



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.

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.

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.

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.

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?

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?

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