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March 19, 2015

Angoon Airpote DEIS  
1220 SW Morrison, Suite 700  
Portland, OR 97205

Dear Federal Aviation Administration,

Wilderness Watch appreciated the opportunity to testify at the public hearing held in Washington, DC, on March 12 regarding the Angoon Airport Draft Environmental Impact Statement (DEIS). We are particularly grateful for the time that FAA staff and SWCA staff took to answer questions and clarify the parallel NEPA/Title XI processes underway both before and after the formal testimony.

As a result of those discussions, and further reading of the DEIS, Wilderness Watch wishes to submit the following supplemental comments on that DEIS for the record.

As we mentioned in our earlier submission, Wilderness Watch is primarily concerned with protecting the integrity and wilderness character of the Kootznoowoo Wilderness on Admiralty Island, a world-class wilderness resource.

But more broadly, the Angoon Airport Draft EIS and Title XI decisions require considering the following factors:

- Impact to the conservation system unit (both the Kootznoowoo Wilderness and Admiralty Island National Monument)
- Meeting the project purpose and need
- Economics
- Safety

Of the action alternatives, Alternative 12a best meets the first three criteria and meets the robust safety standards required for siting an airport. Alternative 12a would be located in town and not develop the Monument-Wilderness lands. Alternative 12a is most conveniently located for medical evacuations, for business purposes and for personal transportation needs. Alternative 12a is tens of millions of dollars cheaper than all of the other action alternatives. And Alternative 12a meets the stringent safety requirements for siting an airport.

By contrast, the other action Alternatives significantly degrade the conservation system unit (the Kootznoowoo Wilderness), less-adequately meet the project

purpose and need, and cost millions of dollars more for negligible safety differences. All of these factors must be considered together.

We suggest that the Final EIS for this project be amended to clearly identify Alternative 12a as the only action Alternative that satisfies all of the 1966 Transportation Law Section 4(f) and ANILCA Title XI criteria. Alternatively, Alternative 12a can be clearly identified as best meeting the ANILCA Title XI criteria, with the other alternatives documented as incurring more degradation of the conservation system unit, more cost to the people and less effectively meeting the project purpose and need. If this latter expression is chosen, then the Final EIS must specifically note that the other (non 12a) action alternatives do not comply with Section 4(f) as required by both the 1966 Transportation Law and ANILCA (which requires applicable law be applied).

Because of the impacts to the Kootznoowoo Wilderness from the other action alternatives, and because only Alternative 12a meets the four factors cited above, Wilderness Watch reiterates its support for either the No Action Alternative, or Alternative 12a with Access 12a.

Thank you for this additional opportunity to submit comments on the Angoon Airport DEIS. Please keep us informed of further steps in this process.

Sincerely,

A handwritten signature in dark ink that reads "Kevin Proescholdt". The signature is written in a cursive, flowing style.

Kevin Proescholdt  
Conservation Director