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Greg Wahl
1835 Black Lake Blvd SW
Olympia, WA 98512

RE: Pacific Northwest Electronic Warfare Range Environmental Assessment

Sent Via Email to gtwahl@fs.fed.us and comments-pacificnorthwest-olympic-pacific@fs.fed.us and the Internet Portal

Dear Team Leader Wahl:

Wilderness Watch submits the following comments on the Pacific Northwest Electronic Warfare Range Environmental Assessment. Wilderness Watch is a national wilderness conservation organization dedicated to the protection and proper stewardship of the National Wilderness Preservation System. Wilderness Watch believes the EA does not adequately address the impacts to Wilderness.

The EA does not discuss the impacts of this proposal on the Olympic Wilderness (Olympic National Park), the Colonel Bob Wilderness, Washington Islands Wilderness, the Lake Chelan-Sawtooth Wilderness or the Pasayten Wilderness. All five of these Wildernesses are within, or partially within, the MOAs outlined in the EA (see figures 1.3-1 and 1.3-2).

Furthermore, the EA does not analyze whether flight paths would go outside of the MOAs. Given the location of the bases, the flights would have to go outside the MOAs. Thus, additional Wildernesses would likely be affected. The Stephen Mather, Glacier Peak, Mount Baker, Noisy Diobsud, Boulder River, Henry M Jackson, Wild Sky, Alpine Lakes and San Juan Islands Wildernesses could be affected.

The EA only says this about the topic:

Noise-sensitive areas are those areas where noise interferes with normal activities associated with its use. Normally, noise-sensitive areas include residential, educational, health, religious structures and sites, parks, recreational areas (including areas with wilderness characteristics), wildlife refuges, and cultural and historical sites. In the context of facilities and equipment, noise-sensitive areas may include such sites in the immediate vicinity of operations, pursuant to the Noise Control Act of 1972. Users of designated recreational areas are considered sensitive receptors.

There is no site-specific analysis of noise or any other impacts, either from the planes and how they may operate differently for this project, or from the emitters,

some of which would be stationed near Wilderness. The only mention is of recreation areas which may have wilderness characteristics. Even if this is an erroneous conflation of recreational areas with Wilderness, it is not an analysis the impacts to Wilderness or wilderness character. Indeed, the Wildernesses affected in the MOAs are not even mentioned by name. The EA contains no analysis of Wilderness. Thus, the EA fails to comply with the Wilderness Act and NEPA.

Given the scope of the project and the admitted harm to biological resources documented in the EA, an EIS must be prepared. Please keep us updated on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Macfarlane", written in a cursive style.

Gary Macfarlane