United States Department of the Interior

National Park Service

Midwest Region
601 Riverfront Drive
Omaha, Nebraska 68102-4226

L 7 AUG 2008
ER-08/0406(MWR-PCL/PC)

Ms. Linda DeVine
HQ ACC/A7PP
129 Andrews Street, Suite 317
Langley Air Force Base, Virginia 23665-2769

Dear Ms. DeVine:

The Department of the Interior (Department) has asked the National Park Service (NPS) to review and comment on the Notice of Intent to prepare an Environmental Impact Statement (EIS) for the Powder River Complex expansion located near Ellsworth Air Force Base, South Dakota. We offer the following comments for your consideration:

The proposed Powder River Complex expansion affects the northeast part of Wyoming, the southeast part of Montana, the southwest part of North Dakota, and the northwest part of South Dakota. National parks in the area include Theodore Roosevelt National Park, Mount Rushmore National Memorial, Devils Tower National Monument, Bighorn Canyon National Recreation Area, and Little Bighorn Battlefield, which are located within or very near the expansion area. The NPS is concerned about the potential of the proposed action to adversely affect the soundscapes of these parks.

The NPS evaluates Federal actions which may impact the human and natural environment within our parks with respect to our Organic Act mandates, including:

> ... to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations.

We are different from other Federal land management agencies in that, in addition to our national legislative mandates, each individual park is established under separate legislative authority which identifies specific purposes for the park and often includes the identification of key natural or cultural resources which define the integrity of the park.

Natural and cultural sounds are integral components of the suite of resources and values which NPS managers are charged with preserving and restoring. A soundscape refers to the total acoustic environment of an area. The soundscape (like air, water, scenery, or wildlife) of a national park is a valuable resource that can easily be degraded or destroyed by inappropriate sound levels and frequencies. An area's ability to transmit ecologically significant sounds is a function of the amount of extraneous noise intrusion.

We understand, at this stage in the process, the U.S. Air Force (USAF) would not include information in the Notice of Intent regarding how the environmental impact analysis would be

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conducted. However, we are aware the USAF typically uses the day-night average sound level (DNL) metric in their environmental impact assessments. The DNL is an energy-based noise-averaging metric widely used by the Federal Aviation Administration (FAA) and the Department of Defense as the primary means for determining the cumulative noise energy exposure of individuals to noise resulting from aviation activities. Therefore, thresholds of significance that have been established by the FAA are based on community response. The 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. Since assumptions regarding the DNL levels are community-based in relation to airports, this metric is not adequate to assess impacts of noise to park resources, values, and visitor experience.

The NPS mission to conserve unimpaired park resources and values is a different standard than significance as defined by the FAA and other agencies. In recognition of the agencies' differences in mission and acknowledgement that special consideration needs to be given to the evaluation of noise impacts on noise-sensitive areas, it is imperative to provide information in the EIS for the NPS to be able to characterize the noise impacts from the proposed action and alternatives. Only then can Park Managers make decisions about impacts to park resources, values, and visitor experience. The NPS uses audibility-based, or "time above," metrics in order to express the time the sound level is above ambient. This takes into account the duration of aircraft noise events, the number of aircraft noise events, and the absolute sound level of events. "Time above" metrics correlate better with flight operations than the DNL metrics which obscure the dynamic range of acoustic events (www.fican.org/pdf/HanscomNoise.pdf). These supplemental metrics would also better satisfy the requirements under the National Environmental Policy Act (NEPA) to characterize impacts to the environment in terms of intensity, context, and duration (40 CFR 1508.27). The NPS Natural Sounds Program would be happy to discuss the inclusion of supplemental metrics in the EIS with the USAF.

We are concerned that the proposed expansion of existing military operations airspace would allow flights down to 500 feet above ground level as well as permitting supersonic flights within the proposed Powder River Complex expansion. The NPS would prefer no supersonic or low-level flights over park units. For example, the NPS worked with the FAA to establish a No-Fly Advisory Zone for the Devils Tower National Monument. The existing No-Fly Zone Advisory Bulletin between the Billings Area FAA and the Devils Tower National Monument is enclosed for your reference. Alternative B would appear to support our desire for no low-level flights over park units. We are also concerned about the use of chaff and flares in and near park units.

We seek mutually beneficial solutions related to impacts associated with the proposed project – solutions that articulate how natural and cultural values interrelate in healthy ecosystems/cultural landscapes, and how public enjoyment of these places as well as the need to ensure realistic training needed by the USAF can be part of a strategy for ensuring the resources are protected unimpaired for future generations. The NPS has worked with the USAF through the Regional Airspace/Range Council meetings regarding military overflight issues, and has found the USAF to be very receptive to the NPS concerns and willing to find mutually acceptable solutions. We have

every confidence that this proactive interagency relationship will continue throughout the NEPA process and we look forward to working with the USAF regarding the NPS concerns about the proposed Power River Complex expansion.

The Department has a continuing interest in working with the USAF to ensure impacts to resources of concern to the Department are adequately addressed. For matters related to these comments, please contact Regional Environmental Coordinator Nick Chevance, National Park Service, Midwest Regional Office, 601 Riverfront Drive, Omaha, Nebraska 68102-4226, telephone: 402-661-1844.

We appreciate the opportunity to provide these comments.

Sincerely,

Ernest Quintana
Regional Director

Enclosure

Devils Tower

National Park Service
U.S. Department of Interior

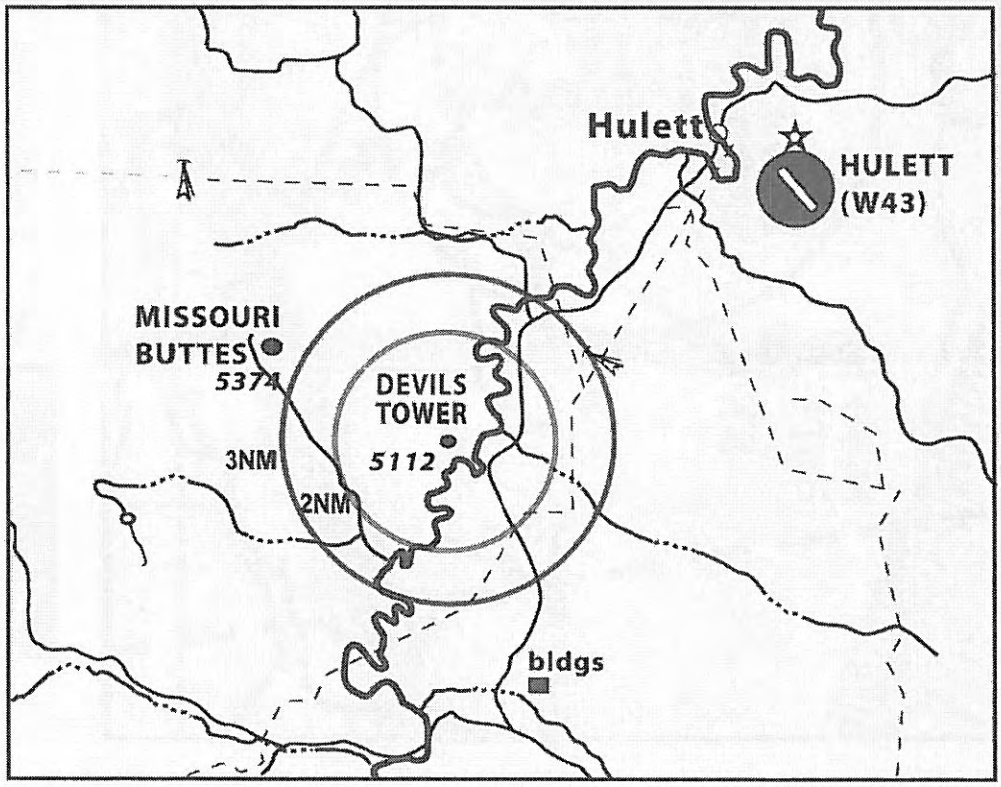
Devils Tower National Monument

No-Fly Advisory Zone

When the airport at Hulett, Wyoming (W43) was established, an agreement between the Federal Aviation Administration, Town of Hulett, Hulett Airport Advisory Board and Devils Tower National Monument created a "No-Fly Advisory Zone".

The No-Fly Advisory Zone recognizes the cultural significance of Devils Tower as a sacred site to over 20 American Indian Tribes, as well as the monument's purpose to preserve the lofty and isolated rock and surrounding public land as an object of historic and scientific interest for the enjoyment, education and inspiration of this and future generations.

The advisory is centered on Devils Tower, (Lat: 44°35'25.86"N, Long: 104°42'54.57"W) and extends for 2 nautical miles (NM) throughout the year, except for the month of June, when it extends for 3 nautical miles. The advisory includes no overflights of the Tower throughout the year. The Hulett (W43) airport is approximately 7.5 nautical miles northeast of Devils Tower. Pilots are advised to fly routes in northeasterly or southeasterly directions when using the airport for arrivals or departures to avoid the no-fly advisory zone.



Visual Flight References for the No-Fly Advisory

-Missouri Buttes
-Wyoming Hwy 24,
-Power lines
-Belle Fourche River

Legend

- 3 mile radius
- 2 mile radius
- major roads
- river
- power lines

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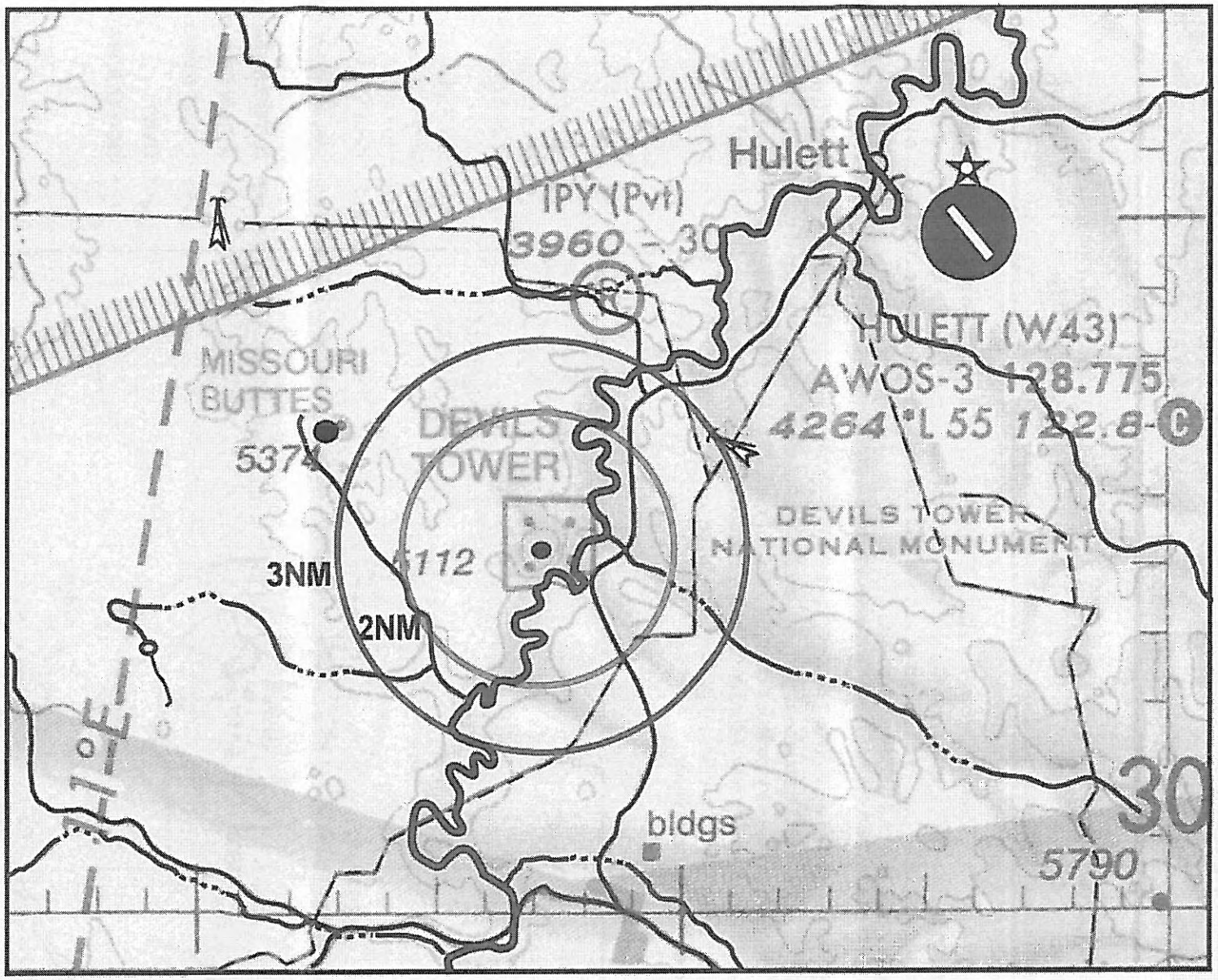

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