

# Methow Conservancy



July 28, 2015

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Via Electronic Mail to: [usarmy.jblm.imcom.list.dpw-eis@mail.mil](mailto:usarmy.jblm.imcom.list.dpw-eis@mail.mil)

Re: JBLM Off-base Helicopter Training Areas

Dear Sir or Madam,

Thank you for the opportunity to provide input as part of the Scoping Process associated with your National Environmental Policy Act review of the proposed JBLM Off-base Helicopter Training Areas. It is our understanding that this Scoping Process is intended to identify areas of potential concern and to inform the depth and focus of your upcoming environmental review. **We believe the proposal, as written, raises several significant issues of concern with regard to the Mountain Training Area proposed** and we appreciate the opportunity to provide input early in this process.

The comments herein are presented on behalf of the Board of Directors of the Methow Conservancy, the local land trust organization serving the Methow watershed here in western Okanogan County, Washington. Our mission is to "Inspire people to care for the land of the Methow Valley." Our work is supported by over 1,000 households, as well as 100 business partners whose economic viability is dependent on the landscape of the Methow Valley. Our primary geographic area of work is the private lands which constitute approximately 10% of the Methow Valley watershed where we partner with private landowners to conserve identified priority lands including irrigated farmland, orchards, grazing lands, wildlife habitat and forestland.

The Methow Valley is one of Washington State's most recognized examples of both economic vitality and ecological integrity, contributing significantly to both our County and State economies. Every year over 500,000 visitors travel the North Cascades Scenic Byway to see and enjoy this unique part of our nation, and in doing so, sustain our local business and lodging community. Over the past decade, more than \$300 million of federal, state, and private funds have been spent to conserve the ecological functioning of this watershed, highlighting the value people place on protecting this unique place.

The opportunity to enjoy quiet nights with minimal light and noise pollution is one of the reasons the Methow Valley has been able to support a growing economy rooted in outdoor recreation and tourism, as well as a growing full-time community attracted here by the natural environment and

proximity to public lands. The community's conservation efforts through the years have conserved a landscape that is increasingly rare in the American west, where residents and visitors can still enjoy a largely in-tact natural landscape. Ensuring the Methow Valley continues to evolve in this way requires understanding from outside agencies proposing work here.

For example, the State of Washington Department of Transportation has recently taken the unprecedented step of pledging to return and re-pay Federal Aviation Administration grant funds for the Methow Valley State Airport in order to avoid installation of a full-time airport beacon, if a waiver of that beacon requirement is not granted by the FAA. Instead, a limited-duration pilot-activated solution is being pursued, which will provide for aircraft safety as well as the opportunity to enjoy the dark skies which are increasingly unique to places like the Methow Valley. As WSDOT did in the airport beacon case, we ask that the Army also consider the potential implications for our tourism-based economy as you seek to provide for necessary training.

You will undoubtedly receive a large number of comment letters expressing concern with respect to the noise associated with low elevation nighttime helicopter operations, and accordingly we strongly encourage your Environmental Analysis (or preferably a full Environmental Impact Statement) to include a careful examination of the noise impacts within the Methow Valley, along the federally designated Scenic Byway, and within North Cascades National Park. Specifically, this analysis should consider the noise contributed by multiple helicopters operating at night in terrain characterized by valleys and canyons, rather than the single aircraft identified in Table 4-3 of your June, 2015 Scoping Document, as well as the cumulative impacts associated with the helicopter operations of other agencies who might utilize the training area as alluded to in your Scoping Document in Section 4.2.4 (Page 12). It should also take into consideration the noise effects on very nearby federally designated Wilderness Areas, which by law are defined to be areas where "the earth and community of life are untrammelled by man."

If this proposal is advanced beyond Scoping, we would ask that as a minimum you commit to formally designating an area consistent with the geographic area of the Methow Valley watershed, the Scenic Highway Corridor and the National Park as a Noise Sensitive Areas in accordance with the guidance and definition provided in FAA Advisory Circular 91-36D, as an area "with wilderness characteristics" where the proposed nighttime helicopter operations would impact an area where "a quiet setting is a generally recognized feature or attribute".

With respect to wildlife impacts, it is our understanding that your NEPA analysis will require consideration of all existing reports and studies in the proposed MTA with respect to threatened and endangered species. The area encompassed by your proposed MTA is home to a large number of sensitive, threatened and endangered species. We encourage you to consult with the Washington State Department of Fish and Wildlife, the United States Forest Service and the National Park Service to ensure that their most accurate data is being included as part of your NEPA review, so that potentially significant adverse impacts can be avoided.

As a hub for recreation in the North Cascades, and as the epicenter of Washington State's largest wildfire in 2014, we have an appreciation for the role that Army helicopters can play in executing high elevation rescues and stopping the spread of wildfire when we invite you into our neighborhood. As a good neighbor, we ask that you do everything within your power to carefully consider the quality of life, environmental, and economic impacts of the proposed Mountain Training Area upon the Methow Valley.

**We believe that as currently written, your proposal poses a significant risk to the local Methow Valley economy and quality of life which are rooted in outdoor recreational opportunities that require dark skies and low levels of human-related noise. Given these potential unintended consequences, we respectfully ask**

**that you develop and consider additional alternative locations for mountain training. The greater Methow Valley is simply not an appropriate area for the activities proposed in this Scoping Notice.**

Thank you again for this opportunity to comment, and for your consideration. We will look forward to learning more about the next opportunities for public comment and discussion which we understand may include public meetings in the region in September.

Sincerely,



Jason Paulsen  
Executive Director

cc: Senator Patty Murray  
Senator Maria Cantwell  
Representative Dan Newhouse  
Governor Jay Inslee