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July 21, 2015

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

Re: JBLA Off-base Helicopter Training

Sent via: usarmy.jblm.imcom.list.dpw-eis@mail.mil

Dear Department of the Army,

The following comments respond to the June 2015 Scoping Document for Off-base Helicopter Training from Wilderness Watch. Wilderness Watch is a national wilderness conservation organization focused on the protection of the National Wilderness Preservation System (NWPS) and all the wilderness units of the NWPS. We have members in all 50 states, a headquarters office in Missoula, and additional offices in Idaho and Minnesota.

The NWPS is governed by the 1964 Wilderness Act, 16 U.S.C. 1131-1135, P.L. 88-577. For over a half-century, the Wilderness Act has protected such areas designated by Congress from development and motorized intrusions in order to preserve the areas' wilderness character.

Our specific comments follow:

1. Site MTA 1-4 must be removed from further consideration due to its location within the Alpine Lakes Wilderness.

As we understand the Scoping Document, the Army wants to establish a large Mountain Training Area (MTA) on the east side of the North Cascades in Washington State. Within this MTA would be sited seven sites for helicopter landing trainings. These seven sites are numbered MTA 1-1 to MTA 1-7.

In the MTA identified in the Scoping Document (p. 13), site MTA 1-4 lies inside

the Alpine Lakes Wilderness. The Alpine Lakes Wilderness is a federally-designated Wilderness that is a part of the NWPS. The landing of any aircraft, either helicopters or fixed-wing aircraft, is prohibited within designated Wildernesses by the Wilderness Act. The Army cannot land helicopters at site MTA 1-4 without violating federal law.

The Department of the Army must eliminate MTA 1-4 from this proposal, as well as any other proposed landing areas that fall within designated Wilderness. The Scoping Document does not once even mention Wilderness; this oversight must be corrected in the environmental review process.

2. The environmental review must evaluate the noise impacts from helicopter training flights on other nearby Wildernesses and National Parks, even if no landing sites are located within Wildernesses or National Parks.

Even if no other landing sites might be located within Wildernesses or National Parks, the impacts of the extensive helicopter flights must be analyzed by the EA in accordance with the National Environmental Policy Act (NEPA). Flights of the number and type proposed by the Scoping Document could bring extreme noise to protected areas even if the helicopters do not actually land within the protected areas. The noise and presence of large mechanized aircraft could significantly detract from the ability of the U.S. Forest Service or National Park Service to protect the special qualities that Congress established those areas to protect. Should any helicopter flights fly over or near any designated Wildernesses, the Army must adhere to the FAA guidelines of flying no lower than 2000 feet above the ground.

3. Any military training exercise within Wilderness is inappropriate. Any military training activities that might occur within designated Wildernesses – whether helicopter landings or low-level flights, ground exercises, instrumentation, mobile electronic emitters, etc. – is inappropriate within designated Wilderness. All of these actions would degrade the area’s wilderness character and therefore violate the 1964 Wilderness Act. All of these impacts must be thoroughly analyzed in the next phase of environmental review for this project.

Because the potential impact of the proposed action is so large, we ask that the Department of the Army conduct a full environmental impact statement (EIS) for the project, rather than the cursory environmental assessment (EA).

Please keep Wilderness Watch on your contact list for further steps in this project.

Sincerely,



Kevin Proescholdt
Conservation Director
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