposed Action and negligible impact it would have on the surrounding communities, it was not used extensively or represented in this analysis.” The DEA then concludes that there would be “no significant environmental impacts on socioeconomic resources, no disproportionately high impacts or adverse effects on any low-income populations or minority populations, and no disproportionate exposure of children to environmental health or safety risks.”

It is important to consider both the proposed action’s potential short-term impacts and long-term impacts (e.g., flight noise, disrupted air quality, viewsapes and disrupted access to recreation areas and traditional use by Indigenous populations) on communities with EJ concerns.

EPA recommends that the NEPA analysis utilize EPA’s EJScreen to identifying potential impacts on communities with EJ concerns for the following reasons:

- EJScreen is EPA’s nationally consistent environmental justice screening and mapping tool.¹ It offers a variety of powerful data and mapping capabilities that enable users to understand details about the population of an area and the environmental conditions in which they live. The tool provides information on environmental and socioeconomic indicators as well as pollution sources, health disparities, critical service gaps, and climate change data. The data is displayed in color-coded maps and standard data reports which feature how a selected location compares to the rest of the nation and state. As the information was not included in the DEA EPA recommends it be included in the NEPA analysis.
- Assessing data from EJScreen is a useful first step in identifying locations in the area that may be candidates for further review or targeted outreach. EPA considers a project to be in an area of potential EJ concern when an EJScreen analysis for the impacted area shows one or more of the EJ Indexes at or above the 80th percentile in the nation and/or state. At a minimum, EPA recommends an EJScreen analysis consider EJScreen information for the block group(s) which contains the proposed action(s) and a one-mile radius around those areas. EPA encourages the Navy to include EJScreen results in the NEPA analysis and discuss implications for communities in the analysis area.
- It is important to consider all impacted areas by the proposed action(s). Areas of impact can be very focused and contained within a single block group, or broader, spanning across

¹ <https://ejscreen.epa.gov/mapper/>. Accessed 1/24/2024.

several block groups and communities.² Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators.³ Therefore, additional review or outreach may be necessary for the proposed action. To address these potential concerns, EPA recommends the NEPA document:

- Apply methods from "Environmental Justice Interagency Working Group Promising Practices for EJ Methodologies in NEPA Reviews" report to this project.⁴ This report compiles methodologies from current agency practices for integrating EJ considerations in NEPA processes. The Promising Practices Report provides particularly useful guidance in assessing the potential direct and indirect impacts of a project, as well as the potentially increased vulnerabilities certain populations may have due to the cumulative impacts of environmental harm.
- Apply guidance from the Council of Environmental Quality's guidance document "Environmental Justice Guidance Under the National Environmental Policy Act" to this project (CEQ's EJ Guidance).⁵
- Characterize the project site with specific information or data related to EJ concerns.⁶
- Describe potential EJ concerns for all EJ Indexes at or above the 80th percentile in the state and/or nation.
- Screen for and describe all individual block groups within or intersecting at least a 1-mile radius of the project.
- Describe individual block groups within the project area in addition to an area-wide assessment.
- Supplement data with state and county level reports and local knowledge such as data from Rural Health Information Hub Idaho State Guide⁷ and Idaho Department of Health and Welfare's Population Health Data.⁸

Meaningful Public Engagement

EPA recommends the NEPA analysis detail the opportunities for effective and meaningful public engagement for communities with EJ concerns, as described in the Promising Practices for EJ

² Agencies should define community as "either a group of individuals living in geographic proximity to one another, or a geographically dispersed set of individuals (such as migrant workers or Native Americans), where either type of group experiences common conditions" (Interim Justice40 Guidance – Executive Order 14008 on Tackling the Climate Crisis at Home and Abroad, January 27, 2021).

³ EPA's Technical Documentation for EJScreen: <https://www.epa.gov/ejscreen/technical-information-about-ejscreen>. Accessed 1/24/2024.

⁴ Promising Practices for EJ Methodologies in NEPA Reviews: https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf. Accessed 1/24/2024.

⁵ Environmental Justice Guidance Under the National Environmental Policy Act: https://www.epa.gov/sites/default/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf. Accessed 6/30/2023.

⁶ For more information about potential EJ concerns, refer to the July 21, 2021, Memorandum for the Heads of Departments and Agencies Interim Implementation Guidance for the Justice40 Initiative: <https://www.whitehouse.gov/wp-content/uploads/2021/07/M-21-28.pdf>. Accessed 1/24/2024.

⁷ <https://www.ruralhealthinfo.org/states/idaho>. Accessed 1/24/2024.

⁸ <https://www.gethealthy.dhw.idaho.gov/population-health-data>. Accessed 1/24/2024.

Methodologies in NEPA reviews and Executive Order 14096. We recommend the following measures to further advance meaningful involvement:

- Review and consider community feedback provided during the NEPA process. Ensure that the NEPA engagement approach is sensitive and responsive to the wellbeing of affected communities.
- Ensure that community feedback is reflected in the decision-making process. Design robust community engagement practices to maximize participation opportunities for communities that would be affected by the project, such as community-based workshops to facilitate discussion and issue resolution. Community-based workshops may also provide an opportunity to identify key issues and milestones for meaningful engagement in the NEPA process for the communities.
- Provide early and frequent outreach and engagement opportunities to collect and incorporate community feedback throughout the NEPA process and to maintain maximum transparency.
- Ensure that translation/interpretation services are provided to accommodate linguistically isolated populations.
- Address technology barriers that may prohibit participation from communities affected by the project.
- Ensure that meetings are scheduled at a time and location that is accessible for community participants, including scheduling meetings after work hours and on weekends as appropriate.
- Provide ample notice of meetings and commenting opportunities so that community members have sufficient time to prepare and participate.
- Promote engagement opportunities within appropriate outlets used by affected communities, such as newspapers, radio, and social media.
- Ensure that all project-related information is conveyed using plain language so that community members of varied reading proficiencies can readily understand the project-related information.

Potential Impacts on Air Quality

Because of this project's potential air quality impacts, EPA recommends that the NEPA analysis include:

- Air quality monitoring and appropriate mitigation measures in coordination with each State's Department of Environmental Protection and other entities in the area to ensure compliance with the National Ambient Air Quality Standards and related regulatory requirements throughout the project's lifespan.
- Monitoring strategies tailored to local conditions. This is because localized air quality impacts can be substantial (e.g., during wildfire burns) even though area-wide and/or long-term monitoring may show compliance with air quality regulatory requirements. In addition, sensitive populations, such as the elderly and children may exist within newly established MOA and ATCAA.
- Increased fire prevention mitigation commensurate with rising risk due to climate change.

EPA appreciates that the DEA describes current air quality conditions within the analysis area. Air quality in the project area is in "attainment" or "unclassifiable /attainment" with all criteria pollutants and General Conformity is not applicable to the analysis area. Although this may be true, local air quality may still be impacted due to cumulative impacts from surrounding activities such as road construction and site operations, traffic on unpaved roads, local traffic emissions, use

of woodstoves, agriculture, fire, and civilian air traffic. Changes in climate may also result in increased air pollution from future wildfires. Further, use of flares in airspace may generate air emissions with potential for cumulative air quality impacts. If a flare is still burning when it hits the ground, it may cause a fire and result in a variety of secondary impacts on soil, water, biological resources, cultural resources, land use, and human safety. All these impacts could also be exacerbated due to prevailing weather conditions and the analysis area is in arid and windy environment.

Potential Impacts on Biological Resources

EPA recommends that the NEPA analysis:

- Implement continued coordination with the U.S. Fish and Wildlife Service, and as appropriate, with each State's Department of Fish, Wildlife, and Game, to reduce risks and protect biota and habitat as the proposed action and related activities are implemented.
- At a minimum, extend the existing seasonal flight restrictions in areas of highest habitat quality; and includes such protective measures in the NEPA analysis and mitigation plan.
- Include the outcomes of Section 7 of the Endangered Species Act consultations with the USFWS, including any recommended measures to protect species from impacts of activities in the MOAs, as well as coordination with other agencies.
- Avoid the use of chaff, particularly in low-altitude MOAs, and replace it with a biodegradable alternative. This is because chemicals released from chaff and flares tend to dissolve faster in water than on land, are more mobile and available to organisms in water, and their toxicity thresholds tend to be lower for sensitive aquatic species.⁹

The DEA discusses biological resources in the analysis area and indicates that this area includes the sagebrush steppe ecosystem, and the habitat supports a variety of wildlife species including species listed as endangered and threatened under the ESA, e.g., the endangered gray wolf and threatened grizzly bear, Canada lynx, and North American wolverine. Others include special status species, migratory birds, as well as mammals and plants.¹⁰ Information in the document also indicates that the proposed action has the potential to impact these resources primarily due to the anticipated higher than optimal noise levels, especially during low-level flight operations; chaff and flares releases; and bird-aircraft strikes.

Impacts of Climate Change

Section 3.1.1.3 of the DEA discusses greenhouse gases and indicates that total baseline emissions are estimated at 56,413 metric tons (MT) of CO₂ per year and that Alternative 1 (Preferred Alternative) will result in emissions totaling 88,413 MT of CO₂ per year, which includes baseline emissions. It is not clear why there is a difference between baseline emissions and no action alternative emissions. The difference is up to 31,996 MT of CO₂ per year. EPA recommends the NEPA analysis explain this difference and basis for it.

⁹ USAF (1997). Environmental effects of Self-protection Chaff and Flares. Headquarters Air Combat Command, Langley Air Force Base, VA.

¹⁰ (DEA, p. 3-15).

The DEA also states that the 2023 Council on Environmental Quality (CEQ) Interim Guidance on Consideration of Greenhouse Gas Emissions and Climate Change recommends that “agencies provide additional context for GHG emissions, including through the use of the best available social cost of GHG estimates, to translate climate impacts into the more accessible metric of dollars, allow decision makers and the public to make comparisons, help evaluate the significance of an action’s climate change effects, and better understand the tradeoffs associated with an action and its alternatives.” EPA appreciates that the DEA includes estimated emissions for all alternative, but the DEA does not include social cost estimates of these emissions. EPA recommends the NEPA analysis also estimate the social cost of GHG emissions for each alternative to facilitate decisionmakers' and the public's evaluation of the proposed alternatives by monetizing the calculated GHG emissions.⁴ It will also be useful to include an evaluation of the effects of climate change on each of the proposed alternatives, including evaluating how a changing climate may impact each alternative and identifying potential mitigation measures that could improve resiliency of the project.

Coordination with Tribal Governments

EPA encourages the Navy to continue consultations with affected Tribes and incorporate feedback from the Tribes when making decisions regarding the project. EPA recommends the NEPA analysis describe the issues raised during ongoing consultations and how those issues will be addressed.

Monitoring of the Project and Adaptive Management

EPA recommends the NEPA analysis include a monitoring program designed to assess both impacts from activities and effectiveness of mitigation measures for the impacts and indicate how the program will use an effective feedback mechanism, such as adaptive management, so that any needed adjustments can be made to the activities to meet environmental objectives during project implementation. For example, there could be a plan to monitor noise impacts and take corrective action if noise complaints or damage claims exceed existing levels.



State of Washington

DEPARTMENT OF FISH AND WILDLIFE REGION TWO

Mailing Address: 1550 Alder Street NW, Ephrata, WA 98823-9699 · 509 754-4624 · TDD 360 902-2207
Region Two Office Location: 1550 Alder Street NW, Ephrata, WA

February 23, 2024

Naval Facilities Engineering Systems Command Northwest
Attention: Code EV23
1101 Tautog Circle
Silverdale, WA 98315

To Whom it May Concern,

**SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT FOR EASTERN
WASHINGTON AIRSPACE EXTENSION**

On January 16, 2024, the Washington Department of Fish and Wildlife (WDFW) received notice from the Department of the Navy's United States Pacific Fleet, that it is accepting comments regarding the proposal referenced above. The Washington Department of Fish and Wildlife (WDFW) interest in this project is based on our agency's mandate to perpetuate fish, wildlife, and their habitat (Regulatory Code of Washington (RCW) 77.04.012). We reviewed the project proposal for potential impacts to fish, wildlife, and their habitats, as well as possible impacts to recreational opportunities, according to our mission; we appreciate the opportunity to offer these comments.

The Eastern Washington Airspace Extension Draft Environmental Assessment (DEA), dated January 2024, shows the new proposed airspace of Okanogan D MOA and Mazama ATCAA (Figure 1.1-1). The new proposed airspace provides habitat for multiple wildlife species noted in Table 3.2-1 of the DEA. There are two species, mountain goats, listed under Table 3.2-1, and golden eagles, not listed under Table 3.2-1, that WDFW is concerned about the potential impacts of the new airspace as they are sensitive to air traffic. Both of these species are identified as Species of Greatest Conservation Need under the Washington [State Wildlife Action Plan](#) and Priority Species under WDFW's [Priority Habitat and Species Program](#). WDFW recommends these species be evaluated for potential impacts in the final Environmental Assessment and the following mitigation measures be added to the proposal:

Golden Eagle

WDFW has designated this species as a candidate for listing in Washington State. The majority of the Navy's existing and proposed Eastern Washington airspace is within the species' range (Larsen et al., 2004). Additionally, our WDFW Priority Habitat and Species (PHS) on the Web Map (<https://wdfw.wa.gov/species-habitats/at-risk/phs/maps>), a source of Best Available Science, shows that the new proposed airspace is above golden eagle breeding area. Golden eagle populations appear to be limited by the availability of undisturbed nest sites, and human activities have been shown to cause breeding failure (Kochert and Steenhof, 2002). Buffers of at least 1000 meters (~3280 feet) with no human disturbance are recommended to avoid disturbance to nesting eagles (Spaul and Health, 2017). Thus, WDFW asks that the navy be in

strict compliance with their lower altitude limits of the new airspace to ensure aircraft do not fly within the suggested buffer. Additionally, since golden eagles occur throughout Okanogan and Ferry County, flights should follow a lower altitude limit of 1000 meters during the nesting period of February 15 to July 15 (Larsen et al., 2004) for the entirety of Okanogan and Ferry County.

Mountain Goat

Mountain goat is listed in table 3.2-1 as a federally sensitive species that occurs in the eastern cascades under the new proposed airspace (Rodrick and Milner, 1991). Over the last twenty-seven years, WDFW has witness a decrease in the number of mountain goats observed in the Methow Valley (Table 1), and this pattern is likely to continue as there will be an increase in thermal stress due to climate change and human disturbance from recreation pressure (Rodrick and Milner, 1991). Mountain goats have been documented to be highly disturbed by aircraft (Côté et al., 2013). Escape terrain consisting of rock-cliff habitats to escape predators is critical to mountain goats especially when their offspring are young. As much of the new proposed flight area could be considered escape terrain, we recommend flights not happen from May 15 to June 30 in the proposed Okanogan D MOA airspace, to avoid and minimize disturbance to goats while they are most vulnerable with their kids. Buffers of 1,500 meters (~4,291 feet) are recommended to avoid disturbance of mountain goats (Côté et al., 2013) year-round. WDFW recommends the Navy is in strict compliance with their lower altitude limits of the new airspace to ensure aircraft do not fly below the recommended buffer to avoid disturbance to mountain goats. Additionally, WDFW asks that if the pilot sees a group of mountain goats, the pilot actively avoids flying near them.

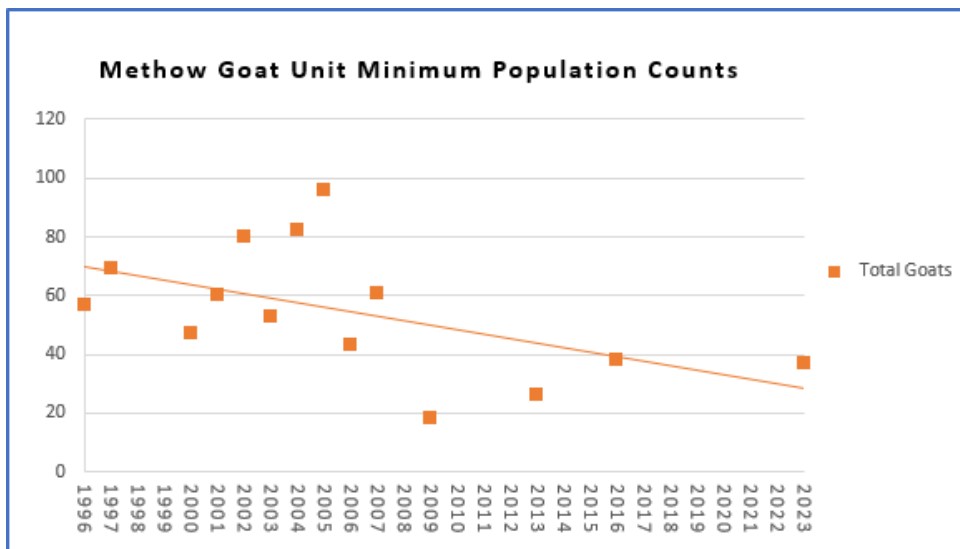


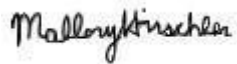
Figure 1. Minimum number of population counts of Mountain Goats occurring (y-axis) in the Methow Valley over time (x-axis)

To summarize, WDFW recommends that golden eagles and mountain goats be further assessed in the final Environmental Assessment for Eastern Washington Airspace. To avoid and minimize impacts to wildlife, WDFW recommends the final Environmental Assessment include the following measures:

1. The Navy strictly enforces the lower altitude limit for the entire airspace to avoid further impacts on the above species and those listed in Table 3.2-1.
2. Flights for the entire airspace do not occur beneath 1,000 meters in Okanogan and Ferry County where golden eagles are prevalent (Larsen et al., 2004) during the nesting period of February 15 to July 15.
3. Flights do not occur in the new proposed Okanogan D MOA airspace from May 15 to June 30 during the period goats are most vulnerable with their kids.
4. If pilots see mountain goats or any wildlife, they actively avoid flying near them.

Thank you for the opportunity to comment on the Draft Environmental Assessment for Eastern Washington Airspace Extension. WDFW recommends the No Action Alternative or Alternative 1, with the above recommendations, be considered for the Final Environmental Assessment. Alternative 2 would increase the number of training activities and likely cause more impacts to the above-mentioned species. WDFW staff are available to provide technical assistance to you and the applicant. If you have any questions, please contact me at 509-570-2354 or Mallory.hirschler@dfw.wa.gov.

Sincerely,



Mallory Hirschler
WDFW Region 2 Habitat Biologist

Cc: Mike Kuttel, Jr. – Regional Director, Region 1, WDFW
Brock Hoenes – Regional Director, Region 2, WDFW
Mark Wachtel – Regional Habitat Program Manager, Region 1, WDFW
Carmen Andonaegui – Regional Habitat Program Manager, Region 2, WDFW
Jeffrey Lawlor – Assistant Regional Habitat Program Manager, Region 1, WDFW
Amanda Barg – Assistant Regional Habitat Program Manager, Region 2, WDFW
Annemarie Prince – District Wildlife Biologist, Region 1, WDFW
Scott Fitkin – District Wildlife Biologist, Region 2, WDFW
Melissa Hunt – District Wildlife Biologist, Methow Ranger District, U.S. Forest Service
Michael Lucid – Wildlife Biologist, U.S. Fish and Wildlife Service

References:

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