

Congress of the United States
Washington, DC 20510

December 12, 2014

The Honorable Deborah Lee James
Secretary
Department of the Air Force
1670 Air Force Pentagon
Washington, D.C. 20330-1670

The Honorable Michael P. Huerta
Administrator
Federal Aviation Administration
800 Independence Avenue, SW
Washington, D.C. 20591

Dear Secretary James and Administrator Huerta:

We write to recommend additional revisions to the Air Force's proposal to expand the Powder River Training Complex (PRTC) for Ellsworth Air Force Base into southeastern Montana, and to request clarification of certain sections of the final Environmental Impact Statement (EIS). While we appreciate the Air Force's on-going efforts to address our concerns, we remain extremely troubled that the proposal, as currently written, will hinder economic development and threaten safety in the region, especially in the section designated Powder River 3 (PR-3) Low. Before you issue a record of decision on the EIS, we urge that the following suggestions be considered for PR-3 Low, adaptive management, and communications and radar. We also request a written response to our questions on the EIS.

PR-3 Low

The EIS mentions the Air Force's extensive efforts to preserve the safety of the airspace within the PRTC. While we appreciate these steps taken by the Air Force, we strongly believe that additional mitigations to PR-3 Low are necessary. According to table 2.5-8, B-1 bombers will only fly up to 92 hours per year in the PR-3 Low military operation area (MOA) at altitudes from 500 feet above ground level (AGL) up to 12,000 feet above mean sea level (MSL). We recognize the importance of low altitude training. However, we question the wisdom of instituting a permanent MOA that will deter general aviation where it is critical to economic development and will create very serious safety concerns when the MOA will only be used for approximately 92 hours per year. We believe that making PR-3 Low a Large Force Exercise (LFE)-only MOA would mitigate much, if not all, of these concerns, and would not be an undue burden to the Air Force. Has the Air Force considered activating PR-3 Low only during LFEs? And how would making PR-3 Low an LFE-only MOA impact the training requirements?

Adaptive Management

Section 2.3.5 of the EIS discusses mitigation management over time and an adaptive management program. This section states, "Since the adaptive management approach is being adopted as part of the implementation for the PRTC, the mitigation plan will have provisions for determining the success of the mitigations, as well as procedures for making necessary adaptations." We believe this is a laudable approach, but warrants further clarification. First, how will the mitigations be assessed to ensure that residents' concerns are being heard and addressed and how will the Air Force ensure input from our constituents in the communities underlying the PRTC? Second, will you commit to informing our offices of the concerns and mitigation efforts?

Communications and Radar

The EIS includes the communications plan for the expansion of the PRTC. We seek clarification on how the Air Force will implement the plan and communicate with civil aviators. For instance, section 4.3.3.1.1 states, "The Air Force has agreed to not activate or train in Low MOAs until adequate communications are established to allow recall of training aircraft from PR-1A, 1B, 1C, 1D, or PR-3 Low MOAs for Modified Alternative A." How does the Air Force define "adequate communications" to allow recall of training aircraft, and the safe operations of non-participatory aircraft in the area?

The section on civilian airspace uses, section 4.1.3.1.3, also raises a number of questions. Point number 7, on page 4-9, states, "Ellsworth AFB will develop a process and staff a position to manage real-time activation, use, modification, recall, and return of the current airspace." First, how will this process transpire, and will the position be staffed by a civilian or military controller? Second, will the Ellsworth staff be able to communicate directly with civilian aviators in the PRTC, or will it be military to air traffic control (ATC).

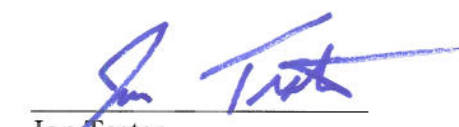
Throughout the EIS, the Air Force describes certain parts of the PRTC as having limited or no radar coverage. This is particularly worrisome in PR-3 Low due to the training floor of 500 AGL, and the prevalence of civil operations. Has the Air Force considered providing additional radar coverage in PR-3 Low to allow visual flight rules (VFR) in the MOA below 12,000 MSL? What would it cost the Air Force to provide such radar coverage and corresponding communications? We strongly urge the Air Force and the FAA to consider installing additional radar capabilities in PR-3 Low.

Finally, we emphasize that the proposed expansion covers the rapidly growing Bakken oil region, where general aviation plays a significant role in commerce, economic development and safety inspections. Energy companies that are developing resources in the Bakken region are troubled by potential limited access to airspace within the proposed expansion, as much of the new development occurs on vast oilfields where few good roads are available for inspecting oil and gas pipelines. We have heard similar comments from agriculture pilots who worry about disruption to their crop spraying operations. We have compiled the following questions from stakeholders on the ground who are seeking clarification on the final EIS:

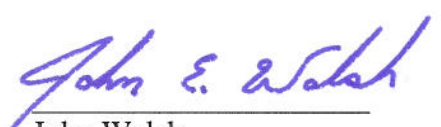
1. Will VFR flights using see-and-avoid be permitted within active MOAs?
2. Unless otherwise notified via notice to airmen (NOTAM), will the MOAs be inactive and open to civilian air traffic between 1200 and 1800 Monday through Thursday, and between 1200 Friday and 0730 the following Monday morning?
3. Will flights below the low MOAs (i.e. 500 feet AGL) and below 1,500 feet AGL within three nautical miles of the Baker Municipal Airport be permitted while the PR-2 and PR-3 Low MOAs are active?
4. Will instrument flight rules (IFR) arrivals and departures to Baker Municipal Airport be supported while the PR-3 MOA is active by temporarily relocating training aircraft to another airspace and vectoring the IFR aircraft?

As you can see, Montanans have made it clear that the expansion should not go through as proposed. As the FAA and the Air Force reviews of the proposal, we urge you to deny your approval of the final EIS until our concerns have been addressed. Thank you for your attention to this matter.


Sincerely,



Jon Tester
United States Senator



John Walsh
United States Senator



Steve Daines
United States Congressman