

OFFICE OF THE GOVERNOR
STATE OF MONTANA

STEVE BULLOCK
GOVERNOR



ANGELA McLEAN
LT. GOVERNOR

December 22, 2014

The Honorable Chuck Hagel
Secretary
Department of Defense
1400 Defense Pentagon
Washington, DC 20301

The Honorable Anthony Foxx
Secretary
Department of Transportation
1200 New Jersey Ave. SE
Washington, DC 20590

Dear Secretary Hagel and Secretary Foxx:

I am writing to express my opposition to the Air Force's proposal to expand the Powder River Training Complex (PRTC) in areas of southeastern Montana to train bombers from Ellsworth Air Force Base in South Dakota and Minot Air Force Base in North Dakota. Given the Military Operating Areas (MOAs) Final Environmental Impact Statement (FEIS) released by the Air Force last month, I recommend that the "No Action" alternative is best result for Montana. If the Record of Decision (ROD) is to result in a different alternative, however, I request that certain revisions are made to the FEIS for the safety and economic security of Montanans.

As you have heard from Senator Tester, Senator Walsh, Representative Daines, and many other Montanans, the impacts of the PRTC expansion in our communities are serious. The Crow and Northern Cheyenne Indian reservations, as well as the towns of Colstrip, Hardin and Baker are all located in the proposed space. It would have a significant negative impact on farmers, ranchers, energy developers, wildlife habitat, municipal and private airports, and, most importantly, the overall safety of Montanans.

The airspace in much of southeastern Montana is critical to emergency medical flights, especially as these areas are rural, and flights are the often the only way to get folks to hospitals for emergency care. Disruption to emergency medical flights can mean life or death to these Montanans. Nearly forty airports will be affected by the proposed training area. Baker Municipal Airport alone operates 30,000 hours per year, and has seen a more than \$20 million investment in recent years to bring it up to the standards required by the oil and gas industry.

The impacts on energy production would be significant. For energy developers, airspace is critical for inspecting oil gas pipelines. These pipelines cover hundreds of miles in Montana, and the only manner for energy developers to find leaks, cracks or other problems is by air. In fact, the training area encompasses Cedar Creek Anticline and Bell Creek Field, of which some pipeline has to be inspected by flight *every other day* of the year. Both are operated by Denbury

Resources—Montana’s second largest oil producer. Similar concerns are shared by agriculture pilots, who rely on flight to spray their crops.

Furthermore, the B-1 and B-52 bombers used in these training exercises can fly fast enough to break the sound barrier, creating sonic booms and reaching noise levels that can cause serious disruption to residents, livestock and wildlife. This is particularly concerning given the work Montana is currently doing to avoid a Greater Sage Grouse Engendered Species listing. Earlier this year, I established the Sage Grouse Habitat Conservation Program to keep management of the bird in state hands, and to protect Montana’s economy, jobs and outdoor heritage. Critical to preservation of the Sage Grouse is deterring loud, disruptive noises in the core areas where the bird lives, as well as preventing fires that threaten the sagebrush habitat, which takes years to re-establish. With flights flying as low as 500 feet above ground level, the activity could result in core habitat loss. That loss could result in an endangered species listing—an outcome Montana has been preparing to avoid by substantial investment.

It is clear that the “No Action” alternative is the best result for Montana. If, however, the final Air Force’s ROD reflects a different alternative, certain revisions to the Powder River MOA FEIS are necessary for the safety and economic prosperity of Montanans. I ask that the following actions be included in the Air Force’s proposal:

- **Eliminate PR-3 Low MOA.** The FEIS states in Table 2.5-6, B-1 bombers will fly up to 92 hours per year in the PR-3 Low MOA at altitudes between 500 ft. AGL and 12,000 ft. MSL. Eliminating PR-3 Low training opportunities will considerably reduce the days/year of potential conflict between military and civilian aircraft.
- **Limit PR-3 High MOA to LFE only.** The FEIS states in Table 2.5-6, B-1 bombers will fly less than 5 hours per year (0.74 during LFE) in the PR-3 High MOA at altitudes between 12,000 ft. MSL and 17,999 ft.
- **Provide real time advisories of military aircraft operations to civilian aircraft.** See and avoid could be enhanced by establishing a Special-Use Airspace Information Service and making it available to civilian aircraft at all altitudes within the MOA.
- **Chart the airspace as active only via Notice to Airmen (NOTAM) to ensure release of the airspace when not being used for training.**
- **Provide low altitude radar and communication capabilities within the limits of the PRTC operations.** Radar capability in combination with adequate communications coverage will allow for real time conflict resolution by ATC and enable ATC to recall military aircraft when potential traffic conflicts exist.
- **Expand and detail the adaptive management approach.** Include recurrent annual meetings attended by the Air Force, FAA, State Government, local officials and businesses, and pilots to evaluate the Air Force/FAA compliance with stated mitigations.

There is no doubt that Montanans support our nation’s efforts to enhance national security. Montanans volunteer to serve our country at a higher rate than any other state in the nation. The PRTC expansion proposal, however, would be at the expense of the livelihoods and economic prosperity of many Montanans. I appreciate your serious considerations of the concerns that I

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and many others have outlined. The requested revisions are essential if an alternative other than “No Action” is taken. The safety and livelihood of many Montana communities depend on this.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Steve Bullock', with a stylized flourish at the end.

STEVE BULLOCK
Governor

CC: Senator Jon Tester
Senator John Walsh
Senator John Thune
Representative Steve Daines
Secretary Deborah James
Administrator Michael Huerta