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February 21, 2001

Mr. Sam Dennis, Lead Environmental Planner Department of the Navy Engineering Field Activity West 900 Commodore Drive San Bruno, CA 94066-5006

RE: Proposal To Utilize Fort Hunter Liggett As An Aerial Bombing Range

Dear Mr. Dennis:

I am responding to your letter of February 12, 2001, informing me of a proposal to utilize a military range at Fort Hunter Liggett, in Monterey County, California, as a location for Navy pilots to carry out aerial bombing practice.

LandWatch believes that the Navy ought to abandon this proposal immediately. American taxpayers have spent millions of dollars to acquire lands in the Ventana Wilderness, and these lands have been specifically set aside for wilderness purposes--for preservation in their natural state. The Navy's bombing range proposal is fundamentally inconsistent with maintaining adjacent areas as wilderness, and has already given rise to very significant public opposition. I hope that you and others at the Navy will consider this opposition--and its validity--and will seek more appropriate alternatives.

If the Navy wishes to continue to consider the Hunter Liggett site, we believe that a full Environmental Impact Statement (EIS) needs to be prepared, pursuant to the requirements of the National Environmental Policy Act (NEPA). Outlined below are a number of the key issues that demand full analysis:

- 1. The project needs to be fully and accurately described. Newspaper accounts have given quite different statements about what, precisely, the Navy is proposing. A full and forthright description of the number, timing, and character of each and every air flight proposed must be the basis upon which the environmental analysis is carried out, and all operations at the site, and between the site and the origination point for the flights, needs to be documented. A "maximum," or "worst case" project description must be used as the basis for the EIS analysis.
- 2. The lands adjacent to the planned range, including parts of Fort Hunter Liggett itself, the Ventana Wilderness and the Silver Peak Wilderness areas, contain sensitive habitat and sensitive archaeological sites. These lands are culturally significant to the Esselen and Salinian peoples. The EIS must fully evaluate the impacts of the proposed bombing range

on Native American treaty rights, and on the sacred, ceremonial, traditional, archeological, historical, and cultural values related to Native Americans.

- 3. The lands adjacent to the planned range, including parts of Fort Hunter Liggett itself, the Ventana Wilderness and the Silver Peak Wilderness areas, are of exceptional recreational value. The EIS must fully evaluate the impact of the bombing range proposal on the use of the Ventana Wilderness and other areas as a recreational resource.
- 4. Much hard work has been done over the years by a number of organizations to preserve and protect the wilderness habitats along the Central Coast of California. Two notable efforts made by the Ventana Wilderness Society and Monterey Peninsula Audubon have been the reestablishment of the Bald Eagle and the reintroduction of the California Condor into the Ventana Wilderness. The Navy's bombing range proposal might eliminate quiet and secure nesting sites; and could also lead to collisions between Navy airplanes and birds, which rise on thermals and soar for many miles in search of food. The EIS needs fully to evaluate the impact of the proposal on all native wildlife within the Ventana Wilderness and adjacent areas, and with particular attention to the effects the proposal would have on the Bald Eagle and the California Condor.
- 5. It may be appropriate for parts of Fort Hunter Liggett to be added to the National Park system, or designated as a national wilderness area. The EIS must fully evaluate alternative uses of Fort Hunter Liggett, and explore how they would be impacted by the bombing range proposal.
- 6. The EIS must fully evaluate the impact of the bombing range proposal on rare, threatened and endangered species, and must consider migratory birds and animals as well as species which inhabit Fort Hunter Liggett, the Ventana Wilderness, and adjacent lands on a year round basis.
- 7. The proposal to make numerous jet plane flights over significant cattle ranching areas may cause economic and other impacts. All potential impacts of the proposed bombing range project on adjacent and affected cattle ranching areas needs to be fully considered.
- 8. There are significant residential uses in South Monterey County. All potential impacts on such residential uses need to be documented in the EIS.
- 9. The impact of the proposed bombing range on schools needs to be fully evaluated in the EIS.
- 10. The EIS must fully evaluate possible impacts to the Pinnacles National Monument, which may be affected by jet planes flying from the Central Valley to the proposed bombing range on Fort Hunter Liggett.
- 11. Tourism is the second biggest business in Monterey County, and there is significant tourism in South Monterey County. The EIS must fully explore all the potential impacts of the bombing range proposal on tourism, which can be significantly affected when jet plane bombing runs take place nearby peaceful areas that are attractive to tourists because of their peacefulness.
- 12. The EIS must fully explore the toxic impacts that the bombing range proposal may have on the target area.

- 13. With respect to all areas in which jet planes may be flying, in connection with the proposed bombing range proposal, the EIS must evaluate all of the following:
 - a. Toxic releases from the planes and/or bombs.
 - b. Noise impacts from the planes and/or bombs.
 - c. Effects of air disturbance (vibration and shockwave impacts).

LandWatch believes that the above is only a "partial list" of the potential impacts. We urge the Navy, if it does continue to pursue the idea of turning parts of Fort Hunter Liggett into a Navy bombing range, to undertake the most thorough review possible, and that you maximize the ability of the public to comment in a full and timely way on the information developed in the draft EIS.

Thank you for taking our comments into consideration.

Very truly yours,

Gary A Patton, Executive Director LandWatch Monterey County

cc: Congress Member Sam Farr Senator Dianne Feinstein Senator Barbara Boxer