

3001

To: Ms. Linda De Vine

From: Bowman North Dakota County Commissioners

Subject: Powder River Training Areas

We the undersigned Bowman County Commissioners and Auditor are very concerned about the proposed final impact draft presented at the public hearing, in Bowman, North Dakota, September 22. Bowman would be directly under Powder River Area 3.

With the Energy sector expanding in our area, we are in the process of building a new airport to accommodate these corporations and associated businesses.

Energy growth, small businesses, and agricultural commodity production are essential for the survival of our community. The expanded training areas would greatly impact this potential!

We hope the final recommendations include raising the Area 3 floor to 10,000' MSL, which would greatly REDUCE the impact to our flight operations.

Alternative C would be our next choice associated with the Powder River proposal.

In conclusion, we hope these recommendations and concerns are considered in the final Powder River Impact study. Thank you for your attention.

County Commissioners:

Bill Bowman  
Rick Braaten  
Kenneth Steiner  
Pete Allan  
Lynn Brochel

Auditor:

Jandra K. Jirka

SD-16  
SD-6  
SD-4



P.O. Box 549  
Brookings, SD 57006  
Tel 605.697.5204  
Fax 605.697.6230

DRA West  
1719 W. Main St., Ste. 303  
Rapid City, SD 57702  
Tel 605.718.4957

www.dakotarural.org

1/20/11

Linda DeVine, Program Manager  
ACC/A7PS  
129 Andrews St., Suite 337  
Langley AFB, VA 23665-2701  
Fax: (757) 764-1975

Dakota Rural Action is submitting these comments on behalf of our over 900 members. We have serious concerns about the proposed expansion of the Powder River Training Complex. Including:

- The reduction of the ceiling to 500 feet;
- The increased use of chaff and flares and the problems they may cause for cattle and wildfires;
- The impacts of low flying on agricultural applicators, wind energy development and the health of livestock;
- The impacts of high speed, low flying aircraft on agricultural chemical drift;
- The process the Air Force will use to determine and deal with damage claims. It's preferred if local government is the mechanism used to deal with these issues.

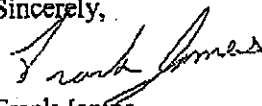
Reducing the ceiling will have severe impacts on agriculture, the dominant industry in the region. Low flying planes will spook cattle, put producers working around the livestock at risk and cause concern for those applying agricultural chemicals. The Air Force has given these concerns little attentions claiming they won't fly when there are agricultural activities happening. However, agriculture happens every day of every year and more attention is needed in addressing these concerns.

The increased uses of chaff and flares causes many concerns mostly surrounding the release of foreign materials onto private land and the impacts of these materials on the land and property. Fire from the flares is one of the most important concerns.

The process the Air Force will use to mitigate and deal with damage claims is also a concern. This process should really upon the local government agencies to determine the proper solution rather than an Air Force Committee.

Thank you for this opportunity to comment.

Sincerely,

  
Frank James  
Dakota Rural Action  
Director

3003



**Recreational Aviation Foundation**  
**John McKenna, Jr., President**

November 23, 2010

Ms. Linda Devine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

Subject: Draft Environmental Impact Statement for Powder River Training Complex

Dear Ms. Devine:

The Recreational Aviation Foundation (RAF) is a national organization with over 2000 supporters representing all fifty states. One of our missions is to promote aviation safety for recreational pilots.

The RAF is in support of proper training of our armed forces. However, what is proposed in regard to the expansion of the Powder River MOA is unacceptable. Public safety is compromised, especially with the lack of adequate radar coverage and communication. The RAF recommends that serious consideration be given to using the MOAs nearer the air bases from which the planes will be flying, not increasing the risk to Montana pilots and their passengers with low level bomber flights. The "see and avoid" concept does not work with the rapid closure rates that will occur. The shear size of the proposed MOA expansion could encourage pilots to fly through enroute to their final destination. Am-3  
PN-2  
SA-7

Another mission of the RAF is to expand recreational opportunities for pilots. This entails the building of airstrips where there are recreational attributes. The RAF is concerned that if and when the organization wishes to build an airstrip under the MOA, there will be opposition from the MOA administrators. SO-10

Being familiar with the proposed expansion area, I know there are numerous ranchers who use their small aircraft to inspect their cattle and check stock water facilities. They are not in a position to account for low level, high speed training aircraft over their land. Once again, this proposal puts others at risk. SA-9

On behalf of the RAF, I urge you to delay the Powder River MOA expansion until all the concerns of Montana's aviation community have been resolved to the satisfaction of all concerned parties.

Sincerely,

John McKenna, Jr, President  
Recreational Aviation Foundation

Cc: Senator Max Baucus  
Senator Jon Tester  
Congressman Denny Rehberg

3004

# Air Dakota Flite Inc.

X

P.O. Box 429 • Hettinger, North Dakota 58639 • 701-567-2069 or 1-800-258-2069

RE: Proposed Buffalo Powder River MOA

Air Dakota Flite, Inc. in Hettinger, ND (HEI) has been in business for over 40 years. We are a FBO, with crop spraying as the mainstay of our business. For several different reasons, we would consider a MOA in our area to be a hardship to our business.

Our first area of concern is with crop spraying. Currently, our trade area for spraying is a radius of 80-100 miles from Hettinger, more north, east, then west, least to the south. We maintain 500' AGL when flying to and from fields, then lower for actual spraying. When our sprayers are loaded, they are near gross weight. Right now our concerns are wind and visibility. With a proposed MOA, our concerns are significantly increased. In the 1980's, there was a bomber route through our area using B52s and some fighter jets. B52s were relatively easy to spot, but even then, there were times, that our spray pilots had to change course in order to feel safe. It is also our concern that B1s and B2s will be more difficult to see by our pilots. Unseen aircraft, a loaded spray plane and the wake turbulence could add up to a major problem.

SO-2

SA-7

With our general aviation we have a couple concerns. The first involves our local pilots. Many of them are "Sunday fliers" or pilots who are generally out enjoying the country only during nice weather conditions. So, a MOA would seriously curtail their activity. A local businessman flies routinely, and it would be difficult to schedule his flying with a MOA. In Hettinger, we have a fairly active medical center. We have an average of 1-2 flights per week, bringing doctors to our clinic. These flights mainly use instrument approach and come even in adverse weather conditions. Most of this charter traffic comes from Bismarck, ND, but we do have one doctor that routinely flies in from Rapid City, SD. During the past 6 months, we have also seen an increase in air ambulance flights with an average of 2 per month. We feel that a MOA could affect our general aviation and the interest that is now enjoyed.

SO-5

Likewise, any transient flights to our airport will be seriously curtailed with a MOA. Pilots flying through our area are more likely to check the maps and decide to stay clear of our area. Our business will be reduced from lack of pilots using our facilities, fuel sales, etc. Our community also will lose business.

SO-6

Another area of concern involves our current and future pilots. In the past 30+ years, we've had an area north of Hettinger that we use for our flight instruction, a practice area for our students. If this area is listed as a MOA, we feel that it will deter the general public from checking into flight instruction. It would be difficult to concentrate on learning or instructing if you are worried about military traffic in the area.

SO-26

*Serving The West River Area*

3001

As a part of our business, we fly an aerial survey for wildlife. This is done for ND Game & Fish Department and we fly Adams, Bowman and Hettinger counties for antelope and deer count. This is a low level flight and as a pilot, you are watching the ground for animals, not the skies for military aircraft.

SA-8

ADFI pilots also have a low level flight for highline patrol. Again, the pilots concern is looking at high lines, not for other low level traffic. A MOA would make our low level flights more dangerous to our pilots. Therefore, this is a great concern for us.

SA-7

Another low level flight for us is our oil pipeline patrol. Our pilots fly this patrol at 500' AGL and below and are constantly looking downward for any oil leaks and or obstacles. They follow a marked area (trench line) that twists, turns, up and over hills, rivers, around train tracks that spans about 1200 miles of pipeline in southwest ND. We are dependent on weather for this flying and therefore do not follow any set dates. We fly Monday through Sunday, sun up to sun down. Many times, in past years, as with spraying, our pilots flying this pipeline have had to take actions to avoid military jets. Again, a big concern for us!

SA-7

Last, but not least, I am concerned about the possibilities of a wind farm near Hettinger. There has been land leased for the past 4 years north of Hettinger and north of Gascoyne for the expressed purpose of a wind farm. So, the possibility of having renewable energy developed in our area is a distinct probability. The major hold up right now is that more investors are needed before the wind farms can proceed. I feel that having a MOA in our area would basically halt any renewable energy development in this area.

SD-17

I recently attended an informational meeting at Bowman, ND. I met with Linda DeVine and feel that it was a good discussion. She told to resubmit our concerns at this time. I would like to see the ceiling for the proposed MOA be higher than 500 ft. It would be nice if there were established routes, so we would know where to be watching. There are a lot of questions that we still feel need to be addressed. We truly fee that this would be a hardship for our business and to our local flight traffic. At this time, with the information we have, we are opposed to a MOA in our service area.

GE-2

Sincerely,

Charles Q. Lindquist

P.S. Are there any plans to have an informational meeting in the Hettinger, ND area? Also, I would appreciate some sort of response so that I know my letter has been received. My phone number is 701-567-2069 / email airdakota@ndsupernet.com / fax 701-567-2986

Charles Q. Lindquist



3005  
November 10, 2010  
Sent via Federal Express

Ms. Linda Devine  
HQ ACC/A7PS  
129 Andrews St. Room 337  
Langley AFB, VA 23655-2769

RE: POWDER RIVER MILITARY OPERATIONS AREA

Dear Ms. Devine,

Please accept this correspondence as Allegiant's official comment on the proposed expansion of the Powder River Military Operations Area (PRMOA).

Allegiant Air currently offers non-stop, commercial air service to Bismarck, North Dakota from two destinations located in the Southwest region of the United States. It is our contention, based on a review of the Environmental Impact Statement provided by the United States Air Force, that the proposed expansion of the PRMOA will have a significant impact on our current flight operations.

Specifically, we have identified two general areas of concern with respect to the expansion. First, the expansion of the Powder River Military Operations Area raises serious safety concerns. Second, the expansion raises concerns about the efficiency of Allegiant flight operations to Bismarck.



Travel is our deal.™

3005

At Allegiant, the safety and well-being of both our passengers and crew is paramount. Thus, developments that present a safety risk are taken very seriously. Accordingly, we are concerned about the safety risks inherent in the proposed expansion. No doubt the increased presence of high-speed military aircraft in close proximity to flight paths of civilian aircraft increases the risk of such a mid-air collision. Admittedly, while the risk itself may be small, any increase in such a risk presents a significant concern. Further, the aforementioned risk is magnified by the fact that pilots may be precluded in certain situations from flying under instrument flight rules, thereby further increasing the risk.

SA-1

Additionally, civilian aircraft risk encountering increased air turbulence caused by wake vortices from large military aircraft. While the risk of injuries resulting from such turbulence may be low, turbulence is uncomfortable and generally frightening for both passengers and crew members.

SA-7

With respect to operational concerns, we believe that the expansion of the PRMOA will have a negative impact on the efficiency of each flight to and from Bismarck. Specifically, the increased size of the PRMOA airspace would require pilots to dramatically alter their flight path, resulting in both time and cost inefficiencies. For example, a pilot landing at BIS would be forced to fly around the area completely, or fly above the area and then descent rapidly once the aircraft was clear of the PRMOA. Similarly, a pilot departing BIS to an Allegiant destination would be forced to maneuver around the PRMOA, or rapidly ascent after take-off in an effort to get above PRMOA airspace. Consequently, Allegiant would incur substantial increases in fuel charges driven by a substantial decrease in flight efficiency.

SO-8

SO-7

Further complications will arise when the PRMOA is active. During military operations, Allegiant pilots may be required to operate under visual flight rules (VFR). In inclement weather, or at times when visibility is low, Allegiant would have no choice but to take delays as flying in such conditions under VFR is prohibited. Delays to Allegiant aircraft result in significant costs to the company in terms of both revenue and reputation.

SO-8



Travel is our deal.

3805

Should the expansion of the PRMOA occur as designed, Allegiant would be forced to reevaluate its current flight schedule to BIS, and may ultimately determine that continued service of the market is no longer feasible in light of increased costs and decreased efficiency. Naturally, this would be a significant detriment to both the Bismarck airport and community.


SD-10

Allegiant understands the need for adequate military training areas and respects the arduous and dangerous work the men and women serving in our Armed Forces perform on a daily basis. Further, Allegiant is a proud member of the Civil Reserve Air Fleet and enjoys the privilege of providing charter aircraft for the Department of Defense. Nevertheless, Allegiant believes the unprecedented expansion of the PRMOA will have a negative impact on Allegiant Air and the Airline industry serving BIS as a whole. Accordingly, Allegiant respectfully requests that the Air Force reconsider its proposed expansion and adopt the "No Action" alternative until a more suitable alternative is identified.

GE-2

Once you have had an opportunity to review the foregoing, please contact me with any questions, comments, or concerns. In that regard, I look forward to working with you.

Sincerely,



E. Keith Hansen, Esq.  
Manager- Airport Planning  
Allegiant Air



Travel is our deal.





3006

NORTH DAKOTA  
**Atmospheric Resource Board**  
A DIVISION OF THE NORTH DAKOTA STATE WATER COMMISSION

November 10, 2010

Ms. Linda DeVine  
HQ ACC/A7PP  
129 Andrews Street, Room 317  
Langley AFB, VA 23665-2769

**Subject: Comments on the Draft Environmental Impact Statement for the Powder River Training Complex**

Dear Ms. DeVine:

The North Dakota Atmospheric Resource Board (NDARB), a division of the State Water Commission, is charged with the regulation of weather modification (cloud seeding) activities in the state of North Dakota. Each summer, the North Dakota Cloud Modification Project (NDCMP) conducts airborne cloud seeding operations to enhance rainfall and suppress damaging hail in convective clouds from June through August. Flight operations are conducted 24/7 on an as-needed basis, with total flight hours ranging from 85-145 hours per season. Both project aircraft are based at the Bowman Municipal Airport in Bowman, ND.

The NDCMP currently includes Bowman and part of Slope County (District 1), which lie under the PR-3 expansion of the PRTC. Also, Gaps B and C MOA/ATCAAs adjacent to PR-3 are in close proximity to the operational area of the NDCMP. NDARB is concerned that PRTC operations may impair NDCMP cloud seeding aircraft from carrying out their missions.

Am-13

The NDCMP has a significant impact on the local agricultural economy. A 2009 economic evaluation shows that cloud seeding operations in the area affected by the PRTC proposal contribute \$3 million annually in additional crop revenues and \$9.2 million in gross business volume.

So-20

***PRTC Flight Operations***

The draft EIS recognizes weather modification and cloud seeding as an affected activity in the proposed PRTC in several sections. The general recommendation for resolution of any conflict between NDCMP and USAF aircraft when the PRTC MOA is active is stated in Chapter 4.9.3.1.2:

“For non-emergency flights, such as fire reconnaissance, U.S. Fish and Wildlife (USFWS) surveys, Angel flights, and cloud seeding, the pilot could coordinate with

3006

Ms. Linda DeVine  
November 10, 2010  
Page 2

Ellsworth AFB to work to deconflict military operations. Weather modification flights need to respond rapidly to cloud formation and other meteorological conditions. Notification to Ellsworth AFB of the seasonable possibility of cloud seeding operations and notification of when and where cloud seeding was occurring would permit the Air Force to deconflict training missions."

Weather modification aircraft operations are primarily conducted under Visual Flight Rules (VFR) below FL180, however, Instrument Flight Rules (IFR) clearance is occasionally requested for "top-seeding" flights, which are typically conducted between FL160 and FL240. The draft EIS indicates that civil aviation would not be prohibited under VFR conditions even when the MOA is active, and that civil and military aircraft would operate under VFR see-and-avoid rules. IFR flights, however, would be prohibited when the MOA is active, a potentially significant impairment to effective cloud seeding operations.

This raises two questions:

- Will prior notification of Ellsworth AFB regarding active weather modification seeding flights in PRTC PR-3 deconflict the affected area under an active MOA to the extent that IFR cloud seeding flights are allowed?
- Will prior notification of Ellsworth AFB regarding active VFR weather modification seeding flights in PRTC PR-3 deconflict the affected area, or will civil and military aircraft operate under VFR see-and-avoid rules in the cloud seeding target areas during seeding operations?

AM-13

The proposed schedule for PR-3 Low/High MOA and PR-3 Low ATCAA is Monday-Thursday, 0730-1200 and 1800-2330 Local, and Friday, 0730-1200 Local. The expected daily use is three hours (MOA) and four hours (ATCAA) per day, respectively and 240 days per year. This constitutes a significant amount of time where USAF and NDCMP aircraft could be operating simultaneously.

Cloud seeding flights have been historically lower in number during the morning hours. This is primarily due to atmospheric stability that sets up overnight into the morning in a normal diurnal cycle. As the day progresses, surface heating begins to destabilize the atmosphere making the onset of convective clouds and precipitation much more likely. One way to significantly deconflict USAF and cloud seeding flights would be for the USAF to use PR-3 primarily during the morning block of scheduled time, as the likelihood of thunderstorms and cloud seeding flights is much greater during the

AM-13

Ms. Linda DeVine  
November 10, 2010  
Page 3

afternoon and evening hours. Figure 1 shows recent NDCMP aircraft departure times by hour. The trough in seeding activities occurs from the early to late morning hours.

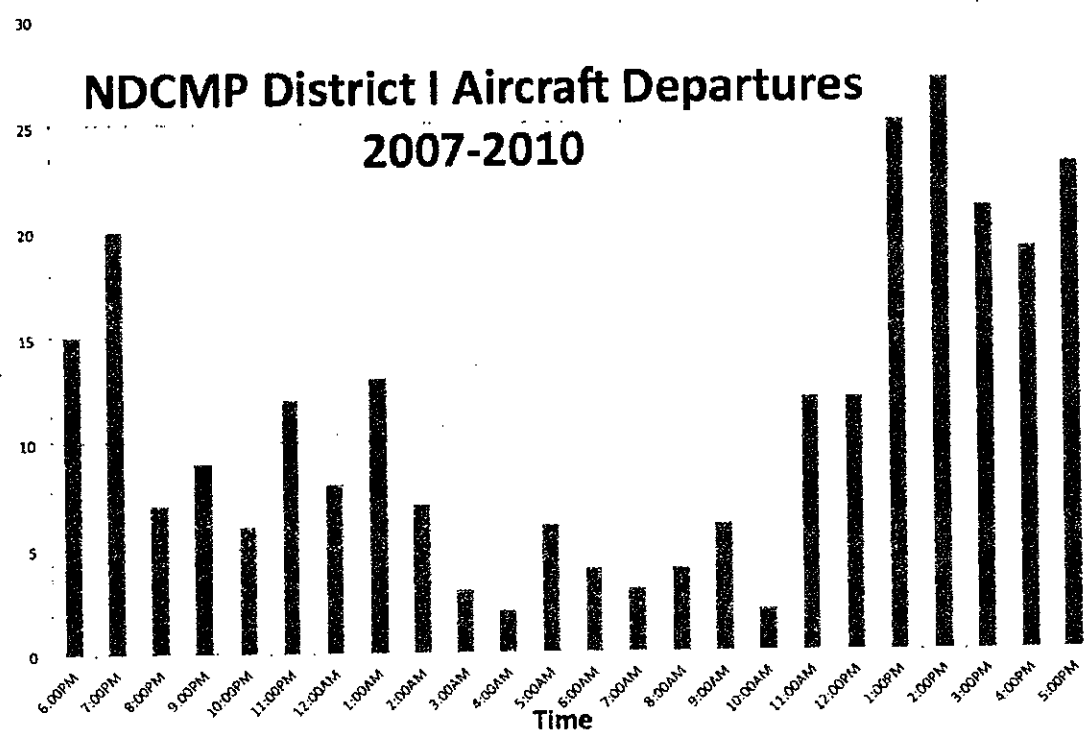


Figure 1. Total aircraft flight departures by hour for the seasons 2007-2010.

### Radar Countermeasures

The draft EIS outlines in section 2.4.6.1 the planned use of chaff as a countermeasure to radar detection. The chaff fibers are said to vary in length from 0.3 to 1.0 inch. NDARB operates a C-band (5 cm wavelength) radar at the Bowman Municipal Airport to assist with weather detection and cloud seeding flight operations logistics. Chaff fibers of 1.0 inch (2.54 cm) are ideal for jamming 5 cm wavelength radar. Thus, it is entirely plausible to suggest that use of chaff during PRTC training exercises would produce high reflectivity radar echoes, which could be detected by the Bowman radar and not associated with clouds or precipitation. Further, prior research (Arnott et al., 2004) indicates that military chaff has very slow terminal fall speeds and can persist in the atmosphere for long periods, deposited many miles downwind. The draft EIS recognizes that chaff can be "detected by improved FAA radars, so to ensure that no chaff cloud

SA-1b

3066

Ms. Linda DeVine  
November 10, 2010  
Page 4

interferes with ATC, chaff would not be deployed within 60 NM of airport approach radars."

- Due to the importance of radar during cloud seeding operations, will the USAF forgo the use of chaff within the same 60 NM range of the Bowman radar as it proposes with FAA radars? Am-13

The proposed actions by the USAF regarding cloud seeding operations in southwest North Dakota help to mitigate concerns that PRTC activity would severely impair those operations. Further, proposed actions indicate that the USAF is willing to cooperate with existing users of the affected airspace so that all missions can be accomplished. However, NDARB requests further consideration of the aforementioned issues to ensure that this important and long-standing program can continue to be effective. GE-11

Thank you for the opportunity to comment on the draft PRTC EIS. If I can provide further information, please feel free to contact me at 701.328.2788.

Regards,



Darin Langerud  
Director, NDARB

References:

Arnott, W.P., A. Huggins, J. Giles, D. Kingsmill, and J. Walker, 2004: Determination of radar chaff diameter distribution function, fall speed, and concentration in the atmosphere by use of the NEXRAD radar. *Desert Research Institute*, Reno, NV, 30 pp.

3007

**BP Wind Energy**



BP Wind Energy, NA Inc.

700 Louisiana Street,  
33<sup>rd</sup> Floor  
Houston, Texas 77002

713-354-2100

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB  
VA 23665-2769

November 11, 2010

Dear Ms. DeVine,

On behalf of BP Wind Energy I am pleased to have the opportunity to submit comments for the record regarding the draft environmental impact statement that analyzes potential impacts of the proposed Powder River Training Complex.

BP is a company that invests in the most diverse energy portfolio in the industry. In the last five years, we have invested approximately \$35 billion in the U.S. to increase existing energy sources, extend energy supplies and develop new, low-carbon technologies. With that investment have come needed jobs, a strengthened U.S. industrial base, export opportunities for U.S.-manufactured goods as well as property and other tax payments to communities and royalty payments to farmers, ranchers and other land owners.

Today, BP Wind Energy is one of the leading wind developers in the U.S. with a portfolio that includes the opportunity to develop some 60 projects across 22 states. In South Dakota we operate the Titan 1 Wind Farm in Hand County from which NorthWestern Energy, an investor-owned utility and one of the largest providers of electricity and natural gas in the northwest quadrant of the U.S., purchases the energy generated under a long-term power purchase agreement. The Titan 1 Wind Farm is part of a large wind complex that has the potential to be built out to over 5,000 megawatts which would make it the largest wind farm in the world with a capability to provide clean, renewable power to over 1.5 million average homes in America. In Wyoming and North Dakota we have the potential to develop further wind facilities.



3007

Wind energy is an important national resource. It is domestic, inexhaustible, clean, and affordable. Wind energy is important for our national security, energy security and economic security. But, if we don't quickly develop a better system for engaging with federal agencies on airspace issues that includes the opportunity to work with the Defense Department and the military service branches to develop mitigation measures and reach compromise, wind projects will continue to be imperiled and the nation will fail to meet its energy goals.

GE-11

The wind energy industry understands as paramount the protection of national security and recognizes, of course, that in some instances, depending on location, wind farms can impact military operations. Very often those concerns can be addressed without compromising either national security or renewable energy goals. Decades of experience in developing wind farms in the US and around the world have demonstrated that wind energy development and military training can, and do, coexist. The key is transparency and cooperation.

Over and above the capital investment, BP's wind projects pay out \$6 million annually in royalty payments to some 400 landowners. In addition, we have employed nearly 3,000 workers during the construction of our projects, created over 130 full time jobs to monitor and maintain the wind farms and BP Wind Energy pays in excess of \$9 million every year in property taxes across 8 states.

Wind energy investments represent a long-term "win-win" opportunity for BP Wind Energy and the States of South Dakota, North Dakota, Wyoming and Montana, their communities and private landowners. The very significant modification of existing Air Force training airspace proposed in connection with the expansion of the Ellsworth Air Force Base would seriously impede future investment in the development of wind power in the region, and would threaten the region's ability to realize its full potential as a key producer of clean, renewable wind energy for the nation.

SD-17

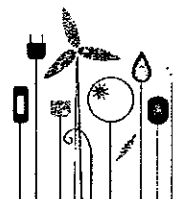
BP Wind Energy stands ready to work together with the Air Force and all other stakeholders to preserve both wind energy development opportunities and the military mission assigned to Ellsworth Air Force Base. Many thanks for your consideration of these comments and we would be delighted to address any further questions or comments that you many have.

GE-11

Sincerely,



**Larry Folks**  
Chief Development Officer  
BP Wind Energy



3008

**Crook County Land Use Planning & Zoning Commission**  
**P.O. Box 37**  
**Sundance, WY 82729**

**Jeanne Whalen**  
**Chairman**

**Nels J. Smith**  
**Vice-Chairman**

November 4, 2010

Ms. Linda DeVine, Program Manager  
ACC/A7PS  
129 Andrews Street, Suite 337  
Langley AFB, VA 23665-2701

RE: Draft Powder River Training Complex (PRTC), Ellsworth Air Force Base, South Dakota,  
Environmental Impact Statement (EIS) – August 2010

Dear Ms. DeVine:

Thank you for the opportunity to submit comment on the PRTC Draft EIS.

Crook County again reiterates its support of the United States Air Force (USAF) in its vital efforts to maintain homeland security and defend the nation. We recognize and support the important role that Ellsworth AFB plays and understand the goal to upgrade and expand operations so as to optimize resources and training opportunities.

The proposed action, Alternative A, appears to address several of our initial concerns. We strongly support flares being restricted in release altitude to above 2,000 feet above ground level (AGL), and the flares not being deployed during extreme fire conditions. The release altitude restriction should help to minimize fire risk from flares hitting the ground that are still burning. When an accidental deployment or malfunction does occur, however, there needs to be full disclosure and immediate action taken to protect county resources.

SA-5

We also support the procedure regarding emergencies that requires unimpeded access to and from the airspace, and the promise that, in an emergency situation, the military aircraft will avoid the affected area, move into another active airspace, or return to base in accordance with the agreed-to procedures.

SA-19

We remain very concerned about potential adverse impacts to historic uses in our county. Crook County's economy is based in natural resource related activities (ranching, mining, logging, recreation). The ability of private property owners to utilize their land and resources remains crucial to the area's economic stability. If the proposed action directly or indirectly prevents, impedes or delays economic development in Crook County, such as wind farms, mineral/energy exploration and/or extraction, communications towers, or historic economic activities, actions

SD-22

SD-17

3008

should be taken on the part of the USAF to work directly with Crook County to mitigate those impacts.

We are also concerned about a disruption in important commercial and private aircraft use during the large force exercises (LFE). Close coordination is imperative for all affected entities, to address safety and other concerns.

SO-6

The one-month notice in advance of an LFE should be adhered to, and we expect that, when properly notified, the USAF will continue to respect reasonable temporary or seasonal avoidance areas, such as for special ranch operations.

NO-7  
NO-10

We support close coordination between the USAF, Crook County and other affected communities so that impacts can be minimized and the benefits of an expanded training complex can be realized. We urge the USAF to establish a direct communication connection to Crook County so that accurate information and important feedback can be exchanged in a timely manner. Monitoring and evaluation of the proposed action should be ongoing and **must** include input from local communities.

GE-11

We look forward to being contacted to establish a direct line of communication with you.

Sincerely,

*Jeanne Whalen*

Jeanne Whalen  
Chairman



3009

BOARD OF COUNTY COMMISSIONERS  
PO BOX 315\*\*\*214 PARK STREET  
EKALAKA, MONTANA 59324

PHONE (406) 775-8749

FAX (406) 775-8750

EMAIL cccomms@midrivers.com

December 30, 2010

Ms. Linda DeVine  
HQ ACC/A7PP  
129 Andrews Street, Room 317  
Langley AFB, VA 23665-2769

Dear Ms. Linda DeVine,

The Carter County Board of Commissioners would like to comment on the expansion of the Powder River Training Complex.

First, the Montana Governor, Senator and Head of the Department of Transportation do not believe there is "any thing in it for Montana", we disagree. Besides the many Montana troops serving in the Persian Gulf area, of which you provide air support for, Eastern Montana has some of the largest energy deposits in the world. Powder River and Rosebud Counties are sitting on one of the largest coal deposits in the world. Fallon, Dawson, and Richland Co are in the oil rich "Bakken" formation. Possibly more oil than the Middle East. As the world energy supplies continue to deplete, these reserves will surely look better and better to foreign countries. Without a viable air force to help protect these reserves of energy it will be all the easier for a terrorist from a foreign country to gain control. Therefore, along with protecting our troops, we feel there is something in it for Montana.

GE-11

Everyone is worried about the congestion of aircraft if the airspace is expanded. Most of Carter County has been used as a MOA every since World War II, without one near miss or mid-air collision. Expanding the airspace would only take some air traffic away from our area and spread it out over almost three times the square miles. The one concern we have is the lack of radar and radio coverage in the area. We understand, private and commercial aircraft would not be able to fly IFR through the area while the

AM-3

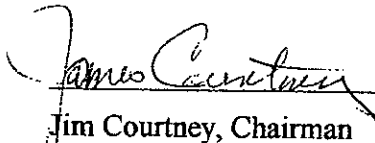
MOA is in use. Would the Air Force be willing to work with the FAA and place some badly needed radio and radar equipment in the area to help solve some of these problems?

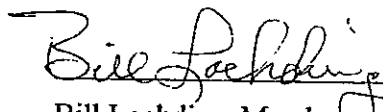
AM-3

The Board of Carter County Commissioners is a three man board, we are all landowners and ranchers. Our prospective as landowners and ranchers is that there has been very little, if any, problem from these aircraft. If anyone has a problem, all they have had to do is call Ellsworth Air Force Base and ask to have their ranch put in a no fly zone. There are some ranchers who have asked to have this done during calving, lambing or other sensitive times for livestock; it has only taken one phone call to accomplish this.

CW-7

We feel the benefits to the Air Force will out weight the sacrifices to the area affected, and are in favor of expanding the Powder River Training Complex.

  
Jim Courtney, Chairman

  
Bill Loehding, Member

\_\_\_\_\_  
Steve Rosencranz, Member

3010

COMMISSIONERS  
Box 846 - Phone 778-7107  
Donald Rieger, Chairperson, Ismay /  
Deb Ranum, Baker  
William L. Randash, Baker

CLERK & RECORDER/SUPT OF SCHOOLS  
Brenda J. Wood  
Box 846 - Phone 778-7106

COUNTY ATTORNEY  
Albert R. (Rich) Batterman  
Box 1075- Phone 778-3006

JUSTICE OF THE PEACE  
Nicole Brown  
Box 846 - Phone 778-7128



CLERK OF COURT  
Jeraldine Newell  
Box 1521 Phone 778-7114

SHERIFF/CORONER  
Tim Barkley  
Box 899 - Phone 778-2879

TREASURER/ASSESSOR  
Faye M. Koenig  
Box 787 - Phone 778-7109

# FALLON COUNTY

BAKER, MONTANA 59313

COPY

## RESOLUTION 11-05-10 RE: OPPOSITION TO THE PROPOSED POWDER RIVER MOA EXPANSION

**WHEREAS**, the Fallon County Commission is empowered, by Section 7-5-2101, MCA, to manage the business and concerns of Fallon County, Montana, as the Commission determines to be in the County's best interest;

**WHEREAS**, the Fallon County Commission has been notified of a proposed expansion to the Powder River MOA that will encompass an area including all of Fallon County;

**WHEREAS**, the proposed MOA expansion will adversely impact Fallon County's economic development. It will limit the development of the local air corridor, regularly ground commercial and private aviation, interfere with local industry by increasing flight times and travel expense, and interfere with local agricultural operations and property;

SO-7

**WHEREAS**, the proposed MOA expansion will adversely impact Fallon County's environment by increasing noise pollution and visual pollution, jeopardizing livestock herds and populations of wild game;

LU-2  
BI-4

**WHEREAS**, the proposed MOA expansion will adversely impact Fallon County's aviation safety by jeopardizing private pilots unused to dealing with military aircraft and protocols;

SA-7

**WHEREAS**, Fallon County lies within a mineral-rich area, the continued development of which depends upon not unduly restricting local business operations;

SO-17

**WHEREAS**, the costs of the local and regional impacts caused by the expansion of the MOA will far exceed than the proposed \$8.5 million in savings realized by the U.S. Air Force.

**NOW, THEREFORE IT IS HEREBY RESOLVED**, that the Fallon County Commission hereby declares its opposition to the proposed expansion of the Powder River MOA, and urges the rejection of the U.S. Air Force's expansion plan.


GE-2


Dated this 5<sup>th</sup> day of November, 2010.

ATTEST:

  
Brenda J. Wood, Clerk and Recorder

FALLON COUNTY COMMISSION

  
Donald Rieger

  
Deb Ranum

  
William Randash

3011

## Written Comment Sheet

### Public Hearing for the Proposed Powder River Training Complex

Thank you for your input!

DATE: 10-28-2010

**PLEASE PRINT**

Based on the information available, the Board of Adams County Commissioners oppose the proposed expansion of the Powder River Training Complex. Attached to this comment sheet is a resolution, which was approved by the Commission at their special meeting on October 28th, 2010.

GE-?

\*\*\*\* CONTINUE ON BACK FOR MORE SPACE \*\*\*\*

<b>NAME:</b>	Howard Nelson, CHairman
<b>ORGANIZATION:</b>	Adams County
<b>ADDRESS:</b>	PO Box 589 602 Adams Ave
<b>CITY/STATE/ZIP:</b>	Hettinger, ND 58639

Yes, please include me in the mailing list for distributing the Final EIS. I would like to receive a copy in: ☐ CD (electronic format) ☐ hard copy format

No, please do not include me in the mailing list for distributing the Final EIS. I do not wish to receive an EIS or further information.

**PLEASE NOTE:** This Draft EIS is provided for public comment in accordance with the National Environmental Policy Act (NEPA), the President's Council on Environmental Quality (CEQ) NEPA Regulations (40 CFR §§1500-1508), and 32 CFR §989, Environmental Impact Analysis Process (EIAP).

The EIAP provides an opportunity for public input on Air Force decision-making, allows the public to offer inputs on alternative ways for the Air Force to accomplish what it is proposing, and solicits comments on the Air Force's analysis of environmental effects.

When making an oral comment, please clearly state your name and the name of the organization, if any, which you are representing before you begin your comments. Please do not provide any other personal information, such as your home address and phone number when making an oral comment. Your oral comments will be used to develop a transcript and permanent record of this meeting. This transcript will be published in the FEIS. If you would like a copy of the Final EIS or other associated documents, you may state that on a written comment card or add your name and address to the mailing list.

Providing personal information is voluntary. If you choose to not provide personal identifying information, your comments will be given the same weight and consideration as any other comments submitted. Private addresses provided will be compiled to develop the mailing list for those requesting copies of the Final EIS. Only the names of the individuals making comments and specific comments will be disclosed. Personal home addresses and phone numbers will not be published in the Final EIS.

**Please hand this form in at a public hearing or mail before November 13, 2010 to:**

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

3011

**UNITED STATES AIR FORCE POWDER RIVER TRAINING COMPLEX  
RESOLUTION**

**WHEREAS**, The United States Air Force and Ellsworth Air Force Base is proposing an expansion to its Powder River Training Complex, and

**WHEREAS**, there is concern among the citizens of Adams County and the Board of County Commissioners regarding the safety of the citizens if the expansion is approved, and

**WHEREAS**, the expansion has the potential to endanger the local pilots and aircraft that regularly fly within the airspace in Adams County for ranching and agricultural purposes, and

SA-9

**WHEREAS**, because the citizens of Adams County enjoy the safety and tranquility that comes with the lack of population in our area, and

LU-2

**NOW, THEREFORE, BE IT RESOLVED**, that the Adams County Board of Commissioners strongly oppose the expansion of the Powder River Training Complex within the boundaries of Adams County, and feel it is the County's responsibility to protect the safety, livelihood, and way of life of the citizens of the County.

GE-2

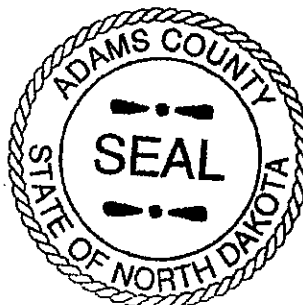
Dated this 28<sup>th</sup> day of October 2010.

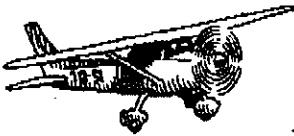
Adams County

Howard Nelson  
Howard Nelson  
Chairman

Attest:

Patricia Carroll  
Patricia Carroll  
Auditor/Treasurer





## Baker Municipal Airport Commission

P.O. Box 1037 • Baker, MT 59313 • 406-778-7108

Ms. Linda Devine  
HQ ACC/A7PS  
129 Andrews Street - Suite 337  
Langley AFB, VA 23665-2769

11/09/2010

Ms. Devine;

I have expressed my concerns & opposition to this expansion at both the scoping meetings & the EIS public hearings. I have also met with a committee and the Air Force in a private meeting. I feel this effort has fallen on deaf ears & the Air Force is only concerned with pushing this forward. I have asked at every meeting how IFR traffic can transition through and operate safely in this area without radio and radar coverage when it is active. The question has never been answered, because it cannot and will not be done. VFR transient aircraft will simply avoid this special use airspace whether it is active or not. That is the way VFR pilots are trained.

AM-3

AM-21

There are many problems with the EIS. Land values – not significantly impacted. How can you say this when there has been no studies, appraisals, or any thing else done but a simple statement. This goes for non-military aircraft airspace use, damage to property, wildlife, and economic impact as well. There have been no studies on any of these points to determine the true impact of this proposed expansion. The whole EIS is full of maybe, probably, possibly, and all the other vague terminology. The Air Force is not telling the whole story, just like it was originally proposed in the scoping meetings as only used 10 days a year for the LFE's. Now it is stated up to 44.5 hours per week!

SD-1

SD-22

NP-9

PN-5

Sage Grouse impact will be minimal & will acclimate to this environment? Mineral exploration & construction projects are currently halted during mating season. Bird strikes are seen as infrequent. The endangered species Whooping Cranes are known to migrate through this area. I guess if you kill a flock of them, oh well!!

B1-3

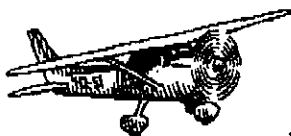
SA-10

As for water and soil pH, the EIS says it is neutral to slightly alkaline. I do not know where the Air Force gets their information, but the water and soil pH in this area are high to very high alkaline. Another case of a incorrect environmental information. Look around. What are all whites spots on the ground!!

PR-1

This area is very mineral rich and exploration and production companies travel frequently to this area either by airlines or private aircraft. We are currently expanding KBHK to handle these needs. We have spent approximately \$5 Million on this airport with another \$2-3 Million to be spent next year alone. What are we going to do with this airport when it cannot be used effectively and safely?

SD-10



## Baker Municipal Airport Commission

P.O. Box 1037 • Baker, MT 59313 • 406-778-7108

The EIS states 285 based civil aircraft under this proposal. My count is over 600 with 214 in Montana alone, based on the FAA Aircraft Registry. The EIS also states 39 airports underlie this area. There are over 40 airports in Montana alone. Again, false information. The EIS is incomplete & has not addressed the environmental concerns adequately.

Am-4

VFR "See & Avoid" would be legal under this proposal but it will be flat out dangerous to both civilian and military aircraft to fly at the proposed speeds. Civilian aircraft will avoid this special use airspace like a plague.

SA-7

Small airports will not survive this impact. Student instruction will be impossible as well as flat out dangerous. Fuel sales will dwindle. Jobs will be lost & the local economy will suffer. This proposal may save the Air Force \$12 Million per year, but it will cost the state on Montana in excess of \$100 Million per year in lost jobs & revenue.

SO-26

SO-5

The opposition to this expansion is huge. Letter groups (AOPA, MPA, MAMA, MATA, NBAA) consisting of over 500,000 combined members are opposing this expansion. Will you hear us?

NP-1

I am not saying this expansion is bad or not needed. It simply does not belong in Montana or any other area where the impact will be so great. Montana has nothing to benefit from this expansion.

PN-2

The No-Action Alternative is the only option that is acceptable to Montana.

GE-2

Roger Meggers  
BHK Airport Manager.

CHRIS LIEN

November 15, 2010

Linda Devine, Program Manager  
ACC/A7PS  
129 Andrews St., Suite 337  
Langley AFB, VA 23665-2701

Dear Ms. DeVine,

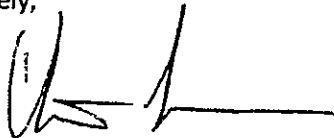
The purpose of this letter is to convey my support as Chairman of the Ellsworth Task Force for Alternative A of Air Combat Command's Powder River Training Complex Environmental Impact Statement, dated August 2010. GE-1

Being a third generation supporter of Ellsworth Air Force Base as a pinnacle of our nation's defense capabilities, I am aware of the necessity of our nation's armed forces to be able to successfully complete combat operations. Towards that objective, I am fully supportive of providing them the airspace in which to fully hone their combat skills so as to be able to both protect themselves and defeat our nation's adversaries in the most effective and efficient manner.

As the technologies of modern warfare have provided our forces the resources with which to optimize their weapons systems, it is evident that the minimal sacrifices and impositions imposed by such training are within the parameters of acceptable commitments of our citizenry. Accordingly, I am committed to the success of your initiative to provide the airspace required to successfully complete such training missions. My endorsement of Alternative A is further founded on the efforts Air Combat Command has made to accommodate those citizens affected by training flights and the knowledge that Ellsworth's leadership team will continue to fully consider special requests for such considerations. GE 11

Thanking you in advance for this pioneering work in combat aviation training, please do not hesitate to contact me as we proceed with the realization of the best training complex our nation has developed in the past fifty years.

Sincerely,



Chris Lien, Chairman  
Ellsworth Task Force



**CITY OF LEMMON**

303 First Avenue West  
Lemmon, SD 57638

Email: [cityoflemmon@sdplains.com](mailto:cityoflemmon@sdplains.com)  
Phone: 605-374-5681  
Fax: 605-374-5789

November 9, 2010

Linda DeVine, Program Manager  
ACC/A7PS  
129 Andrews, St., Suite 337  
Langley AFB, VA 23665-2701

Dear Ms. DeVine:

Enclosed is a copy of a resolution which passed before the City of Lemmon Council on October 4, 2010. Our concerns are not only for the residents of the City of Lemmon but our surrounding area as well. We are a rural area that enjoys the peace and quiet of the country. We feel that this will be an unfair burden and expense on our rural area.

Your consideration in not expanding the Powder River Training Complex to encompass the City of Lemmon and its surrounding regional trade area would be greatly appreciated.

Sincerely,



Neal Pinnow  
Mayor

Enclosure

3014

City of Lemmon  
State of South Dakota  
Resolution 2010-5

Whereas, the United States Air Force has announced the expansion of the Powder River Training Complex to encompass the City of Lemmon and its surrounding regional trade area; and

Whereas, the City of Lemmon consists of many patriotic citizens that support our military forces with their personal sacrifice and moral support; and

Whereas, the City of Lemmon has contributed, along with the state and federal government, to the improvement and expansion of the Lemmon Municipal Airport at Ray Kolb Field; and

Whereas, the expansion of the Powder River Training Complex would adversely affect air traffic in and around the Lemmon area; and

Whereas, the interruption of air traffic for any specified period of time will undoubtedly cause negative economic impact; and

Whereas, wind development and any other types of tower development may be stymied by the expansion of the Powder River Training Complex; and

Whereas, our larger sister cities of Spearfish, Rapid City, Sturgis, Belle Fourche and larger cities lying outside of South Dakota including Dickinson, Bismarck, Miles City and Gillette will not be included in the Powder River Complex Expansion and unfairly targeting lower population areas to carry the brunt of this training area; and

Whereas, the City of Lemmon derives its economic base and existence from agriculture, including the production of livestock and management of thousands of acres of grassland that could be endangered by the increase risk of fire; and

Whereas, agricultural producer's property values will likely suffer from the military activity that will take place in many cases five hundred fifty feet above their property, cause noise, inconvenience and a breach of quiet enjoyment of their property; and

Whereas, the private property rights of area landowners will be infringed upon by the expansion of the Powder River Complex Expansion; and

Whereas, other private property owners are compensated when the government devalues property and are deemed a taking; and

Whereas, the Air Force has alternatives for training exercises and the expansion of the Powder River Complex is not necessary; and

SO-8

SO-17

EJ-2

SA-5

SO-1

LU-1

SO-1

PN-2

3015

# City of Minot

Office of the Mayor

November 3, 2010

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

Dear Ms DeVine:

As the Mayor of Minot, I would like to express my full support for the military to expand their airspace to perform readiness training over North and South Dakota. By enlarging the airspace in the region crews will be able to save time and money by training closer to their base. Certainly we want to use any opportunity to assist the men and women of our armed services to keep them ready for existing and future threats. I believe this is a great way to do just that. If I can be of any further assistance please don't hesitate to contact me.

GE-1

GE-11

Thank you,

  
Curt Zimbelman  
City of Minot Mayor

CZ/tks

★ The Magic City ★

515 2nd Ave. SW • Minot, North Dakota 58701-3739 • (701) 857-4750 • Fax (701) 857-4751

[mayer@web.ci.minot.nd.us](mailto:mayer@web.ci.minot.nd.us)



1020 20th Avenue SW  
PO Box 940  
Minot, North Dakota 58702-0940

Telephone: 701.852.6000  
Facsimile: 701.838.2488  
e-mail: chamber@minotchamber.org  
www site: minotchamber.org

November 4, 2010

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

Dear Ms DeVine:

The Minot Area Chamber of Commerce is a long time supporter of the US Air Force. We have over the last number of years even proposed an expanded MOA in North Dakota for the exact type of training exercises that are envisioned to occur within the expanded Powder River Training Complex.

Having reviewed the Draft EIS, the Minot Area Chamber of Commerce supports the preferred Alternative identified in the process. We support this alternative for a number of reasons. First, the proximity of the training complex would allow the airmen flying the B-52 to train in a manner in which they would in real world situations. Also, the proximity to the training complex would reduce the costs of training in a time where budgets will continue to be tight and training is an important component to our airmen winning the fight. Additionally, the proximity to the training complex would also mean a higher quality of life for the airmen and their families because of less time away from home for a TDY on a training exercise. GE-1  
PN-2

The Chamber did note a number of concerns identified by landowner groups located in and around the complex. We believe that those concerns can be met or mitigated by identifying avoidance zones similar to areas called out for avoidance because of Native American sacred grounds. Conceivably this could include round-up areas, birthing areas, watering holes and the like. We encourage the Air Force to pursue these types of arrangements with the affected landowners. CU-2  
NO-10

Again, the Minot Area Chamber of Commerce supports the preferred alternative identified in the draft EIS for the expanded Powder River Training Complex. GE-1

Respectfully,

Brekka Kramer,  
Chair of the Board

L. John MacMartin, CCE  
President.

November 1, 2010

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

Dear Ms DeVine:

I am writing to you in my role as the Chair of the Military Affairs Committee (MAC) of the Minot Area Chamber of Commerce. When I'm not volunteering, I am the General Manager of Verendrye Electric Cooperative.

Having reviewed the Draft EIS, the MAC supports the preferred Alternative identified in the process. The MAC supports this alternative for a number of reasons. First, the proximity of the training complex would allow the airmen flying the B-52 to train in a manner in which they would in real world situations. Also, the proximity to the training complex would reduce the costs of training in a time where budgets will continue to be tight and training is an important component to our airmen winning the fight. Additionally, the proximity to the training complex would also mean a higher quality of life for the airmen and their families because of less time away from home for a TDY on a training exercise.

As a general manager of a rural electric cooperative, I fully understand the concerns identified by some of the landowners located in and around the Powder River Complex. I believe that those concerns can best be mitigated by identifying avoidance zones similar to those called out for Native American sacred grounds.

Again, the MAC supports the preferred alternative identified in the draft EIS for the expanded Powder River Training Complex.

Respectfully,

  
Bruce Carlson, Chair  
Military Affairs Committee



3018

615 Highway 52 W. • Velva, ND 58790-7417 701-338-2855  
1225 Highway 2 Bypass E. • Minot, ND 58701-7927 701-852-0406  
Fax 701-624-0353 • WATS 1-800-472-2141  
E-mail: rec@verendrye.com • Website: www.verendrye.com

November 8, 2010

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

Dear Ms. DeVine:

Verendrye Electric Cooperative (VEC) has the privilege of serving the electrical needs of the Minot Air Force Base and a majority of the missile sites in the area. Not only is the USAF our number one key account but more important, we consider the men and women of the MAFB our friends and neighbors. In fact, a number of retired servicemen and their families live here in the Velva area. We certainly support the efforts to expand the MAFB's military training airspace and their flying mission.

Having reviewed the Draft EIS, VEC supports the preferred alternative identified in the process. VEC supports this alternative for a number of reasons. First, the proximity of the training complex would allow the airmen flying the B-52 to train in a manner in which they would in real world situations. Also, the proximity to the training complex would reduce the costs of training in a time where budgets will continue to be tight and training is an important component to our airmen winning the fight. Additionally, the proximity to the training complex would also mean a higher quality of life for the airmen and their families because of less time away from home for a TDY on a training exercise. } GE-1  
PN-2

Again, Verendrye Electric Cooperative supports the preferred alternative identified in the draft EIS for the expanded Powder River Training Complex which would be a great benefit to the MAFB. } GE-1

Very truly yours,

A handwritten signature in black ink that reads "Randy Hauck".

Randy Hauck,  
VEC Member Services and Marketing Manager



3019



STATE OF SOUTH DAKOTA  
M. MICHAEL ROUNDS, GOVERNOR

October 27, 2010

Linda DeVine  
HQ ACC/A7PS (PRTC EIS)  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

Dear Linda,

I am writing to express my support of proposed expansion of the Powder River Training Complex. Today's modern warfare dictates a higher level of training than ever before. I believe the expansion of the Powder River Training Complex is essential to the mission of the United States Air Force, the security of our country, and protecting the lives of those we put in harms way.

GE-1

Sincerely,

A handwritten signature in black ink, appearing to read "M. Michael Rounds".

M. Michael Rounds

MMR:ls

cc: Jeffrey B. Taliaferro, Col, USAF

3020



*A Premier Aviation Center*

Date: 11-11-2010

RE: Powder River Training Complex

TO: Whom it may concern

Executive Air Taxi Corporation is a full service Fixed Base Operation (FBO) in Bismarck, ND providing a wide range of aviation services to the not only local operators but we service aircraft from throughout the nation that fly into the Bismarck Airport. Our services include Aircraft Charter Services with clients that fly to various destinations including communities that lie within the proposed Powder River Training Complex (PRTC) Airspace.

Our charter service includes providing air transportation of local medical physicians and medical personnel to much of the rural areas within the PRTC. Many of those transports are scheduled well in advance and bring much needed medical services to individuals that rely on having medical care brought to those communities. The active proposed MOA will cause the cancellation of those prescheduled flights.

SO-5

Executive Air also provides aircraft refueling to many organizations from around the country who find Bismarck to be an ideal fuel stop due to our geographic location. This has a tremendous economic benefit to the airport, the Bismarck/Mandan communities and the entire surrounding region. Bismarck is the regions hub for air service, air freight, medical transportation and EMS medical services. The proposed MOA will have a negative effect on all of these operations and services and have a dramatic effect on our business as well.

SO-10

SO-5

We also provide Emergency Medical Helicopter Services to the rural region. Although it is stated that EMS flights will have priority, those flights are most often non-scheduled and need to respond to an emergency on a moments' notice. The people who live in these remote areas rely on these services for their health and well-being and it is also a tremendous economic benefit to the entire region to have the emergency medical services available.

SA-19

The area directly under the proposed MOA is also rich in energy production and with it requires the need for many companies to travel to this area by air. The proposed MOA will cause increased costs and delays by having to divert around the MOA. This will have a negative effect on their ability to efficiently conduct business here and that in turn will not be in the best interest of North Dakota.

SO-8

Executive Air supports our military and our service men and women. We also rely on the airspace that is provided to all of us. Given the affect the MOA will have on our business, city, state and region, Executive Air does not support the proposal. Feel free to contact me anytime. Thank you.

GE-2

Respectfully,

A handwritten signature in dark ink, appearing to read 'Paul Vetter', is written over a faint, illegible background.

Paul Vetter, COO



# HARDING COUNTY

**KATHY GLINES, AUDITOR**  
**PO Box 26, Buffalo, SD 57720**

3081  
**605-375-3313**  
**605-375-3318 Fax**  
**kathy.glines@state.sd.us**

October 8, 2010

HQ ACC/A7PS (PRTC EIS)  
Attn: Ms. Linda A. DeVine  
129 Andrews Street, Room 337  
Langley AFB VA 23665-2769

RE: POWDER RIVER TRAINING COMPLEX PUBLIC COMMENT

Dear Ms. DeVine:

The Board of Harding County Commissioners have directed me to submit a public comment on behalf of Harding County concerning the proposed changes to the Powder River Training Complex. While it is understood by the Board that it is vital to the security of our nation that this training be done, there is also concerns about the safety of our residents and the impact that the training will have on their livelihoods.

We would ask that the following be carefully considered and adapted into the Training Complex standards:

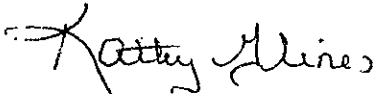
1. All aircraft will fly no lower than 1000' to ensure the safety of our local pilots that use aircraft for their day to day operations.
2. Local pilots will be notified of the training schedules to eliminate any confusion and possible conflict with local flying patterns.
3. All public and private airports and runways need to be identified within the proposed Complex training area and taken into consideration when developing the training pattern. Training aircraft must stay at least one mile away from the identified areas and stay at least 1000' above the ground.

PN-4  
AM-12  
AM-4  
PN-4

We would like to thank you for taking the public comments that have been submitted to you seriously. This is important to the people that the Board of Commissioner's represent and the safety of your pilots, as well as our people, and is vital to the success of this program.

As directed by the Harding County Board of Commissioners on October 5, 2010.

Sincerely,

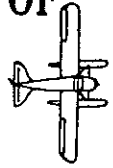


Kathy Glines  
Harding County Auditor



3022

# THE INTERNATIONAL ASSOCIATION OF NATURAL RESOURCE PILOTS



Ms. Linda DeVine  
HQ ACC/A7PP  
129 Andrews Street, Room 317  
Langley AFB, VA 23665-2769

11-9-10

I am the President of the International Association of Natural Resource Pilots and am responding to the proposed Powder River Training complex (PRTC).

Natural resource aviation is made up of aircraft operators using fixed wing and rotor wing doing aerial operations from surveys to enforcement. These operators are made up of state, federal and private organizations.

Our members and non members alike are concerned about safety and efficiency. The expansion of this airspace would cause flight delays and cancelations and with weather restrictions some work would simply not get done. I realize that this would not be a "Restricted Airspace" but operating in a see and avoid environment with closing speeds of 400 to 500 mph is unrealistic and dangerous.

SO-8

SH-7

The IANRP opposes any increase in the size of the existing Powder River MOA and ATCAA and recommend the "No Action Alternative"

GE-2

Jeff Faught

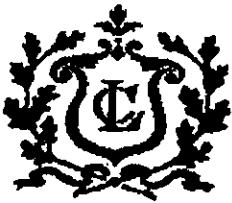
President IANRP

1125 Tacoma Ave. #105

Bismarck, ND 58504

701-250-8081

3023



## LAWRENCE COUNTY COMMISSIONERS

90 Sherman Street, Suite 3  
Deadwood, South Dakota 57732

Voice: (605)-722-4173

Fax: (605)-578-1065

Email: [commissioners@lawrence.sd.us](mailto:commissioners@lawrence.sd.us)

November 9, 2010

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews Street, Rm. 337  
Langley AFB, VA 23665-2769

Re: Powder River MOA Proposed Expansion

Dear Ms. LeVine:

I am writing on behalf of the Lawrence County Commission concerning the Powder River MOA proposed expansion. This matter is of great concern to the Commission.

In the last several years, over \$10 million of federal/state/local taxpayer monies have been spent in furtherance of several projects at the Black Hills Airport/Clyde Ice Field. Improvement projects are ongoing and an additional \$7 million (approx.) has been committed for current projects. As detailed in the bullet points below, the proposed expansion of the MOA shall have significant adverse economic impacts on Black Hills Airport. A subset of the adverse economic impacts is significant interference with air traffic in the region.

SO-10

Of critical concern is that at the time data was being compiled for the Environmental Impact Study, the primary runway at Black Hill's Airport was closed for lengthening and re-construction. Therefore, it must be concluded that any such data collected during this period is inaccurate and requires re-evaluation.

AM-4

- Black Hills airport ranks #5 of 34 public use airports within the study area for annual operations and is **not shown** on prepared maps.
- During the time data was compiled Black Hills airport's primary runway was closed for lengthening and re-construction with a total investment of approx. 10 million dollars.
- The County is currently moving forward with a full-length parallel taxiway project with a price tag of approx. 7 million dollars.



EQUAL OPPORTUNITY EMPLOYER

- Owing to recent expansion at Black Hills Airport, the process of developing new LPV approaches to runway 13/31 for category A, B, & C aircraft is underway. IFR capabilities throughout this construction period have been curtailed or significantly reduced.
- Expanding the MOA to an area of 37,800 Sq. Mi. (Larger than the state of Indiana) will have a **dramatic effect** on air travel to and from the Black Hills Region. Am-6
- IFR traffic to or from any area north of the Black Hills will be **significantly impacted**, and such traffic may very well choose an **alternate destination** - even though the Black Hills region is the most popular destination for recreation/tourism within hundreds of miles. SO-9
- VFR "See and Avoid" as proposed in the planning document will result in increased risk to flight safety assuming a pilot is able to conduct flight under VFR conditions considering a closure rate of **800 plus knots**. (B-1 pilot stated 580 kt. Airspeed as normal within the MOA) SA-7
- FAR 91.117 requires a civilian pilot to reduce speed to below 250Kts. Anytime one is below 10,000 ft. to provide an opportunity to "See and Avoid" (Max. potential closure rate of **500 Kts.**)
- Exemption #7960C authorizes the USAF to operate in the Powder River MOA "**Lights Out**" at night to practice night vision goggle usage and yet we are told to feel safe flying through the MOA after dark VFR "**See and Avoid**"? Am-7
- As stated in the EIS, Radar coverage is **unavailable below 8000 ft.** which will provide no help for a VFR flight through the MOA. Am-3
- With the proposed MOA extending from 500 ft. AGL up to 60,000 ft. it will be **impossible for IFR** traffic to transition through this area when the MOA is active mon. thru fri. 6:00 AM till Noon and again mon. thru thurs. from 6:00 PM till 11:30 PM or other times when activated by NOTAM. Am-21
- The three corridors along Victor airways would allow IFR traffic through below 18,000' except during Large Force Exercises. These corridors do **little to mitigate** the impacts to the Black Hills and most IFR traffic would generally fly above 18,000' due to weather as well as operating efficiency.
- Restrictions on IFR traffic through the MOA would not only have **significant economic impact** on businesses at the airport, but also to all commercial airline traffic that traditionally flies over this area as they are incapable of flying above 60,000'. SO-10
- The EIS does nothing to address **the economic impact** of this proposal other than stating a "Potential Economic Impact" to General Aviation. SO-22
- If the MOA were to be expanded as proposed, it can be reasonably expected that there will be a significant reduction in fuel sales at the Black Hills Airport. This will result in a SO-10

3023

loss of flowage fees collected. These flowage fees are used by Lawrence County to help offset the operational costs of this public use airport.

Accordingly, the Lawrence County Commission requests that the area of the proposed MOA be reconsidered not only to account for the fact that the primary runway at Black Hills Airport was closed during the data collection phase, but also that a more detailed study of the adverse economic impacts on the local and regional community must be completed. It is important that these impacts be identified and properly evaluated. It is expected that once an appropriate re-evaluation is made, it will support a reduction in the area of the proposed MOA area to include relief for Black Hills Airport.

AM-4

Thank you in advance for your time and consideration in this matter. Do not hesitate to contact me should you require more information, or in the event questions arise.

Sincerely,

*Connie H. Douglas*  
Connie H. Douglas, CHAIR

cc: Congressional Delegation  
Lawrence County Airport Board



**NATIONAL  
BUSINESS AVIATION  
ASSOCIATION, INC.**

1200 EIGHTEENTH STREET NW, SUITE 400  
WASHINGTON, DC 20036-2527  
Tel: (202) 783-9000 • Fax: (202) 331-8364  
E-mail: info@nbaa.org • Web: www.nbaa.org

November 8, 2010

Ms Linda A. Devine  
129 Andrews Street, Room 337  
Langley AFB, VA 23655-2769

Reference: (1) Powder River Training Complex Draft Environmental Impact Statement (EIS)  
(2) FAA Airspace Study 10-AGL-6NR

Founded in 1947 and based in Washington, DC, the National Business Aviation Association (NBAA) is the leading organization for companies that rely on general aviation aircraft to help make their businesses more efficient, productive and successful. The Association represents more than 8,000 companies and provides more than 100 products and services to the business aviation community. On behalf of our membership, we submit the following comments in response to the Powder River Training Complex Draft Environmental Impact Statement (EIS).

NBAA and its members are supportive of the need for the men and women in our armed forces to be able to "train as they fight" and are grateful for the service and sacrifice of the men and women in our armed services. GE-9

Unfortunately, NBAA is unable to support the majority of the Proposed Action Alternative A of the PRTC Draft EIS. USAF has gone to substantial lengths to describe and justify the 4 quarterly Large Force Exercises lasting 1 to 3 days each per calendar year. NBAA is supportive in general of this portion of the proposed action provided mitigations such as increased radio and surveillance coverage are installed in the region to provide safety buffers for civil aircraft operating VFR in the MOAs or operating IFR/VFR near the MOAs. Am-3

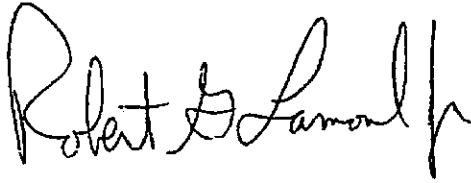
However, USAF has provided no justification, nor does NBAA believe any justification could be sufficient, to allow for the proposed MOA/ATCAA activation outside the quarterly LFEs. To activate MOA/ATCAAs on a Monday through Thursday, 7:30am to 12:00pm and 6:00pm to 11:30pm and then on Fridays from 7:30am to 12:00pm is an immense and unjustified expansion of military airspace covering portions of three States that will have devastating impacts on the economics of several NBAA member companies located throughout the region as well as impacting numerous NBAA members overflying the region in the en route structure. The USAF provided no justification whatsoever for the expansive MOA activations and USAF failed to make a minimum effort to offset even a small portion of this massive increase in airspace by offering to give up the Tiger, Devils' Lake, Hays, and Lake Andes MOAs which even the AF acknowledges "were created and configured for Cold War era missions". PN-3  
SO-22  
PN-3

As it stands in the coordination process, it seems there still has been no national-level look at the impact to Transcons in the NAS by the FAA if Proposed Action Alternative A were approved as drafted by USAF. Regrettably, we cannot support this initiative at this time without serious work being done to drastically scale back the non-LFE portion of the proposal. SO-22

3024

Additionally, I have enclosed two letters from NBAA members that are typical of our member's deep concerns over this current proposal.

Sincerely,



Robert G Lamond Jr  
Director, Air Traffic Services & Infrastructure

Enclosures: Basin Electric Power Cooperative letter dated September 28, 2010 and Bismarck Aero Center letter undated

CC: Robert Henry  
Operations Support Group Team Manager  
FAA Northwest Mountain Regional Office  
1601 Lind Ave., SW  
Renton, WA 98057

Mike O'Brien  
Midwest Manager, Tactical Operations  
619 W. Indian Trail Road  
Aurora, IL 60506

Steve Atkinson  
Western Manager, Tactical Operations, AJR-W  
1601 Lind Ave SW  
Renton WA 98057

Mike Rizzo, ATREP  
FAA, ATO Central Service Center  
Operations Support Group, AJV-C2  
2601 Meacham Blvd  
Fort Worth, TX 76137

Roger Mcgrath  
OSG, ATO Central Service Center, AJV-C23  
2601 Meacham Blvd  
Fort Worth, TX 76137

Manager, Operations Support Group, ATO Central Service Center, AJV-C2  
Airspace Study 10-AGL-6NR  
Department of Transportation 2601 Meacham Blvd  
Fort Worth, TX 76137

3025

**BASIN ELECTRIC  
POWER COOPERATIVE**

1717 EAST INTERSTATE AVENUE  
BISMARCK, NORTH DAKOTA 58503-0564  
PHONE: 701-223-0441  
FAX: 701-557-5336

September 28, 2010

Ms. Linda DeVine, Program Manager  
ACC/A7PS  
129 Andrews Street, Suite 337  
Langley AFB, VA 23665-2701

Dear Ms. DeVine,

Basin Electric Power Cooperative is responding to the proposed Power River Training Complex (PRTC). Basin Electric Power Cooperative (BEPC) is a regional wholesale electric generation and transmission cooperative serving more than 120 member systems. These member systems provide power and services to more than 2.6 million consumers in nine states and covers more than 430,000 sq. miles in these nine states and is based in Bismarck ND.

BEPC is strongly against any increase in the size of the existing Powder River MOA and ATCAA. Basin Electric recommends the "**No-Action Alternative**". BEPC believes the No-Action Alternative is the most responsible choice for the following reasons:

- **Adverse Financial Impact** – BEPC is constructing a new 1.4 Billion dollar electrical generating plant 6 miles NE of Gillette, WY. Construction will be completed in 2011 and operations are planned for a minimum of 50 years. This facility is called "Dry Fork Station" and requires air transportation of employees and consultants from our headquarters in Bismarck, ND to the Gillette Airport several times each week. BEPC has three business aircraft that we use to fulfill that and many other missions for BEPC. Currently the Powder River MOA and ATCAA already have a negative impact on our flight operations and the proposed enlargement to the PRTC will have an even more negative impact in both direct operating cost with extra miles flown, loss of productive time of the passengers, and also safety with weather conditions (thunderstorms) block the sides of this PRTC giving no alternate routes. The general location causes coordination problems with Denver, Salt Lake, and Minneapolis ARTCC facilities. Two of our aircraft can climb and fly over the top of the existing MOA and ATCAA, but not the proposed tops of 60,000 MSL.

Over the last three (3) years, BEPC has flown 1,791 flights into some part of the proposed Powder River Training Complex. BEPC has flown 316 trips annually between Bismarck and Gillette (286 miles one way) which if going direct between these two cities is 90,376 miles.

At our direct operating cost (DOC) gives a yearly expense of \$442,242. If BEPC has to avoid PRTC, this now gives a trip distance of 386 for 316 trips annually or a cost of



3025

\$596,292. The additional cost to avoid PRTC would be \$154,050 annually or \$487.50 per flight.

If I used that average additional expense for the other 281 flights that go through the proposed PRTC would have a negative cost of \$136,988 per year. Add this to the Bismarck to Gillette flights and I get \$291,038 annual direct operating cost increase. This does not include any employee loss of productivity time or salaries.

- Fuel – Training aircraft, commercial airline flights, business aircraft, and general aviation will have to use more aviation fuel if the PRTC is approved. With today's fuel prices and economic conditions, conservation of fuel should be the goal. SO-7
- Alternate Training – BEPC uses Level D full motion flight simulators for initial and recurrent training. Basin has also seen the complex training simulators for the F-14 and B-52 aircraft. Basin believes that with today's advance computer technologies, military flight simulators can be used for training in a safer and more efficient environment. If actual training flights need to occur the use of the current Power River MOA and ATCAA should be adequate. If other size areas are required only a couple times a year, then there are many military areas to choose. For example on 06-23-2008, the internet shows over 720 different military areas. The military does not need any more areas. PN-1
- Speed – Allowing greater than Mach 1 speeds and above in anything except positive controlled airspace could be very unsafe. Allowing that type of speed above 10,000 MSL and having VFR traffic near-by would give a very short reaction time to see and avoid. SA-7
- Chaff – Many of the rural electric consumers rely on the grasslands for their income and any fires that can be prevented would be the only responsible risk management plan. Many of the lands underlying the proposed PRTC are not readily accessible by rural fire departments and with the typical dry conditions, a grass fire could be not only financial devastating, but could in worse case be harmful or fatal. SA-5
- Attendance – BEPC staff attended the scoping meeting held in Bowman, ND. In talking during this meeting to some of the military folks that all the previous meeting had only 177 people attend says volumes on the ineffectiveness of getting people to attend. Why not a meeting in Bismarck, this proposed airspace is almost to the border of our FAA approach airspace to the southwest? NP-8
- If the PRTC continues, then several **SAFETY FACTORS** need to be resolved.
  - 30 distance between PR4 and Bismarck airport. Normal aircraft factory recommendations for descents would require Basin's Citation Model 560 to be 17,000 MSL and be either 33 or 43 miles from the airport depending on the type of descent. If the high MOA is active, then we cannot comply with the Factory recommended descent profile. If any of the ATCAA's are active, then the problem gets worse and safe operation would be compromised. Leading air ambulance turboprop would need to start out of altitude 46 miles from Bismarck at a factory recommended 1,500fpm descent. The local Bismarck air ambulance piston twin would need approximately 42 miles to descent from 17,000 to traffic pattern in Bismarck. Am-5

The distance from the edge of the MOA/ATCAA is too close to the airport. This distance would be near the same at other airport that would be bounded by the

3025

Date  
Page 3

proposed PRTC. A sixty (60) nautical mile radius from IFR airport to the edge of the PRTC would then allow normal and safe operations.

- o There needs to be communications coverage for all of PRTC at all altitudes to control, de-conflict and cover other non-standard operations.
- o There needs to be ATC radar coverage for all of the PRTC within the low and high MOA for the FAA's ARTCC to control and monitor all aircraft within the MOA and ATCAAs.
- o FAA ARTCC boundaries need to be modified so one "Center" has control of all aircraft in the PRTC. There are many time requests are not handled in a timely manner due to the coordination required between centers facilities.
- o Real time data on status of PRTC needs to be available for everyone to see. No changes within 36 hours should be allowed by the FAA except if already planned usage is cancelled.

Am-2

Am-1

Basin Electric Power Cooperative again is strongly against this proposed Powder River Training Complex and hope that this proposed Powder River Training Complex proposal will be cancelled.

GE-2

Sincerely,

Fred E. Adams, CAM  
Basin Electric Power Cooperative  
Chief Pilot/ Travel Supervisor

Cc: Mr. Barry Cooper, FAA Central Region Administrator  
Mr. Bob Lamond, National Business Aircraft Association  
Mr. Larry Taborsky, North Dakota Aeronautics Commission

3026



2301 University Dr. #53

Bismarck, ND 58401

RE: Powder River EIS

TO: Whom it may concern

Bismarck Aero Center (BAC) is a Fixed Base Operator (FBO) located at the Bismarck Airport (KBIS) and is a subsidiary of Aircraft Management Services (AMS). We have been in business at the KBIS airport for 20 years. As a FBO we wear many hats and service many areas of aviation. We are an avid supporter of our military and its contribution to our freedoms. Our main revenue comes from ground support of the flying public. We have many concerns pertaining to the proposed expansion of the Powder River MOA.

As a provider of aviation fuel 30 % of our fuel business comes from transient aircraft. The implementation of the proposed changes would encourage our cross country clients to find other stops that were more predictable and less inhibited by restrictions that reroute IFR traffic. This alone could cost us in excess of \$300,000 in gross revenue annually.

There are approximately 80 medical flights that originate in Bismarck monthly. Not all of these flights originate at our facility; however all of them require maintenance, and purchase fuel and require storage at this airport. These flights service the small communities such as Hettinger and Bowman in North Dakota and some of the western cities in eastern Montana with medical services that are not readily available in the small rural communities. These teams can be more efficient and flying adds economic value to them and the community. The proposed MOA expansion would cause cancellations and delays that would soon render these services too expensive to provide and these services would no longer be available to the rural communities.

SO-8

Under this proposal there are provisions to accommodate air ambulance flights. Air ambulance flights are rarely scheduled and as implied are needed on the spur of the moment. The lack of communication in the MOA would imply that this MOA could not be cleared without delay to a life flight request. These could cause life and death delays. The EIS states that most of these flights are conducted below 10,000 feet which is a statement that is not the norm any more. Most lifeguard flights today are provided by high performance pressurized aircraft capable of flight in excess of 25,000 feet. These high flights satisfy the need for increased safety and comfort for the passengers.

SA-19

Our Upper Midwest economy is spurred by energy development. Oil and energy companies fly daily trips from out of this area transporting teams of specialists in and out of the area. The expansion of this MOA will cross the direct route of many of these flight and cause delays that will have a negative effect on the their respective companies and the state of North Dakota.

SO-8

Charter operators provide flights into these rural areas that are proposed to underlie the expanded MOA's. These operators operate under a more stringent set of rules and the uncertainty and unpredictability of these airspaces will cause significant delays to these operators.

SO-8

North Dakota has a very high use of agricultural aircraft used to apply pesticides to growing crops. With the amount of productive acres that lie below the proposed expansion and their need for these services, the exposure to conflict with military aircraft multiplies exponentially during the application season. Regulation suggests that once these heavy less maneuverable aircraft apply their load and start back to the airfield to reload that they maintain an altitude of 500 feet

SA-15

3026  
or greater AGL and that puts them in conflict with low flying military aircraft. With agriculture being the mainstay of the North Dakota economy, any delay would have a huge economic impact on the state and it's producers.

The EIS makes provisions for the existing Victor airways however these airways are scheduled to be phased out. The FAA and NASA are working on a transportation system of point to point navigation and the satellite GPS is the heart of this system. With the new Technically Advanced Aircraft designs, all navigation will be point to point.

During my review of this document I found numerous areas of incorrect documentation and misinformation. Page 3-153 attempts to chart agricultural acres and revenues but is not representative or logical in its presentation. The figures are erroneous. I reviewed the charts representing charted flights through the proposed airspace. Some of these charts (Figure 3.1-13.) referred to flights below 4,000, feet. There is no radar coverage below 6-8,000 feet in most of this area so I find this documentation misleading. If these pages are representative of this document, then this document is misleading and not factual at best.

I have been flying in excess of 45 years and all of my flying has originated in North Dakota. I have been flying into and around the existing MOA's my entire flying career. My experience has been that posted "HOT" times have rarely been adhered to and that popup times are the norm. I have had more delays when the MOA was not scheduled and all of a sudden became "HOT".

The Bismarck Airport is the gateway to Bismarck North Dakota, our states capital. Implementation of this proposal, added to the proposed changes in the airspace to the northeast (EIS for the use of RPA's, Grand Forks, ND) would virtually cripple air commerce into and out of the Bismarck Airport. This virtually affects every citizen of the Bismarck/Mandan area.

Thank you for your time. I may be reached at 701-223-4754 or at [bobs@bismarckaero.com](mailto:bobs@bismarckaero.com).

Respectfully submitted,

Bob Simmers

President

3027

## Written Comment Sheet

### Public Hearing for the Proposed Powder River Training Complex

Thank you for your input!

DATE: 11/03/10

#### PLEASE PRINT

I attended the public hearing held at Elgin, ND. I was disappointed with the opposition to the expansion. Since the hearing the media continues to print concerns of those not in favor of expansion. I remember the train flights of years ago, I don't remember opposition.

As far as airplanes making noise, so do the barking dogs belonging to a dog trainer a few blocks from my home. One speaker had his cattle spooked by an airplane. I also own cattle and have had them spooked by snowmobiles, deer, coyotes, dogs, and housecats. Another speaker suggested that aerial crop sprayers would be affected. I aerial crop spray and the Airforce won't hinder my operation.

I would welcome activity in our skies of Southwestern ND. They're

GE-1

\*\*\*\* CONTINUE ON BACK FOR MORE SPACE \*\*\*\*

NAME:	Rex J. Kelsch
ORGANIZATION:	Mott, ND Airport Authority
ADDRESS:	PO Box 174
CITY/STATE/ZIP:	Mott, ND. 58646

Yes, please include me in the mailing list for distributing the Final EIS. I would like to receive a copy in: ☐ CD (electronic format)  
☐ hard copy format

No, please do not include me in the mailing list for distributing the Final EIS. I do not wish to receive an EIS or further information.

**PLEASE NOTE:** This Draft EIS is provided for public comment in accordance with the National Environmental Policy Act (NEPA), the President's Council on Environmental Quality (CEQ) NEPA Regulations (40 CFR §§1500-1508), and 32 CFR §989, Environmental Impact Analysis Process (EIAP).

The EIAP provides an opportunity for public input on Air Force decision-making, allows the public to offer inputs on alternative ways for the Air Force to accomplish what it is proposing, and solicits comments on the Air Force's analysis of environmental effects.

When making an oral comment, please clearly state your name and the name of the organization, if any, which you are representing before you begin your comments. Please do not provide any other personal information, such as your home address and phone number when making an oral comment. Your oral comments will be used to develop a transcript and permanent record of this meeting. This transcript will be published in the FEIS. If you would like a copy of the Final EIS or other associated documents, you may state that on a written comment card or add your name and address to the mailing list.

Providing personal information is voluntary. If you choose to not provide personal identifying information, your comments will be given the same weight and consideration as any other comments submitted. Private addresses provided will be compiled to develop the mailing list for those requesting copies of the Final EIS. Only the names of the individuals making comments and specific comments will be disclosed. Personal home addresses and phone numbers will not be published in the Final EIS.

**Please hand this form in at a public hearing or mail before November 13, 2010 to:**

Ms. Linda DeVine  
HQ ACC/A7PS

129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

not exactly crowded.

Rec'd 11/15/2010

3028



November 12, 2010

Ms. Linda Devine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

Subject: Draft Environmental Impact Statement for Powder River Training Complex

Dear Ms. Devine:

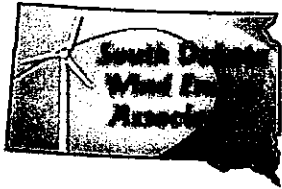
The Montana Department of Transportation (MDT) supports and understands the importance of training our United States Military but remains very concerned with the current proposal to expand the Powder River Training Complex for many reasons:

- Montana is home to the Hays MOA in north central Montana and the current Powder River MOA. We are happy to share our airspace as currently provided but feel that if expansion is necessary, it should occur in North and South Dakota where the air bases are located. PN-2
- The EIS does not consider all possible alternatives. It must include considerations to expand the Devils Lake, Tiger and Lake Andes MOAs under the same criteria as the existing Powder River MOA. PN-5
- These existing MOAs could offer accommodation with less impact. AM-5
- The communication and use regarding the proposal has been confusing and portrayed as only 10-days per year. The impact of approximately 240 days per year needs to be analyzed and clarified. AM-4
- The revised proposal eliminated impacts to the Billings, Bismarck and Dickinson airports. The same must be done for Montana's other public and private airports located underneath the MOA. There is no provision for airborne access to Ashland, Baker, Broadus, Colstrip, Ekalaka, Hardin or the 40+ private airstrips located in southeast Montana. SA-7
- The EIS information on the number of airports underlying the Powder River Training Complex is underestimated at 39 airports. Montana alone has close to 50 airports underneath the proposed MOA. AM-3
- The EIS states that the number of airports and airfields located under the proposed MOA create what is "perceived" as an impact by airport operators and users. This proposed expansion is a real impact, not perceived and must be explained. SD-7
- VFR aircraft are allowed to enter the airspace at their own risk and are to "see and avoid". VFR traffic flying in the area and sharing the airspace with large, low-flying, high speed bombers and fighters creates an unsafe environment.
- There is no method to provide for safe separation of military and civilian aircraft due to limited or no radar and voice communications in the area.
- Seven of Montana's eight essential air service airports are located in eastern Montana. These communities receive this service because of their necessity to enter the national transportation system, to conduct business and receive medical services. The expansion will force the air carrier to divert and be re-routed around the proposed MOA causing increased expenses for fuel, aircraft time, maintenance and lost productivity.

I am confident that we can continue to work together to enjoy our open skies and share the existing airspace that Montana currently provides you. This allows us to maintain the most competent and qualified armed forces in the world. And because of our need to maintain their expertise along with the reasons stated above, you need to look at the expansion of Devils Lake, Tiger and Lake Andes MOAs not the Powder River MOA. Those expansions would better facilitate both the training of our armed forces and allow the essential general and commercial aviation industries to share our airspace without a negative economic impact. PN-2

Sincerely,

Jim Lynch, Director



**SDWEA**

3029  
Wind Energy Association  
300 East Capitol Avenue, Suite 1  
Pierre, SD 57501

November 11, 2010

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley Air Force Base, VA 23865

Dear Ms. DeVine,

The South Dakota Wind Energy Association would like to comment on the new Power River Basin Flyover area.

We are concern that wills new flyover area will impede wind development in rural South Dakota. Since 1995 I have been working on installing anemometer to record wind speed in Western and Central South Dakota. Our measuring equipment is at 100 meter currently and the wind projects that we have been working on have a total height of excess 600 feet over on ridge top and buttes. } 50-17

We would like to tell rest of your sorry and be at the negotiation table if you proceed.

Sincerely,

Steve Wegman  
Executive Director,  
South Dakota Wind Energy Assoication  
300 East Capitol Ave.  
Pierre, SD 57501

Attachment  
Project map



# Residents in Colorado and New Mexico Fear Impact of Military's Nighttime Sorties

By STEPHANIE SIMON

The U.S. Air Force thinks the rough-hewn peaks of southwest Colorado and northern New Mexico make excellent surrogates for the treacherous mountain ranges in global hotspots such as Afghanistan. Some local residents beg to differ.

In a bid to provide Special Operations pilots more realistic simulations of wartime missions, the Air Force has proposed a vast new tactical training zone that stretches across 94,000 square miles of rugged terrain. Starting next year, commanders want to send C-130 transport planes and CV-22 Osprey tilt-rotor aircraft skimming across the region after dark at altitudes as low as 200 feet and speeds of up to 288 miles per hour. They envision three sorties a night.

The pilots would dart among the ridges and dip low over the rangeland, practicing the stealth needed for covert operations, said Col. Stephen Clark, wing commander at New Mexico's Cannon Air Force Base, which is pushing the proposal.

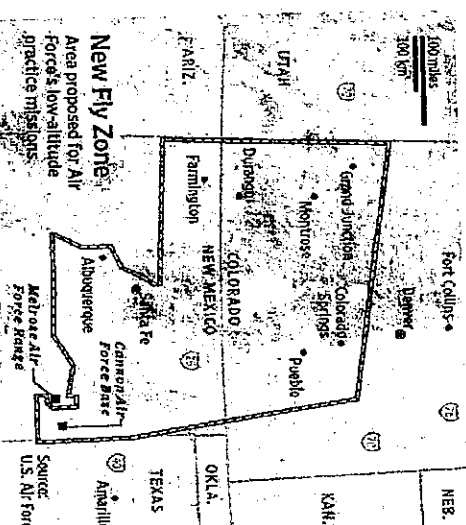
Pilots would be required to avoid cities in the zone, including Santa Fe and Taos in New Mexico and Aspen, Pueblo and Durango in Colorado. But communities and residents fighting the Air Force say that hundreds of low-altitude flights each year will spook cattle, scare children, rattle adobe buildings, create pollution and mar the tranquility they cherish.

"Our economy is based on people coming here for the beauty of the land, the solitude, the wild qualities," said Cliff Bain, who lives in Arroyo Hondo, N.M., north of Taos. He started an opposition group called Peaceful Skies.

At least four county commissions and two city councils have taken a stand against the proposal, and the Air Force has received 1,200 comments, most ex-



Satellite image of terrain in flight-training zone near Arroyo Hondo, N.M.



## New Fly Zone

Area proposed for Air Force's low-altitude practice missions.

pressing concern about the proposal.

The vocal opposition to the new training zone disturbs some civic leaders who fear that Cannon Air Force Base, an economic anchor for eastern New Mexico, might be vulnerable to future cutbacks if pilots based there can't properly prepare for missions.

Others say putting up with occasional noise is a small sacrifice to ensure adequate training

urges the military to minimize the impact on people and wildlife.

Military officers say the fears are overblown. The Air Force already sends pilots zipping across the region, at times as low as 200 feet above the ground, though current regulations have the effect of limiting night sorties to a half-dozen well-surveyed routes, Col. Clark said.

Under the new proposal, pilots would be allowed to map their own routes through the tactical training zone, increasing the challenge and realism of the training, Col. Clark said. It would also tend to disperse the noise and disruption across a broader area. He said he doesn't anticipate that any one village or ranch would experience the aircraft overhead more than a couple times a month.

Col. Clark said the military has not measured noise levels of aircraft flyovers at 200 feet. For someone standing on the ground, aircraft at an altitude of 500 feet would create a sound exposure of 91 to 95 decibels, or "somewhere between a lawn mower and a chain saw," he said.

The Air Force has hired a consultant to assess potential environmental impacts, which will be the subject of public comment next spring, after which Special Operations commanders will decide whether to scrap, revise or implement the proposal.

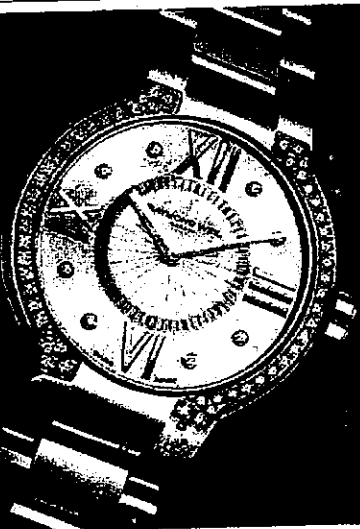
Kathleen Dudley plans to throw herself into fighting the Air Force should commanders choose to move ahead. A writer in Mora, N.M., northeast of Santa Fe, Ms. Dudley said she and her husband were eating lunch on their deck recently when a military aircraft screamed overhead, flying so low "that we were looking into the eyeballs of a pilot bearing down on us."

"I was terrified," she said. "You don't hear or see them until they're upon you, and then it's like being in a war zone."

TIFFANY & CO.

800 843 2500 TIFFANY.COM

INDEPENDENCE 1755 (1755) RAYMOND WEIL GENEVE



Noemia

bloomingdale's



Dustin Johnson, Chair  
Steve Kolbeck, Vice-Chair  
Gary Hanson, Commissioner

## **SOUTH DAKOTA PUBLIC UTILITIES COMMISSION**

500 East Capitol Avenue  
Pierre, South Dakota 57501-5070  
[www.puc.sd.gov](http://www.puc.sd.gov)

Capitol Office  
(605) 773-3201  
(866) 757-6031 fax

Warehouse  
(605) 773-5280  
(605) 773-3225 fax

Consumer Hotline  
1-800-332-1782

October 6, 2010

Ms. Linda DeVine  
PRTC EIS Project Manager  
ACC/A7PS  
129 Andrews Street, Suite 337  
Langley AFB, VA 23665-2701

RE: Impact of proposed Powder River Training Complex on wind generation

Dear Ms. DeVine:

We have received inquiries at the Public Utilities Commission from landowners about the impact of the proposed Ellsworth PRTC on potential wind energy development in the project area. We wish to ensure we understand the effects of the proposed action on our constituents and their properties so we can accurately respond to questions.

Our inquiry should not in any sense be interpreted as expressing opposition to the project. The commission has the utmost respect for the service provided by Ellsworth and its personnel, often involving great personal sacrifice. We express pride and gratitude that our state is home to such a significant national defense institution. We also understand the need for Ellsworth to maintain training and readiness facilities that enable the base to fulfill its mission.

Based on our reading of the Draft Environmental Impact Statement, wind energy development would not be negatively affected by the PRTC expansion. For example, in Land Use under Proposed PRTC, Section 4.8.3.1 on p. 4-95, the DEIS states with respect to Alternative A, the preferred alternative:

A concern noted by scoping participants was the potential incompatibility of low-level flight with land dedicated to wind farms due to the height and electromagnetic emissions of the wind turbines. Like other tall structures, existing and future structures must be officially charted with FAA and avoided by appropriate vertical and lateral distances. As a precaution for proposed night operations and other commercial and private flight, tall structures are required to have lights that warn of their presence. Overflights at altitudes would avoid the physical structure and electromagnetic emissions of wind turbines. The Proposed Action would not inhibit the development of future wind farms or other industrial land uses. (emphasis supplied).

GE-11

• PRTC DEIS Inquiry  
October 6, 2010  
Page 2 of 2

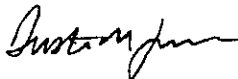
Similar language is repeated at several other places in the DEIS. Later in Section 4.9.3.1.4, Environmental Consequences, Energy Resource Development, the DEIS contains the following general policy statement:

In 2007, the Department of Defense released a letter stating that the DoD would not oppose the development of wind farms or other sources of renewable energy that would not impact military readiness or training. The Air Force would coordinate with FAA and other regulatory agencies to evaluate wind farm proposals under the proposed airspace on a case-by-case basis.

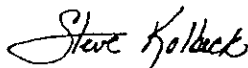
These excerpts from the DEIS indicate the case-by-case evaluation in reference to the PRTC project has concluded curtailment of wind tower development is not necessary to accommodate the project, is not being requested and will not be a natural consequence of the project.

Please provide affirmation regarding our interpretation so we can share this with landowners who have contacted us and are investigating wind energy development potential in the PRTC area.

Sincerely,



Dustin Johnson  
Commissioner



Steve Kolbeck  
Commissioner



Gary Hanson  
Commissioner

Cc: Todd Goddard, Northwest Landowners Energy Alliance  
Bob Drown, Northwest Landowners Energy Alliance

3031

Big Sky. Big Land. Big History.

**Montana**  
**Historical Society**

September 20, 2010

*Historic Preservation  
Museum  
Outreach & Interpretation  
Publications  
Research Center*

HQ ACC/A7PS  
ATTN LINDA DEVINE  
129 ANDREWS STREET  
ROOM 337  
LANGLEY AFB VA 23665 2769

RE: Powder River Training Complex, National Historic Preservation Act (NHPA) Section 106 Compliance.

Dear Linda,

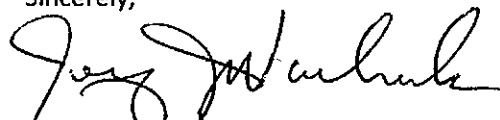
Thank you for the EIS and the cover letter which lays out your plans for complying with Section 106. Our office thinks that this project may have an adverse effect on cultural resources in Montana. We would not be able to comment in detail on what properties may be affected, or what level they may be affected, until after a survey report is submitted. We recognize that not every section of land will be affected that was outlined in the maps submitted, so we need to define the undertaking to a degree that will allow a file search and survey to be conducted.

CW-2

We would look forward to a meeting on this subject in the late fall or early winter of 2010. If the meeting cannot be held in Helena, Montana, we would request funding to attend such a meeting. Please keep us abreast of the planning on this undertaking as it develops.

If you have any questions or concerns about what I have written above, you can contact me at (406) 444-0388, or email at [jwarhank@mt.gov](mailto:jwarhank@mt.gov).

Sincerely,

  
Josef J Warhank  
Review & Compliance Officer

File: DOD/USAF/2010

225 North Roberts Street  
P.O. Box 201201  
Helena, MT 59620-1201  
(406) 444-2694  
(406) 444-2696 FAX  
[montanahistoricalociety.org](http://montanahistoricalociety.org)

Big Sky. Big Land. Big History.

# Montana Historical Society

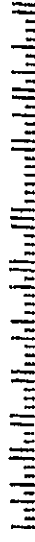
225 N. Roberts, P.O. Box 201201  
Helena, MT 59620-1201



02 1M  
0004289737 SEP 21 2010  
\$ 00.44<sup>0</sup>  
MAILED FROM ZIP CODE 59601

HQ ACC/A7PS  
ATTN LINDA DEVINE  
129 ANDREWS STREET  
ROOM 337  
LANGLEY AFB VA 23665 2769

2366532701 C039



COMMITTEE ON  
NATURAL RESOURCES

COMMITTEE ON  
AGRICULTURE

COMMITTEE ON  
BUDGET

WESTERN CAUCUS  
EXECUTIVE COMMITTEE

WASHINGTON DC OFFICE:  
1004 LONGWORTH HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515  
PHONE (202) 225-2311  
FAX (202) 225-3057



Cynthia M. Lummis  
Congress of the United States  
Wyoming

November 22, 2010

WYOMING OFFICES:

2120 CAPITOL AVENUE, SUITE 2015  
CHEYENNE, WY 82001  
PHONE (307) 772-2595  
FAX (307) 772-2597

100 EAST B STREET, SUITE 4003  
P.O. Box 44003  
CASPER, WY 82602  
PHONE (307) 261-6595  
FAX (307) 261-6597

404 "N" STREET, SUITE 204  
ROCK SPRINGS, WY 82901  
PHONE (307) 362-4095  
FAX (307) 362-4097

45 E. LOUCKS, SUITE 300F  
SHERIDAN, WY 82801  
PHONE (307) 673-4608  
FAX (307) 673-4982

Ms. Linda Devine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769.

SENT VIA FAX: (757) 764-1975

Dear Ms. Devine

Enclosed is a copy of the correspondence I received from my constituent, Mr. Wade Bergslien, Pilot for True Drilling Company of Casper, Wyoming concerning the Powder River Training Complex. I believe Mr. Bergslien was in attendance at the meeting in Gillette and that he made his concerns about the proposed project known at that time to your agency, the Federal Aviation Administration and Air Combat Command. I believe you will also find this information self-explanatory.

I would respectfully ask for your thorough review of Mr. Bergslien's comments and for you to provide me with as much information possible including, but not limited to, what measures are taken to ensure that his concerns will be given full and fair consideration throughout the analysis process. It may also be helpful for Mr. Bergslien to know precisely what options are available to him and his business and the proper procedures he must follow to remain adequately involved.

NP-3

You may reply to me at my Casper District Office, Post Office Box 44003, Casper, Wyoming 82602; or fax (307) 261-6597. Your assistance is greatly appreciated. My Field, Jackie King, may be reached at (307) 261-5585 with any questions or comments pertaining to Mr. Bergslien's inquiry.

Sincerely,

Cynthia M. Lummis  
Member of Congress

CL/jk

cc: HQ ACC/A7PP, Sheryl Parker  
FAA, Megan Rosia

3032

**True Drilling Company**  
**P.O. Box 2360**  
**Casper, Wyoming 82602**

November 10, 2010

Congressman Cynthia Lummis  
United States Congressman, Wyoming  
1004 Longworth House Office Building  
Washington D.C. 20515  
202-225-2311

Dear Madam:

We the aviation department of the True Companies located in Casper, Wyoming would like to say we are in disagreement with the proposed Powder River Training Complex. This proposal is excessive in size as well as scope and will seriously impair the efficient use of our aircraft, and requires additional review before any consideration of implementation. GE-2

The needs of the United States Air Force and all of the benefits it forecasts for all components involved are noteworthy, yet they negatively impact flight operations such as ours and other corporate aircraft. The summary of the PRTC addresses how the Air Force will increase training capabilities and gain fuel and maintenance savings at the same time. However if implemented the civilian sector while be tasked with longer flight legs and increased fuel consumption which goes hand in hand with increased maintenance costs. SO-7

We are a long time participant in the energy industry of the Rocky Mountains. Corporate aircraft are an integral tool and facilitate companies such as ours and help us efficiently develop the natural resources with what we have been blessed. Bottom line is that streamlining our operations, thru the effective use of our aircraft, means reduced man-hours for those within and out of our companies who are dependant on our services.

As I have stated the proposed PRTC is immense and if granted is approximately 350 miles wide and will detrimentally affect all of our operations into and out of the proposed area within eastern Montana and western North Dakota. Aircraft dispatched from Casper or other airports that are set back from the MOA will be directed around the MOA when the airspace is "hot" (in use) and this will mean additional time and fuel and decrease our payloads. This could mean increasing fuel loads and or dropping passengers or using a larger aircraft than the trip should require. In times of obscured weather it could mean not even being able to reach your intended destination due to fuel requirements at arrival. An en-route tech stop is not a positive when time is of essence. SO-7

To compound the problem the proposed quarterly exercises have potential to increase usage as other units will want to travel to the new area for their requirements. This will only decrease the airspace availability time potentially impacting the civilian users even more, additionally this would find fault with the Air Forces forecasted fuel savings.

The Air Force and the FAA are stressing their willingness to coordinate to the civilian sector when these airspaces will be in use, yet those who fly professionally will admit that this coordination is weak at best. If this proposal comes to fruition, the Air Force and the FAA will be tasked with becoming stewards to an area which many companies and families find their livelihoods dependant upon. The Environmental Impact Statement or EIS does not approach or encompass our sector of the energy business, which is corporate aviation, to include charter aviation. It fails to consider that aircraft as far AM-1

RECEIVED  
NOV 15 2010  
BY: \_\_\_\_\_

November 10, 2010

away as Houston, Texas are dispatched daily to western North Dakota and eastern Montana. This portion of the energy business will as stressed as ours will.

In closure, it is clear that the inability to share this airspace will result in a less efficient cost structure for not only the energy industry but also all effected companies. These costs will ultimately be borne by the American citizen who is already stressed by the weakest economy in a generation. We request your assistance first in ensuring that the decision makers, the Air Force, the FAA and ATC, understand the burden placed on private industry; and second to facilitate a different solution for the military that benefits all parties.

Sincerely, Wade Bergslien

Wade Bergslien  
Pilot True Drilling Company



3034



STATE OF SOUTH DAKOTA  
M. MICHAEL ROUNDS, GOVERNOR

November 15, 2010

Linda Devine, Program Manager  
ACC/A7PS  
129 Andrews Street, Suite 337  
Langley AFB, VA 23665-2701

Dear Linda,

The purpose of this letter is to convey my support for the Alternative "A" of Air Combat Command's Powder River Training Complex Environmental Impact Statement, dated August 2010.

GE-1

I strongly believe in our nation's armed forces being well equipped and trained to the best of their ability to successfully complete combat operations. Toward that objective, I am fully supportive of providing them the airspace to sharpen their combat skills to be able to both protect themselves and defeat our nation's adversaries in the most effective and efficient manner.

GE-1

Therefore, I am committed to the success of your initiative to provide the airspace required to successfully complete such training missions. My endorsement of Alternative "A" is further founded on the efforts Air Combat Command has made to accommodate those citizens affected by training flights and the knowledge that Ellsworth's leadership team will continue to fully consider special requests for such considerations.

GE-1

Thanking you in advance for this pioneering work in combat aviation training, please do not hesitate to contact me as we proceed with the realization of the best training complex our nation has developed in the past 50 years.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Michael Rounds".

M. Michael Rounds

MMR:ls



1101 1st Ave. N., Fargo, ND 58102  
P.O. Box 2064, Fargo, ND 58107-2064  
Phone: 701-298-2200 • 1-800-367-9668 • Fax: 701-298-2210

4023 State St., Bismarck, ND 58503  
P.O. Box 2793, Bismarck, ND 58502-2793  
Phone: 701-224-0330 • 1-800-932-8869 • Fax: 701-224-9485

January 3, 2010

Ms. Linda DeVine, HQ ACC/A7PS  
29 Andrews St., Suite 337  
Langley AFB, VA 23665-2769

Dear Ms. DeVine:

North Dakota Farm Bureau members oppose the proposed U.S. Air Force expansion of the Powder River Training Complex. The Minot Air Force Base and the Ellsworth Air Force Base are both important strategies in our national defense. While we recognize the need for national security and proper training for our military, quadrupling the size of the area would have detrimental impacts to residents in southwest North Dakota. GE-2

Maj. Matthew Reese has said, "We're looking at expanding the Powder River Training Area to about four times its current size, over primarily unpopulated areas." We believe the residents in southwest North Dakota are just as important as other areas of the country and deserve consideration. EJ-2

The noise of the low-flying B-1 and B-52 bombers will spook beef cattle and sheep, causing them to run. The animals will not only lose weight, but can injury themselves by stepping in a prairie dog hole or other obstacle. In this part of the country, ranchers make their living raising cattle and sheep. Agriculture is the number one industry in North Dakota and the southwest area of our state is a vital component of our industry. These people depend on livestock for their livelihood. SO-13

The noise will similarly impact wildlife. At the same time, the flares set off by the aircraft could start fires in the area. BI-4  
SA-5

With 27,000 members, North Dakota Farm Bureau is an independent, non-government, voluntary organization united for the purpose of analyzing issues and formulating action on agricultural concerns.

We hope the U.S. Air Force will reassess its expansion of the Powder River Training Complex. Thank you for your consideration of this matter.

Sincerely,



Eric Aasmundstad  
President

cc: Sen. John Hoeven  
Sen. Kent Conrad  
Rep. Rick Berg

3036

# Dickinson Theodore Roosevelt REGIONAL AIRPORT

11120 42nd St. SW, Suite A • Dickinson, ND 58601  
Phone: 701-483-1062 • Fax: 701-483-1072  
dickinsonairport@ndsupernet.com • www.dickinsonairport.com

Linda DeVine, Program Manager  
ACC/A7PS  
129 Andrews St. Suite 337  
Langley AFB, VA 23665-2701

Dear Ms. DeVine,

My name is Matthew Remyense; I am the manager of the Dickinson Theodore Roosevelt Regional Airport (Dickinson Airport) in Southwest North Dakota. The Dickinson Airport is governed by the Dickinson Municipal Airport Authority (DMAA) a five member board appointed by the City of Dickinson. Aviation has a vital part in the economic development of Southwest ND and the DMAA has the responsibility of assuring that aviation in southwest ND continues to grow, remains strong, is convenient, and remains readily available for our citizens. I have been following the development of the MOA expansion and believe that the expansion will adversely impact aviation activities in southwest North Dakota. I'm writing to inform you of the concerns I have with the expansion of the Powder River MOA.

I'd first like to describe the current economic situation in southwest, ND and how the Dickinson Airport plays a part. Southwest ND is seeing unprecedented growth and is in the midst of a growing economy that is being pushed by the oil development of the Bakken and Three Forks Oil deposits. Aviation has played a large role in the growth by allowing companies from across the nation to fly into the Dickinson Airport utilizing both commercial and general aviation. In a 2004 study conducted by the North Dakota Aeronautic Commission, it was determined that the Dickinson Airport has a \$30 million impact on Southwest ND and creates 305 direct jobs. The study also determined that each commercial passenger that flies into Dickinson spends approximately \$710 per trip. In 2004 the airport had just over 5,000 commercial boardings for the year, by taking 5,000 passengers and multiplying it by an average of \$710 that is an impact of \$3.5 million. If we move ahead six years to 2010 the airport has already boarded 8,200 passengers and will be over 10,000 boardings for the year. Based on the 2004 number of \$710 that is impact of \$7.1 million to southwest ND. This impact includes jobs of airline personnel, airport personnel, and personnel in Southwest ND who support the traffic such restaurants, motels, rental cars, and service stations. This impact allows southwest ND to continue to grow its economy while the rest of the country is in a downturn.

I feel that the expansion of MOA could affect both General Aviation and Commercial Aviation to and from the Dickinson Airport during a time in which southwest ND is seeing such unprecedented growth.

Commercial aviation has played a large role in the growth of Dickinson. Great Lakes Airlines operates three round trips daily between Dickinson and Denver. The airline has been able to keep up with the demand of travelers by adding additional flights and working hard to assure that Dickinson passengers

SD-22

get to Denver at time where they can connect with other flights. The hard work of the airline has not gone unnoticed by the businesses using the airline either. The airports annual boardings have continued to rise since the oil activity started in late 2006. In 2006 the airport only had two round trips that were shared with another community and airport's annual boardings totaled 5,400 passengers. In 2009 there were three round trips shared with another community and the airport's annual boardings were 8,937. Today the airport has three round trips daily and only one of those round trips is shared. The airport's boardings as of October 31<sup>st</sup> were 8,217. By the end of 2010 the airport is going to have over 10,000 boardings.

All of this success is due to the fact that Great Lakes Airline is able to offer convenient reliable air service to southwest ND. If the MOA were to be expanded the airline would be affected. The times proposed for PR-4 coincide with the two busiest trips a day. This may cause our commercial flights to be delayed or forced to divert around the MOA because the MOA is "hot". Both of these scenarios will cause the airline to incur additional costs and inefficiencies. This translates into southwest ND no longer having the convenient affordable air service it has come to expect. If passengers do not have convenient affordable air service out of Dickinson they will choose other airports that are not affected by the MOA. This is a direct loss of passengers for the airport.

SO-22

There are many possible effects that the airport could receive due the the loss of passengers. The biggest effect is the loss of air service. If the airport starts losing passenger the airline will no doubt reduce the air service into the Dickinson Airport ultimately reducing the available seats to southwest ND passengers and greatly reducing the redundancy and reliability of our flights. If the airport were to lose passengers it will fall into a lower category for funding. As the airport closes out 2010 it will be above 10,000 boardings for the year. Every year the airport is above 10,000 boardings a year it is able to receive \$1 million in funding from the FAA for capital improvements of the airport. If the airport loses this status the airport will lose \$850,000 a year in funding. This will slow the airport growth and will not be able to meet the infrastructure demands of the growing region. Every passenger lost to another community is \$710 that is no longer being spent in southwest ND. If the airport were trend back to 2006 numbers that would be an annual loss of \$4 million dollars to southwest ND's economy.

SO-22

The Dickinson Airport has seen general aviation grow just as we have seen commercial aviation grow. This is evidenced by the increase in fuel and hangar sales at the airport, and the amount of entries in the airport's GA operations log. The airport's operation tracks all the general aviation traffic. General Aviation plays a role in the economic sustainability of the growing region as well. General aviation at the Dickinson Airport provides charter service, freight service, air medical and agricultural service. The airport's FBO, Western Edge Aviation provides charter service, flight instruction, aircraft rental, aircraft maintenance, courtesy car and a full pilot's lounge. Above all, these services allow for any person or business from across the world to fly right into our economy and I feel that the development of the MOA could disrupt the general aviation traffic coming into the Dickinson Airport.

SO-8

The proposed MOA essentially blocks off the Dickinson Airport from any traffic coming for the south, southwest and southeast. A majority of the traffic the airport receives comes from these directions due the geographical location of the airport. The PR -3 and PR-4 MOA are active during the morning, which is a busy time for general aviation traffic and this has the potential to reduce the amount of traffic that utilize the airport. Any time an aircraft chooses not to utilize the airport it is a direct loss of income for the FBO and airport. An aircraft can take between 30-100 gallons of fuel when it stops at the airport. If an aircraft decides to use another airport it could cost the airport and FBO anywhere from \$60-\$200 per aircraft. It is difficult to gauge the amount of traffic that could be lost, but suppose the airport lost 10%

SO-22

3036

of its GA traffic or 240 aircraft. If the airport were to lose 240 aircraft to another airport the Dickinson airport could stand to lose \$48,000 in revenue. How would an airport compensate for the lost revenue? There are two options, reduce services, or increase fees. Either option the airport chooses will ultimately cause the airport to lose more customers. The expansion of the MOA is an economic hardship to the FBO and southwest ND. The reduction in traffic could lead to a loss of jobs, and create further economic hardship to the region.

SO-10.

The above paragraphs speak toward general aviation as a whole, but the MOA expansion will affect each aspect of general aviation differently. Charter service coming into and out the Dickinson Airport will be affected any time there are IFR conditions. Since IFR is prohibited when the MOA is "hot" it will provide unpredictability into the charter operation causing charter companies to experience delays and cancellations. Medical flights that serve the small general aviation airports underneath the MOA may be delayed or canceled creating a huge burden to the hospitals that rely heavily on doctors from larger towns. Businesses utilizing private aircraft will be negatively impacted. The potential for rerouting around the MOA will cause additional hardships to the company as a result of additional fuel and time.

SO-5

I understand the need for the military to train its personnel, but the expansion of the MOA will negatively impact the airport and the economy in southwest ND. I thank you for your time and strongly urge the USAF to take the No-Action Alternative. If this airspace is chartered it would be detrimental to aviation in southwest ND. Again I thank you for your time and if you should have any questions please do not hesitate to contact me at 701-483-1062

GE-2

Sincerely,



Matthew Remyse  
Airport Manager

3037

**UNITED**



Friday, November 12, 2010

Ms Linda A. Devine  
129 Andrews Street, Room 337  
Langley AFB, VA 23655-2769

Reference: Powder River Training Complex Draft Environmental Impact Statement (EIS)  
FAA Airspace Study 10-AGL-6NR

United Air Lines, Inc. and Continental Airlines, Inc. are wholly owned subsidiaries of United Continental Holdings, Inc. Together with United Express, Continental Express and Continental Connection, these airlines operate a total of approximately 5,800 flights a day to 371 airports on six continents from their hubs in Chicago, Cleveland, Denver, Guam, Houston, Los Angeles, New York/Newark Liberty, San Francisco, Tokyo and Washington, D.C. A significant number of our flights cross the proposed Powder River Training Complex (PRTC) every day providing vital scheduled air service to and from many domestic and international city pairs.

We hereby submit the following comments in response to the Powder River Training Complex Draft Environmental Impact Statement (EIS).

Both Continental Airlines and United Airlines have long shown extraordinary levels of support for the men and women of our armed forces and are truly grateful for their service and sacrifice. In the modern world, more than ever, we recognize the need for them to train as they fight.

As proposed, the Powder River Training Complex (PRTC) Military Operations Areas (MOAs) will be comprised of an unprecedented amount of airspace from parts of Montana, Wyoming, North Dakota and South Dakota. Though the PRTC covers a somewhat sparsely populated part of the United States, numerous jet routes and efficient trajectories pass through this airspace. For example, on Tuesday, August 17<sup>th</sup> 2010, between the hours of 1400Z and 0200Z between FL 330 and FL390, three hundred ninety five flights passed through the proposal area. The majority of these flights were scheduled Part 121 (air carrier) operations. But in total, on that day, from the surface to FL 450, 776 flights of various kinds transited or used airspace within the proposal area. If the PRTC is activated as described in the EIS on a daily basis, most of these flights will have to find another way to get to their destinations.

AM-21

About 110 United and Continental flights transit the proposed PRTC to or from our hubs in SFO, LAX, DEN ORD, IAH, IAD, EWR and CLE daily. When the area is in use each of these flights will have to fly an average additional 50 flight miles to avoid the area. The extra flight miles at cruise will require an additional 55,000 pounds of fuel each day.

SO-7

At current fuel prices with the proposed times of use this represents \$6,000,000 in fuel costs and 14.3 million pounds of extra fuel burned each year to our airline.

In the EIS, the United States Air Force (USAF) describes in detail proposed quarterly Large Force Exercises (LFEs) designed to last one to three days each. We have no objection to these limited duration exercises and consider this to be high value use of the airspace.

GE-14

In our review of the proposal, however we do not see justification for activation of the MOA /ATCAAs beyond the LFEs. Blocking the area Monday through Thursday from 7:30am to 12:00pm and then from 6:00pm to 11:30pm with an additional block from 7:30am to 12:00pm on Friday will require hundreds of flights a day to be delayed or rerouted around the area. The excess fuel burn associated with these flights' altered trajectories and the associated increased emissions do not appear to be addressed in the EIS.

SO-22

AQ-1

United and Continental Airlines had hoped to be able to address our concerns regarding the "Proposed Action Alternative A" with the USAF directly and at the national (NAS) level. Such an opportunity to have a frank and open discussion with the USAF and other stakeholders regarding their needs might have lead to other potential alternatives to manage the airspace more safely and efficiently. However, the USAF has been unwilling to meet to discuss the proposal beyond the LFEs and that has left us few alternatives.

GE-11

United Airlines and Continental Airlines feel that this proposal has not had sufficient review at the NAS (national) level. The LFE use of the airspace appears to be manageable in terms of its impact on other NAS users and not significantly different from other similar exercises that are conducted periodically in other parts of the NAS. The non-LFE portion of the proposal impacts a vast volume of airspace on a daily basis and will put an undue burden on the environment and hundreds of civil aviation and non-participating DOD flights every day. United Airlines and Continental Airlines object to the non-LFE portion of the proposal based on its adverse impacts on the efficient use of the navigable airspace.

GE-14

Sincerely,



Timothy L. Stull  
Managing Director Air Traffic Strategy and Programs  
United Airlines  
1200 E Algonquin  
Elk Grove, IL 60007

3038

**Written Comment Sheet**  
**Public Scoping Meeting for the Proposed Powder River Training Complex**

Thank you for your input!

DATE: 9-16-10

PLEASE PRINT

AS PRESIDENT OF THE SUNDOWN RANCHES HOA, WE  
WELCOME THE TRAINING COMPLEX. WE WANT TO HAVE  
THE BEST FIGHTING FORCE ON THE PLANET. AND IF  
THE EXPANDED/NEW COMPLEX HELPS. THEN WE ARE ALL  
FOR IT.

CE-1

AS AN AMERICAN I LIKE SEEING OUR WAR PLANES @ WORK.  
IN OUR REMOTE AREA, WE DON'T GET TO SEE IT  
MUCH.

*Scott Evans*

\*\*\* CONTINUE ON BACK FOR MORE SPACE \*\*\*

NAME:	SCOTT EVANS
ORGANIZATION:	SUNDOWN RANCHES HOME OWNERS ASSO. (HOA)
ADDRESS:	430 SUNDOWN TRAIL, P.O. Box 116
CITY/STATE/ZIP:	Upton, WY 82730

- ☐ Yes, please include me in the mailing list for distributing the EIS. I would like to receive a copy of the EIS in: ☐ hard copy format ☐ CD (electronic format)
- ☒ No, please do not include me in the mailing list for distributing the EIS. I do not wish to receive an EIS or further information.

Please note: Providing your private address information is voluntary. This information will be used to compile a mailing list for distributing future information regarding this EIS. Failure to provide such information will result in your name not being included on the list. Private address information will not be released for any other purpose unless required by law.

Please hand this form in at a public scoping meeting or mail before August 4, 2008 to:

Ms. Linda DeVine  
HQ ACC/A7PP  
129 Andrews Street, Room 317  
Langley AFB, VA 23665-2769



# **SOUTH DAKOTA STOCKGROWERS ASSOCIATION**

3039  
Kenny Fox, *President*  
foxtranch@gwtc.net  
(605) 344-2516

Shane Kolb, *Vice-President*  
lazyys@sdplains.com  
(605) 244-7145

Margaret Nachtigall, *Executive Director*  
margaret.sdsga@midconetwork.com  
(605) 342-0429

November 11, 2010

To:  
Linda Devine  
HQ ACC/A7PS  
129 Andrews St. Suite 337  
Langley AFB, VA 23665-2769

Re: Powder River Training Area Expansion - Comments

To Whom It May Concern:

**Background:**

The South Dakota Stockgrowers Association (SDSGA) is an organization of 1,300 cattle and sheep producers committed to representing the independent livestock producers in regards to the sustainability of their livelihoods.

SDSGA appreciates the opportunity to provide meaningful input regarding the expansion of the Powder River Training Complex.

**Comments:**

South Dakota livestock producers understand and support the need for military training for the security and benefit of our country.

We also understand and support the need for livestock producers whose livelihoods feed and promote the health and well being of the citizens of our country; whose inherent job it is to protect the land that is their sustaining factor. It is with these facts in mind that we oppose the expansion of the Powder River Training Complex as it is defined today. GE-2

1) Opposition to military aircraft flying at 500 feet altitude.

A.) At present there are over 300 private planes registered to people in this area. Many of these small planes belong to ranchers who use them in their day to day work. Some belong to people whose job is predator control. Some belong to people who use them for transportation to and from work in small towns. Crop sprayers who work seasonally according to certain crops, and only in weather conditions that prevent drift of spray, do not have the luxury of working according to a set schedule. PN-4  
SO-15  
SO-2

3039

11/11/2010

We have been told that Ellsworth must notify the Federal Aviation Administration two hours before a mission and that the information can be obtained by phone or website. We realize this is for the purpose of being a "good neighbor", and we certainly hope to be the same. However, many of these folks would be in the air before any given time; are not radio equipped, and often are not in close proximity to a computer or phone.

Am-12

The increased number of military aircraft in the area flying at that altitude is a danger to farmers, ranchers and business people who have the right and the need to use their small aircraft.

SA-7

2) Opposition to chaff and flares.

A.) We understand there is a "small" chance of a dropped flare igniting a fire. There is also a "small" chance of lightening striking the ground and causing a fire, but it happens. According to Ellsworth Air Force personnel "there would be roughly half a dozen flights a day at Powder River". That means there would be roughly half a dozen chances a day for the "possibility" of a fire. This would be extremely dangerous in oil and/or gas fields such as those in Harding County and parts of North Dakota, Montana and Wyoming.

SA-5

Although we were told by Air Force personnel that there has never been a fire from a flare, we understand a 17,000 acre fire near Atlantic City, New Jersey in 2007 was the result of a flare accidentally dropped from an Air Force aircraft.

3) We have found no evidence of an Environmental Impact Study on the effects of noise, chaff and flares over the habitat area of the Greater Sage Grouse. In March 2010, prior to the Powder River Training scoping meetings, the U.S. Fish and Wildlife Service listed this Sage Grouse as "Warranted but Precluded" under the Endangered Species Act.

B1-3

4) We appreciate the fact that the training area is directed away from major airports and commercial air-traffic lanes. However, several times we have heard Air Force personnel refer to the training area as a "sparsely populated" area. The reason it is sparsely populated is due to the fact that you cannot produce food to feed our nation in an urban area. It would seem as though the Air Force has established a certain distinction between urban and rural populations and has chosen an area of lesser importance instead of looking at *unpopulated* areas.

U-1

South Dakota Stockgrowers appreciate the opportunity to comment on this extremely important subject. We have the greatest respect for the United States Air Force and are fully aware of the need for their continued training and education. We hope those of you who make these decisions will also realize the importance of this country's farmers and ranchers and would have the same respect for our needs and will take our concerns into consideration as you make the final plans.

Most Sincerely,

Margaret Nachtigall, Executive Director  
South Dakota Stockgrowers Association

3040

**Written Comment Sheet**  
**Public Hearing for the Proposed Powder River Training Complex**

Thank you for your input!

DATE: 12-29-10

PLEASE PRINT

SEE ATTACHED LETTER

\*\*\*\* CONTINUE ON BACK FOR MORE SPACE \*\*\*\*

NAME:	<u>WILLIAM L. NEUMILLER</u>
ORGANIZATION:	<u>PPL MONTANA</u>
ADDRESS:	<u>PO BOX 38</u>
CITY/STATE/ZIP:	<u>COLSTRIP, MT. 59323</u>

- ☒ Yes, please include me in the mailing list for distributing the Final EIS. I would like to receive a copy in: ☒ CD (electronic format) ☐ hard copy format
- ☐ No, please do not include me in the mailing list for distributing the Final EIS. I do not wish to receive an EIS or further information.

PLEASE NOTE: This Draft EIS is provided for public comment in accordance with the National Environmental Policy Act (NEPA), the President's Council on Environmental Quality (CEQ) NEPA Regulations (40 CFR §§1500-1508), and 32 CFR §989, Environmental Impact Analysis Process (EIAP).

The EIAP provides an opportunity for public input on Air Force decision-making, allows the public to offer inputs on alternative ways for the Air Force to accomplish what it is proposing, and solicits comments on the Air Force's analysis of environmental effects.

When making an oral comment, please clearly state your name and the name of the organization, if any, which you are representing before you begin your comments. Please do not provide any other personal information, such as your home address and phone number when making an oral comment. Your oral comments will be used to develop a transcript and permanent record of this meeting. This transcript will be published in the FEIS. If you would like a copy of the Final EIS or other associated documents, you may state that on a written comment card or add your name and address to the mailing list.

Providing personal information is voluntary. If you choose to not provide personal identifying information, your comments will be given the same weight and consideration as any other comments submitted. Private addresses provided will be compiled to develop the mailing list for those requesting copies of the Final EIS. Only the names of the individuals making comments and specific comments will be disclosed. Personal home addresses and phone numbers will not be published in the Final EIS.

Please hand this form in at a public hearing or mail before November 15, 2010 to:

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

EXTENDED TO  
JANUARY 3, 2011

December 29, 2010

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley Air Force Base, VA 23665-2769

RE: Proposed Powder River Training Complex

Dear Ms. DeVine

Thank you for allowing us to comment on the Proposed Powder River Training Complex EIS. We are a 2300 megawatt Coal Fired Steam Electric Station located in Colstrip on Highway 39 thirty miles south of Forsyth. We are located in the proposed PR-1 High Military Operation Action Area and just north of the PR-1B high Military Operation Action area that covers the Northern Cheyenne Indian Reservation.

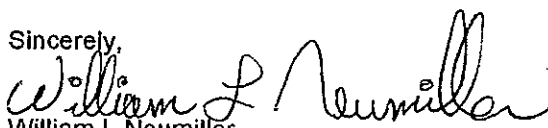
In Alternative A of the Proposed EIS, Large Force Exercises will be conducted 1-3 days per quarter or 10 days annually. In light of the Homeland Security Act and the safety and security of our employees here at the Colstrip Steam Electric Station, we are requesting a notification process be added to the Proposed Action and Alternative Action Items in the Environmental Impact Statement (EIS).

A notification of when LFE's (Large Force Exercises) will occur in our area will allow our manager and our security department to have this information available in case questions arise from our employees about activities in the air space above our power plants. It would also be a good idea to contact the police and sheriffs offices in the towns of the affected areas during LFE's. In our situation, we are thinking an email to our security department and to our plant manager would be sufficient notice. The timing should be 2-3 days notice prior to the start of the LFE's

AM-12

Thank you again for allowing us to comment on your Powder River Training Complex EIS.

Sincerely,

  
William L. Neumiller  
Senior Environmental Engineer  
PPL Montana - CSES

3041

Nov. 12, 2010

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews St., Suite 337  
Langley AFB, VA 23665-2769

Dear Ms. DeVine:

The North Dakota Stockmen's Association (NDSA) is an 81-year-old trade organization that represents nearly 3,000 North Dakota beef cattle producers. Our association is a strong supporter of the U.S. military and credits the freedoms we enjoy and the ability we have to live out our American dream, raising cattle and providing a safe, wholesome product for consumers, to the hard work and sacrifices of past and present soldiers.

Our members understand the importance of training and equipping our forces so they are able to protect our nation and defend our way of life. Yet, the massive proposed expansion of and the low-level flight involved with the Powder River Training Area could negatively impact livestock operations in the region, and we urge you to instead consider other alternatives to improve military readiness and expertise.

Our members identified the following major concerns with the Powder River Training Complex proposal in a policy resolution at our recent convention: possible interference with producers checking livestock with small aircrafts at similar altitudes, the potential of fires when flares are released and the startling of livestock due to noise. SA-7

We understand that flares are only being planned for higher-elevation flights, which should allow for burnout before they near the surface, but we are concerned that if those thresholds are not followed and flares are accidentally deployed, serious damage could result, like in the May 2007 accident in the Warren Grove area in New Jersey. The Environmental Impact Statement indicates that the use of flares would be suspended when the fire danger reaches the "extreme" category. The proposed expansion area in North Dakota, however, is big grasslands country, often with lots of "fuel" for prairie fires. Consequently, we believe that a much lower fire danger category would have been a more appropriate trigger. SA-5

The Environmental Impact Statement points out that "increases in the Day-Night Average Sound Level and individual noise events from an aircraft overflight would be noticed and could be perceived as a significant impact by residents under the airspace." Livestock producers agree and find the low-level flights, such as the B-1 missions proposed, where adjusted sound exposure levels could hit as high as 133 dB, a particular concern. The uncertainty of low-level overflight and the inability to anticipate when such an overflight could occur would contribute to the startle effect of animals. This, of course, could result in livestock fleeing, breaking loose and/or causing infrastructure damage and/or injury or death to themselves or humans tending to their care. B1-4

We appreciate the inclusion of the "temporary avoidance areas" in the plan; however, must point out several limitations with this concept. The Environmental Impact Statement identifies branding and weaning as potential activities, which could be indicated as times to avoid upon arrangements between air space managers and livestock producers. Those activities would certainly be ones to avoid, but it is important for planners to understand that these are not the only times when livestock would be gathered, penned and have an increased tendency to spook. For instance, backgrounding and finishing are growing enterprises in this region, and complement the already prevalent cow-calf production that occurs there. Considering the functions of these cattle enterprises, it is not unusual for some cattle to be corralled for three to six or even more months out of the year, so the temporary avoidance concept may not be workable for military officials. Another question that arises is how livestock producers would "register" these avoidance areas, and how much notice would have to be given so trainees could adjust their routes? Unfortunately, Mother Nature "unplans" many work plans on livestock operations, and, consequently, producers need the flexibility to respond to whatever the conditions allow them to do without the delay of any sort of waiting or processing period. SD-13

The Environmental Impact Statement indicates a desire to minimize the annoyance that the expanded training area would cause for residents. Have planners considered putting applicable farmsteads on a permanent avoidance area list, and, if so, would that be a practical option? W-2

3041

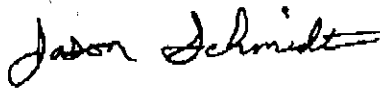
We would also appreciate more information regarding the proposed threat emitter sites. The Environmental Impact Statement alludes to some of the details, but does not include many specifics, like the number of sites being proposed. Are plans to lease the acreage for all sites, or would some property be acquired as well?

cm-2

In summary, the North Dakota Stockmen's Association supports U.S. troops, the defenders of our democracy; however, livestock producers have significant concerns about the proposed Powder River Training Complex expansion project and, therefore, encourage the utilization of current or alternative options that would be less intrusive.

We appreciate this opportunity to comment and ask questions about the proposed plan.

Sincerely,



Jason Schmidt, President  
North Dakota Stockmen's Association

3042



"VARIETY IN HUNTING AND FISHING"

**NORTH DAKOTA GAME AND FISH DEPARTMENT**

100 NORTH BISMARCK EXPRESSWAY BISMARCK, NORTH DAKOTA 58501-5095 PHONE 701-328-6300 FAX 701-328-6352

Ms. Linda DeVine  
HQ ACC/A7PP  
129 Andrews Street, Room 317  
Langley AFB, VA 23665-2769

11-9-10

I am the pilot for the North Dakota Game and Fish Department and am responding to the proposed Powder River Training Complex (PRTC). The NDGF has two aircraft and eight vender aircraft which are used extensively in the area proposed as well as in the current Powder River MOA and ATCAA.

Being the NDGF Aviation Department and an avid general aviation enthusiast, I strongly oppose any increase in the size of the existing Powder River MOA and ATCAA. I recommend the "No Action Alternative" based on the following reasons:

GE-2

The department can have surveys, surveillance missions and radio telemetry work going on nearly every day of the week using the two department aircraft and vender aircraft. A great percentage of this is done in the south western part of the state as well as telemetry work done in South Dakota and Montana as far south as the Wyoming border. Reducing the regularity of these flights due to a "hot MOA" combined with weather considerations would cause time constrictions that would be unworkable. It is understood that this expanded area would not be a "Restricted Air Space" and that civil operations would be allowed, but to rely on see and avoid tactics with 400 mph to 500 mph closing speeds is unrealistic.

SA-8

Sincerely,  
Jeff Faught

A handwritten signature in cursive script, appearing to read "Jeff Faught".

Pilot  
North Dakota Game and Fish Department  
701-220-7248



3043

From: North Dakota Aeronautics Commission  
PO Box 5020  
Bismarck, ND 58502

To: Linda DeVine, HQ ACC/A7PS, (PRTC EIS)  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

Manager, Operations Support Group, ATO Central Service Center, AJV-C2  
Airspace Study 10-AGL-6NR  
Department of Transportation  
Federal Aviation Administration  
2601 Meacham Blvd  
Fort Worth, TX 76137

November 8, 2010

Subject: Comments on the Powder River Environmental Impact Study

**Executive Summary:**

The Powder River Military Operations Area (MOA) is presently located primarily in Montana. Additional airspace is being requested by the 7<sup>th</sup> Bomb Wing from Ellsworth Air Force Base, South Dakota. The 5<sup>th</sup> Bomb Wing from Minot Air Force Base, North Dakota would be an additional user. Air warfare has changed, and additional air space is being requested to provide realistic training for these and others. The requested airspace would expand to approximately four times the original MOA, and affect North Dakota from Bismarck south and west to the borders, and from 500 feet above the ground to 60,000 feet. Options were given, with option A being what was requested by the Air Force, option B expanding only into North Dakota, option C expanding only into Montana, and a no-action alternative.

The North Dakota Aeronautics Commission attended each Environmental Impact public hearing and noted citizen's concerns at each hearing. In addition, the commission has received numerous additional inputs as the proposed airspace debate gained publicity. The North Dakota Aeronautics Commission recommends option C, since it would satisfy all of the military's needs while minimizing the negative impacts to our state. Option C, as was stated by the Air Force at these hearings, would be the preferred option because this plan would allow for continued economic prosperity and quality of life while allowing the military to satisfy all of its training needs, including mountainous terrain training in the western portion of the proposed MOA.

DD-5



2043

Factors leading to this decision:

The following topics reflect the concerns of North Dakota's citizens which would need to be addressed if the Powder River 4 MOA sector (the eastern portion) was to become active:

#### Airlines

- The city of Dickinson has benefited greatly from the Department of Transportation's Essential Air Service program, helping small cities to connect with the rest of the country. The goal of the program is to build an airline infrastructure to become independent of funding in the future. In recent years, the oil development has helped to increase loads toward 10,000 passengers, a significant threshold for FAA funding increases from \$150,000 to \$1 million annually. Ten days of cancelled flights due to military operations could make the difference in making this threshold.

SO-5

#### Corporate/Charter

- FAR Part 135 flight operations and company operations specifications requirements often dictate that flights must be conducted on instrument flight plans (IFR). Flights would not be permitted through any airspace that is active or scheduled, severely limiting these companies. This uncertainty of available airspace would make it prudent to change a company's destination. These communities count on the oil industry, hunting and tourism for a large part of their livelihood. If the destination changes, the community suffers.

SO-9

#### Aerial Applicators

- 127,060 acres were sprayed in southwest North Dakota associated with the proposed MOA in the previous year. The Federal Aviation Regulation 91.119 requires aerial applicators to fly at least 500 feet above any person or structure when transiting between fields and their airport. This puts the sprayers at the same critical altitude where the crews of large, high-speed military aircraft are concentrating on terrain following training and tactical maneuvers.

SA-15

#### Private Pilots

- During a period of declining pilot numbers, this airspace would limit the state's ability to produce new pilots. Concerns of special use airspace would keep any prudent student from flying where their skills at see-and-avoid would be critically tested. The proposed military airspace is below radar contact, and visual is the only means of separation at 600 knots closing speeds.

SO-26

- The sector gaps are intended to allow transit on VOR navigation, or Victor airways. These airways are no longer the normal means of navigation, but a hold-over from before the advent of GPS. Pilots generally fly direct to save time and fuel, and the FAA's NexGen plan reinforces this. The airways can be used to avoid the MOA, but at an increased cost to the flying public.

SO-7

### FBOs

- Fixed-base operators are the anchor points for general aviation. They survive through the combined income of fuel sales, flight training, aircraft rentals, and hangar fees. Civil flight training will be curtailed without adequate training areas for student pilots. Flight paths for transient aircraft will change to avoid potential airspace restrictions, losing fuel and other sales at the FBOs. An FBO in Bismarck anticipates a loss of \$300,000 in revenue annually.

SO-5

SO-7

### Local Communities

- Cattle herdsman at the hearings passionately objected to the low altitude aspects of the proposal. Many grew up in the same area when B-52s flew low altitude routes, and saw the devastation of startled cattle, breaking necks and limbs against stockade fencing. Even the most positive of the ranchers asked, "Please- can you just give me a number to call a real person when my year's income is killed in a stampede?"
- A Real estate agent knows what makes the property valuable – they value the peace and serenity that gave people a reason to live there. Many people noted the "startle" effect on a fly-over at 500 feet for unsuspecting people.

SO-13

GE-8

SO-1

### Weather Modification

- Crops and homes are kept safe by aerial hail suppression, which requires quick response, accurate radar imagery, and precise cloud seeding. By design, the chaff which will be deployed ruins the weather radar returns, putting a halt to their business. Cloud seeding often requires close proximity to the clouds or penetration, dictating the need for an instrument (IFR) clearance. IFR is not permitted in the active MOA, halting cloud-seeding operations and putting homes and agriculture at risk for damage from the weather.

SO-28

### Clinics

- Approximately 80 medical flights each month originate in Bismarck. Doctors and their staff would not accept the loss of revenue associated with driving between their homes and outlying clinics. Flights requiring an IFR clearance could not be conducted into an active or scheduled MOA, and the proposed time of MOA activity (07:30- 12:00) corresponds with the times needed to deliver these medical teams to rural clinics. Cancellations or delays would jeopardize the clinics in the rural areas including the towns of Hettinger and Bowman.

SO-5

### Air ambulance operations

- The EIS implies that most air ambulance flights are below 10,000'. The majority of air ambulances are now pressurized turboprops operating above these altitudes. Rural communities have been assured that all military operations will cease in the event of an air ambulance operation, but the FAA and Air Force should be aware that the aircraft may be operating between Flight Level 180 and 250.

SA-18

### Tribal Concerns

- Separate and private hearings were conducted at the tribal reservations. Concerns were stated, but were not submitted to the aeronautics commission.

NA-7

### Aerial Wildlife surveys and predator control

- This topic is important to North Dakota, but will be detailed through the response from the North Dakota Game and Fish Department.

SD-15

### Conclusion

Option C, which excludes the area in western North Dakota, would provide the additional airspace and geography needed for the additional training required by the Air Force without deteriorating North Dakota's economic, environmental, and quality of life elements. The public input was emotional and well documented across the state. The reasons against the Powder River 4 MOA varied between the different communities of North Dakota, but the solutions to each community's concerns could be solved by selecting Option C of the Environmental Impact Proposal. Regardless of the final decision, the following modifications would minimize the negative effects on North Dakota:

DD-5

1. Attempt to shrink the North Dakota area as much as possible ... exclude areas around cities and airports.
2. Raise the minimum altitude as much as possible. A floor of 10,000 within the eastern sector would allow for most business to continue and limit the hazards caused by high-speed military aircraft and their operations.

AM-5

PN-4

3044

## Written Comment Sheet

### Public Hearing for the Proposed Powder River Training Complex

Thank you for your input!

DATE: 4-21-10**PLEASE PRINT**

Due to the economic activity related to natural resource development in our community, I have concerns with the flight space proposed interfering with our airport expansion and any expansion of constructed or proposed wind farms in our area. While I believe training for the Air Force is essential, I would request flights near Bowman County to be at higher altitudes near 14000 ft. My daily duties require me to try to develop improved living quality of life, these govt and other inv flights I believe will be a public nuisance or impact our daily living. My greatest concern however involves the chaff.

Am-5  
SO-17  
LU-2

\*\*\*\* CONTINUE ON BACK FOR MORE SPACE \*\*\*\*

NAME: <u>Ashley Alderson</u>
ORGANIZATION: <u>Bowman County Development Corp</u>
ADDRESS: <u>PO Box 1143</u>
CITY/STATE/ZIP: <u>Bowman, ND 58623</u>

Yes, please include me in the mailing list for distributing the Final EIS. I would like to receive a copy in: ☒ CD (electronic format)

☐ hard copy format

No, please do not include me in the mailing list for distributing the Final EIS. I do not wish to receive an EIS or further information.

**PLEASE NOTE:** This Draft EIS is provided for public comment in accordance with the National Environmental Policy Act (NEPA), the President's Council on Environmental Quality (CEQ) NEPA Regulations (40 CFR §§1500-1508), and 32 CFR §989, Environmental Impact Analysis Process (EIAP).

The EIAP provides an opportunity for public input on Air Force decision-making, allows the public to offer inputs on alternative ways for the Air Force to accomplish what it is proposing, and solicits comments on the Air Force's analysis of environmental effects.

When making an oral comment, please clearly state your name and the name of the organization, if any, which you are representing before you begin your comments. Please do not provide any other personal information, such as your home address and phone number when making an oral comment. Your oral comments will be used to develop a transcript and permanent record of this meeting. This transcript will be published in the FEIS. If you would like a copy of the Final EIS or other associated documents, you may state that on a written comment card or add your name and address to the mailing list.

Providing personal information is voluntary. If you choose to not provide personal identifying information, your comments will be given the same weight and consideration as any other comments submitted. Private addresses provided will be compiled to develop the mailing list for those requesting copies of the Final EIS. Only the names of the individuals making comments and specific comments will be disclosed. Personal home addresses and phone numbers will not be published in the Final EIS.

**Please hand this form in at a public hearing or mail before November 13, 2010 to:**

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

and its effect on our local Bannock Radar. While this radar is most utilized during the summer months by the weather modification program, it is in the process of being up and running year round. This radar is vital to our area due to the lack of radar coverage from Bismarck and City of Billings. Because these three radars are a good distance away, none of them accurately cover Bannock County. Again, we need radar coverage & without the Bannock Radar - we have none. The economic impact from severe weather on our agricultural community is huge. Our farmers & ranchers need to have radar coverage to see approaching storms and the increased protection from the weather modification program. This program's hail suppressing activities are proven successful and protect our agricultural community from great loss, not to mention the loss to property caused

from hail damage. Funding using drift near our radar is very important and appreciated.

As a community we support our Armed Forces and we appreciate the opportunity to have public input in this project.

Thank you for your consideration of our concerns & compromise on these important issues.

5A-16

NP-3

3045

Written Comment Sheet  
Public Hearing for the Proposed Powder River Training Complex

Thank you for your input!

DATE: \_\_\_\_\_

PLEASE PRINT

WE'VE HAD B-52 TRAINING FLIGHTS SINCE  
THE 80'S - HOW LONG IS THIS PROGRAM  
SCHEDULED FOR? - AS A COUNTY COMMISSIONER  
FOR FALLON COUNTY IN MONTANA - I HAVE  
CONCERNS FOR THE OPERATION OF OUR  
LOCAL AIRPORT - COMMERCIAL PILOTS  
(BRINGING IN OUR FIELD EXECUTIVES) HAVE  
TOLD OUR AIRPORT MANAGER THEY WILL  
BE AVOIDING OUR AIRPORT WITH THE  
IMPLICATION OF THIS PROGRAM IN ITS  
PRESENT FORM. THERE IS PLANS TO  
(SEE BACK)

50-10

NAME:	WILLIAM L. RANDASH
ORGANIZATION:	FALLON COUNTY COMMISSION
ADDRESS:	BOX 846
CITY/STATE/ZIP:	BAKER, MONT 59313

Yes, please include me in the mailing list for distributing the Final EIS. I would like to receive a copy in: ☐ CD (electronic format) ☐ hard copy format

No, please do not include me in the mailing list for distributing the Final EIS. I do not wish to receive an EIS or further information.

PLEASE NOTE: This Draft EIS is provided for public comment in accordance with the National Environmental Policy Act (NEPA), the President's Council on Environmental Quality (CEQ) NEPA Regulations (40.CFR §§1500-1508), and 32 CFR §989, Environmental Impact Analysis Process (EIAP).

The EIAP provides an opportunity for public input on Air Force decision-making, allows the public to offer inputs on alternative ways for the Air Force to accomplish what it is proposing, and solicits comments on the Air Force's analysis of environmental effects.

When making an oral comment, please clearly state your name and the name of the organization, if any, which you are representing before you begin your comments. Please do not provide any other personal information, such as your home address and phone number when making an oral comment. Your oral comments will be used to develop a transcript and permanent record of this meeting. This transcript will be published in the FEIS. If you would like a copy of the Final EIS or other associated documents, you may state that on a written comment card or add your name and address to the mailing list.

Providing personal information is voluntary. If you choose to not provide personal identifying information, your comments will be given the same weight and consideration as any other comments submitted. Private addresses provided will be compiled to develop the mailing list for those requesting copies of the Final EIS. Only the names of the individuals making comments and specific comments will be disclosed. Personal home addresses and phone numbers will not be published in the Final EIS.

Please hand this form in at a public hearing or mail before November 13, 2010 to:

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

LENGTHEN OUR LANDING STRIP BY  
1000' FEET - LAND HAS BEEN ~~RENTED~~  
PURCHASED & BIDS ARE ABOUT TO  
BE LET. GRANTED FEDERAL MONEY SO-10  
IS THE PRIMARY FUNDING AGENCY -  
BUT WHAT A WASTE OF TAX PAYER'S  
MONEY IF THE STRIP IS NOT  
GOING TO BE USED.

I DO REALIZE THAT TRAINING  
OUR PILOTS AND AIR CREWS  
IS ESSENTIAL. PN-1

3046

# Written Comment Sheet

## Public Hearing for the Proposed Powder River Training Complex

Thank you for your input!

DATE: 10/14/10

PLEASE PRINT

THE AIR FORCE NEEDS TRAINING, THEY  
PROTECT US FROM FOREIGN ENEMIES  
WE NEED TO SUPPORT THEM WITH THEIR TRAINING  
NEEDS.  
I AM PROUD TO SEE THE PLANES IN THE  
AIR EVEN IF SOMETIMES THEY SCARE THE XXXX  
OUT OF ME.  
THE AIR FORCE HAS ALWAYS BEEN EASY TO WORK  
WITH @ OUR LOCAL GOVT, "COUNTY"

\*\*\*\* CONTINUE ON BACK FOR MORE SPACE \*\*\*\*

NAME:	RUSTY TARDRE
ORGANIZATION:	CARTER CO. SHERIFF
ADDRESS:	
CITY/STATE/ZIP:	BEAVER, MT. 59324

- ☐ Yes, please include me in the mailing list for distributing the Final EIS. I would like to receive a copy in: ☐ CD (electronic format) ☐ hard copy format
- ☐ No, please do not include me in the mailing list for distributing the Final EIS. I do not wish to receive an EIS or further information.

PLEASE NOTE: This Draft EIS is provided for public comment in accordance with the National Environmental Policy Act (NEPA), the President's Council on Environmental Quality (CEQ) NEPA Regulations (40 CFR §§1500-1508), and 32 CFR 5989, Environmental Impact Analysis Process (EIAP).

The EIAP provides an opportunity for public input on Air Force decision-making, allows the public to offer inputs on alternative ways for the Air Force to accomplish what it is proposing, and solicits comments on the Air Force's analysis of environmental effects.

When making an oral comment, please clearly state your name and the name of the organization, if any, which you are representing before you begin your comments. Please do not provide any other personal information, such as your home address and phone number when making an oral comment. Your oral comments will be used to develop a transcript and permanent record of this meeting. This transcript will be published in the FEIS. If you would like a copy of the Final EIS or other associated documents, you may state that on a written comment card or add your name and address to the mailing list.

Providing personal information is voluntary. If you choose to not provide personal identifying information, your comments will be given the same weight and consideration as any other comments submitted. Private addresses provided will be compiled to develop the mailing list for those requesting copies of the Final EIS. Only the names of the individuals making comments and specific comments will be disclosed. Personal home addresses and phone numbers will not be published in the Final EIS.

Please hand this form in at a public hearing or mail before November 15, 2010 to:

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769



3047

# Written Comment Sheet

## Public Hearing for the Proposed Powder River Training Complex

Thank you for your input!

DATE: \_\_\_\_\_

PLEASE PRINT

The proposed area includes areas of excellent potential for the development of wind energy. We would request ~~that~~ a firm definitive statement that this federal action would not result in limitations or constraints on the development of wind energy projects - either by the Federal Aviation Administration or the military. NP-6

\*\*\*\* CONTINUE ON BACK FOR MORE SPACE \*\*\*\*

NAME:	Ron Rebenitsch
ORGANIZATION:	Basin Electric Power Cooperative
ADDRESS:	1717 E Interstate Ave
CITY/STATE/ZIP:	Bismarck, ND 58503

Yes, please include me in the mailing list for distributing the Final EIS. I would like to receive a copy in: ☐ CD (electronic format) ☐ hard copy format

☒ No, please do not include me in the mailing list for distributing the Final EIS. I do not wish to receive an EIS or further information.

PLEASE NOTE: This Draft EIS is provided for public comment in accordance with the National Environmental Policy Act (NEPA), the President's Council on Environmental Quality (CEQ) NEPA Regulations (40 CFR §§1500-1508), and 32 CFR §989, Environmental Impact Analysis Process (EIAP).

The EIAP provides an opportunity for public input on Air Force decision-making, allows the public to offer inputs on alternative ways for the Air Force to accomplish what it is proposing, and solicits comments on the Air Force's analysis of environmental effects.

When making an oral comment, please clearly state your name and the name of the organization, if any, which you are representing before you begin your comments. Please do not provide any other personal information, such as your home address and phone number when making an oral comment. Your oral comments will be used to develop a transcript and permanent record of this meeting. This transcript will be published in the FEIS. If you would like a copy of the Final EIS or other associated documents, you may state that on a written comment card or add your name and address to the mailing list.

Providing personal information is voluntary. If you choose to not provide personal identifying information, your comments will be given the same weight and consideration as any other comments submitted. Private addresses provided will be compiled to develop the mailing list for those requesting copies of the Final EIS. Only the names of the individuals making comments and specific comments will be disclosed. Personal home addresses and phone numbers will not be published in the Final EIS.

Please hand this form in at a public hearing or mail before November 13, 2010 to:

Ms. Linda DeVine  
 HQ ACC/A7PS  
 129 Andrews Street, Room 337  
 Langley AFB, VA 23665-2769

3048

# MEMO

DATE: September 20, 2010  
TO: The United States Air Force  
FROM: Holly Waddell, Chairman, Dakota Rural Action  
SUBJECT: Expansion of the Powder River Training Complex

*Holly Waddell*

Thank you for your time in considering the public comments presented at the various hearings being held. NP-3

On behalf of Dakota Rural Action (DRA), I wish to present this copy of DRA's policy in regards to the proposed expansion of the Powder River Training Complex. Our membership adopted this resolution in 2008 and members still have grave concerns about this proposal. DRA is a family agriculture and conservation group organized to help South Dakotans preserve the family farm and ranch, the environment, and our unique way of life. Offices are located at 910 Fourth Street, Ste. A, in Brookings, South Dakota; phone 605-697-5204.

## OPPOSITION TO EXPANSION OF THE POWDER RIVER TRAINING COMPLEX (adopted 2008)

WHEREAS, The United States Air Force and Ellsworth Air Force Base is proposing an expansion to its Powder River Training Complex which would:

1. Expand and enhance the existing Powder River Complex (PRC), which currently has both airspace and ground-based Air Force training assets in South Dakota, Wyoming, Montana, and North Dakota
2. Add new airspace with a floor of 500 feet and eliminate some existing airspace
3. Support additional ground-based simulated threat emitters under the Military Operations Areas (MOAs)
4. Authorize use of defensive chaff and flares throughout the special use airspace
5. Permit supersonic flight above 10,000 feet throughout the special use airspace
6. Support large force (over 20 aircraft) exercises (Federal Register: May 29, 2008 Volume 73, Number 104), and

WHEREAS, the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S.C. 4321, et seq.) requires the Federal Government to coordinate with counties which have a Natural Resource Plan; and

WHEREAS, Jet plane take-offs produce 120 decibels, and noise levels greater than 85 decibels are hazardous to hearing and regular exposure of more than one minute at 110 decibels or louder can cause permanent hearing loss; and NO-5

WHEREAS, There are no provisions for airborne access to any municipal or private airstrips except Rapid City Regional severely limiting private air travel, crop dusters, ambulance aircraft ability to travel with no provision for reimbursement of fuel or time consumption; and SO-7

WHEREAS, Chaff is composed of aluminum-coated glass fibers that reflect radar being released in packets of 0.5 to 100 million fibers, which is determined to be necessary by the Department of Defense, but is known to affect human health, public safety by interfering with air traffic control radar and weather radar observations, electrical equipment, and impacts to wildlife and food supplies in an agricultural area are unknown; and SA-14  
SA-16

WHEREAS, 'Flares' burn at 2000 degrees and pose a serious fire risk if they are ejected as proposed, at less than 1500 feet over an area that depends on voluntary fire departments and 'Duds' (flares which failed to ignite), that fall to the ground can endanger people or animals as they contain magnesium and lead; and SA-5

WHEREAS, official Air Force policy precludes wind energy development due to radar interference; now SO-17

THEREFORE BE IT RESOLVED, that Dakota Rural Action calls for full coordination between the US Air Force, Ellsworth Air Force Base and the impacted local governments and agencies to ensure minimal impact of the expanded airspace to human and animal health, the environment and natural resources, and use of local infrastructure necessary for maintaining a rural quality of life; and NP-10  
W-1

BE IT FURTHER RESOLVED that any airspace used by the Air Force is rented from the landowner, with annual payments (not perpetual easements) to compensate for the use of the land including, but not limited to impacts to agriculture and wind energy production potential. SO-1  
SO-17

**Written comments**  
**Proposed Powder River Training Complex**

Continuing economic development efforts and retaining quality of life in Grant County, North Dakota, is extremely important to the Grant County Job Development Authority (JDA) and all of Grant County. Consequently, the Grant County JDA requests the following concerns be addressed in regards to the proposed Powder River Training Complex:

1) With respect to Grant County and North Dakota, would the proposed airspace expansion hinder the day-to day operation of the existing communications towers (i.e. cell, radio, microwave, etc.) which are within the confines of the proposed airspace expansion?

SD-17

2) Grant County is the potential site for wind energy development; the county currently has developers considering the construction of wind farms in the county. One developer is in the queue with the Federal Energy Regulatory Commission. With respect to Grant County and North Dakota, would the proposed airspace expansion affect the development of wind tower sites within the confines of the proposed airspace expansion?

SD-17

3) Would aircraft flying in the vicinity of wind turbine farms negatively impact the mechanical operation and/or electrical generating capacity of these machines?

EA-24

4) What is the approximate number of flights (low and high estimates) we can expect to occur in the proposed expansion on a daily, weekly and monthly basis?

AM-27

5) Grant County depends upon regional air ambulance and helicopter medical evacuation (MEDEVAC) capability to transport patients who are in danger of losing life, limb or eyesight. Will the USAF give these flights priority over its scheduled military training?

SA-19

6) With respect to Grant County and North Dakota, will the infrastructure exist (assigned civilian compatible frequencies, repeaters, etc.) for air ambulance and MEDEVAC operators on lifesaving missions to be able to directly communicate their need for airspace with the authority (FAA, military controllers, etc.) in charge of this airspace?

AM-3

Respectfully submitted,

Luann Dart, director  
Grant County JDA  
PO Box 309  
Elgin, ND 58533

# Alaska Airlines

3050

November 5, 2010

Ms. Linda DeVine  
HQ ACCC/A7PP  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

Dear Ms. DeVine:

Alaska Airlines (ASA) has reviewed the Draft Environmental Impact Statement for the Proposed Powder River Training Complex (PRTC). We appreciate the opportunity to provide our comments on the impacts this proposal will have on civil aviation.

The proposed PRTC greatly expands MOAs and ATCAAs over North Dakota, South Dakota, Wyoming and Montana. The proposed expansion controls the airspace from the surface to FL600 resulting in significant negative impacts to commercial aviation. It will routinely cause re-routes that increase track miles, increase fuel burn and emissions, and reduce operational reliability. Additionally, it will degrade the safety of our flights because this proposal eliminates severe weather avoidance route options.

## Routes

Alaska Airlines' primary and alternate weather routes go through the proposed PRTC. Twenty-five flights per day would be directly impacted by the ATCAA during the proposed hours of operation. Per the DEIS, the PRTC could be scheduled "other times by NOTAM", permitting military access to the MOA 24 hours per day. In a 24 hour period, up to 38 Alaska Airlines' flights could be impacted if the ATCAA is activated above FL260.

SD-8

## Fuel Burn/Emissions

Changing our primary route around the proposed PRTC between SEA and DCA would add 36 miles per flight (or 700 lbs of fuel). Just this one re-route would burn 153,000 additional gallons of fuel per year. The increased fuel burn adds up quickly when considering all of ASA's impacted flights both in cost (estimated to be in the millions of dollars annually), and environmental impacts from increased emissions.

SD-7

In addition to burning fuel to fly the extra distance, we will burn additional fuel to carry this fuel. For example, from SEA to DCA, the cost to carry the extra 700 lbs of fuel to fly around PRTC is about 70 lbs. Even if the military releases the airspace tactically, the extra fuel needs to be carried for dispatch purposes. To avoid carrying this fuel, we would need to know the airspace is available 5 to 6 hours prior to flight through it.

SD-7

**Severe Weather**

Due to restrictive airspace constraints on the East Coast, it is essential for us to have route flexibility leading up to the constrained "catch points". On a daily basis, our routes could flex dramatically over the course of several hours due to weather. Because of the turbulence over and along the east side of the Rocky Mountains, Alaska Airlines reroutes flights further north than optimal to ensure they are safe from severe weather and turbulence hazards. The proposed ATCAA above FL260 prevents this northerly reroute away from terrain and would force flights into airspace that is already constrained by numerous MOAs and ATCAAs in the southwest increasing flight distance by more than 100 miles.

SD-8

**Cumulative Impacts**

While the direct impacts of delays, inefficient routings, and reduced weather avoidance routes are significant, the indirect impacts of flights being rerouted around the PRTC also need to be considered. According to the DEIS, more than 500 daily IFR flights between 18,000' and FL370 currently fly through the proposed PRTC. These aircraft would be forced to funnel through narrow corridors, similar to what happens today in the southwest due to military complexes R2508 and R4800. This compounds the impacts for the flights directly impacted as well as the traffic that now has to share the remaining available airspace.

SA-3

Alaska Airlines has determined that any expansion of the PRTC airspace above FL260 will cause safety concerns and an undue financial burden. We oppose development of the Powder River Training Complex as proposed and would like to work with the Air Force to develop an alternative that balances the needs of the military with those of commercial aviation.

GE-2

GE-11

Sincerely,



Captain Gary Beck  
Vice President, Flight Operations

# AOM

"The Voice of Aviation in Montana"

## Aviation Organizations of Montana

November 12, 2010

Ms. Linda Devine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

Dear Ms. Linda Devine,

As the current President of the Board for the Aviation Organizations of Montana, I was requested to make written comment concerning the proposed expansion of the Powder River Military Operations Area. Of these organizations, some have been in existence for many years, one since 1939. At our last board meeting which was held October 16<sup>th</sup> 2010, we had a lengthy discussion concerning the proposal. At the conclusion of the discussion we had a unanimous vote of those attending to voice our negative opinion. This proposal would be detrimental to aviation as a whole in the State of Montana. The restrictions to commercial and private instrument flights would not be economically feasible to be rerouted during the times of activation, which would be quite extensive. With flight levels from 500 feet above ground level to 45000 feet above ground level, there is nothing that can penetrate this airspace safely with "see and avoid" tactics. Spray plane pilots and ranchers occupy the lower levels, with commercial and general aviation pilots occupying the middle to upper levels of airspace from approximately 1000 feet above ground level to a maximum of 45000 feet above ground level. We do not believe the full economic impact has been properly addressed and we are in agreement with many of our elected Montana officials. This is simply not a good proposal for the State of Montana. The Aviation Organizations of Montana is comprised of the following:

- |   |  |
|---|--|
| 1. Montana Pilots' Association                  | 8. Montana Airport Managers Association    |
| 2. Montana 99's                                 | 9. Montana Antique Airplane Association    |
| 3. Montana Flying Farmers                       | 10. Montana Seaplane Association           |
| 4. Experimental Aircraft Association            | 11. Montana Civil Air Patrol               |
| 5. Montana Community Airport Assoc.             | 12. Aircraft Owners and Pilots Association |
| 6. Montana Aviation Trades Association          | 13. Montana Aeronautics Division of the    |
| 7. Association of Montana Aerial<br>Applicators | Department of Transportation               |

3051

As you can tell from the list above this represents most aviation aspects in the State of Montana. With all due respect we would like to see the Airforce adopt option D. which would be no change to the current Powder River Military Operations Area. GE-2

Sincerely,

*Wade Cebulski*

Wade Cebulski, President  
Aviation Organizations of Montana  
P.O. Box 333  
Seeley Lake, MT 59868

cc.

FAA

Senator Max Baucus

Senator Jon Tester

Congressman Denny Rehberg



421 Aviation Way  
Frederick, Maryland 21701

T. 301-695-2000  
F. 301-695-2375

[www.aopa.org](http://www.aopa.org)

November 11, 2010

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

Re: Draft Environmental Impact Statement for Powder River Training Complex

Ms. DeVine,

The Aircraft Owners and Pilots Association (AOPA) represent the interests of more than 410,000 general aviation pilots and aviation enthusiast nationwide. On behalf of our members, we support the United States Air Force (USAF) and their need to conduct training in a manner in which they fight. However, the massive airspace expansion being proposed in the Powder River Training Complex (PRTC) Draft Environmental Impact Statement (DEIS) would be the largest Special Use Airspace (SUA) complex in the United States and cover an area of approximately 28,000 square miles, roughly the size of South Carolina. AOPA contends that the PRTC is an overly expansive airspace request that will severely and unnecessarily impact the national airspace system and the operators who fly in the affected airspace. The USAF has not provided sufficient justification for such a massive expansion of the airspace for year round activities.

While large areas of special use airspace and generous charted times of use translate into flexibility for the USAF, that flexibility results in substantial negative impacts on general aviation. The proposed PRTC will result in significant economic impacts to airports, flight schools, pilots, and small businesses that rely on general aviation. AOPA is also concerned with multiple safety issues related to the PRTC including high speed, low altitude maneuvering, deployment of chaff and flares, and limited radio communications and radar coverage. For these reasons, AOPA opposes the PRTC proposal for year round airspace expansion and provides the following concerns and associated impacts of the proposed airspace expansion.

#### **Proposed airspace does not match demonstrated need**

The PRTC proposal would establish four Military Operations Areas (MOA) extending from 500 feet above ground level (AGL) to 12,000 feet mean sea level (MSL) with charted times of use amounting to 44.5 hours per week. However, the DEIS states that the USAF expects to use most of these MOAs for just 15 hours per week. While charting 44.5 hours of use provides enormous flexibility for the USAF, it would increase operating expenses, increase delays, and degrade safety for 285 based civil aircraft and countless Visual Flight Rules (VFR) transient operators who will be required to traverse an active MOA to arrive or depart one of 39 airports underlying the PRTC. Pilots operating under Instrument Flight Rules (IFR) will be routed around the MOA's when they are in use and likely will incur delays as a result of reroutes. In addition, the proposal provides for the use of Notice to Airmen (NOTAM) to schedule SUA outside of charted times of use. With a minimal need provided in the justification for the proposed expansion, the extensive charted times as well as the allowance of additional flexibility seems excessive. .

According to page 2-40 of the PRTC DEIS, only 75 to 100 minutes per week will be spent at altitudes below 2,000 feet AGL. AOPA questions the need to activate airspace below 2,000 feet for the same duration as airspace above 2,000 feet when it is only expected to be used 10% of the time. Perhaps subdividing actual needed airspace would be a better solution than requesting a massive SUA with excessive charted times. Similar solutions could have resulted from early dialogue with the user community had they been part of the planning process from the conceptual phase of airspace development.

3052

SD-7  
SA-7  
SO-8  
DN-2  
PN-5

AM-26



7052

Ms. Linda DeVine  
Page 2  
November 11, 2010

### **Economic Impacts of the Proposal are Excessive**

The USAF is required to give public use airports that underlie the MOA a 3 nautical mile radius and 1,500 foot exclusion area. However, this exclusion area does not allow for aircraft to ingress and egress the airport safely nor does it provide any accommodation to the 20 private use airports that would be unusable during times of PRTC SUA activation. Without real time SUA data, locally based and transient pilots will lose flexibility in choosing departure and arrival times at airports underlying the PRTC. In the long term, this reduction in flexibility will result in businesses and private owners relocating their aircraft outside of the PRTC to avoid the expense and delay associated with operating through expansive special use airspace.

Am-5

SO-10

Fixed base operators (FBO) rely on local and transient aircraft as their primary sources of income. When local operators begin relocating their aircraft to airports outside of the PRTC, income from fuel sales, hangars, and tie down fees will drop precipitously. Based on data contained in the 2007-2008 Montana Economic Impact of Airports Study, the average airport underlying the PRTC provides 5 jobs, \$81,000 in annual payroll, and nearly \$200,000 in economic activity to the surrounding community. With 19 publicly owned airports underlying the PRTC, this translates to approximately 95 jobs, \$1,539,000 in annual payroll and \$3,800,000 in economic activity in the surrounding communities directly attributed to the airport. This economic activity is not sustainable under the PRTC and will be eroded until reaching a point where operating an aviation business under the PRTC is no longer financially viable. Transient aircraft will be more likely to utilize an airport outside of the PRTC even if means renting a car and driving to their desired destination inside the PRTC. This will further erode the FBO's income through lost fuel sales and ramp fees. Operating margins for an FBO are extremely thin and even a small decrease in normal traffic levels will have devastating consequences to these small businesses.

SO-10

SO-5

The PRTC will destroy the flight training industry at 39 airports underlying the proposed airspace. In the DEIS, the USAF explained that one of the key drivers of the PRTC was avoiding expensive, unproductive commutes to distant ranges. The same can be said for general aviation pilots who are paying for flight training as well. Flight instructors would be forced to choose between conducting a flight in an active MOA with low altitude military aircraft operating at speeds in excess of 500 knots, or commute as much as 50 minutes to conduct the flight training outside of the SUA. A typical general aviation training flight lasts approximately 1.5 hours. Adding an additional hour and forty minutes of flight time to every flight lesson will more than double the cost of earning a pilot certificate. When faced with additional flight time expenses exceeding \$7,000.00 over the course of their private pilot training, potential student pilots will simply drive to an airport outside of the PRTC, or forego learning to fly altogether. This is too high a price for civil aviation to pay when other options must be considered by the USAF to be a responsible steward of the national airspace system.

SO-26

We appreciate the USAF's willingness to return SUA to the National Airspace System (NAS) when it is no longer in use, as mandated by the Federal Aviation Administration (FAA) Joint Order 7400.2G, paragraph 21-1-8. Unfortunately, the lack of real-time information sharing makes it nearly impossible in the current airspace environment for non-participants to know the actual status of a SUA at a given time. Although the USAF plans to notify Air Traffic Control (ATC) when the airspace is no longer active, there is limited communication coverage in the PRTC area making it unlikely that general aviation pilots will be aware that the SUA has been deactivated, or is about to be activated. Because general aviation pilots as well as other operators do not have access to real-time SUA data, pilots are forced to typically rely on the charted times of use for a given SUA area. The excessive charted times of use and lack of real-time information compound the economic impacts of special use airspace.

Am-1

SO-8

3052

Ms. Linda DeVine  
Page 3  
November 11, 2010

### Safety Concerns of Non-Participating VFR Traffic

General aviation traffic operating within the boundaries of the proposed PRTC use see and avoid to mitigate the risk of a mid air collision. The success of see and avoid is dependent on aircraft below 10,000 feet operating at or below 250 knots. The USAF plans to operate at speeds up to 540 knots within the PRTC. While this operation may be legal under the USAF's waiver with the Federal Aviation Administration (FAA), it does not make good sense nor is it a responsible use of this massive airspace area. At best, this operation will render see and avoid difficult to impossible. Despite the waiver permitting operations in excess of 250 knots below 10,000 feet, the requirements for see and avoid remain. The USAF has not explained how, at more than 500 knots, they plan to see or avoid a VFR aircraft operating legally within the active MOA.

SA-7

Because the proposed airspace will be accessible to non-participating VFR aircraft, there are increased risks associated with the release of chaff and flares that the USAF has not adequately identified. The flares burn in excess of 2000 degrees Fahrenheit for at least 500 feet vertically, creating a risk of the flare embers coming into contact with non-participating aircraft. With the failure rate of these flares at 1%, there is also a potential for an un-ignited flare (dud) to come into contact with a non-participating aircraft while in flight. The damage that would result from such contact would range from minor to disastrous and could potentially result in loss of life.

SA-5

The use of chaff within the proposed MOA poses a similar risk. By design, chaff must form a cloud of metallic fibers at least 30 meters in diameter. The risks to non-participating civil aircraft unknowingly flying through one of these clouds includes, but are not limited to: in-flight windscreen blanketing, engine foreign object damage (FOD), turbine FOD, propeller FOD, aircraft environmental system contamination, and possible navigation and communication equipment interference.

SA-26

### Summary

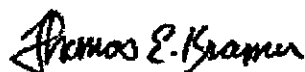
AOPA understands and respects the military's need to train. However, the massive scale of this airspace will have devastating impacts on the general aviation industry. The size and charted times of use are excessive, unjustified, and must be reduced. We strongly recommend the USAF utilize early and continuous dialogue with the user community during the development of additional SUA to meet training requirements. Based on the economic impacts and safety concerns with the proposed expansion of the PRTC, we strongly recommend the USAF go back to the drawing board and involve users in a meaningful dialogue to ensure any considered airspace expansion includes input from the user community. As proposed, AOPA opposes the PRTC due to the lack of justification for this expansive airspace design and its substantial impact on civil aviation. We appreciate the opportunity to provide comments on the Draft Environmental Impact Statement for the Powder River Training Complex.

AM-6

GE-11

GE-2

Sincerely,



Thomas E. Kramer  
Manager  
Air Traffic Services

3003

**BASIN ELECTRIC  
POWER COOPERATIVE**

1717 EAST INTERSTATE AVENUE  
BISMARCK, NORTH DAKOTA 58503-0564  
PHONE: 701-223-0441  
FAX: 701-557-5336



November 10, 2010

Ms. Linda DeVine  
HQ AC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

**RE: Powder River Training Complex (PRTC) Draft Environmental Impact Statement (EIS)**

Dear Ms. Devine:

Basin Electric Power Cooperative is submitting this letter as its official, formal comments on the August 20, 2010, Draft Environmental Impact Statement (EIS) related to the expansion of the Powder River Training Complex (PRTC) in South Dakota, North Dakota, Wyoming, and Montana. This letter supersedes any other comments that may have been made on behalf of Basin Electric in any other public forum.

Basin Electric has long supported our men and women in uniform, and is proud to have several employees as active members of the National Guard. Military bases are key accounts and many of the base personnel are members of our distribution cooperatives. The Basin Electric cooperative family continues to work tirelessly to ensure that the bases and the members have a reliable and affordable power supply.

Basin Electric supports the need for the military to have adequate airspace for readiness training and wants to work constructively with the military and FAA on these issues. After review of the Draft EIS, we identified two items needing further clarification and/or possible modifications to the proposed training area: 66-11

1. **Communications and radar coverage.** We are pleased that the Air Force expressed an interest in further developing the regional communications structure to support commercial and private aviation. Basin Electric believes this is important and commits to work with the Air Force on this issue, including support in the federal budget process for additional appropriations if needed. We look forward to a continued dialogue on this important issue. Am-3
2. **Commercial airport buffers.** The Draft EIS indicates the MOAs' boundaries will come within 30 miles of larger commercial airports, such as Bismarck and Dickinson. However, manufacturer guidelines for aircraft used by Basin Electric, and many others common to general aviation, recommend descents of between 33 and 43 miles from the airport. Would extending the MOA boundaries to between 45 to 60 miles from these airports adversely affect the use of the training airspace by military aircraft? Am-5

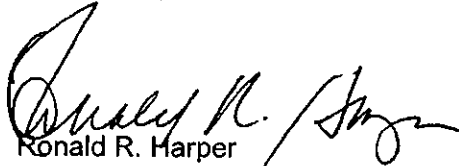
3063

November 10, 2010  
Page 2

We sincerely appreciate the good working relationship that our members have with the United States Air Force. Our desire is that as the final EIS and decision are prepared, that all affected parties can find common ground to support military training and readiness while minimizing impacts to communities and businesses in the region. Thank you for your consideration of these comments.

6E-11

Respectfully,



Ronald R. Harper  
CEO & General Manager



November 10, 2010

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews St, Room 337  
Langley AFB, VA 23665-2769

RE: Powder River Training Complex EIS

Dear Ms. DeVine:

The purpose of this letter is to provide comments to the Powder River Military Operations Area (MOA) Environmental Impact Statement (EIS). Bismarck Airport (KBIS) is a Non-Hub primary commercial service airport serving Bismarck, Mandan and surrounding areas of North Dakota. Bismarck has three airlines that serve approximately 360,000 total passengers per year with direct commercial service to six non-stop destinations. Bismarck Airport has 70 Based Aircraft and two Fixed Based Operations (FBO's) serving all aeronautical users with fuel, maintenance, air taxi, avionics, upholstery, hangaring, and other flight line services. Two major energy companies also have hangars, aircraft and flight departments on our airfield. Bismarck Airport has among its tenants the North Dakota Army National Guard Army Aviation Support Facility. Bismarck Airport and the City of Bismarck are strong supporters of the military; however, we have concerns about the proposed expansion of the Powder River MOA.

The proposed MOA expansion will have several negative impacts on private and commercial aviation users in Bismarck that should be considered as this proposed expansion of the Powder River MOA is reviewed.

Aircraft departing Bismarck to conduct business at communities and airports within the proposed MOA will be limited to flying by Visual Flight Rules (VFR) when the expanded MOA is active. A business must be able to count on flight under Instrument Flight Rules (IFR) to get personnel into airports in the proposed MOA during inclement weather. We are concerned about safe and unlimited access to neighboring airports at Bowman, Elgin, Hettinger and Mott, which are under the proposed expanded MOA PR4. Bowman and Hettinger have community medical facilities that are serviced by fly-in medical specialists under IFR controlled airspace by

SA-3

Part 135 and Part 91 aviation providers. These flights deliver medical specialists, on a scheduled basis, to area clinics from large regional medical facilities in Bismarck. There are approximately 80 medical flights that originate from Bismarck Airport each month. These flights are serviced by Bismarck's FBO's or private owners. The proposed MOA expansion would cause delays and cancellations to those teams of medical personnel who travel to serve those communities.

SO-5

While the Air Force says that active emergency ambulance flights will be accommodated, routine travel by medical teams will be negatively impacted. Those teams routinely fly under IFR, an option not available when the MOA is active. Medical teams that experience delays and cancellations resulting from the MOA will find that they cannot count on air transportation as an efficient means of travel. As a result, these medical providers may stop their services to those communities altogether, eliminating convenient access to essential medical service to thousands of rural residents of southwestern North Dakota. The reduction in flights would also have a negative economic impact on the aviation service providers in those communities.

SO-5

Charter operations will be impacted because they operate under more stringent flight rules. The unavailability of flight under IFR flight rules when the MOA is active will introduce unpredictability that will result in unnecessary delays and cancellations.

SO-8

Hettinger and Bowman Airports have expended significant efforts developing and improving their airport facilities. They have installed automated weather reporting at their airports to improve dependability of air services by both charter and private operators under Instrument Flight Rules to their cities. These efforts will be negated whenever the PR4 MOA is active. IFR flights from Bismarck to these communities during these times are effectively eliminated during any scenario with limited ceiling and visibility. Both the communities and the aviation service providers will suffer social and economic hardship due to the proposed expansion of the PR MOA.

SO-10

Oil and energy companies also fly daily trips from Bismarck Airport into and out of the airspace that is proposed in this expansion of the current Powder River MOA. The expansion of the MOA will introduce additional negative impacts because the flight route of many of these operations is across and through the expanded MOA. The re-routing around the proposed MOA will cause unnecessary financial hardship on these companies as a result of increased cost for aircraft time, fuel, lost productivity, increased maintenance, etc.

SO-7

A harder to measure negative impact to Bismarck Airport will be when private and corporate pilots choose to go around the expanded MOA to "avoid the hassle" of passing through or

around it. As a result they will choose a route that avoids Bismarck altogether resulting in more social and economic hardship due to loss of fuel and support services sales at our FBO's at a time when they are already hurting due to the national economy.

SO-6

North Dakota is the number one producer of 13 agricultural commodities so changes that negatively affect agricultural production will be felt throughout the economy of all of North Dakota. We have heard comments about the proposed MOA from area crop sprayers and others (USDA Animal Damage Control) who routinely fly at low levels (below 500') to conduct their business. These operators are concerned about little or no vertical separation between them and low flying, high speed military aircraft when there is no radar coverage at this altitude. If this proposed MOA expansion leads to increased crop losses and livestock depredation due to these operators inability to perform their functions, the negative effect on agriculture will ripple through North Dakota's number one economy.

SA-7

SO-11

We are concerned about the negative effects of the expanded MOA on the three (3) airlines serving Bismarck. All three (Delta, United and Allegiant) have direct flights to four (4) destinations to the south and west of Bismarck requiring them to fly above or around the proposed MOA. When departing Bismarck they will have to either climb rapidly to over 18,000 feet within 35 miles or fly south into South Dakota and then back to the west before being able to fly direct to their destinations. Both scenarios add costs and time to the airlines and the passengers who use them making both options less efficient. Bismarck already has higher than average fares for airline travel. This proposal will drive our air fares even higher by the inefficiency that it creates for the airlines, this translates into economic hardship for our citizens. When these same airlines approach Bismarck to land, the options are the same: fly over or go around. If they fly over, they will have 35 miles or less to come down from over 18,000 feet making a more rapid descent likely. This may cause alarm and discomfort for some of passengers. We understand that all three (3) airlines will be providing their own separate comments on this proposal.

AM-5

SO-7

AM-5

With proposed 500 Foot Above Ground Level Military Operations, safe separation of aircraft is questionable. We feel the lack of low altitude radar coverage and lack of voice communications as well as the coordination/communications issues that will be necessary between the three (3) Air Traffic Control Centers (ATCC's) at Salt Lake, Denver and Minneapolis, has not been adequately addressed. With proposed 500 Foot Above Ground Level Military Operations, safe separation of aircraft is questionable. This puts military and civilian aircraft in a situation with higher potential for mid-air collisions. We also feel the current NOTAM system is inadequate to inform aviation users of changes in use of the MOA when it is active.

AM-3

SA-1

AM-12

3164

Because of these concerns and others there will be an overall decline in use of the Bismarck Airport and adverse social and economic impact on our airport, community and region. We know the impact of aviation on any community is huge. Bismarck Airport's economic impact has been calculated at \$178,759,000 a year with 558 direct jobs. This information comes from the 2004 North Dakota Aeronautics Commission Local Economic Impact of Aviation report. This does not take into account increases of activity resulting from increased oil and gas exploration in the region. If this proposed expansion gets approved the airport's economic engine will be degraded!

SO-10

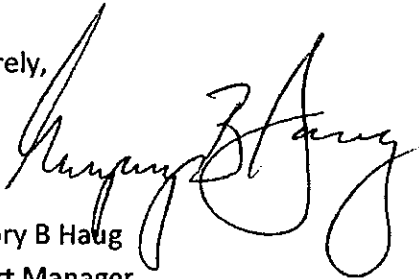
SO-17

While Bismarck Airport and the City of Bismarck understand need for Military Operation Areas to train our military, the size of this expansion is unprecedented, increasing the existing MOA by four times its current size. The MOA when active will impede access to medical facilities, negatively impact aviation business, airlines and cause traffic separation concerns in an area of limited radar and communications coverage. The Bismarck Airport requests that the USAF take the no-action alternative. None of the other alternatives (A-C) presented will alleviate the socio-economic hardships placed upon the aviation users and communities that will be affected by the Air Force's proposal.

CE-2

Thank you for the opportunity to comment

Sincerely,



Gregory B Haug  
Airport Manager



3069



## United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Wyoming High Plains District

2987 Prospector Drive

Casper, Wyoming 82604-2968



In Reply Refer To:  
9211 (WYP000)

OCT 26 2010

Linda DeVine, Program Manager  
ACC/A7PS  
129 Andrews St., Suite 337  
Langley AFB, VA 23665-2701

Dear Ms. DeVine:

The Wyoming High Plains District Office of the Bureau of Land Management (BLM) is supportive of the Proposed Actions described in of the Powder River Training Complex Environmental Impact Statement. Upon review, I have comments regarding two potential impacts on fire operations within the High Plains District. I would appreciate your consideration in adopting the following mitigations to the final approved plan:

- Impact one – Deployment of chaff and flares, increases fire risk to public lands administered by the Bureau of Land Management.

Recommended Mitigation – Notify Casper Interagency Fire Dispatch Center at 307-261-7691, when training within the Wyoming portion of the Powder River Training Complex includes deploying chaff and flares.

- Impact two - Air Space Conflicts

Recommended Mitigation – Notify Casper Interagency Fire Dispatch Center, Air Desk at 307-261-7695, when training flights are in the Wyoming portion of the Powder River Training Complex.

Thank you for your consideration and the opportunity to comment. For further information regarding the content of these comments and recommended mitigation measures, please contact the BLM, High Plains District Fire Management Officer, Jay Esperance at 307-261-7690.

Sincerely,

*Stephanie Connolly*

Stephanie Connolly  
District Manager

30860

# BUREAU OF LAND MANAGEMENT

Miles City Field Office

111 Garryowen Road

Miles City, Montana 59301

Phone: 406-233-2800

Fax: 406-233-3650



BLM

## FAX COVER SHEET

To:

MS Linda DeVries

From:

Kathy Bowers - Planning & Env Coord

Subject:

Comments on DRAFT PRTC

Date:

11/15/10

Number of Pages to Follow:

2

Remarks:

My phone # is 406-233-2844



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Miles City Field Office

111 Garryowen Road

Miles City, Montana 59301-7000

www.blm.gov/mt



In Reply Refer To:

1600 (MTC000)

NOV 15 2010

Ms. Linda DeVine  
PRTC EIS Project Manager  
HQ ACC/A7PP  
129 Andrews Street, Suite 337  
Langley AFB, VA 23665-2701

Dear Ms. DeVine:

Thank you for the opportunity to provide public comment on the Powder River MOA Training Complex (PRTC) draft Environmental Impact Statement (EIS). The United States Department of the Interior (USDI), Bureau of Land Management (BLM), Eastern Montana/Dakotas District (EMDD), Division of Fire and Aviation within the Eastern Montana Fire Zone (EMFZ) has reviewed the proposal and would like to provide comments. As our agency is a primary user of the current and proposed airspace, we would like to see the following concerns addressed in the final Environmental Impact Statement and in your deliberation toward choosing your preferred alternative to implement:

### 1) PRTC PROPOSED ACTION ALTERNATIVES

During the 2008 public scoping period, our office provided you with a request to consider another alternative as was stated below:

"BLM would also like DoD to evaluate one additional alternative. Please consider, in addition to the existing MOA, adding only one area identified as area PR-3 MOA in the proposal literature. This MOA location north of the existing MOA would add space for additional DoD training and also have the least impact on the Eastern Montana Fire Zone (EMFZ) as far as the number and frequency of aircraft to schedule/deconflict."

In reviewing the PRTC draft EIS, the military determined this alternative would not provide adequate training airspace. In consideration of the proposed alternatives, the Fire and Aviation Division of our BLM office would prefer to support the No-Action Alternative over the proposed Alternatives A, B, and C. This is due to the following considerations: potential increased man hours that would be required to coordinate/deconflict the majority of our emergency response flights, which now occur in areas not designated as MOA airspace; potential increased man hours that would be required to coordinate/schedule almost daily fire detection flights during the summer that would occur in the majority of the proposed PRTC identified MOA's; lack of assurances that DoD aircraft can be contacted immediately in "real time" to ensure they will relocate or curtail low level training operations and safely yield to higher priority emergency response aircraft entering active MOA's.

GE-2

SA-5

SA-19

Should the DoD elect to adopt an alternative other than the No-Action Alternative, then the Fire and Aviation Division of our BLM office would prefer the implementation of proposed actions as presented in Alternative B. This is due to the following considerations: our area of highest

DO-2

establish communication procedures to ensure deconfliction with emergency flight operations within the proposed airspace" (see page 2-110).

In another section of the draft EIS, there is verbiage which seems to contradict this where it states "there is no proposal for increased radio frequency coverage or radar coverage for the PRTC airspace where current coverage is limited" (see page ES-18). DoD officials have informed us that it may take up to 30 minutes for either them or the controlling ARTCC to contact military aircraft currently involved in low level flight profiles. Our response times enable us to have aircraft within MOA airspace in as little as 15 minutes. Because military aircraft in training are not required to maintain immediate "real time" communications to yield the airspace to higher priorities, there can be an unsafe period of at least 15 minutes, and likely more, of increased potential for mid-air collisions. This period of increased risk and exposure would require mitigation to address the effects to other airspaces uses.

The BLM would like to see the DoD address in the final EIS how they will ensure that military training aircraft will be contacted immediately in "real time" to be informed that they must yield to the more critical life flight and fire suppression aircraft in the interest of promoting mid-air collision avoidance. Incident response dispatch centers would need some form of confirmation that military aircraft have indeed been contacted and acknowledge that they are yielding low altitude flight profiles to higher priority emergency response aircraft occupying the airspace.

#### 4) COLLISION AVOIDANCE UNDER V.F.R. CONDITIONS

Due to the nature of each agency mission, "see and avoid" may not be sufficient mitigation for mid-air collisions. BLM would like DoD to address more reasonable and effective avoidance measures other than "see and avoid" VFR procedures to prevent mid-air collisions, and seek to increase the safety of our aviation personnel.

#### 5) REASONABLE AVOIDANCE MEASURES

There exists predictable periods of airspace usage based on historical data from which reasonable mid-air collision avoidance measures can be implemented. For example, the BLM rarely responds to wildland fires with aircraft from November through April. The shoulder months of the fire season include May and October where average fire season use of aircraft is low. Usage increases to a moderate level in June and September. Our period of highest aircraft use is July and August, when ground fuels are most receptive to ignition sources such as lightning.

In addition, the majority of our incidents are concentrated within a known geographical area. With the likelihood of aircraft responding almost daily to fire dispatches into what would likely be the PR-1A/B MOA and Gap A MOA during what is typically a two month period, it would seem appropriate for the DoD and partnering agencies such as the BLM to adopt reasonable avoidance measures in the interest of mid-air collision avoidance. This falls in line with your planned actions to avoid altitudes that would interfere with commercial aircraft. In addition, many of our aircraft have to transition from established bases to the TFR area each mission to reload with fire suppressants/retardants and thus have a period of risk during flight not addressed by implementing the TFR.

Please find attached a 20-year fire occurrence map indicating historical incident locations. The majority of fires on the EMFZ are "short duration" which means that the use of aircraft to aid in the suppression of these fires typically lasts only 1 to 2 days. It is impractical to establish a TFR for multiple fires when most are going to be contained within 2 shifts. It would be more practical if the EMFZ could call the DoD scheduling desk and let them know that we have active fires requiring the use of aircraft and that our aircraft will remain 3500' AGL and below (our

emergency response aircraft activity occurs over the Ashland Ranger District of the Custer National Forest (adjacent to the Northern Cheyenne Indian Reservation) where there is currently no MOA established- and the option to not establish PR-1A/B MOA and Gap A MOA would help to ensure that our highest use area remains minimally impacted; savings of taxpayer dollars realized in fuel conservation by utilizing MOA's located closer to established military bases, where it is less likely for our emergency response aircraft to be dispatched to (thus providing for fewer interrupted military training sorties).

## 2) PRIORITY TO LIFE FLIGHT & EMERGENCY RESPONSE AIRCRAFT

Our staff attended public hearings for the PRTC draft EIS in Miles City, MT on Friday, October 15, 2010. DoD personnel addressing the attendees at those public hearings confirmed that Life Flight and Emergency Response Aircraft activity held higher priority for MOA airspace use than military training sorties within the existing and proposed MOA's.

The BLM would like to see the Final EIS address exactly how the DoD intends to uphold MOA airspace use prioritization. While the scheduling of known flights involving resource project missions and non-emergency fire reconnaissance is understood, the process of having military training missions/sorties yield to Life Flight and Emergency Response Aircraft is not well addressed. Verbiage within the draft EIS indicates that emergency-related activities would be avoided by military training aircraft and that ATC would notify the training aircraft of the emergency. After being contacted, the affected military training mission would avoid the incident area, move to another active airspace or return to base in accordance with agreed-to procedures. The draft EIS does not seem to address the additional impacts to public and civil entities involved with emergency related missions should the existing MOA be expanded into the PRTC.

The BLM would like the final EIS to adequately address the impacts to public and civil entities who provide aircraft with rapid access in response to emergency related missions. The BLM would also like to see the specific procedures and protocols of prioritized MOA airspace use be well documented for correct implementation. The nature of life flight and emergency response aircraft missions are unpredictable as to specific launch times. Any steps taken to ensure military aircraft training at low level (i.e. below 5000 feet AGL) yield to higher prioritized missions (by altering training areas or curtailing operations) will need to be immediate and real time.

## 3) IMMEDIATE "REAL TIME" COMMUNICATIONS WITH MILITARY AIRCRAFT

When an interagency dispatch center launches public aircraft to respond to a wildfire, these aircraft and pilots meet established standards to ensure operational safety. These interagency fire aircraft are required by policy to maintain radio communications with the dispatching unit at all times. The jurisdictional agencies bare the expense of radio communication systems to ensure that aircraft can be contacted real time in the interest of protecting life and property.

One of the greatest concerns of the Fire and Aviation Division within our BLM office involves the delay in relaying airspace use prioritization to military aircraft currently in training within the MOA. Verbiage within the draft EIS indicates the DoD is aware that there is limited communication capabilities in the region. Specific verbiage within the draft EIS states "radar and radio communications are limited below 12,000 feet MSL and in some areas are limited below FL180". (see page ES-14) However, also within the draft EIS there is verbiage stating that the military "would establish communication procedures to ensure the ability to recall the military aircraft from the low altitude MOA's" (see page 2-110) and that the military "would

### 7) FUTURING POTENTIAL MOA AIRSPACE USAGE

The PRTC Draft EIS indicates that expansion of the existing MOA into the PRTC will benefit both current and future DoD training needs, yet there is very little discussion found within the document to address potential future airspace use. The BLM would like to see the EIS address how expanding the current MOA could potentially allow additional training opportunities that have to date been prevented, due primarily because of size.

### 8) MISCELLANEOUS UNANSWERED QUESTIONS

Most of the following questions were presented during the public scoping period and answers were either not provided or could not be found within the draft EIS:

- What safety measures beyond see-and-avoid will the DoD implement to buffer between military and civil or public aircraft operating concurrently within an active MOA? SA-1
- Will there be quantity limitations as to how many military aircraft will occupy any given PRTC area at any one time? Am-27
- As ARTCC's covering the proposed PRTC are divided between Salt Lake City, Denver, and Minneapolis, will there be a communication gap in contacting military aircraft that are moving between MOA's as ARTCC's hand off DoD aircraft to each other? SA-4
- Will the FAA be considering moving ARTCC jurisdictional boundaries to simplify coverage within the PRTC? SA-4
- How will the scheduling of non-DoD aircraft occur within the MOA's during the quarterly "mass" large force DoD exercises (LFE's) that are anticipated to last from 1-3 days? Am-12
- If the DoD will be monitoring seasonal fire conditions to determine when to discontinue use of chaff and flares over receptive fuels (i.e. NFDRS; Red Flag Warnings; etc.), how and when will the decisions be made to implement and rescind these actions? SA-5
- What sort of aircraft chaff/flare training is available to educate interagency wildland fire investigators? Am-10
- How quickly will newly used flares and chaff deteriorate so that fire investigators who find them at fire origin locations can determine that the fire could not have started from recently utilized or misfired flares? Am-10
- With a larger area to facilitate training of more mission profiles, what are the additional impacts of military ground assets that will likely be integrated into the local training should the MOA expand?
- USAF personnel stated that there is one large fixed and two mobile pedestals used as threat emitters in 15 locations currently within the Powder River MOA. They also stated that these threat emitters require electricity and phone connections, and are therefore moved infrequently. The USAF representatives said that no new threat emitters were anticipated for installation, as current emitters would be adequate for the entire expansion. Should long term needs dictate the need for additional threat emitters, how will the DoD undertake NEPA analysis tiered to the final EIS? CM-2
- Will the military include the use of AWACS aircraft during the Large Force Exercises (LFE's) to enhance the realism of an actual large force mission and concurrently increase the safety of civil, public, and military aircraft within the MOA? Am-27

Thank you again for the opportunity to provide input into the final EIS. If you have any general questions, you may contact Kathy Bockness, Planning & Environmental Coordinator for the Miles City BLM Field Office, via phone at 406-233-2844.

ceiling height for Fire Traffic Area dimensions). If the DoD would initiate avoidance measures such as establishing their training floor (hard deck) with a reasonable buffer (say 5000' AGL) then the establishment of TFR's that could number into the hundreds annually during June through September may be avoided. USAF personnel informed BLM that DoD training is typically done either at low level or well above our Fire Traffic Area ceiling. Ideally it would save multiple agencies tremendous coordination time, effort, and expense if no low level DoD training were held during the primary fire season when the EMFZ utilizes aircraft on active incidents (typically between June through September).

Am-33

It would seem to be less efficient and more costly when low level military training missions within the proposed PR-1A/B MOA and Gap A MOA are curtailed or interrupted repeatedly from frequent emergency response aircraft dispatches. When considering the data presented in the draft EIS concerning the Average Annual Baseline Training Hours and Estimated Annual Day-to-Day Time and Altitude Distributions, implementing a 5000' AGL low level VFR training floor as a temporary avoidance measure during the highest fire occurrence period would seem a reasonable and realistic solution.

Verbiage within the draft EIS indicates that the military would establish reasonable temporary or seasonal avoidance areas for concerns with other topics already identified, such as over ranches during calving/weaning/branding seasons or cultural native American/tribal events. Specific verbiage indicates the military "would establish reasonable temporary or seasonal avoidance areas or could adopt other measures identified in Government-to-Government consultation..." (see page 2-100). The BLM would like the PRTC final EIS to address reasonable avoidance measures which would include no low level military training flights during the highest incident response months within all existing and/or proposed PRTC MOA's.

Am-33

#### 6) SCHEDULING OF LONG DURATION MULTIPLE MOA FLIGHTS

With the current size of the Powder River MOA, it has been practical to work out a schedule with DoD when fire detection aircraft need to patrol the Eastern Montana Fire Zone (EMFZ). Lightning maps from the previous storms determine areas that are to be flown by detection aircraft. Historically the majority of fire activity on the EMFZ is south of Interstate 94. To date, we have been successful to direct flight routes through the current MOA during periods of DoD inactivity.

However, with the proposed expansion of the PRTC spanning from Billings, MT to Bismarck, ND this would end up encompassing most of the southern half of the EMFZ, which is where our predominant fire activity occurs. At public hearings held in eastern Montana during October of 2010, DoD officials commented in their presentations that expansion of the current MOA into the PRTC would not impact Life Flight or Emergency Response Aircraft missions. Is there analyses within the draft EIS to support this? Incidents within the current MOA utilizing aircraft require man-hours to coordinate and deconflict the airspace each time. With the proposed expansion, that workload will increase proportionately.

SA-19

How will BLM be able to do late morning/early afternoon VFR reconnaissance flights (typically lasting about 3-4 hours due to the size of the area of jurisdiction) to cover that area in the proposed Powder River 1, 2, and 3, which may need to occur daily from June through September? Would DoD schedulers be able to reserve a 3-4 hour time slot in late morning/early afternoon for Powder Rivers 1-3 that will facilitate a VFR detection flight daily through those 3 MOA's for basically a 4 month period?

Am-33

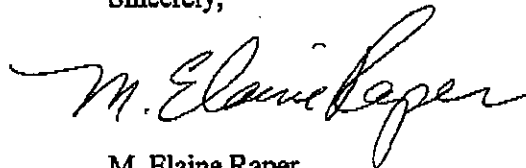
3056  
Aside from the comments above to the Draft PRTC EIS, the Montana/Dakotas BLM State Office currently has a signed Memorandum of Understanding (MOU) between the BLM and Ellsworth Air Force Base in South Dakota where scheduling of the existing MOA occurs. While this document is adequate toward assisting our agencies in achieving mutual objectives of shared airspace usage within the existing MOA, any expansion of the existing Powder River MOA into a larger PRTC would necessitate changes be made to the agreement to address the additional impact. GE-11

Personnel who assembled the original MOU agreed that should the MOA be expanded into the PRTC, the document would have to be updated to reflect changes such as the structure of an expanded MOA or inclusion of other affected agencies. Discussions then addressed the likelihood of formulating a MOA committee to address issues/concerns by the identified agency partners as well as development of a more inclusive MOU.

In consideration of the large number of civil and public entities, of which may include city, county, state and federal agencies and other potential partners which could be affected by implementing an expansion to the existing Powder River MOA.....it is requested that a multiple agency "umbrella" Memorandum of Understand (MOU) be developed. We would encourage that development of the MOU be accomplished by open invitation and collaborative teamwork in good faith from interested partners, with periodic meetings of an area MOA committee to review concerns and make needed updates. NP-10

If you require additional specific information or need clarifications, you may contact Kevin Gappert, Unit Aviation Manager for the Fire and Aviation Division of the Eastern Montana Fire Zone (EMFZ), via: phone at (406) 233-2909 office or (406) 853-5163 cell; email at [kgappert@blm.gov](mailto:kgappert@blm.gov) or write him at BLM, 111 Garryowen Road, Miles City, MT 59301.

Sincerely,



M. Elaine Raper  
District Manager

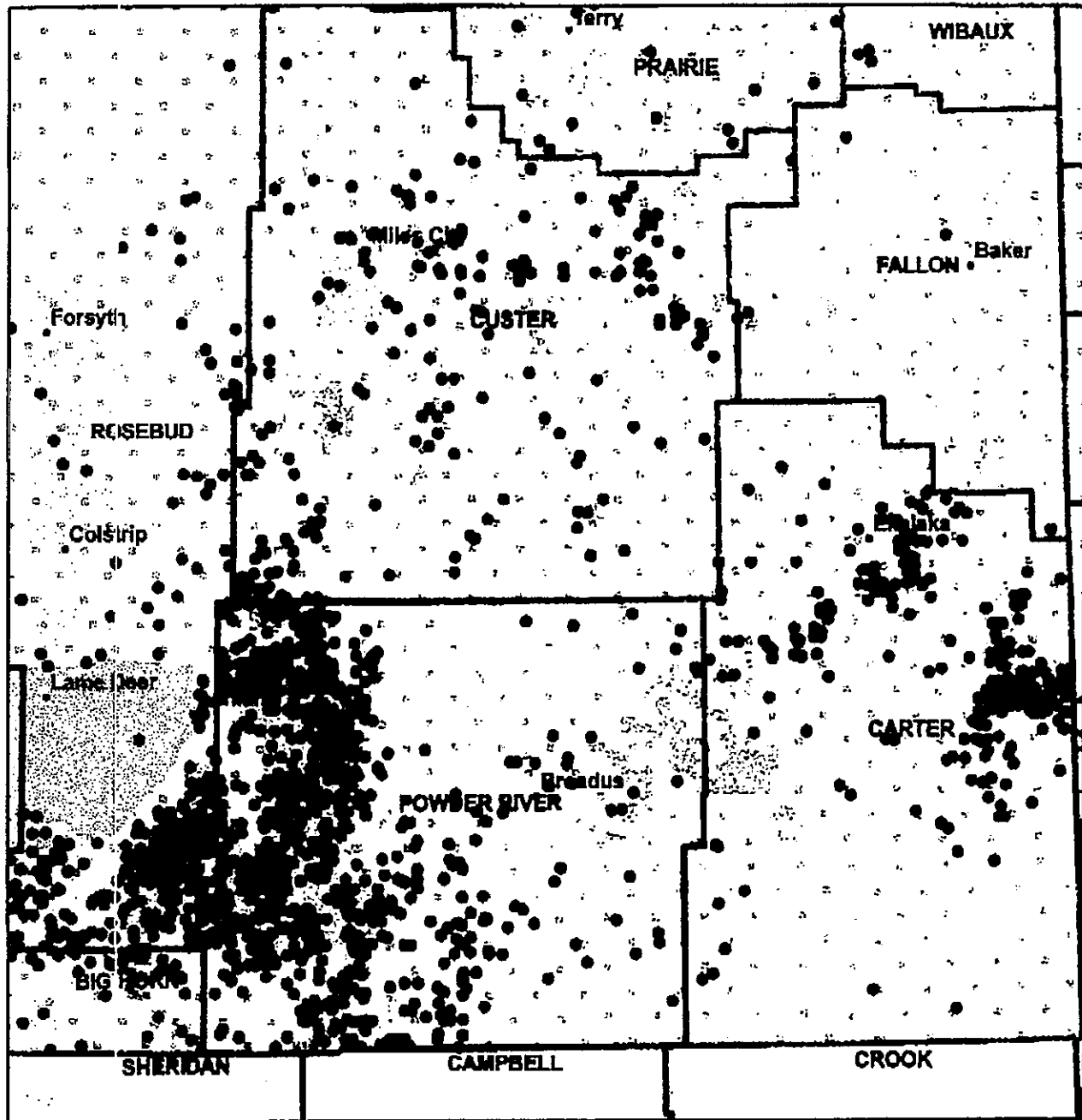
Enclosure (Map)



# 20-Year Fire Occurrence (1989-2009)

State of Montana

1:1,181,252



United States Department of the Interior  
Bureau of Land Management  
Eastern Montana/Dakotas District



## Legend

● Dispatch MT Towns	■ COE	■ PRI
● FireIgnition_20YearFire	■ DOD	■ STATE
■ BIA	■ FWS	■ USFS
■ BLM	■ LOCAL	■ USFS NC
■ BLMGND J	■ NPS	■ USFS WA
■ BOR	■ OTHER	

## CAUTION:

Land ownership data is derived from less accurate data than the 1:24000 scale base map. Therefore, land ownership may not be shown for parcels smaller than 40 acres, and land ownership lines may have plotting errors due to source data. No warranty is made by the Bureau of Land Management for the use of the data for purposes not intended by the BLM.

NAD 1983 Albers

To: Ms. Linda De Vine

From: Bowman, North Dakota Airport Board

Subject: Powder River Training Area

We the undersigned Airport Board members are very concerned about the proposed final impact draft presented at the public hearing, in Bowman, North Dakota, September 22. Bowman would be directly under Powder River Area 3. We are in the process of building a new airport to accommodate the growing energy industry in our area. This energy growth, along with small businesses and agricultural commodity production are essential for the survival of our communities. The expanded Training areas would greatly impact this growth potential.

We hope the recommendations include raising the Area 3 floor to 10,000 MSL, which would greatly reduce the impact of our flight operations.

Alternative C would be our next choice associated with the Powder River proposal.

In conclusion, we hope these recommendations and concerns are considered in the final Powder River impact study. Thank you for your attention.

SD-10

DD-4

DD-2

Eugene Miller  
Ray D. Duff  
Stanley Pope  
Rodney Schenck  
Bob M. M. M.

3058



Veterans Day 2011

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews Street, Rm. 337  
Langley AFB, VA 23665-2769

Re: Powder River MOA Proposed Expansion

Ms. LeVine:

Greetings, we appreciate the invitation to comment on the proposed expansion of the PRMOA. As proposed, the expansion will have a negative impact on our business, CityServiceValcon. We provide aviation fuel and related services to airports in the PRMOA area.

It is our view that given the complexity and restrictions of the PRMOA, that sales to our existing customers in the affected area will be reduced. Fully 75% of the business is generated from transient aircraft. Should the result be only a 25% reduction in sales, the impact will be \$1,903,000.00 annually.

SO-5

In addition, this student pilot finds the concept of VFR "See and Avoid" in an area with B-1's, B52's, F-16's, etc. operating at speeds exceeding 500 kts. Without radar coverage and possibly with their lights off is dangerous. Should this proposal move forward, please consider adding layers that would allow through traffic such as 8,000 – 12,000 MSL and 16,000 – 24,000 MSL to allow transitioning aircraft through MOA and improvements to radar and radio coverage. Proposed activities such as supersonic flight, live flares, defensive chaff, Lights-out NVG training, closure rates far exceeding what is acceptable to the FAA for civilian operations, lack of radar and radio coverage throughout the area. I remain convinced that these are operations which should be conducted in Restricted Airspace not in a MOA. Lastly, the addition of CTAE to military aircraft would be considered wise.

SA-7

Am-26

Am-11

Sincerely:

A handwritten signature in cursive script that reads "Breezy Burlison".

Breezy Burlison  
Aviation Sales  
CityServiceValcon



3059

November 9, 2010

Ms. Linda A. Devine  
129 Andrews Street, Rm 337  
Langley AFB, VA 23655-2769

Re: (a) Powder River Training Complex Draft Environmental Impact Statement (EIS)  
(b) FAA Airspace Study 10-AGL-6NR

Delta Air Lines serves more than 160 million customers each year within its United States and global network, Delta and the Delta Connection carriers offer service to more than 350 destinations in nearly 70 countries on six continents. Delta has a significant presence in the Midwest and Rocky Mountain area, including service to several cities affected by the proposed Powder River Training Complex, and flights which traverse the PRTC area flying to and from the west coast everyday. Delta Air Lines strongly supports the training needs of men and women in uniformed service to our country. Our forces deserve the best training possible, including the ability to train in realistic combat conditions.

While Delta initially supported the PRTC proposal, changes have occurred in the proposed use times that force us to withdraw support. The first briefing interaction took place in 2008 through the RTCA ATMAC Airspace Working Group (AWG) with mixed results and an apparent change in use plans. The timeline follows:

- Spring 2008 - the AWG formed a sub-group with a primary task of receiving and addressing the proposed MOA and ATCAA changes concerning Powder River from an aviation community perspective. The AWG sub-group met with the FAA and USAF on several occasions
- March 2008 - first brief to the AWG. PRTC proposes to create three Gap MOAs and three Gap ATCAAs to serve as specially scheduled airspaces for *two two-hour time blocks an estimated one to two days monthly*
- June 2008 - full AWG meeting dedicated to Powder, included USAF proponents and environmental contractors
- February 2009 - update presented by USAF and FAA Central Service Center
- June 2009 - verbal update from USAF (no progress)
- September 2009 - verbal update presented by FAA Central Service Center (no progress)
- March 2010 - update from USAF - maps and schedule
- May 2010 - email update from USAF (no progress on aeronautical review)
- August 2010 - last AWG, ZDV provides update on Powder, no Service Center update, USAF email update. *MOA activation plans now include Mon-Thurs, 0730-1200, and 1800-2330, and Fridays, 0730-1200*

In each briefing, the USAF described the need for quarterly Large Force Exercises lasting 1 to 3 days each per calendar year and Delta was supportive of this proposed frequency of use, even though high and low altitude routes would be affected. At no time was daily use indicated. Unfortunately, the USAF appears to have altered its use plans to allow for Monday - Friday scheduling of the MOAs with only non-specific mention of the use of the overlying ATCAAs FL180-260, and FL260 and above. We find no justification which supports use of the areas, especially the high areas, at greater frequency than the quarterly LFEs that were originally described. Utilization of the airspace on a Monday-Friday basis could have significant impact on Delta's service to local communities such as Rapid City, Bismarck, Billings, Bozeman, etc., and the impact to high altitude, overflying traffic would cause delays and reroutes affecting on time performance and fuel burn.

PN-5

SD-7

3069

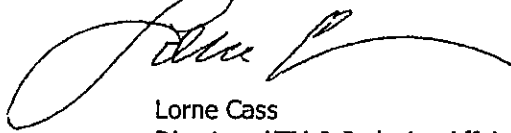
In addition, it does not appear as if the USAF has considered the tenets being put forth in the recent National Special Activity Airspace Proposal (NSAAP) of which it was a party. NSAAP Section 5.2.2 spells out specific scheduling requirements for real-time needs, rather than a 'blanket' schedule period during which the MOA/ATCAA may or may not be used. Delta strongly recommends that the USAF support this process in reviewing its PRTC proposal.

Am-1

As it is currently proposed, it is with regret that Delta Air Lines must withhold support for the Powder River Training Center initiative.

GE 2

Respectfully,



Lorne Cass  
Director, ATM & Industry Affairs  
Delta Air Lines, Inc.  
1010 Delta Blvd., Dept OCC 19  
Atlanta, GA 30320 USA

1.404.715.1945  
1.612.308.0926 (m)



## United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Denver Federal Center, Building 56, Room 1003  
P.O. Box 25007 (D-108)  
Denver, Colorado 80225-0007



## FAXOGRAM

FAX No: 303-445-6320

Date: Nov 15, 2010

Fax Machine No.: (757) 764-1975

Verification No: \_\_\_\_\_

To: Linda Devine

Telephone No: \_\_\_\_\_

From: Robert Stewart

Telephone No: 303-445-2500

DOI/OEPC

Subject/Remarks: Attached are comments from the Dept of the Interior regarding the DEIS for the Powder River Training Complex. We tried to e-mail but was returned as undeliverable. Please acknowledge your receipt of this fax by e-mail to Robert\_F\_Stewart@ios.doi.gov.

**United States Department of the Interior**

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Denver Federal Center, Building 67, Room 118  
Post Office Box 25007 (D-108)  
DENVER, COLORADO 80225-0007



November 12, 2010

9043.1  
ER 10/725

Ms. Linda Devine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley Air Force Base, Virginia 23665-2769

Dear Ms. Devine:

The U.S. Department of the Interior (Interior) has reviewed the U.S. Air Force's Draft Environmental Impact Statement (DEIS) for Powder River Training Complex, Ellsworth Air Force Base (AFB), South Dakota. The U.S. Air Force (USAF) seeks to improve airspace assets for required training by B-1 aircrews stationed at Ellsworth AFB, South Dakota and B-52 aircrews stationed at Minot AFB, North Dakota. The USAF proposes to develop the Powder River Training Complex to improve training through establishing new airspace and modifying existing airspace.

Interior submits the following comments under the authority and provisions of the National Environmental Policy Act (42 U.S.C. 4371 et seq.), the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. §§1531 to 1543 et seq.), and the Migratory Bird Treaty Act (16 U.S.C. 703).

**FISH AND WILDLIFE RESOURCES***General Comments*

Under the ESA, Federal agencies are required to review their proposed activities to determine whether species federally listed as threatened or endangered, or habitat(s) designated by the Interior as critical habitat, may be affected. If such a determination is made, formal interagency consultation with the U.S. Fish and Wildlife Service (USFWS) is required under Section 7(a)(2). If the USAF determines that the selected alternative may (either adversely or beneficially) affect federally-listed species or critical habitat, please contact the USFWS' Field Office (phone (605-224-8693) in Pierre, South Dakota, to initiate formal consultation.

Ms. Linda Devine

2

In addition, section 7(a)(1) of the ESA requires Federal agencies to use their authorities in furtherance of the purposes of the ESA, i.e., "...to provide a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved, to provide a program for the conservation of such endangered species and threatened species, and to take such steps as may be appropriate to achieve the purposes of the treaties and conventions."

The DEIS does not explain how the USAF will meet its 7(a)(1) responsibilities for this project. We recommend that USAF contact the USFWS Field Office in Pierre, South Dakota, to establish reasonable temporary or seasonal periods when impacts will be avoided, or adopt other conservation measures to avoid and minimize intrusive impacts upon federally listed threatened, endangered, or candidate species. In particular, USFWS recommends that measures be developed to avoid impacts to endangered whooping cranes (*Grus americana*) which migrate through the area, and to two species that are candidates for listing that breed in the project area: Greater sage-grouse (*Centrocercus urophasianus*) and Sprague's pipit (*Anthus spragueii*). A full analysis of the direct (noise, visual stimulants) and indirect effects (fire) from chaff and flare exercises on federally listed threatened, endangered, or candidate species should be considered. B1-8

The USFWS also recommends that mitigation measures include limited operations of low-level flights in the Powder River 4 Military Operations Area during spring and fall bird migration. B1-6

#### *Specific Comments*

Sprague's pipit has been added as an ESA candidate species since the DEIS was completed. The USFWS recommends that affects of the project on Sprague's pipit be addressed under the section "Threatened, Endangered, and Other Special Status Species," which begins on page 4-75. B1-9

### **NATIONAL PARK RESOURCES**

#### *General Comments*

The National Park Service (NPS) is concerned the proposed project will potentially adversely impact the soundscapes, visitor experience, cultural resources, and sacred sites of Little Bighorn Battlefield. Many of their concerns were raised conceptually in a letter dated July 24, 2008 in response to the Notice of Intent to prepare the EIS. CW-2

The mandate of the National Park Service (NPS) is to preserve and protect the scenery, and natural and cultural resources of parklands, such as Little Bighorn Battlefield for the enjoyment of the American public, and to leave them unimpaired for the enjoyment of future generations (16 USC 1-4). The "scenery" includes the natural soundscape, as well as the landscape (NPS *Management Policies* 2006). A soundscape refers to the total acoustic environment of an area. The soundscape of a national park, like air, water or wildlife, is a valuable resource that can easily be degraded or destroyed by inappropriate sound levels and frequencies. CW-2



3060

Ms. Linda Devine

3

According to the Little Bighorn Battlefield National Monument General Management Plan (GMP) (updated 1995), "The primary purpose of Little Bighorn Battlefield National Monument is to preserve and protect the historic and natural resources pertaining to the battle of the Little Bighorn and to provide visitors with a greater understanding of those events which led up to the battle, the encounter itself, and the various effects the encounter had on the two cultures involved".

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 National Monument contains 2 parcels of land separated by 5 miles, the Custer Battlefield unit and the Reno Benteen Battlefield, with a combined acreage of 786 acres. 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).

Under the 1995 GMP, the battlefield is managed as a historic zone, "...where all activities would be managed to preserve, protect, and interpret cultural resources and their settings." The NPS has worked extremely hard to preserve the landscape, vegetation, setting, and feeling of the battlefield to as closely as possible evoke the landscape and conditions of 1876. A recent Cultural Landscape Inventory (2010) for the National Monument found the cultural landscape retains a high degree of integrity and concluded that "...despite external encroachment and ever increasing visitation, Little Bighorn largely retains its qualities of remoteness and history. The natural setting of the battlefield appears much as it did in 1876, with its scattered markers in isolation or in larger clusters poignantly expressing a moment frozen in time that can be felt and appreciated by visitors to the site." The National Register program identified seven aspects of integrity: Location, Design, Setting, Materials, Workmanship, Feeling, and Association. Retention of these qualities is essential for a property to convey its historic identity or evoke its appearance during a significant period in history. Little Bighorn Battlefield's cultural landscape retains the integrity of all seven aspects. CW-2

#### Soundscapes

Under the proposed action in the EIS, the National Monument would be included in area PR-1B-MOA, which would be from 500 feet above ground level (AGL) up to, but not including 18,000 mean sea level (MSL). On Page 3-60, Table 3.2-3 (Average Frequency of Military Aircraft Noise Events at Selected Noise-Sensitive Locations), contains a footnote that the published aircraft avoidance area is 0.75 nautical miles horizontally and 2,000 feet AGL for the National Monument. However, the reference for this footnote should be noted (Federal Aviation Administration Advisory Circular, FAA AC-91-36D), as the general public may not know where to find this information. It should also be noted that this avoidance regulation is voluntary as aircraft are requested, but not required, to maintain a minimum altitude above noise sensitive areas. Overflights over 2,000 feet are restricted above the National Monument under the National Park Air Tour Management Act of 2000 (Public Law 106-181). The area above the National Monument does not currently have military special use airspace or training operations. Under the proposed action, Large Force Exercises (LFEs) could occur above Little GE-15

Ms. Linda Devine

4

Bighorn for 1-3 days per quarter. This would include supersonic flights for up to 10 days per year. Training exercises would include the deployment of chaff and flares. The EIS notes that three aspects of the increased noise could cause environmental impacts: 1) increases in ambient noise levels, 2) low-level startle effects; and 3) sonic booms. We have concerns about the effects of all three types of noise on soundscapes, visitor experience and cultural resources, and we disagree with the assertion that "Infrequent overflights over 2,000 feet would not be expected to be perceived as a significant intrusion to a National Monument" (EIS Executive Summary, page ES-24).

LV-2

Acoustic data collected by the NPS at Devils Tower National Monument during June and July, 2010, show that ambient conditions in that park are very quiet. The daytime median exceedence level (L50) was 29.8 dBA (the sound pressure weighted [A] level given in units of decibels) and 35.0 dBA at the monitoring locations. Put another way, the percent of time the ambient sound level was above 35 dBA was less than 5 percent of the time from 0700 hours to 1900 hours, and less than 1 percent of the time from 1900 hours to 0700 hours. Although the NPS has not conducted acoustic monitoring at the National Monument, we would expect the ambient levels would be similar away from the road or visitor center in areas where a visitor would expect to have solitude and a contemplative atmosphere.

Thresholds of significance that have been established by the Federal Aviation Administration (FAA) are based on community response. FAA Order 1050.1E notes that special consideration needs to be given to the evaluation of the significance of noise impacts on noise sensitive areas within national parks. The threshold cited in the Draft EIS, 55 DNL (Day-Night Average Sound Level), as the threshold below which adverse impacts would not be expected to occur does not adequately address disruption of tranquility or disruption of solitude. Although the noise analysis in the Draft EIS is very detailed and describes the types of impacts that would occur at various levels of noise, no specific discussion is provided as to how thresholds of significance were defined in determining impacts of noise; for instance, negligible, not significant, to the resources described in the document. In other words, it is not clear how conclusions about impacts were determined.

NO-4

#### Visitor Experience and Soundscapes

The National Monument is of enormous significance to American history, the American public, and the 280,000 to 420,000 visitors who visit the site annually. The National Monument is the second most visited tourist site within the state of Montana, and its economic importance to Southeastern Montana cannot be underestimated. Additionally, it has great significance to the U.S. Military and their Crow and Arikara allies, who suffered one of their most famous defeats at this site in 1876 at the cost of over 260 men, and to the Cheyenne, Lakota, and Arapaho tribes whose victory at this site also came with significant losses of warriors and noncombatants. Today, many Americans, Veterans, and Tribal members view Little Bighorn Battlefield as a solemn and sacred place of reflection, where they can come reflect upon the human sacrifice that all sides made defending what they believed was right, and reflect on cultural changes that have occurred since the battle. Many visitors, Tribes, and stakeholders have commented over and over that the ability to hear the natural sounds, listen to the wind blowing, and hear the sound of the Meadowlark is a fundamental part of the Little Bighorn Battlefield experience.

CV-2

LV-2

3060

Ms. Linda Devine

5

Increases in ambient noise levels, low level startle effects and sonic booms would all impact the visitor experience and natural soundscapes of the site, and would impact visitors' ability to enjoy the contemplative and sacred atmosphere that is so fundamental to Little Bighorn Battlefield. Being startled by a sonic boom while standing alone on Last Stand Hill, contemplating the sacrifice of the U.S. Army and the Cheyenne and Lakota, would have a serious impact on the visitor experience and that person's ability to imagine what it was like to be on that same hill in 1876. All three types of noise would likely impact NPS operational and educational activities such as the outdoor ranger programs (guided walks and outdoor ranger talks) that take place 10 times a day between May and October and that over 60,000 visitors each year enjoy.

W-2

In addition, the increases in ambient noise levels, low-level startle effects, and sonic booms would also impact the family members and loved ones who come to pay their respects to the over 5,000 veterans and dependents who are buried at the National Cemetery. Increased noise would also significantly disrupt the solemn and reflective atmosphere for the 10 to 15 funerals that are still conducted annually at the National Cemetery. The release of chaff or flares over the battlefield also has the possibility of visual impact to all of the visitor experiences during these and other services, as well as during operational activities and the special activities listed above. Fallen chaff and flare remnants would also have the potential to litter the battlefield, disrupting the historic scene.

W-2

W-9

Additionally, the National Monument issues approximately 25 special use permits per year for activities such as Tribal religious or cultural ceremonies, commemorative events by military and non-military groups, and commercial filming. Increases in ambient noise levels, low level startle effects, and sonic booms would significantly disrupt these activities. As described in the EIS, "Native Americans from the four directly impacted reservations explained that low-level overflights and intrusive noise would be detrimental to their cultural practices." These types of cultural practices, highly significant to Tribal members from 17 reservations throughout the region occur not only on reservations but at sites such as Little Bighorn Battlefield. We suggest further consultation with the Lakota, Dakota, Nakota, Cheyenne, Arapaho, Arikara, and Crow Tribes about how low level overflights might impact their cultural practices, ceremonial practices and offerings at Little Bighorn Battlefield National Monument.

NA-4

#### Cultural Resources

The EIS notes the possibility of sonic booms causing the failure of glass, plaster or other structural elements. Little Bighorn Battlefield is home to many irreplaceable cultural resources, including historic monuments and structures. The two-story stone lodge constructed in 1894 as the Superintendent's residence is said to be one of the first permanent dwellings in Eastern Montana. Thanks to preservation work and good care, it retains its historical and architectural integrity and is in good condition. However, it would be unacceptable if sonic booms caused the failure of its historic glass windows and/or doors, or plaster, or disturbed its stone foundation or exterior walls. Other historic structures at the Battlefield that must be protected from sonic booms include the Fort C.F. Smith Memorial (circa 1868), quarried from local limestone and the 1881 7th Cavalry granite memorial on Last Stand Hill, both of which are part

CW-2

Ms. Linda Devine

7

## CONCLUSIONS

Based on information provided in the DEIS, the USFWS determines that the relative impacts of the DEIS alternatives on fish and wildlife resources would be as follows:

**Alternative A.** This alternative would likely have the largest potential impact to federally listed as threatened and endangered and on migratory birds, because it increases the level of disturbance to the Greater sage-grouse in all four states, and to Sprague's pipit.

B1-8

**Alternative B.** This alternative would likely have the least impact to the Greater sage grouse in Wyoming and Montana.

D0-2

**Alternative C.** This alternative would have the least impact to endangered whooping cranes and other migratory birds that use the principal migrational routes of the central and Mississippi flyways.

D0-5

**No Action Alternative.** This alternative would have the least impact on federally listed species since there would be little to no increase in the current activities.

GE-2

The NPS is quite concerned with the proposed action and its potential to affect visitor experience, natural soundscapes, cultural resources, and sacred sites at the National Monument. Our first preference would be the No Action alternative, although we realize this may not be feasible given your purpose and mission. We note that Alternative B would have had no low-level flights over the National Monument (in addition to other culturally sensitive areas). We would strongly support either a reconsideration of this Alternative or the modification of the preferred alternative to include expansion of the avoidance distance to include the National Monument to reduce or eliminate the noise and visual impacts of low level military aircraft. The avoidance measure listed is the standard for all aircraft; however, military aircraft are substantially louder than general aviation aircraft. An avoidance distance similar to the one charted for Devils Tower National Monument would be acceptable.

GE-2

D0-2

Am-24

The Department has a continuing interest in working with the Air Force to ensure impacts to resources of concern to the Department are adequately addressed. If you have questions regarding Fish and Wildlife Resources comments, please contact Mr. Scott Larson, Field Supervisor of the U.S. Fish and Wildlife Service' Ecological Services Field Office, in Pierre, South Dakota, at telephone (605) 224-8693. For issues concerning National Park Resources comments, please contact Regional Environmental Coordinator Nick Chevance, Midwest

GE-11

2060

Ms. Linda Devine

6

of Historic District One; and the Reno-Bentzen granite memorial (circa 1928), located in Historic District Two.

The EIS also notes the possibility of sonic booms causing "...bric-a-brac balanced on shelf edges such as mantles or bookcases to be vibrated off and fall and break." It should be of note that the National Monument's priceless museum collection and rare book collection is stored onsite. The museum collection includes over 119,000 objects, many of which are fragile and sensitive, and many of which are on display in the museum gallery of the Visitor Center. If sonic booms were to cause exhibit or museum collection items to fall or break, or for windows or glass exhibit cases to break, it would have serious unacceptable resource protection, security, and safety impacts.

CV-2

The EIS also notes the possibility for future threat emitters on 15 acre sites, which would be subject to further environmental review (ES-30). In the future we would like to be notified if any threat emitters are proposed in the historic viewshed of the National Monument, which includes adjacent lands pertaining to the Battle of the Little Bighorn, as these would have an adverse effect on the cultural landscape/historic viewshed.

CM-2

#### Natural Resources

The EIS states: "Flares burn out in approximately 500 vertical feet, or a minimum of 1,500 feet above the ground. There would be a very slight potential for increased fire risk if flares were accidentally deployed substantially below authorized altitudes." The National Monument's prairie grass ecosystem and riparian zone has a very high fire danger from over nine years of prolonged drought, especially between July and September, and use of chaff and flares should be restricted over the National Monument and adjacent lands. We also recommend that local Bureau of Indian Affairs, Big Horn County, and area fire departments be involved in training and fire protection from chaff and flares.

SA-5

One of the NPS primary missions is to preserve natural resources unimpaired. Baseline data about wildlife species at the National Monument is incomplete. However, we are concerned about the potential for low level flights to impact all types of wildlife species with increased ambient noise, startle-effect, and sonic booms. The National Monument has several species of concern, including Sage Grouse, wild Turkey, and several nesting sites for Canadian Geese, Great Blue Herons, and other water fowl in the riparian zone along the Little Bighorn River in the Custer Battlefield sector. These species may be adversely affected by low level overflights and noise including sonic booms and jet engines.

BI-9

BI-4

#### Specific Comments

Please provide a citation for footnote 2 in Table 3.2-3 (Average Frequency of Military Aircraft Noise Events at Selected Noise-Sensitive Locations), that states the Devils Tower National Monument published aircraft avoidance area is 5 nautical miles (NM) horizontally and 18,000 feet AGL. The notice on the Billings Sectional Aeronautical Chart, dated 26 August 2010, states "...for reasons of national welfare pilots are requested to avoid flights within 3 NM of Devils Tower National Monument."

AM-24

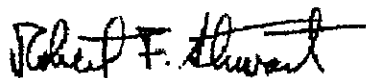
Bobo

Ms. Linda Devine

8

Regional Office, National Park Service, 601 Riverfront Drive, Omaha, Nebraska 68102,  
telephone 402-661-1844.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert F. Stewart". The signature is fluid and cursive, with a horizontal line extending from the end.

Robert F. Stewart  
Regional Environmental Officer

3061



Ms. Linda DeVine

HQ ACC/A7PS

129 Andrews Street, Rm. 337

Langley AFB, VA 23665-2769

Re: Powder River MOA Proposed Expansion

Ms. LeVine:

My name is Ray A. Jilek, president of Eagle Aviation, Inc., the Fixed Base Operator at Black Hills Airport in Spearfish, SD and I am also the Airport Manager. I had previously attended your "Scoping" meeting in Belle Fourche, SD June of 2008 and Public hearings in both Rapid City and again Belle Fourche September 14<sup>th</sup> & 15<sup>th</sup>.

We are very concerned with the MOA proposal as presented and detailed in the Environmental Impact Statement. The following "Bullet" points are some of the primary issues with which we have concerns that have not been fully addressed to this point:

- Black Hills Airport ranks #5 of 34 public use airports within your study area for annual operations and is **not even shown** on your maps.
- During the time your data was compiled Black Hills Airport's primary runway was closed for lengthening and re-construction with a total investment of approximately 10 million dollars.
- We are currently moving forward with a full-length parallel taxiway project with a price tag of approximately 7 million dollars.
- Due to our recent expansion we are in the process of developing new LPV approaches to runway 13/31 for category A, B, & C aircraft. IFR capabilities throughout this construction period have been curtailed or significantly reduced.

AM-21

Model

- Expanding the MOA to an area of 37,800 Sq. Mi. (Larger than the state of Indiana) will have a **dramatic effect** on air travel to and from the Black Hills Region. AM-6
- IFR traffic to or from any area north of the Black Hills will be **significantly impacted** and may very well chose an **alternate destination** even though the Black Hills region is the most popular destination for recreation / tourism within hundreds of miles. SD-5
- VFR "See and Avoid" as proposed in your document is an incredible increased risk to flight safety assuming one was able to conduct flight under VFR conditions considering a closure rate of **800 plus knots**. (B-1 pilot stated 580 kt. Airspeed as normal within the MOA) SA-7
- FAR 91.117 requires a civilian pilot to reduce speed to below 250Kts. Anytime one is bellow 10,000 ft. to provide an opportunity to "See and Avoid" (Max. potential closure rate of **500 Kts.**) SA-7
- Exemption #7960C authorizes the USAF to operate in the Powder River MOA "Lights-Out" at night to practice night vision goggle usage and yet we are told to feel safe flying through the MOA after dark VFR "See and Avoid"? SA-11
- As stated in your EIS, Radar coverage is **unavailable below 8000 ft.** which will provide no help for a VFR flight through the MOA. AM-3
- With the proposed MOA extending from 500 ft. AGL up to 60,000 ft. it will be **impossible for IFR** traffic to transition through this area when the MOA is active Mon. through Fri. 6:00 AM till Noon and again Mon. through Thurs. from 6:00 PM till 11:30 PM or other times when activated by NOTAM. AM-21
- The three corridors along Victor airways would allow IFR traffic through, below 18,000' except during Large Force Exercises. These corridors do **little to mitigate** the impacts to the Black Hills and most IFR traffic would generally fly above 18,000' due to weather as well as operating efficiency.
- Restrictions on IFR traffic through the MOA would not only have **significant economic impact** to our customers, but also to all commercial airline traffic that traditionally flies over this area as they are incapable of flying above 60,000'. SD-7
- Your EIS does nothing to address **the economic impact** of this proposal other than stating a "Potential Economic Impact" to General Aviation. SD-22
- Approximately 80% of our fuel sales are to Transient aircraft. If the MOA were to be expanded as proposed, one could reasonably expect a **significant reduction** in fuel sales which contribute to the employment of our existing employees as well as a significant reduction in the collection of "Flowage Fees" collected for Lawrence County to help offset the operational costs of this Public-Use Airport. SD-10

In addition to the above concerns, I have issues with the proposed activities planned for this expanded MOA. Specifically, the concept of VFR "See and Avoid" in an area with B-1's, B52's, F-16's, etc. operating at speeds exceeding 500 kts. Without radar coverage and possibly with their lights off is dangerous, reckless and foolish like a ticking time bomb. Should this proposal move forward, please consider adding layers that would allow through traffic such as 8,000 – 12,000 msl and 16,000 – 24,000 MSL to allow transitioning aircraft through MOA and improvements to radar and radio coverage. Proposed

SA-7  
AM-26



306d

activities such as supersonic flight, live flares, defensive chaff, Lights-out NVG training, closure rates far exceeding what is acceptable to the FAA for civilian operations, lack of radar and radio coverage throughout the area, etc. I'm convinced that these are technically operations which should be conducted in Restricted Airspace not in a MOA. The last issue of concern is the complete lack of any effort to identify or quantify the significant economic impacts of the proposal to the entire region.

AM-11  
SD-22

Sincerely:



Ray A. Jilek, Airport Manager

Black Hills Airport / Clyde Ice Field



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

1595 Wynkoop Street  
DENVER, CO 80202-1129  
Phone 800-227-8917  
<http://www.epa.gov/region08>

**NOV 19 2010**

Ref: EPR-N

ATTN: Ms. Linda A. DeVine  
HQ ACC/A7PS (PRTC EIS)  
129 Andrews Street, Suite 337  
Langley AFB, VA 23665-2769

Dear Ms. DeVine:

Re: Powder River Training Complex DEIS  
CEQ# 20102947

In accordance with our responsibilities and authorities under the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, the Region 8 office of the U.S. Environmental Protection Agency (EPA) has reviewed and is providing a CEQ rating for the Draft Environmental Impact Statement (DEIS) for the proposed Powder River Training Complex (PRTC).

The purpose for the DEIS is to analyze the environmental effects of designating additional airspace in Wyoming, Montana, North Dakota, and South Dakota, adjacent to Ellsworth AFB, that would provide military aircrew training opportunities that cannot be accomplished in the existing Powder River military operations area (MOA). Alternative A, the Air Force Proposed Action, would expand and enhance the existing Powder River airspace to become the PRTC. The enhanced airspace would provide realistic, integrated B-1 bomber training close to Ellsworth AFB to maximize training in local airspace and minimize long-distance commute time to remote training ranges. The expanded training complex would also support continued and enhanced B-52 training for aircraft from Minot AFB. Alternative A is based on B-1 and B-52 training needs, which in turn dictate the airspace structure and number and type of airspace operations that occur within the proposed PRTC airspace units. The FAA and the USAF identified the no action and two additional action alternatives to the proposed alternative after several public hearings to obtain input from the public and other stakeholders. We defer to the FAA, which has jurisdiction by law or special expertise for administering all navigable airspace in the public interest of safety.

The DEIS documents the process that analyzed impacts identified during the scoping hearings. We reviewed a summary of the issues raised during those hearings and were satisfied with the public involvement process required by NEPA. Environmental impacts were assessed and mitigation measures were designed to address the following relevant planning issues organized into the applicable resource categories of interest:

- Regional energy development projects including tall wind turbine towers
- Civil/commercial aircraft flight operation compatibility

- Access to local general aviation airports
- Destructive ground effects of sonic booms from military aircraft
- Chaff and flare deposition under severe wildland fire conditions

In general, the DEIS is well organized and thorough in its analysis of impacts. It also clearly demonstrates where impacts from the proposed alternative may be significant. However, EPA was disappointed in the decision to screen several alternatives that were considered but not carried forward into detailed analysis. An increase in funding for commuting (§2.3.3.2), use of flight simulators (§2.3.3.3), and relocation of basing for the training aircraft (§2.3.3.4) were considered but not very well explained before dismissal from detailed analysis. We believe the public would be better served by providing them a better understanding of the increased funding required for longer flight commutes to remote military training airspace. Also the limited discussion on expanding the use of flight simulators seems to underestimate the public perception that simulation technology available to the military is highly sophisticated and capable of integrating the entire Air Force team and obtaining aircrew combat mission readiness. The Final EIS should discuss how the Base Realignment and Closure (BRAC) Commission voted to retain Ellsworth AFB for continuing to base a B-1 fleet without, at the same time or within the BRAC analysis, determining whether the existing airspace could meet the change in military training requirements for these multi-mission aircraft.

DO-6

PN-1

GE-16

The DEIS discusses the proposed management practices that would be used to control the risk of wildland fires initiated from the use of flares within the PRTC (§2.4.6.2). The Air Force proposes to discontinue release of flares in an MOA when fire danger is rated "extreme" under the National Fire Danger Rating System (System) provided by the United State Forest Service Wildland Fire Assessment System. However the "extreme" classification under this System identifies conditions where fires start quickly, spread furiously and burn intensely. All fires in this condition are potentially serious because fire development into high intensity burning will usually be faster and occur from smaller fires than in the very high fire danger class. EPA suggests that a more conservative management approach be adopted within the PRTC so that release of flares is not authorized whenever the System rates the fire danger as "moderate" or higher (i.e. high, very high, or extreme). The System classifies "moderate" fire danger as those conditions when fires can start from most accidental causes, but with the exception of lightning fires in some areas, the number of starts is generally low. Fires in open, mature grasslands will burn briskly and spread rapidly on windy days. EPA recommends that the Final EIS provide information on how often the System rated fire danger moderate or higher in the proposed PRTC during the last major drought year (2002). This historical comparison would give the reader some idea of how often adverse fire conditions would not permit use of flares.

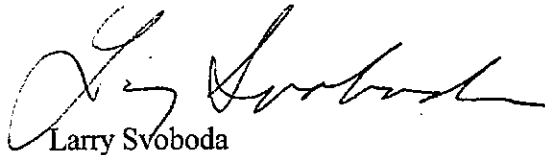
SA-5

EPA evaluated the potential effects of the proposed action and the adequacy of information in the Draft EIS. EPA rates this proposal to establish the Powder River Training Complex with a Lack of Objection ("LO") under our rating criteria. The "LO" rating means that our review has resulted in finding no environmental impacts that have not been effectively mitigated in the proposed alternative. We are raising no objections to the proposed action.

3062

We appreciate the opportunity to provide comments at this stage of the project. If you have any questions or would like to discuss our rating, please contact me (303 312-6004) or James Hanley (303) 312-6725 of my staff.

Sincerely,



Larry Svoboda  
Director, NEPA Program  
Office of Ecosystems Protection and Remediation



3063

**Essential Air Service Task Force**

643 Remuda Creek Road

Fort Peck MT 59223

(406) 525-3318

November 10, 2010

Ms. Linda Devine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

Subject: Draft Environmental Impact State for Powder River Training Complex

Dear Ms. Devine:

The Montana Essential Air Service Task Force consists of representatives from Montana's seven eastern essential air service communities located in; Sidney, Glendive, Miles City, Glasgow, Wolf Point, Lewistown and Havre.

The task force opposes the expansion of the Powder River Training Complex into Montana. The proposal and charted times of use are extreme and unsupported and the colossal level of this proposal will have devastating impacts on southeast Montana. GE-2  
AM-6

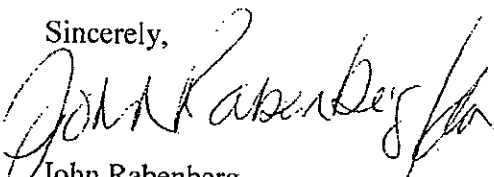
Any disruption in air service to these communities is unacceptable. These scheduled flights are in most cases the only form of public transportation available. Essential Air Service plays a key role in local communities by attracting and retaining businesses that depend on commercial air service, in health care by enabling our citizens to easily access sophisticated healthcare that is often absent in rural communities. SD-5

Great Lakes Airline provides this service with flights originating from Denver. When the MOA is active, Great Lakes will be forced to divert and fly through the proposed gaps. During a Large Force Exercise, the carrier will be re-routed and made to fly around this large mass of airspace. SD-6

Adding additional time and expense to any air carrier or general aviation operator is not acceptable. In these volatile economic times and current state of the aviation industry, I urge you to adopt the "no action alternative" and do not interrupt our commercial or general aviation activities. SD-7  
GE-2

The task force values and appreciates our United States military forces. We thank you for your service to this great country.

Sincerely,



John Rabenberg  
Chairman

c: task force members  
Federal Aviation Administration

3064

LANTIS ENTERPRISES, INC.  
*Over 30 Years of Service Excellence*

PO Box 699, 4755 E. Colorado Blvd.  
Spearfish, SD 57783

P: 605 642-7736  
F: 605 642-8443  
lantisnet.com

November 1, 2010

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andres Street, Room 337  
Langley AFB, VA 23665-2769

Dear Ms. DeVine,

I am writing to express my concerns over the expansion of the Powder River Training Complex (PRTC). I have four major concerns. The first is the expense burden on business and private aviation, the second is destination aviation and the loss of revenue in the Black Hills, third is the impact on ranching and the loss gains therefore the loss of revenue, and the fourth is safety.

Our business and private aviation will be affected because of several different reasons. The expansion of the PRTC will increase operating costs immensely because of restricted flight schedules as well as the added flight costs and wages for Lantis Enterprises, Inc. The increases can be figured at an added \$680 in flight costs as well as an extra \$350 in wages for employees per flight if we would be required to fly around the PRTC. This would be detrimental to our company as we need to make regular flights to check on our facilities and businesses; we are literally estimating costs just for our company in excess of \$100,000.00 a year. This would not include the cost of being grounded for several hours while waiting for the flight exercises to be completed so that we could take off or land. To expect businesses and individuals to reschedule their lives, business, and flight plans around the PRCT flight exercises is not an option.

50-7

50-8

Private aviation would be negatively impacted through all of the public and private use airports in the region. During PRCT flight exercises, small airports would see a drastic reduction in the amount of traffic in an out of their facility. These flight exercises would even cause a permanent reduction in business, business which is vital not only for the airport, but the surrounding community. For example, the local airport here in Spearfish, based on the numbers gathered by the PRTC is rated fifth highest for activity in the region, even though those numbers were gathered during a reconstruction period, of which over a month of the data collection information the airport was completely closed. If they were to lose any

50-10

3064

business, either temporarily or permanently, this would cause significant damage to current business relations as well as future relations.

I believe that this would cause destination aviation in the Black Hills area to decrease. Tourism is a big part of the viability of the Black Hills. If the PRTC expansion did take place I believe that this would have a large economic impact on this area.

Another concern that I have is for the ranching business. My family owns a large ranch with various numbers of livestock in northwest South Dakota. The problems that would be caused by the low flying aircraft and other exercises would be sizeable. This would cause stress on the livestock, resulting in low weights, increased veterinary bills, increased cost for fencing repairs and the loss of livestock. It would also be difficult to attempt to coordinate events such as moving livestock or branding around the PRTC schedule with any amount of efficiency. The expansion of the PRTC into this area would cause the resale value of our ranching operation to decrease. All of these combined concerns regarding our family ranch would have large economic ramifications on that facet of our business.

There are many safety concerns that need to be considered regarding the PRTC. Civilian pilots operating under Visual Flight Rules (VFR) have addressed that flight, with the current size of the PRTC, is already a risk to fly through. The combination of the expansion of the area to the proposed size, the lack of suitable and reliable surveillance radar and radio communications at low altitudes, and the high speed of the Bomber and other aircraft involved would take an already risky situation and escalate it to a dangerous situation.

The expansion of the PRTC to the proposed areas will add a considerable amount of grassland to the project, and while they will practice using chaff and flares at such a low altitude there is a heightened probability that these could come into contact with another aircraft. Furthermore this practice could cause a major fire in some rural areas. This is a major problem, as the rural areas all have volunteer firefighters and it can take some time for them to arrive on scene. With the hot dry summers that we have in this area, one ember from a flare could very quickly engulf the entire acreage of a ranch or farm. This one exercise alone could cause the loss of crops, livestock and possibly a home and ranch buildings.

According to the Air Force, the sound of a Bomber has been used as a weapon in combat, described as a "show of force," and is deafening to the human ear. The level at which hearing loss begins is 90-95 decibels, with physical pain beginning at 125 decibels. A Bomber with afterburners emits 133 decibels at 2000 feet above ground level (AGL). This is louder than a rock concert. This doesn't take into effect the sonic booms that will be occurring and the affect that they will have as well. Stated indoor levels of 113 decibels as well as the supersonic flight could also cause damages to people's homes and possessions. Who will pay for the damages caused every time a supersonic flight breaks a window in someone's home or even in their vehicle? These are all problems that need to be very carefully considered, especially the repeated flights at a decibel that can cause hearing loss.

3064

Two suggestions that I would like to make regarding the expansion of the PRTC are to allow two elevation gaps for flights and to expand and improve radar surveillance and radio communications. My proposal would be to allow for two separate elevations from the surface to 5,000 feet AGL and from 26,000-34,000 feet MSL that would be open at all times for private, business and commercial flights to have access to, with radio and radar coverage. This would allow flights for both entities to continue at all times and would alleviate the extra costs that would arise instead of having flights grounded during these exercises. This proposed plan would not cripple the public and private use airports. This would be a compromise on both parts and would satisfy the need for flight time for the USAF and for the private, business and commercial aviation.

AM-26

If the expansion was to occur before that could happen there would need to be some major improvements in radar surveillance and radio communications. This should be an essential requirement for a project of this size because of the increase in air traffic.

AM-3

I believe that all of the noted problems and improvements need to be carefully considered and a very in-depth economic impact study needs to be conducted and information compiled. If a project of this size is not handled appropriately and the studies are not done correctly ahead of time, major damages would be caused and several people would be very disgruntled when it comes to the USAF, our troops need our support not a fight with the public it's very existence is to protect.

SO-22

With all of the problems, concerns, and work that should be addressed, I believe that we are nowhere close to where this project should be approved. If you have any questions, please do not hesitate to contact me.



Travis Lantis  
CEO, Lantis Enterprises  
President, Lantis Aviation



3065

**MAMA****Montana Airport Managers Association**

November 15, 2010

Ms. Linda DeVine  
HQ/ACC/A7PP  
129 Andrews Street, Room 317  
Langley AFB VA 23665-2769

Dear Ms. DeVine:

The Montana Airport Manager Association (MAMA) represents the interests of Montana's airports, both large and small. The proposed expansion of the Powder River MOA is an issue that causes many members of MAMA much concern. The area of eastern and south eastern Montana being considered in the proposed expansion of the Powder River MOA significantly increases the impact to Montana airspace without any economic benefit to this area of Montana. In fact this expansion will add to an already difficult economic condition in this part of the State. The Air Force bases in North Dakota and South Dakota provide a very large economic impact to those States and subsequently should be willing to shoulder the burden of an expanded MOA in their respective States, as opposed to a large expansion into neighboring Montana.

SO-24

In recent years south eastern Montana has began to see an increase in general aviation activity as the result of the exploration of Montana's natural resources. This activity has fueled local economies through the sale of fuel, overnight parking, hotel accommodations, use of restaurants, and rental car sales. IFR aircraft would be significantly restricted in the use of the air space over these areas and subsequently could result in a loss of revenue to these communities. Any loss of revenue will impact the ability for these communities to maintain their airports and provide a safe airport environment. Many local residents depend on aerial applicators to spray fields at low altitudes, additionally many local ranchers who pilot aircraft will fly at low altitudes to check on livestock spread out over many square miles. The ability for these activities to safely perform a necessary function is greatly diminished with an expansion of the Powder River MOA. It does not appear that there will be a method to provide for safe separation of military and civilian aircraft due to limited or non-existent radar and voice communication.

SO-9

SA-9

AM-3

The aviation industry has taken some hard lumps over the past few years and requiring aircraft to circumvent this expanded area will only serve to increase the cost of operating an aircraft in the vicinity of the Powder River due to the need to use additional fuel, which the price is steadily increasing on. This impact could be especially difficult on the Essential Air Service (EAS) provider that currently serves seven (7) cities in eastern Montana that are near the proposed Powder River MOA and may need to deviate many miles on many of its flight routes, adding additional costs to a very revenue lean operation.

SO-7

3065

While MAMA and its members whole heartedly supports all branches of the U.S. military, and all agree that training is important, we believe that with the expansion of the Powder River MOA, the airports of eastern and south eastern Montana and their supporting communities are being asked to provide more than their fair share in helping the military in their training needs.

GE-3

Sincerely,



Kevin Ploehn  
President  
Montana Airport Managers Association

KP:

3066



Montana Department of Transportation

Aeronautics Division  
2630 Airport Road  
PO Box 200507  
Helena MT 59620-0507

Jim Lynch, Director  
Brian Schweitzer, Governor

October 7, 2010

Ms. Linda DeVine  
HQ ACC/A7PP  
129 Andrews Street, Room 317  
Langley AFB VA 23665-2769

Subject: Powder River Training Complex; scoping comments

Dear Linda:

Thank you for the conversation and information today.

I am requesting that all comments received by your office during the scoping period of the Powder River Training Complex environmental process be copied and shared with the Federal Aviation Administration to be entered into its record for the aeronautical study they are conducting in conjunction with this proposal.

NP-5

I appreciate your willingness to assist in this matter and look forward to meeting you in Billings.

Sincerely,

A handwritten signature in cursive script, appearing to read "Debbie", is written over the printed name.

Debbie Alke  
Administrator

3067

MONTANA PILOTS' ASSOCIATION  
INCORPORATED



P.O. BOX 4311 • HELENA, MONTANA 59604  
www.montanapilots.org

November 9, 2010

Ms. Linda Devine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

Dear Ms. Devine,

As President of the Montana Pilots Association which was founded in 1939 and represents approximately seven hundred members, I was requested to send this letter of comment, after a unanimous vote by the board of directors. We are not in favor of any expansion to the Powder River Military Operations Area. Several Montana Pilots Association members, including myself, state officials, eastern Montana county officials, ranchers, and numerous other concerned parties attended a meeting September 7<sup>th</sup> 2010 in Billings, Montana. The meeting was arranged by Congressman Denny Rehberg's staff member, J.T. Korkow, with Colonel Jeffrey B. Taliaferro, Wing Commander Ellsworth Air Force Base, Rapid City, South Dakota and his staff. I also attended the public hearing meeting in Billings, Montana. The Montana Pilots Association has come to the conclusion the negative economic hardships to the aviation community in the State of Montana are not acceptable. We are in agreement with our elected officials: Senator Max Baucus, Senator John Tester and the State of Montana, whom have all voiced the negative impact this proposal will have on our State. Jim Lynch, Director of the Montana Department of Transportation and Debbie Alke, Administrator of the Aeronautics Division, Department of Transportation, have also made numerous negative comments to this proposal.

It was quite evident the majority of folks that made comment at the Billings public hearing were not in favor for many reasons, including concerns over negative economic impacts to commercial and private aviation operations, safety issues such as spooking of domestic animals, wildlife stress, and Post Traumatic Stress victims from previous military conflicts. The list of opposition is long and varied.

So with all due respect please mark our comment down as No-Action Alternative, which is no change to the current Powder River Military Operations Area. ]GE-2

Sincerely,

Wade Cebulski, President

Cc:

Federal Aviation Administration  
Senator Max Baucus  
Senator Jon Tester  
Congressman Dennis Rehberg

# NDBAA Response to the EIS for the Powder River MOA Expansion Request

---

North Dakota Business Aviation Association (NDBAA) represents commercial and corporate pilots, FBO's, SASO's and anyone that incorporates aviation in to their business operations. Our Mission is to promote the interests of those that benefit from the use of business aviation in North Dakota

The proposal for the expansion of the Powder River MOA by the US Air Force has no foreseeable value to the professional and corporate air traveler. As it is proposed, it will only cause delays and add expense to those traveling into and out of western North Dakota. It will also delay and even deter many flights that would have crossed over and stopped in North Dakota to seek a different alternative stop.

SO-8

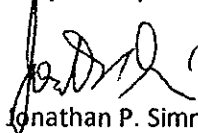
For those that satellite out if the Bismarck/Mandan area with medical and legal services to the smaller rural communities, it will cause unpredictable delays in those travels. In some cases it will cause complete cancellation of services to the smaller communities.

SO-5

Delays to critical care flights are proposed to be minimal however when these flights are most needed any delay can mean the difference between life and death.

SA-19

Respectfully submitted,



Jonathan P. Simmers

Secretary

2301 University Dr., #53

Bismarck, ND 58504



STATE  
HISTORICAL  
SOCIETY  
OF NORTH DAKOTA

3069

John Hoeven  
Governor of North Dakota

North Dakota  
State Historical Board

Chester E. Nelson, Jr.  
Bismarck - President

Gerold Gerntholz  
Valley City - Vice President

Richard Kloubee  
Fargo - Secretary

Albert I. Berger  
Grand Forks

Calvin Grinnell  
New Town

Diane K. Larson  
Bismarck

A. Ruric Todd III  
Jamestown

Sara Otte Coleman  
Director  
Tourism Division

Kelly Schmidt  
State Treasurer

Alvin A. Jaeger  
Secretary of State

Mark A. Zimmerman  
Director  
Parks and Recreation Department

Francis Ziegler  
Director  
Department of Transportation

Merlan E. Paaverud, Jr.  
Director

Accredited by the  
American Association  
of Museums since 1986

August 25, 2010

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB VA 23665-2769

ND SHPO 08-0893 USAF Powder River Training Complex - low flying training missions B-52s and B-1s in Southwestern North Dakota

Dear Ms. DeVine,

We received your initial consultation materials regarding ND SHPO 08-0893 USAF Powder River Training Complex low flying training missions B-52s and B-1s in Southwestern North Dakota. We request more detailed maps to understand better which aircraft would be flying in which corridors in North Dakota. Other comments include:

- There is one newly listed National Register Property in the APE: Evangelisch Lutheraner Dreienigkeit Gemeinde (Church) Grant County, City of New Leipzig. } CU-2
- We have concerns regarding fragile historic earthen-based homes and outbuildings in the area. Many of these have earthen walls or stone walls with mud plasters that could be damaged or destroyed easily by vibrations. Stern Homestead is an example, and there are several others that are eligible for but not listed in the National Register of Historic Places. } CU-2
- We have concerns regarding low flying aircraft and disturbances to the tranquility of the prominent buttes in the area, such as Sentinel Butte. } CU-2

We look forward to further review information and consultation. If you have any questions please contact Susan Quinnell, Review and Compliance Coordinator at (701) 328-3576, [squinnell@nd.gov](mailto:squinnell@nd.gov).

Sincerely,

Merlan E. Paaverud, Jr.  
State Historic Preservation Officer (North Dakota)

3070

## BOARD OF COUNTY COMMISSIONERS

POWDER RIVER COUNTY  
PO Box 200  
Broadus, Montana 59317

Phone: 406-436-2657  
Fax: 406-436-2151

Ray Traub, Broadus  
Don McDowell, Broadus  
Les Thompson, Broadus

November 1, 2010

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

RE: Powder River Training Complex expansion

Dear Ms. DeVine:

We, the board of County Commissioners of Powder River County, Montana, would like to express our concerns about the expansion of the Powder River Training Complex.

First: With a floor of 500 feet, our area has no radar below 15,000 feet. We feel if you do this, a system should be in so Salt Lake can see all the activity that is here. This would include landing and take offs from the Broadus Airport and our local rancher's private air strips.

Am-3

Second: This complex should not limit any of our natural resource development. We feel this is very important because of the economic development this would bring to our area. Along with this, if the 9 am to 2 am flight times are obeyed, then energy company's corporate planes could work with that. Also, the farmers and ranchers in the area could adjust to those times.

SD-17

Third: We feel Elsworth Air Force Base should plan annual meetings in our area to meet with the local residents. A face to face meeting would provide opportunity for interaction between local residents and Air Force personnel. That way we see them and they see us, face to face. Sometimes things look good on paper, but reality is sometimes different. This would give the Air Force a chance to listen to local concerns. It would also give the local residents a chance to meet and listen to Air Force concerns.

GE-5

Fourth: There must be written protocol for operation of firefighting, and life flight aircraft. Operations of aircraft in this capacity may range from several hours to several days. Crop dusters and aircraft involved in predator control have a limited window of opportunity to perform their tasks. Protocol must be included that does not restrict the use of this type of aircraft, which could affect our local economy.

SA-19

SD-12

SD-15

SD-2

3070


Fifth: We do depend on recreationalists who come to our area to get away from noise and debris. Every effort can and must be made to minimize the effect low flying aircrafts would have on this type of economic industry in our county.

50-9


Powder River County Board of Commissioners are interested in how you address concerns related to this proposal.

Sincerely,


BOARD OF COUNTY COMMISSIONERS  
POWDER RIVER COUNTY



Ray Traub, Chairman



Don McDowell

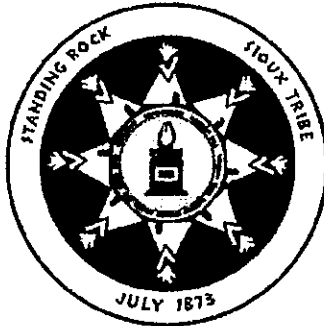


Les Thompson



3071

Charles W. Murphy  
Chairman



TRIBAL COUNCIL  
(DISTRICTS)

TRIBAL COUNCIL  
(AT LARGE)

Jesse "Jay" Taken Alive

Margaret M. Gates

Avis Little Eagle

Dave Archambault II

Joseph McNeil Jr.

Jesse McLaughlin

Mike Faith  
Vice Chairman

Adele M. White  
Secretary

Sharon Two Bears  
Cannonball District

Henry Harrison  
Long Soldier District

Duane Claymore  
Wakpala District

Kerby St. John  
Kenel District

Errol D. Crow Ghost  
Bear Soldier District

Milton Brown Otter  
Rock Creek District

Frank Jamerson Jr.  
Running Antelope District

Samuel B. Harrison  
Porcupine District

December 9, 2010

Ms. Linda DeVine  
ACC/A7PS  
129 Andrews St. Suite 337  
Langley AFB, VA 23665-2701

RE: Powder River Training Complex Draft EIS

Dear Ms. DeVine,

The Standing Rock Sioux Tribe (Tribe) appreciates the opportunity to comment on the Powder River Training Complex Ellsworth Air Force Base, South Dakota Draft Environmental Impact Statement (DEIS) and its environmental impacts to the Standing Rock Indian Reservation (Reservation).

Before we begin our comments on the DEIS, the Standing Rock Sioux Tribe is very supportive of the U.S. military and its efforts to protect and serve our country. Many of our tribal members are proud to have served in the Armed Forces. GE-9

In the DEIS, we request that you use "Standing Rock Indian Reservation" when referring to our Reservation and "Standing Rock Sioux Tribe" when referring to our Tribe.

We were notified of this project two years ago when people from Ellsworth Air Force Base visited the Reservation and gave a presentation. At that time, we were told by several different military personnel that the flights over the Reservation would be infrequent, even nonexistent. The few flights that would take place would be at a very high altitude. However, in the recently released DEIS, it appears that there are plans to fly at altitudes of 500 ft. over our Reservation, contrary to what we were led to believe. The information provided by military personnel to the Tribe directly contradicts the proposed DEIS. If what we were told two years ago by Army personnel is correct, it should be included in the DEIS. PN-5  
PN-4

Our people are deeply concerned about low-level flights and sonic booms that would occur over our Reservation, especially during the summer months. Many tribal members practice traditional religious ceremonies outdoors in the summer on tribal lands. Aircraft flying at low-levels and/or sonic booms would be not only disruptive and intrusive but also highly disrespectful to our spiritual and religious practices. NA-4

Ms. Linda DeVine  
Powder River Training Complex Draft EIS  
Page 2

Our religious practices take place outdoors and can occur anywhere on Tribal lands within the reservation boundaries, both day and night.

Also, many of our tribal members are also cattle ranchers and sonic booms and low-flying aircraft would be disruptive to their ranching activities such as calving, branding, weaning or other penning operations.

B1-4

**For these reasons, we are requesting that the entire Standing Rock Indian Reservation be made an avoidance area and that there be no low-level aircraft or sonic booms over tribal lands during the months of June, July and August. Please find attached a map of all tribal lands within the exterior boundaries of the Standing Rock Indian Reservation**

NA-5

Please be reminded that "Federal agencies shall protect and preserve Native American religious cultural rights and practices". [See, American Indian Religious Freedom Act, 42 U.S.C. §1996 (1978), et. seq.] In this case, we interpret that to mean that the U.S. Army will refrain from low-level flight and sonic booms during the summer months when tribal members are practicing their traditional and religious ceremonies.

Moreover, many of our tribal members are concerned about the dispersion of chaff over the Reservation. Although the DEIS claims that the chaff will likely disperse before reaching the ground and that there is little harm, we request that the military limit the use of chaff over the Reservation and start using new technologies available that create invisibility.

NA-6

Our tribal members are also concerned about the potential of a lit flare reaching the ground and causing a fire. While there is a small chance this may occur, we would like the Air Force to assume full liability for all damages including the cost of fighting range fires started by flares.

SA-5

We are disappointed in the brief history of Native Americans that is portrayed in the DEIS on pages 3-109 to 3-113. Not only are there misspellings but also factually incorrect information. We offer the following corrections for inclusion in the DEIS.

Page 3-109, second paragraph  
Change the word legend to history.  
Change semi-woodland to woodland  
The last sentence uses the date mid-1800s, change to mid-1700s.

NA-4

Page 3-110

The third paragraph starts with "The Treaty of Fort Laramie". Please note that you are referring to the second Treaty of Fort Laramie of 1868. The first Treaty of Fort Laramie was in 1851.

Ms. Linda DeVine  
Powder River Training Complex Draft EIS  
Page 3

Also in this paragraph, Yanktonai is misspelled

We ask for a rewrite of the fourth paragraph. The sentence "Conflict was exacerbated by the Black Hills gold rush" is a polite way of saying that the Fort Laramie Treaty was repeatedly violated by white settlers in search of gold. Please include language that states the Black Hills are sacred to the Dakota and Lakota, and were illegally taken from the Lakota and Dakota by the U.S. Government. To this day, the Dakota and Lakota people refuse to accept money for their sacred Black Hills (Paha Sapa) and continue to fight legally. We object to the following language, "Mining and other intrusions in to the Great Sioux Nation created tension..." Mining in the Black Hills was a direct violation of the 1868 Fort Laramie Treaty.

Page 3-112

The last sentence in the first paragraph refers to the "battle" at Wounded Knee. This was not a battle but a massacre. All weapons were taken from the Dakota and Lakota and they were surrounded by the 7th Calvary. In less than one (1) hour, 350 Lakota men, women and children were slaughtered at the hands of the U.S. Government.

Page 3-112

In the third paragraph the first sentence is incorrect. The five reservations, including Standing Rock, were created by the Act of March 2, 1889, not the Dawes Act.

We hope that you are able to incorporate these changes into your historical section. We believe it is important that you provide an accurate account of history.

If you have any questions, please call my office at 701-8524.

Respectfully Submitted,



Charles W. Murphy, Chairman  
STANDING ROCK SIOUX TRIBE

3072

**TRIBAL COUNCIL  
(AT LARGE)**

Jesse "Jay" Taken Alive

Margaret M. Gates

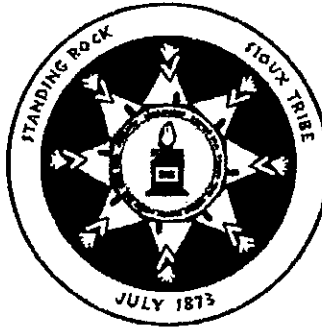
Avis Little Eagle

Dave Archambault II

Joseph McNeil Jr.

Jesse McLaughlin

**Mike Faith**  
*Vice Chairman*



**Charles W. Murphy**  
*Chairman*

**Adele M. White**  
*Secretary*

**TRIBAL COUNCIL  
(DISTRICTS)**

**Sharon Two Bears**  
*Cannonball District*

**Henry Harrison**  
*Long Soldier District*

**Duane Claymore**  
*Wakpala District*

**Kerby St. John**  
*Kenel District*

**Errol D. Crow Ghost**  
*Bear Soldier District*

**Milton Brown Otter**  
*Rock Creek District*

**Frank Jamerson Jr.**  
*Running Antelope District*

**Samuel B. Harrison**  
*Porcupine District*

October 11, 2010

Linda DeVine  
ACC/A7PS  
129 Andrews St. Suite 337  
Langley AFB, VA 23665-2701

RE: Powder River Training Complex  
Ellsworth Air Force Base, SD  
Draft Environmental Impact Statement

Dear Ms. DeVine,

The Standing Rock Sioux Tribe appreciates the opportunity to review the Powder River Training Complex Draft Environmental Impact Statement (DEIS).

Due to the many complex issues presented in the DEIS and the variety of concerns from our tribal members, we would like request a 30-day extension on the comment period. ] NP-5

Should you have any questions please contact Adrienne Swallow, Environmental Protection Specialist at 701-854-8582 or [aswallow@standingrock.org](mailto:aswallow@standingrock.org).

Sincerely,

**Charles W. Murphy**  
Chairman

STANDING ROCK SIOUX TRIBE

The Air Force briefers at the public meeting are no doubt briefing us in good faith. I believe they truly believe they are telling us the way it will be. However, a center controller WILL NOT ALLOW IFR TRAFFIC IN AN ACTIVE MOA OR ATCAA. Flying VFR in an active MOA is okay if the weather is clear and there are large bombers in the airspace. Flying VFR in an active MOA in less than good weather, and or with fighter type aircraft is NOT SAFE. To believe otherwise is naïve, and to state otherwise is irresponsible. It is doubtful that the briefer has ever been denied access to a piece of airspace that suddenly turned active and been vectored 60 miles out his way because someone didn't do their job. He has never had to reroute and make an unscheduled fuel stop for these reasons; I have. Long after they (the briefers at the public meeting) are transferred or retired we users will continue to be dealing with broken promises, more restrictions, etc. I expect that once this airspace is established, it will be in use more than the Air Force briefers and your EIS tells us, and we believe the Gap ATCAA'S will be active more often, further burdening our operations.

SA-3

NP-7

The information to pilots for pre flight briefings about MOA'S and ATCAA'S have historically been unreliable, and inaccurate. I am paying (as a tax payer and user) to get accurate, reliable information on special use airspace from normal Flight Service Station channels. Many of the Flight Service Station briefers don't even know how to find this information. With your (USAF and FAA) track record, we users expect the Powder River Training Complex will be a nightmare from a planning and operational standpoint.

AM-12

With a planned complex this large and other types of aircraft using this airspace, the implication is that you'll be inviting other units to Ellsworth. The fuel savings to the Air Force appears non-existent because instead of the local units traveling to existing ranges, other units will be traveling to Powder River. Ellsworth and the Powder River Training Complex will become busier and more congested, and our company's operations will suffer further.

SD-14

Again, with the frequency of our trips through the airspace in question, and the track record of timely, accurate, and reliable information to pilots, I expect this huge airspace proposal to be a fiasco for many years to come.

John Campbell  
Chief Pilot True Drilling Company

Dear Madam:

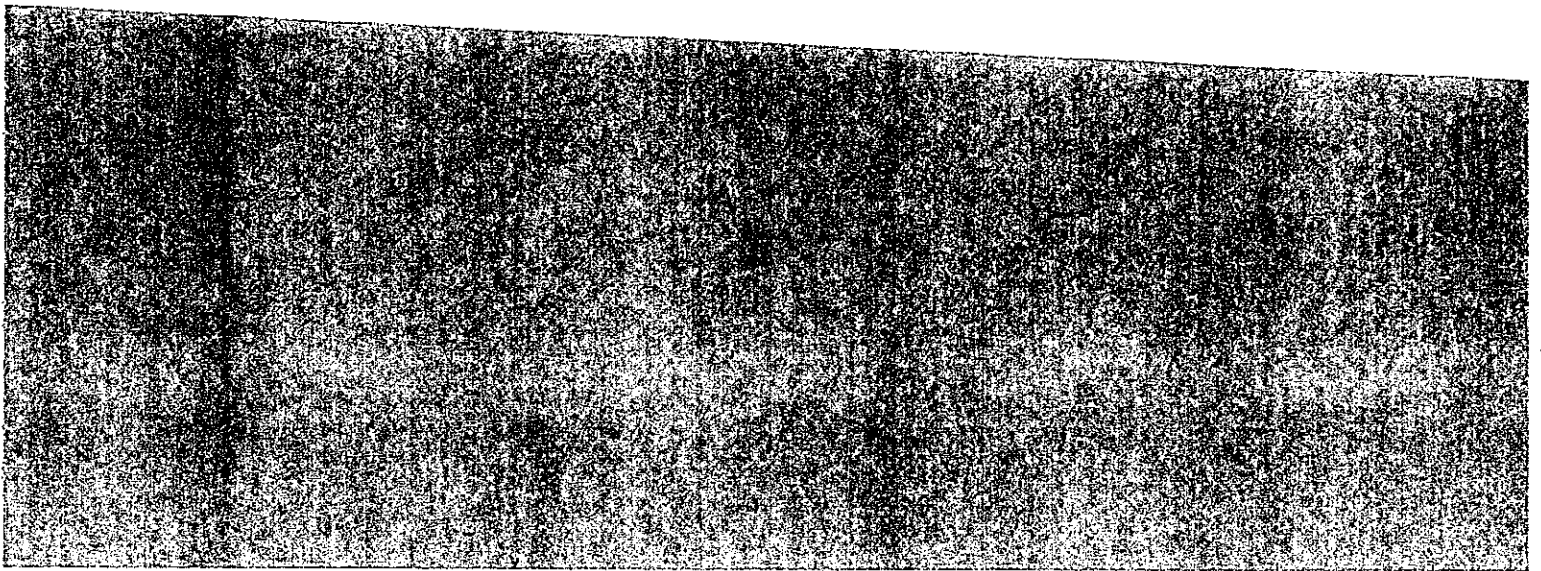
3073

Comments regarding the public hearing for the Proposed Powder River Training Complex held in Gillette, Wyoming October 18, 2010

I represent the True Companies from Casper, Wyoming. We are in the oil and gas drilling and production business, pipeline, trucking, and oil field supply business. We travel to North Dakota and eastern Montana on company airplanes on a regular basis. This proposal creates a three hundred mile obstacle between Casper and Gillette, and our destinations in North Dakota (Williston, Watford City, Stanley, Minot, Dickinson, Bismarck,) and Montana (Ekalaka, Baker, Glendive, Sidney.) The proposed Powder River Training Complex extends from Billings, Montana to Bismarck, North Dakota. For us to get to each of these destinations except Bismarck, avoiding the entire Complex will add at least two hundred miles (45 minutes to an hour depending on the airplane used) for each round trip. We often pickup and or drop off employees in Gillette to be taken to, and returned from, North Dakota. While the distance from Gillette to Dickinson, North Dakota is 200 miles, when the complex is active, we will have to fly to Dickinson via Bismarck adding 200 miles to each leg and will cost us an extra 400 miles (1.5 to 2.2 hours depending on the airplane used) for each round trip. In addition to the time and expense impact, the weight of the fuel to fly the extra 100 miles each way is the same as a passenger, so we will also be losing utilization. In the two weeks prior to the public meeting in Gillette we went to Bismarck twice, Minot, Stanley, Watford City, and Williston. Your proposed schedules are, and have been, about the same as our schedules. The phrase "and other times by NOTAM" implies that this 300 mile wide obstacle will active more and more often.

50-7

There are many other users of this area in the energy business who aren't even aware of this airspace grab. I've not seen anything in the AOPA magazine, Business and Commercial Aviation, or any other trade publications. Is this an oversight? I think you need to expand your public awareness.





United States  
Department of  
Agriculture

Forest  
Service

Custer National Forest

1310 Main Street  
Billings, MT 59105  
406 657-6200

3074

File Code: 1530/1950

Date: November 9, 2010

Linda DeVine  
Program Manager  
ACC/A7PS  
129 Andrews St., Suite 337  
Langley AFB, VA 23665-2701

Dear Ms. DeVine:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Powder River MOA Training Complex. The proposed action would change where Air Force training exercises occur over National Forest System (NFS) lands managed and administered by the Custer National Forest. The Forest Service, Custer National Forest, is providing the following comments.

We acknowledge the efforts of the Air Force to expand their training area to reduce fuel costs and continue to provide training for their pilots with this effort. We do ask that some things be clarified or considered in more detail. Training flights already occur over much of the Ashland and Sioux ranger Districts in Powder River and Carter counties, MT and Harding County, South Dakota, in the current Powder River A and B MOAs. Staff from each ranger district report they have not heard of problems as a result of the use of that airspace.

#### 1) Use of Above Ground Level vs. Mean Sea Level

The presentation at the Buffalo, SD presentation mentioned having planes at certain elevations above the ground. One was Above Ground Level (AGL) for most flights. However, another type of training flight mentioned would use Mean Sea Level (MSL) instead. We suggest using AGL as the guide when talking about all flights unless a specific training need is identified that needs to use MSL instead.

AM-32

#### 2) Archaeology

The Forest Archaeologist indicates there is no reference or analysis of the action to the North Cave Hills, South Cave Hills, or Slim Buttes cultural landscapes. It is our understanding that the North and South Cave Hills land units of the District are considered sacred to the Lakota, Mandan, Hidatsa and Arikara tribes and are used for vision quests, solitude, etc. These three land units are part of the Sioux Ranger District and are located in Harding County, South Dakota. The Sioux Ranger District consists of eight land units, five of which are located in South Dakota.

W-2



3074

and the remaining three in southeast Montana, in Carter County. We recommend that you may wish to contact the tribes regarding those areas they might consider sacred.

There appears to be no analysis on the effects of noise and vibration, related to sonic booms and low altitude fly-overs, to the geologic units where rock art sites currently listed on the National Register of Historic Places are located. The sites are listed in tables, but no analysis is disclosed if there are potential effects. Also, there does not appear to be analysis of effects to four potentially eligible historic structures located within the analysis area - Jessie Elliott Guard Station, Tri-point Lookout, and the Molstad Cook shack located on the Sioux Ranger District; and Poker Jim Lookout and Whitetail cabin located on Ashland Ranger District. Environmental Consequences address potential effects on p. 4-83 of the DEIS but these structures are not included. The concern is the potential effects of noise and vibration to the rock art sites and historic structures located on the Forest and within the proposed project area. We would appreciate it if you would evaluate the effects of noise and vibration to these resources.

CV-2

Find enclosed copies of the Record of Decision for the Sioux Ranger District Oil and Gas Leasing Final Environmental Impact Statement, Appendices and maps. This reference provides information regarding heritage sites and traditional cultural properties on the South Dakota portion of the Sioux Ranger District. Also enclosed are copies of the site forms for the historic structures. These site forms are confidential documents and not subject to the Freedom of Information Act (FOIA) requests.

### 3) Botany

The Forest Botanist has recommended that several species of sensitive plants be included in the analysis. All but one of these species are considered Northern Region Forest Service Sensitive Species, and one is a Species of Interest. Forest Service sensitive species are analyzed pursuant to the National Forest Management Act (NFMA) to determine whether the effects of an action to these species would cause a trend toward listing under ESA. The single Species of Interest in this instance should be considered like a Sensitive Species, the determination of effects being similar to that of a Sensitive Species. These species are indicated in the table below. Recommended additions are indicated in "red" colored text.

B1-9

Forest Service, Custer National Forest additions to Appendix K. Add to footnote 2, after FSR = USFWS Sensitive and Region; USFS = Forest Service Sensitive or Species of Interest.

Common Name	Scientific Name	Project Area States and Counties of Known Occurrence				FED	Habitat
		ND	SD	MT	WY		
Nuttall desert-parsley	Lomatium nuttallii			Big Horn, Rosebud		USFS Species of Interest	Open, rocky pine woodlands in mid to



3074

Common Name	Scientific Name	Project Area States and Counties of Known Occurrence				FED	Habitat
							lower elevation.
Pregnant sedge	Carex gravid var. gravida			Big Horn, Carter, Powder River, Rosebud		USFS	Green ash ravines and wooded draws.
Visher's buckwheat	Eriogonum visherii			Carter		USFS	Barren rock outcrops or clay outwash.
Barr's milvetch	Astragalus barrii			Powder River, Rosebud		USFS	Gullied knolls, buttes, & barren hilltops, often on calcareous soft shale and siltstone.
Ovalleaf milkweed	Asclepias ovalifolia			Carter		USFS	Prairies and woodlands in sandy, gravelly or clayey soils.
Prairie gentian	Gentiana affinis		Harding			USFS	Wet meadows, shores, seeps, springs, and low prairie.
Mountain bluebells	Mertensia ciliata		Harding			USFS	Forested slopes, damp thickets, moist

3074

Common Name	Scientific Name	Project Area States and Counties of Known Occurrence				FED	Habitat
							valley bottoms.
Small yellow lady's slipper	Cypripedium parviflorum			Carter		USFS	Fens, damp mossy woodlands, seepage areas.

In Appendix K, add to footnote 2, after FSR\_ = USFWS Sensitive and Region; USFS = Forest Service Sensitive or Species of Interest.

#### 4) Fire, Fuels, and Fire Suppression, and Emergency Aircraft

The Forest Service recommends using a combination of the National Fire Danger Rating System's (NFDRS) Adjective Fire Danger Rating and the National Weather Service's Red Flag Warning system to determine times when flare use should be suspended. The NFDRS Adjective Fire Danger Rating is based on indices that track season long and short term fire danger trends by combining calculated Staffing Levels and Ignition Component. We suggest utilizing Miles City Dispatch calculated values for determining the Adjective Fire Danger Rating and suspending flare use between 1000 and 2100 during days of Very High and Extreme Adjective Ratings or raising the minimum altitude for flare deployment to 5000 feet during Very High and Extreme rating days. Very High and Extreme ratings tend to correlate with the potential for numerous fire starts and large fires thus representative of environmental conditions where flares used at low altitude would cause a fire. Additionally, the National Weather Service issues Red Flag Warnings when predicted wind speed, minimum relative humidity and/or lighting activity reach critical thresholds for a particular fire weather zone. The Forest Service recommends suspending flare use during Red Flag Warning issuances.

SA-5

During fire season (June-September) how much notice will Miles City Dispatch be given of planned exercises. We would ask that large quarterly exercises be scheduled in June or late September to avoid the peak of fire season and fire aviation traffic which is typically mid-July through the first part of September to reduce airspace traffic conflicts.

AM-12  
SA-13

We have reviewed the July 2008 scoping comments submitted by the Bureau of Land Management (BLM) and concur and incorporate those comments into our recommendations. The Forest Service and BLM jointly work together with other Federal, Montana State and local departments, such as the Department of Natural Resources and Conservation, as well as the Bureau of Indian Affairs in the management and suppression of fire in the Eastern Montana Fire Zone (EMFZ). Due to the large number of cooperating agencies in EMFZ and the need for rapid fire management response, we want to emphasize the need for quick, efficient and effective communication between the Air Force and Miles City and/or Billings Dispatch Center(s).

SA-19

## 5) Recreation

The Proposed action Powder River Training Complex (PRTC) completely covers the Ashland Ranger District, completely covers seven of the eight land units that comprise the Sioux Ranger District (Long Pines, Ekalaka Hills, Chalk Buttes, East Short Pines, West Short Pines, North Cave Hills, and South Cave Hills), and partially covers the eighth land unit on the Sioux Ranger District (Slim Buttes).

The Ashland and Sioux ranger districts on the Custer National Forest are very popular destinations for hunters. National Forest System (NFS) lands provide an important recreation opportunity for hunters both in local communities and those who travel from neighboring states. Families return annually to hunt on these particular lands. Hunting provides individuals an important connection to the land, an opportunity to engage in individual and family hunting traditions, and a way to provide meat for oneself and family. During the various hunting seasons, use of the Forest occurs throughout the week, though use is heaviest on weekends. Noise from aircraft has the potential to negatively affect hunters and their prey.

LW-5

SO-6

Review of the Powder River Training Complex Draft EIS and Executive Summary, indicates that based on the noise, safety, biological, and land use analyses, it appears that impacts to recreationists, in particular hunters, and big game are likely to be minor in both context and intensity under all of the action alternatives and the no action alternative. From a recreation perspective, there is no clear preferred alternative. (The no action alternative concentrates impacts, although they would still be expected to be minor; the action alternatives disperse impacts over a larger area, but portions of the additional area are utilized by recreationists on the Forest.)

## 6) Wildlife

The Forest Wildlife Biologist has recommended that several wildlife species be included in the analysis. Some of these species are considered Northern Region Forest Service sensitive species, and others are Forest Plan Habitat Indicator Species (also known as Management Indicator Species (MIS)), and other species are Forest Plan key species. Forest Service sensitive species are analyzed pursuant to the National Forest Management Act (NFMA) to determine whether the effects of an action to these species would cause a trend toward listing under ESA. The analysis of Habitat Indicator Species and Key species ensure an action is consistent with the Custer National Forest Land and Resource Management Plan (Forest Plan) pursuant to NFMA. These species are indicated in the table below. Recommended additions are indicated in "red" colored text. Please make the Biological Evaluation (BE) available for review.

BI-9

Forest Service, Custer National Forest additions to Appendix K. Add to footnote 2, after FSR\_ = USFWS Sensitive and Region; USFS = Forest Service Sensitive, Management Indicator Species, or Key Wildlife Species.

Common Name	Scientific Name	Project Area States and Counties of Known Occurrence				FED	Habitat
		ND	SD	MT	WY		
Blue-gray gnatcatcher	<i>Poliophtila</i>		Harding	Big Horn, Carter, Powder River, Rosebud		USFS, Sensitive	Open stands of juniper and limber pine with intermixed sagebrush.
Loggerhead shrike	<i>Lanius ludovicianus</i>		Harding	Big Horn, Carter, Powder River, Rosebud		USFS, Sensitive	Grassy pastures that are well grazed, nest in shrubs or small trees, preferably thorny such as hawthorn.
Long-eared myotis	<i>Myotis evotis</i>		Harding	Big Horn, Carter, Powder River, Rosebud		USFS, Sensitive	Use a variety of habitats but are strongly associated with coniferous forests.
Long-legged myotis	<i>Myotis volans</i>		Harding	Big Horn, Carter, Powder River, Rosebud		USFS, Sensitive	Primarily a coniferous-juniper forest bat found at moderate elevations ( $\geq 6000$ ft) but may also inhabit riparian cottonwood bottoms and desert areas.
Greater Short-horned lizard	<i>Phrynosoma hernandesi</i>		Harding	Big Horn, Carter, Powder River, Rosebud		USFS, Sensitive	Areas with short, sparse grass or sagebrush; flats with pebbly or stony soil; and rock outcrops.
Western kingbird	<i>Tyrannus verticalis</i>		Harding	Big Horn, Carter, Powder River,		USFS, MIS	Open or partially open country with scattered trees, including agricultural

Common Name	Scientific Name	Project Area States and Counties of Known Occurrence				FED	Habitat
				Rosebud			lands.
Lark sparrow	<i>Chondestes grammacus</i>		Harding	Big Horn, Carter, Powder River, Rosebud		USFS, MIS	Open or partially open country with scattered trees, including agricultural lands.
Bullock's oriole	<i>Icterus bullockii</i>		Harding	Big Horn, Carter, Powder River, Rosebud		USFS, MIS	Open deciduous woodland and riparian areas.
Yellow warbler	<i>Dendroica petechia</i>		Harding	Big Horn, Carter, Powder River, Rosebud		USFS, MIS	Brushy riparian especially with willows.
Ovenbird	<i>Seiurus aurocapillus</i>		Harding	Big Horn, Carter, Powder River, Rosebud		USFS, MIS	Mid-late successional, closed-canopied deciduous or deciduous/conifer forests with limited understory.
Golden eagle	<i>Aquila chrysaetos</i>		Harding	Big Horn, Carter, Powder River, Rosebud		USFS, Key Species	Open hilly to mountainous areas. habitat
Merlin	<i>Falco columbarius</i>		Harding	Big Horn, Carter, Powder River, Rosebud		USFS, Key species	Patchy shrub/grassland habitats with large trees to support nesting (secondary nester).

In Appendix K, add to footnote 2, after FSR\_ = USFWS Sensitive and Region; USFS = Forest Service Sensitive, Management Indicator Species (MIS), or Key Wildlife Species.

3674

The Forest Wildlife Biologist indicates that he could not find the Biological Assessment and recommends that one be prepared, pursuant to the Endangered Species Act, and as noted in section 3.6.2 of the DEIS. Please make the Biological Assessment available for review.

B1-9

The Forest conducts flights for wildlife surveys (e.g. goshawk nest surveys), reconnaissance flights after lightning activity or infrared flights to determine hot spot activity during fire operations. Please clarify what procedure will be used when coordinating flights with the DoD flight scheduling desk at Ellsworth AFB. The nature of some of these flights does not warrant requesting a TFR due to the limited amount of flight time required. How much consideration and how far in advance would we be able to schedule flights to avoid conflicts with planned exercises?

AM-31

Again, thank you for the opportunity to comment on the DEIS for the Air Force's proposal to expand the Powder River MOA Training Complex. Please contact Mark Slacks, Forest Planner, by phone at 406-657-6205x240 if you have any questions regarding our recommendations. Also enclosed is a CD that contains a copy of the Forest Plan for the Custer National Forest, Record of Decision to the Forest Plan, and Management Area Maps.

Sincerely,

*Fredrick W. Prange (for)*

MARY C. ERICKSON  
Forest Supervisor

CC: Ashland District Ranger  
Sioux District Ranger



November 12, 2010

Ms. Linda DeVine  
HQ ACC/A7PS  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

**Subject: Comments on the Draft Environmental Impact Statement for the Powder River  
Training Complex**

Dear Ms. DeVine:

Weather Modification, Inc. is the primary contractor providing specially-modified aircraft and pilots for the North Dakota Atmospheric Resource Board (NDARB) cloud seeding project each summer. The ND Cloud Modification Project (NDCMP) runs from June 1 through September 1 each year, with options to extend through the end of September if growing conditions merit. This project is sponsored and primarily financed by the individual counties that make up the two current target areas of the NDCMP, with the State of North Dakota providing some matching funds, project meteorologists, weather radar support, and overall project management through the ARB. The two project target areas (Districts 1 and 2) together cover 10,425 square miles – nearly 15% of the State's total area.

District 1 is comprised of Bowman and portions of Slope counties with buffer zones on the northern and eastern sides, in the southwestern corner of ND. This area is completely overlaid by the proposed PR-3 MOA and the GAP B and C MOA's. Airborne cloud seeding activities have been going on in this District 1 area since 1961. The objective of the program is to provide relief from damaging hailstorms while also producing enhanced rainfall amounts during the growing season.

WMI's contract with the ARB to provide services for District 1 cost the taxpayers of Bowman and Slope counties about \$135,000 for the 2010 summer season. As an indication of the value received for this expenditure, a 2009 study commissioned by the ARB showed that this program produces a 98 to 138-1 gross economic impact resulting from the increased agricultural production that the program allows. This is a huge impact for the citizens of southwestern ND.

As part of our contract with the ARB, WMI bases two cloud seeding aircraft in Bowman, ND to serve the District 1 target area. These aircraft, sometimes supplemented by other WMI aircraft from the northern District 2 area, operate around 130 flight hours per season depending upon weather conditions. Operations are conducted 24/7, with the crews on call during the entire

50-28



season ready for immediate launch. Flights generally last around 2 hours, with the entire flight track normally contained within the District 1 area.

Figure 1 (below) shows a map of District 1 with all operational flight tracks plotted; blue is District boundaries and buffer zone areas, black is flight tracks while not seeding, green / yellow / red are flight tracks during seeding activities.



*Fig. 1: 2010 NDCMP District 1 cumulative flight tracks*

This graphic shows the unpredictable routes that the seeding aircraft fly during operations, as their flight paths are dictated by the thunderstorms around which they must operate. While seeding takes place only to target storm cells that will impact the District, the aircraft must also work around the storms to gain access to the proper areas of the storm cells for effective seeding. Safe operations around severe and cumuliiform weather cells also require that the aircraft crews be able to escape the storm if lowering visibility or other storm growth were to

SA-3





trap them, precluding a visual return to their base at Bowman. Also note that approximately 30-40% of these flights take place during nighttime hours.

While most of the seeding flights are conducted near the cloud bases under visual flight conditions (VFR), about 15% of District 1 seeding flights are conducted at "cloud top" (in and around the tops of the growing cumulus areas at altitudes between 15-23,000 ft) under instrument flight rules (IFR). And some flights that start as VFR operations become IFR flights when conditions deteriorate. This means that for effective and safe flight operations the WMI aircraft MUST be able to operate under IFR in this area, as well as the surrounding area if needed to skirt the severe weather.

SA-3

This raises several operational and safety issues that could be adversely impacted by the expanded MOA areas.

1. While the WMI seeding aircraft do mostly operate VFR, by necessity they do not fly a pre-planned route, speed, or altitudes. VFR flight plans are not filed as the route, altitude, duration, or even the eventual destination of the flight are all unknowns when the aircraft is launched. Where the storms go, so must go the airplanes. While the WMI aircraft are always coordinating with each other they are not always going to fly a predictable flight path which could increase collision hazards with military aircraft during MOA operations.

SA-1

2. When the WMI aircraft are called to operate as IFR flights for certain mission parameters, they will need to be able to do so immediately. Thunderstorms do not occur at preplanned times, and this means that the WMI crews have little advance notice when they are called to fly. Even the best forecasting cannot accurately predict the exact onset and timing of thunderstorm formation or movements, and even though the WMI aircraft are guided by the NDCMP ground based weather radar at Bowman this does not afford extra time at the start of storm formation. Therefore while the draft EIS mentions coordination with Ellsworth AFB to "deconflict" the airspace, WMI aircraft will need that to happen very quickly. We simply are not in a position to plan ahead.

SA-19

3. As already pointed out, when the weather conditions deteriorate making it unsafe to remain VFR, WMI aircraft will need to be able to "airfile" IFR flight plans and transition to those plans IMMEDIATELY. This is a safety issue; to operate safely around severe weather means that all options must be available to the WMI aircraft crews. Since the only reason they will be flying around the thunderstorms is to protect crops and property for the taxpayers in the target area, they must be able to "stick with it" as long as possible before they must abandon the area. When the weather is clear, WMI aircraft will not be operating except if transiting between storms or bases.

SA-3

SA-19

3075



Simply stated, the WMI aircraft must be afforded every opportunity to operate in the area of the proposed PR-3 MOA without undue delays or prohibitions on IFR flights, and in a safe manner without added collision hazards while operating in an already potentially hazardous flight environment. Coordination with Ellsworth AFB would of course be welcome but "deconfliction" of the airspace cannot be delayed for any appreciable amount of time. Procedures and protocols must be put in place that will allow these operations in a timely manner.

8A-15  
8A-19

Weather Modification, Inc. has been safely operating in and around severe weather conditions around the globe with our aircraft since 1961 without an injury accident. We pride ourselves in providing a safe and reliable service to our customers, and those same customers – in this case, taxpaying citizens of the State of North Dakota - deserve the freedom to be protected from the hailstorms and drought that threaten their livelihoods.

Thank you for the opportunity to again provide comments regarding this matter.

A handwritten signature in black ink, appearing to read "Hans Ahlness", is written over a horizontal line.

Hans Ahlness  
Vice President – Operations  
Weather Modification, Inc.

# ARTS. PARKS. HISTORY.

Wyoming State Parks & Cultural Resources

3676

State Historic Preservation Office  
Barrett Building, 3rd Floor  
2301 Central Avenue  
Cheyenne, WY 82002  
Phone: (307) 777-7697  
Fax: (307) 777-6421  
<http://wyoshpo.state.wy.us>

September 8, 2010

Dimasalang F. Junio  
Colonel, USAF  
Chief, Programs Division (A7P)  
Dept of the Air Force  
HQ ACC/A7P  
129 Andrews Street  
Langley AFB, VA 23665-2769

Re: Powder River Training Complex Section 106 Compliance (SHPO File # 0910JPL002)

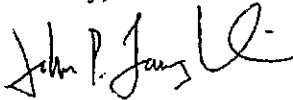
Dear Colonel Junio:

Thank you for consulting with the Wyoming State Historic Preservation Office (SHPO) regarding the Powder River Training Complex (PRTC) Draft Environmental Impact Statement. Our office will be happy to provide comments regarding the expansion of the PRTC once tribal consultation has been completed, and the results of said consultation are provided to our office for review.

NP-10

Please refer to SHPO project #0910JPL002 on any future correspondence regarding this undertaking. If you have any questions, please contact John Laughlin at 307-777-3424.

Sincerely,



John P. Laughlin  
Archaeologist/Senior Cultural Resources Specialist



Dave Freudenthal, Governor  
Milward Simpson, Director

Rec'd Sep 30, 2010

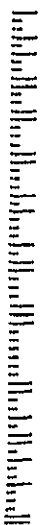
# ARTS. PARKS. HISTORY.

Wyoming Department of State Parks and Cultural Resources  
State Historic Preservation Office  
DIVISION OF CULTURAL RESOURCES

2301 Central Ave  
Barrett Building 3RD Floor  
Cheyenne, WY 82002

Dimasalang F. Junio  
Colonel, USAF  
Chief, Programs Division (A7P)  
Dept of the Air Force  
HQ ACC/A7P  
129 Andrews Street  
Langley AFB, VA 23665-2769

23665#2701 C039



UNITED STATES POSTAGE  
PRIMLY BOOKS  
02 1M  
0004247557  
MAILED FROM ZIP CODE 82001  
\$ 00.44<sup>0</sup>  
SEP 09 2010

[Type text]

3077

1111 Northwestern Dr.  
Grand Forks, ND 58203

November 6, 2010

Ms. Linda DeVine  
EIS Project Manager  
HQ ACC/A7PP  
129 Andrews Street, Room 317  
Langley AFB, VA 23665-2769

Dear Ms. DeVine,

The expansion of the Powder River MOA at this time appears unnecessary. We are engaged in a war where the United States has technological superiority. It has been stated that we will begin decreasing our forces overseas. The airspace which is currently in place is massive in size and any further addition will cause undo hazard to persons, property and business. The majority of commercial aviation operates under Instrument Flight Rules, when active the MOA will restrict such operations.

PN-3

AM-6

Sincerely,

Benjamin Taylor  
Flight Instructor  
UND Aerospace

# American Airlines®

3078

138

November 23, 2010

Ms. Linda DeVine  
HQ ACCC/A7PP  
129 Andrews Street, Room 337  
Langley AFB, VA 23665-2769

Dear Ms. DeVine,

American Airlines (AA) has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed Powder River Training Complex (PRTC), which expands Military Operations Areas (MOAs) and Air Traffic Control Assigned Airspace (ATCAA) over portions of Montana, Wyoming, North Dakota, and South Dakota. AA strongly supports our armed forces and the need to develop a realistic training environment to protect our democracy and our citizens.

We also pride ourselves by being supportive of the families of our military personnel with our annual Skyball and Snowball Express activities. In addition, we have several aircraft in our fleet sporting yellow ribbons to express our gratitude to those that serve or have served. The latest, a Boeing 767 named Flagship Independence, was dedicated just last week at JFK Airport. The observance also served as a send-off for approximately 150 wounded warriors and their guests as they departed on the aircraft for a weekend in Las Vegas.

Initial briefings on the PRTC indicated that activities would be limited to quarterly Large Force Exercises lasting up to 3 days per event. Although this activity would have a significant impact on the routes we fly in the area, we were able to support the proposal with the limited number of days of activity. However, the DEIS indicates that the usage will now be up to 240 days a year and would impact more than 500 IFR flights daily at FL370 and below. We find that the impact upon the National Airspace System (NAS) as well as our operation will be unacceptable.

GE-14

Impact upon AA flights will primarily be in two areas:

1. Flights to and from destinations in the Pacific Northwest will have to be routed around the airspace. Our analysis indicates that the impact will be about 9 minutes additional flying time and about 133 gallons of fuel for each flight that is required to circumnavigate the airspace. This adds up to about \$445 per flight including other operating costs factored in.
2. Convective weather activity across the Midwest or Ohio Valley many times forces additional flights north through the PRTC airspace. Due to the part time

50-7

usage of these routes it is difficult to quantify the impact. However, when there is already one constraint in the airspace that is impacting traffic flows, then any additional constraint, such as the PRTC, will only exacerbate the problem by limiting the number of options, resulting in additional miles flown and fuel burn.

SD-7

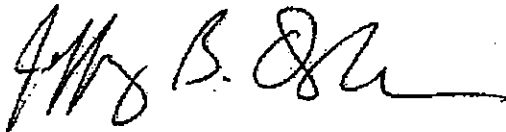
With the number of flights that transit the proposed PRTC airspace each day, the impact to flights required to be routed around the areas will be significant. This results in less than optimum profiles for our flights and limited opportunities to manage abnormal situations during weather events.

Use of the PRTC above FL260 on a daily basis will have a significant adverse impact upon the operational efficiency of American Airlines. This also adversely affects the people we serve, our passengers. As a result, American Airlines cannot support the proposed PRTC as it is outlined in the DEIS.

SD-22

CE-2

Sincerely,



Jeffrey B. Osborne  
Managing Director  
System Operations Control



## NORTHERN CHEYENNE TRIBE

### ADMINISTRATION

P.O. BOX 128

LAME DEER, MONTANA 59043

(406) 477-6284

FAX (406) 477-6210



December 22, 2010

Ms. Linda DeVine  
HQ ACC/A7PP  
129 Andrews Street, Room 317  
Langley, AFB, VA 23665-2769

Dear Ms. DeVine:

The Northern Cheyenne Tribe (Tribe), again, appreciates all your efforts to provide comments on the hearing that was held on the DEIS on December 7, 2010 regarding the Powder River Training Complex (PRTC).

The Tribe has an array of concerns regarding the far-reaching and long-term effects of the PRTC on the welfare of our members and health of the Reservation environment and nearby areas. Because the PRTC will affect the Tribe's homeland, we take a long view of how the project will impact our people, both their economic and social well-being, but also the environment to which their traditional, spiritual and ceremonial practices are integrally linked.

Below is a summary of comments from the Tribe, tribal members, and tribal agencies regarding the DEIS on the PRTC. We ask that the Air Force examine the effects of the PRTC on these resources in its preparation of a DEIS for the project.

1. The Tribe monitors air pollution from various sources on and off the Reservation. We are very concerned with the potential emissions such as carbon monoxide, sulfur dioxide, uranium tailings, and other toxins from the "jet trail" and their long term negative effects on human health.

AQ-1

LITTLE WOLF AND MORNING STAR - Out of defeat and exile they led us back to Montana and won our Cheyenne homeland that we will keep forever.



2. At the Tribe's request, the EPA designated the Northern Cheyenne Reservation a Class I air shed in 1977. This reflected the Tribe's long-standing value of protecting the clean air of its homeland in southeastern Montana. We are concerned with the impacts to visibility and air quality caused by the PRTC, particularly with respect to carbon monoxide, nitrogen oxides, sulfur dioxide, uranium tailings and other pollutants that are likely to be emitted by the increase in air traffic over the Reservation's air space. The Air Force should analyze the effects of the PRTC on the "increments" established for the Reservation under the Prevention of Significant Deterioration (PSD) provisions of the Clean Air Act, 42 U.S.C. §7473. This analysis is required under NEPA because an EIS must discuss the possible conflicts of the proposed action with federal, state, and local (including tribal) laws as well as the "significance" of the potential impacts. 40 C.F.R. § 15-2.16(a)-(c). The Montana DEQ prepared an "Increment consumption analysis" as part of its EIS for the Roundup power plant in 2002. This document showed that the Class I increments for 24-hour and 3-hour  $\text{SO}_2$  had been exceeded and that the post-baseline projects such as the Colstrip Units #3, and #4 have consumed significant parts of the increments for annual  $\text{NO}_2$  and 24-hour  $\text{PM}_{10}$ . The EIS for the PRTC should include a similar increment consumption analysis so as to avoid any further violations of federal law.
3. Visibility is a very significant issue for the Tribe. The EIS should analyze the cumulative impacts of the PRTC on visibility on and near the Reservation as well as acute visibility impacts from individual jet contrails.
4. The deployment of chaff and flares can cause fires leading to collateral impacts to the Reservation and the property of the Tribe and tribal members. Potential fire concerns affect the total environment of the Reservation from quality of water, fish, wildlife, plant fauna, to the people who live here. The scoping document indicates that the Air Force will coordinate fire response efforts. The EIS should examine this in detail given the large area covered by the project, the limited resources of the Reservation to combat PRTC-caused fires, and the importance of a quick response time to protect tribal resources, including timber in the hot, dry Montana summer weather.
5. Noise pollution is a significant concern. Sonic booms would be highly disruptive to the tribal communities on and near the Reservation. Noise pollution can disrupt normal activities such as sleep, prayer, ceremonies, and other traditional and day-to-day activities. Tribal members have told us that they chose to live on the Reservation (rather than urban areas) because of the peace and quiet that life here provides, particularly when outside in the hills, valleys and forests for fishing, hunting, gathering berries and medicinal plants, and participating in traditional ceremonies and family gatherings. A major change in air traffic over or near the

AQ-1

LU-9

SA-5

SA-6

W-2

Reservation would severely impact this vital aspect of the local environment. Sudden and dramatic noise impacts could cause short- and long-term health problems, especially for those that are sensitive to noise. The EIS should examine the baseline noise on the Reservation and predict the increase in noise caused by PRTC in its analysis of the impacts of noise on the Reservation environment. It is critical that this examination considers "single-event" (i.e. the noise caused by a single fly over or sonic boom) rather than average noise that will be caused by the PRTC.

ND-9

6. The threat of aircraft accidents, during training, is a serious concern. Fallout from air collisions and other potential accidents would create hazards for the local environment, including safety of those on the ground, fire, and property damage. The distraction caused by unpredictable, low flying, loud aircraft could also lead to an increased risk of accidents on the ground.
7. The PRTC would conflict with and jeopardize current air traffic over the reservation, such as by ranchers who own planes. The PRTC would also significantly impact future plans for an airport within the Reservation. In addition to considering these effects on the Northern Cheyenne Reservation, the Air Force should examine the effects of other commercial and military aircraft operations located in proximity to Indian reservations in other parts of the country. We understand that such operations near other reservations have adversely impacted on-reservation economic development efforts.
8. The Reservation's wildlife is already scarce and subject to intense pressure from coal bed methane and other energy development near the Reservation. The EIS should examine how PRTC activities will impact wildlife on and near the Reservation, including whether animals will take refuge in other areas where there is less aerial activity. Deer, elk, and other land animals are vital to the subsistence and ceremonial existence of tribal members, and we cannot afford to have additional pressures on these resources. The EIS should examine how reduced access to wildlife will affect the subsistence, cultural and ceremonial practices of the Tribe.
9. The spirituality of the Northern Cheyenne people will be compromised by the PRTC. The reservation and surrounding area is considered one contiguous cultural landscape. There are many places where ceremonies are performed that often last for several days. Prayers, ceremonies and other spiritual activities would be significantly and adversely affected by the noise, visual and other likely impacts of the PRTC. The EIS must consider these impacts and, as requested below, an alternative that would eliminate or significantly mitigate them.
10. The social and economic impacts are far reaching and will create unforeseen circumstances. For example, economic development on the Reservation, which has

SA-1

SO-10

SO-6

SO-21

BI-4

W-5

NA-4

historically been very difficult to achieve, could be frustrated because of noise impacts caused by low-altitude and supersonic flights, possible on-the-ground accidents related to sudden and loud noises and other adverse impacts of the PRTC. This is also an environmental justice issue, as the impacts of the PRTC would be more heavily felt by the tribal community than other groups. The Tribe has a high rate of poverty and must be able to take advantage of any economic development opportunities that are feasible for the remote location of its Reservation. For example, the Tribe is considering development of a casino on tribal trust lands near the Tongue River Reservoir.

LU-2

EJ-2

The Tribe requests that the Air Force consider a No-Action Alternative (4.6.3.4) including a No-Action Alternative (4.7.3.4) that would eliminate the creation of the PRTC and eliminate the expansion of training airspace. This would provide that PR-A, PR-B MOAs would not overfly Native American reservations. Powder River Training aircraft would not overfly Devils Tower, Bear Butte, and fly adjacent to Deadwood at altitudes above 18,000 feet MSL.

GE-2

The above comments are comments gathered by the Tribe as part of the hearing on December 7, 2010 and also comments from the communities.

If you have any questions, please feel free to contact my office at 406-477-6284 or email me at [Leroy.spang@cheyennenation.com](mailto:Leroy.spang@cheyennenation.com).

Sincerely,



Leroy A. Spang, President  
Northern Cheyenne Tribe

C: Northern Cheyenne Tribal Council  
Steve Chestnut, Tribal Attorney