



United States Department of the Interior  
NATIONAL PARK SERVICE  
Intermountain Region  
12795 West Alameda Parkway  
Lakewood, CO 80228



IN REPLY REFER TO:  
IMDE-NR

NOV 28 2011

George Stone  
28OSS/OSOA Airspace Manager  
1956 Scott Drive, Suite 207  
Ellsworth AFB, SD 57706

Ely *Eme*  
Turk *AT*  
Malone *PLM*  
Whittington *AW*

Dear Mr. Stone,

The National Park Service (NPS) appreciates the opportunity to discuss our concerns with you regarding the Powder River Training Complex proposed actions. As you are aware, we previously submitted comments in the summer of 2008 during the Notice of Intent (NOI) as well as during the Draft Environmental Impact Statement (EIS) comment period in November 2010. Each of these responses details our concerns about the potential of the proposed action to adversely affect the soundscapes, visitor experience, cultural resources, and sacred sites of Little Bighorn Battlefield National Monument (NM). We further highlight the Organic Act which establishes the NPS, reference the NPS Management Policies 2006 which guides NPS controlled projects and decisions, and discussion of sound metrics and FAA Order 1050.1E noting special consideration needs to be given to the evaluation of the significance of noise impacts on noise sensitive areas such as national parks.

We seek mutually beneficial solutions related to impacts associated with the proposed project – solutions that articulate how natural and cultural values interrelate in healthy ecosystems/cultural landscapes, and how public enjoyment of these places as well as the need to ensure realistic training needed by the United States Air Force (USAF) can be part of a strategy for ensuring the resources are protected unimpaired for future generations. We look forward to working with Ellsworth Air Force Base (AFB) on the establishment of mitigation measures that will ensure protection of our nation's finest natural and cultural resources and leave them unimpaired for the enjoyment of future generations. We remain concerned about the potential for significant adverse direct and indirect impacts to Little Bighorn Battlefield National Monument and Custer National Cemetery.

The National Monument contains two parcels of land separated by approximately 5 miles, the Custer Battlefield unit and the Reno Benteen Battlefield. A portion of the National Monument is actively administered and maintained as Custer National Cemetery and is the final resting place of approximately 5,000 U.S. veterans and dependents. The Custer Battlefield unit has been protected since 1879, and the Reno Benteen unit since 1926, first by the War Department as Custer National Cemetery and later (since 1940) by the NPS. The entire battlefield is listed on

the National Register as Custer Battlefield Historic District 1 and Historic District 2 (Reno Benteen Battlefield).

To clarify, we are concerned with the potential for both noise and visual intrusions at the monument. The National Monument is of enormous significance to American history, the American public, the 280,000 to 420,000 visitors who visit the site annually, and to the descendants of the combatants from both sides. We are concerned with the impact that noise and visual intrusions would have on the visitor experience, interpretive programs, special use permittees, and family members and loved ones who come to pay their respects at the National Cemetery.

The NPS would prefer no direct flights over Little Bighorn Battlefield NM and Custer National Cemetery consistent with our 2008 NOI and 2010 Draft EIS comments. No direct overflights would ensure positive protection of the Monument and Custer National Cemetery and would prevent significant adverse direct and indirect impacts to park soundscapes, cultural resources, wildlife, military internments and overall visitor experience. However, if the USAF finds they cannot accommodate our request for a complete avoidance we recommend an avoidance of five nautical miles (NM) lateral and 5,000 foot above ground level avoidance area for low altitude overflights. Establishing an avoidance area of this size for the Monument would also include the community of Crow Agency, another noise sensitive location. A 5 NM horizontal avoidance of Little Bighorn Battlefield would have a very minimal effect (0.61%, 108,725 acres or 169.9 square miles) on the total amount of area available to Ellsworth AFB for low level training.

NPS recommends the avoidance area for supersonic flights to comport with existing Specified Critical areas listed in Flight Information Publication AP/1B under the section for Supersonic Flight. This section designates Specified Critical areas in accordance with Air Force Instruction 13-201 that "shall be avoided by one-half NM for each 1,000 feet of flight altitude up to a maximum of 30 NM."

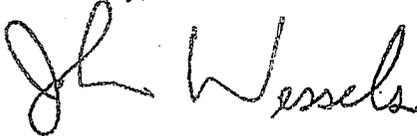
Should overflights of Little Bighorn Battlefield NM and Custer National Cemetery be necessary we request no use of chaff or flares due to safety concerns. NPS further requests the establishment of procedures for reporting overflight issues so noise concerns can be addressed immediately. NPS also requests that overflights be re-routed if an internment or special events are scheduled for the same day.

We have provided pertinent information in Attachments 1-5 and encourage you to review this information in detail. These attachments supplement information that was submitted in July 2008 when we first commented during public scoping and again in November 2010 during the Draft EIS comment period. Attachment 1 provides the enabling legislation for Little Bighorn Battlefield NM and Custer National Cemetery. Attachment 2 is a park map indicating GIS calculated acreage calculations of the two units comprising Little Bighorn Battlefield NM and Custer National Cemetery. Additionally this map displays our suggested five nautical mile diameter buffer for low level flights. Attachment 3 transmits the Cultural Landscape Report completed in 2010 for Little Bighorn Battlefield NM. Attachment 4 provides a listing of the 2011 List of Classified Structures for Little Bighorn Battlefield NM. Attachment 5 is a listing of scientific reports and published studies detailing the effects of vibrations on structures, effects of

sounds on wildlife, and related topics. Although the vibrational studies were not conducted at Little Bighorn Battlefield NM we believe the relevancy of these studies to be applicable. Should you require a copy of previous comments on the NOI and Draft EIS we would be glad to provide those.

Kate Hammond, Superintendent of Little Bighorn Battlefield National Monument, continues to serve as your NPS point of contact. Kate can be reached at (406) 638-3201 or at [kate\\_hammond@nps.gov](mailto:kate_hammond@nps.gov). We look forward to further discussion on this topic and the opportunity to help you be successful with this project.

Sincerely,

A handwritten signature in cursive script that reads "John Wessels". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

John Wessels  
Regional Director

Cc: Kate Hammond, Superintendent, Little Bighorn Battlefield National Monument  
John Keck, Montana/Wyoming State Coordinator, Intermountain Region  
Cheryl Eckhardt, Environmental Compliance Specialist, Intermountain Region  
Theresa Ely, Soundscape and Night Sky Coordinator, Intermountain Region  
Thomas Flanagan, Environmental Compliance Specialist, Environmental Quality  
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Vicki McCusker, Overflights Branch Chief, Natural Sounds & Night Skies Division