FINAL FINDING OF NO SIGNIFICANT IMPACT (FONSI)
ARMY NATIONAL GUARD

Environmental Assessment of the Construction and Operation of a Permanent Limited Army Aviation Support Facility in Billings, Montana

Introduction

Montana Army National Guard (MTARNG), in cooperation with the National Guard Bureau (NGB) prepared an Environmental Assessment (EA) to analyze the potential environmental impacts of constructing, and operating from, a permanent Limited Army Aviation Support Facility (LAASF). The EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 United States Code [U.S.C.] 4321 et seq.), the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Sections 1500-1508), and 32 CFR Part 651 (*Environmental Analysis of Army Actions, Final Rule*).

1. Description of the Proposed Action and Alternatives (DOPAA)

Proposed Action – The MTARNG's Proposed Action is to construct a permanent LAASF near the Billings Airport in Montana. The building would be constructed on a 40-acre site, approximately 620 feet west of a leased hangar, west of the airport from which MTARNG currently conducts aviation activities. NEPA analysis for the current leased facility is set forth in *Montana Army National Guard Environmental Assessment for the Development and Operation of a Limited Army Aviation Support Facility at Billings, Montana*. The proposed permanent facility would be approximately 66,000 square feet for the primary LAASF structure (plus parking and apron). The new LAASF would provide MTARNG with additional space when compared to the 12,000 square foot leased hangar (plus parking and apron).

The current leased hangar allows for limited aviation operations in Eastern Montana. However, it does not meet 42 U.S.C. §4154 *Standards for design, construction, and alteration of buildings*; and National Guard Pamphlet 415-12 *Army National Guard Facilities Allowances*. Further, the leased LAASF facility does not meet the standards of UFC 1-200-02 *High Performance and Sustainable Building Requirements, With Change 2* since it is not e based on sustainable design and lacks energy efficiencies. Finally, the leased hangar does not include Anti-terrorism/Force Protection (AT/FP) measures that meet UFC 4-010-01 *DoD Minimum Antiterrorism Standards for Buildings, With Change 2*.

The proposed MTARNG-owned LAASF facility would be constructed to meet all Industry Standards and local, state, and federal building codes, while accommodating a permanent hangar with backup/emergency generators, paved parking, unheated aircraft storage, and fire detection, alarm, and suppression equipment. Other features would include utility connections, information systems, roads, sidewalks, curbs, gutters, storm drainage, and site improvements. This larger, long-term permanent facility includes space for training rooms, offices, etc. and would accommodate the emerging growth needs and coverage requirements of the MTARNG aviation assets in Eastern Montana. The permanent LAASF facility would improve on-the-ground drill and training activities and would include the following activities that cannot be conducted at the leased hangar due to the inadequate facilities:

- Aircraft wash
- Improved classroom and administrative capabilities
- Additional flight runups
- Avionics and engine maintenance
- Store petroleum, oil, and lubricants (POL)
- Store hazardous wastes on site

The LAASF would continue to support up to six helicopters (including, but not limited to, the Chinook [CH-47], Blackhawk [UH-60], and Lakota [UH-72]). Flights would occur primarily during the day, with approximately three (3) percent returning after dark.

Alternatives Considered – The MTARNG's Proposed Action includes two variations, Option 1, to construct the project, including the helipad, within the 40-acre State of Montana-owned parcel, and Option 2, to construct the helipad and associated clear zones to the north of the State parcel on adjacent City of Billings property. The second action alternative added the use of the Billings Armed Forces Reserve Center (BAFRC) while keeping the helicopter operations at the leased hangar. The No Action Alternative consists of continuing activities out of the leased hangar.

The MTARNG's LAASF alternatives were evaluated based on five screening criteria. These include:

1) Adequate long-term training and classroom/administrative facilities
2) Secure storage for up to six helicopters and space to conduct all LAASF maintenance activities
3) Air traffic control and land use compatibility
4) Security and Minimum AT/FP requirements
5) Government-owned facilities, preferably on a military installation

Only the Proposed Action Alternative (either Option) would effectively meet all the MTARNG's screening criteria. The No Action Alternative fails to meet the purpose and need because it does not allow for adequate hangar space and AT/FP or comply with DoD and NGB requirements to only use leased facilities on a temporary basis.

However, as required by NEPA, the No Action Alternative was retained in the analysis to provide a basis of comparison with the proposed action. The BAFRC Alternative fails to meet three of the MTARNG's five screening criteria, adequate long-term training and classroom/admin facilities, secure storage for up to six helicopters (leased hangar accommodates four aircraft), and government-owned facilities (hangar on leased private property).

The EA shows that Option 1 of the Proposed Action Alternative meets the purpose and need of a permanent LAASF while remaining on State of Montana-owned property which provides MTARNG with adequate control of, and access to, the helipad as well as comprehensive AT/FP security of the entire LAASF facility.

Per a public comment, MTARNG revised Section 2.2, Page 11 of the EA. The following sentence was edited to read: "Flight paths originate at the LAASF facility and travel over the airport property north of Highway 3." The next sentence in the paragraph was removed: "~~Under Option 1, flights would all approach and leave to the west to avoid land use conflicts.~~" And the following sentence was updated to reflect the flight paths are the same under both Option 1 and 2: "Under both Options 1 and 2, approximately 40 percent of the flights go to the east, 40 percent to the west, and 20 percent to the north." This change has been carried through Table ES-2 Page v, Table 2-3 Page 14, and Table 2-4 Page 18. The land use conflict was due to the presence of an aviation-related facility in the Accident Potential Zone east of the helipad. MTARNG aircraft avoid this by travelling north then east as depicted in the noise analysis report in Appendix D of the EA. This flight pattern is compatible with current land use. Potential noise impacts from MTARNG aircraft were based on the noise analysis report so were accurately represented in the EA.

2. Environmental Analysis

The potential environmental impacts associated with the Proposed Action are fully described in the EA. The EA identifies the environmental resources that could be affected by the Proposed Action, and determines the significance of the impacts, if any, to each of these resources. Based on the EA's analysis, the MTARNG determined that the potential adverse impacts from the Proposed Action on land use, air quality, climate change/greenhouse gases, noise, geology, topography, soils, water resources, biological resources, cultural resources, socioeconomics, protection of children, Environmental Justice, infrastructure, and hazardous and toxic materials and wastes would not be significant. The Proposed Action would not result in any disproportionate adverse impacts on minority or low-income populations or result in adverse health or safety risks to children. There would be no impact on traffic except during construction when equipment and construction personnel would enter and leave the property. There would be a minor increase in noise and air pollutants, but these increases would be

below federal noise thresholds for significant impact and all federal, state, and local noise regulations would be met. There would be a minor loss of previously disturbed habitat (approximately 40 acres), and a short-term increase in water use during construction. No significant cumulative impacts were identified.

3. Best Management Practices and Mitigation

The MTARNG will employ Best Management Practices (BMPs) to minimize potential minor adverse environmental impacts and maintain good stewardship. These BMPs would be implemented as appropriate for the proposed improvements and include measures that minimize vehicle emissions, noise, water quality, biological resources, any cultural resources uncovered during construction, and contamination of land or water. No site-specific mitigation measures are required for the Proposed Action because no potentially significant adverse impacts were identified.

4. Regulations

The Proposed Action complies with NEPA, the CEQ Regulations and 32 CFR Part 651 *Environmental Analysis of Army Actions.*

5. Commitment to Implementation

The National Guard Bureau (NGB) and MTARNG affirm their commitment to implement this EA in accordance with NEPA.

6. Public Review and Comment

The Final EA and Draft FONSI were available for a 15-day public review and comment period following publication a public notice in the *Billings Gazette* on February 25, 2024. The comment period ran from February 25, 2024 until March 11, 2024 with comments provided via email to rebekah.l.myers2.nfg@army.mil or postal mail to Rebekah Myers, DMA Environmental Bureau, JFHQ-MT, P.O. Box 4789, 1956 Mt. Majo Street, Fort Harrison, MT 59636-4789.

MTARNG received ten public comment documents that contain 38 individual comments. The comments ask questions, or request additional information, about the project. Topics identified in the comments included noise/flight paths, fuel storage/delivery, accident response, stormwater, visual/lighting, traffic, and cumulative impact on infrastructure. MTARNG reviewed and responded to each individual comment on the attached matrix and provided commenters with additional information regarding the noise analysis, MTARNG fly neighborly practices, aviation standard operating procedures (SOPs), and how to file a noise complaint with the MTARNG Public Affairs Office (PAO). MTARNG provided information about facility lighting and explained that lighting requirements would meet AT/FP and Leadership in Energy and Environmental

Design (LEED). The permanent LAASF and the associated lighting will be constructed partially below ground level on the west side, which will help minimize visual impacts from lighting on that side of the facility. The attached comment matrix provides MTARNG's response to each comment. The MTARNG concluded that no additional analysis of the proposal is necessary due to the comments received. MTARNG made one clarifying revision to Section 2.2 on Page 11 of the EA, along with updating Table ES-2 Page v, Table 2-3 Page 14, and Table 2-4 Page 18. The discussion of the revision is found in Section 1 of this Final FONSI. This Final FONSI will be posted to the DMA's project website located at https://dma.mt.gov/CFMO/index following approval and signature.

7. Finding of No Significant Impact

After careful review of the EA, I have concluded that implementation of the Proposed Action would not generate controversy or have a significant adverse impact on the quality of the human or natural environment. This analysis fulfills the requirements of NEPA and the CEQ regulations. An Environmental Impact Statement will not be prepared, and the NGB is issuing this Final FONSI.

17 April 2024
Date

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ANTHONY HAMMETT
COL, GS
G-9, Army National Guard

Comment #	Commenter	Mode		Date	Category	Comment	Response
1	Al Hayes	E-mail	alhayes1946@msn.com	25-Feb-24	Noise	I am generally in support of this facility. My concern is the vertical and horizontal distances of helicopter flights over and near the Indian Cliffs Subdivision which is south and west of this facility. I live in this subdivision. We have experienced flights closer than those allowables since the Army National Guard has been operating out of this facility. The private company that operates the Chinook or large double rotor aircraft are doing an excellent job of maintaining proper flight standards. Can the ANG do the same?	The routes that the MTARNG helicopters fly out of the current Billings location are dictated by the Billings Logan Airport tower. A copy of the current MTARNG flight paths and proposed future flight paths can be found in Appendix D on the Department of Military Affairs website (https://dma.mt.gov/CFMO/CFMO-Documents/Billings-LAASF-2024/MTARNG_LAASF_PermFacilityEA_Noise_ApxD.pdf).
2	Howard Evans, LCDR USN (ret)	E-mail	howardevans@bresnan.net	29-Feb-24	Fuel Storage	Since we've been through this process before, I concentrated on things which might have changed as a result of the relocation of the LAASF and for which I have concern. These are the issues I've identified. Fuel Storage a. Will there be containment measures for the two underground 10,000 gal fuel tanks should a leak occur?	The underground storage tanks will be double walled (a primary tank to store the fuel, plus a secondary tank designed to capture any leak from the primary tank) fiberglass tanks with an Automatic Tank Gauge (ATG) system to monitor the tanks. The ATG system will monitor both tanks continuously for inventory control and has leak detection sensors within the interstitial space of the secondary tank. The tanks will be permitted with the State of Montana Department of Environmental Quality, which has numerous requirements within their Tank Program. There are monthly monitoring and inspection requirements, including monthly, annual, and tri-annual inspections to ensure all equipment and sensors are operational. Operators of underground storage tanks (facility personnel in charge of the tanks) are required to get an UST Class A and B Operator License through the State of Montana. More information regarding underground storage tanks and how the State of Montana Department of Environmental Quality permits tanks can be found on DEQ's website (https://deq.mt.gov/twr/Programs/ust).
3	Howard Evans, LCDR USN (ret)	E-mail	howardevans@bresnan.net	29-Feb-24	Fuel Storage	Since we've been through this process before, I concentrated on things which might have changed as a result of the relocation of the LAASF and for which I have concern. These are the issues I've identified. Fuel Storage b. How will the area be monitored for possible fuel contamination?	The underground storage tank will be double walled. In the event of a fuel leak, the interstitial space and the leak monitoring sensor system will alarm. The ATG system will monitor the tank 24/7 to track inventory of fuel as well as any leaks within the secondary tank or piping. Fuel inventory is tracked by facility personnel (MTARNG soldiers) who are trained to monitor the tanks and fuel levels with the ATG system and manually measure the fuel volume routinely. Inventory management is essential for fueling operations, managing fuel deliveries and acts as a secondary method to detect leaks if the sensors fail. Monthly UST inspections, annual inspections and tri-annual inspections are all required under the MTDEQ UST Permit. The inspections are designed to ensure tank operators are managing the tanks as required as well as detect any maintenance issues with the tank and equipment.
4	Howard Evans, LCDR USN (ret)	E-mail	howardevans@bresnan.net	29-Feb-24	Fuel Storage	Since we've been through this process before, I concentrated on things which might have changed as a result of the relocation of the LAASF and for which I have concern. These are the issues I've identified. Fuel Storage c. I assume that fueling of helicopters will be done on the apron and if so, are there measures to keep any spillage confined to the area? Also will there be containment measures be at the truck fueling site?	Helicopters are fueled on the apron of the facility. The permanent LAASF will have a site-specific Spill Prevention Control and Countermeasures Plan (SPCCP) that will describe how to prevent, control or respond to a spill if it occurs, and how to report a spill to the necessary authorities. SPCCPs are required under 40 CFR Part 112. SPCCP will document all petroleum storage at the LAASF, all spill prevention structures (i.e. secondary containment, oil water separators), and locations of spill response materials. Per the SPCCP, the Department of Military Affairs Environmental Office will conduct spill training and spill inspections at the permanent LAASF annually. The SPCCP must be reviewed and certified by a Professional Engineer, documenting that

							the LAASF is utilizing appropriate spill prevention methods and meets all regulatory requirements.
5	Howard Evans, LCDR USN (ret)	E-mail	howardevans@bresnan.net	29-Feb-24	Fuel Storage	Since we've been through this process before, I concentrated on things which might have changed as a result of the relocation of the LAASF and for which I have concern. These are the issues I've identified. Fuel Storage d. Will fuel be "stored" in the fueling truck with a possible 5,000 gal being stored above ground? Will containment methods be provided to contain a catastrophic spill from the fueling truck?	Per 40 CFR Part 112.7(c), all fueling trucks that contain fuel are required to be stored on secondary containment that is sized to contain entire volume of the tank (e.g. 5,000 gallons) with additional headspace to prevent overflow. MTARNG soldiers that are responsible for fueling equipment are properly trained to complete the fueling actions.
6	Howard Evans, LCDR USN (ret)	E-mail	howardevans@bresnan.net	29-Feb-24	Noise	a. Due to the logarithmic scale in measuring noise, the changes don't equate to human values. I've noticed that noise measurements have increased in the rim top residential areas, Masterson Circle being the highest. At this point, I'd like to point out that there are residences west of the planned facility on the north side of the highway which will be more directly impacted than other residential areas. Can you equate, in human terms, the change of noise at Masterson Circle?	Since the human ear does not respond equally to all frequencies (or pitches), measured noise levels are often adjusted or weighted to correspond to the frequency of human hearing and the human perception of loudness. The weighted noise level is designated as the A-weighted noise level in decibels (otherwise known as dBA). Table 4-3, page 43 in the Final EA provides modeled noise levels for representative locations, including Rehberg Ranch to the west of the proposed LAASF. In addition, contour maps follow the table. These will visually provide you information about noise in dBA. Noise mitigation is typically considered if noise levels exceed 65 dBA. The noise contours over Masterson Circle under both Option 1 and Option 2 show noise level to be 59.6 dBA. Dept. of Defense, Safety & Occupational Health Network and Information Exchange (DENIX) has provided a resource to help the public understand noise (https://www.denix.osd.mil/dodnoise/what-is-noise-and-how-do-we-talk-about-it/).
7	Howard Evans, LCDR USN (ret)	E-mail	howardevans@bresnan.net	29-Feb-24	Noise	b. When BFS facilities were first proposed, residents of Sky Ranch prevailed through legal negotiations in having an earthen berm built between the hangar and the highway. I believe this resulted in no, or few, complaints from apron activity. The new proposal does not specify a berm nor any other noise abatement measure between the facility, particularly the apron area, and highway. The south-eastern end of the apron area will be exposed to the highway and the noise profile from ground operations will be different from that of the current facility. Additionally, some flight operations will be visible from the highway, which can create dangerous distractions. A wall between the apron and the highway would, in my estimation, be a better option than a fence. However I am aware that there are operational issues which may prohibit the construction of a wall. Given that, is there a possibility of a berm being built to buffer noise from apron operations?	The MTARNG does not propose to construct a berm as part of the permanent LAASF. However, to meet height limitations due to proximity to the runways, the facility will be constructed partially below ground level on the west side. Antiterrorism/Force Protection (AT/FP) requirements are designed to protect personnel and property. AT/FP measures dictate such things as fencing heights, access points, berms (where appropriate), setback spacing, etc. The MTARNG will ensure that the facility complies with required AT/FP setbacks and design requirements. The Architect and Design Team for the facility has been working on ways to help reduce operational noises, by incorporating various measures in the landscape design. MTARNG will continue to comply with federal and DoD noise regulations while operating as a good neighbor.

8	Howard Evans, LCDR USN (ret)	E-mail	howardevans@bresnan.net	29-Feb-24	Flight Paths	Appendix D, Noise, has a portion dedicated to flight paths. Figures on pages 15 (current) and 24 (future) depict paths which are quite similar. It is appreciated that an altitude of 1,000 feet above ground structures are a practice of the Guard to provide less of a noise impact on neighborhoods. It's a practice which I hope continues. It was indicated that flights of more than one helicopter would not be using the established flight path and would be directed by air control. How often and for what purpose do these flights occur?	In Section 2.2, Page 11, the Environmental Assessment states "While most flights are single-aircraft operations, some multi-ship operations occur. Multi-ship flights depart the airspace immediately and do not use the traffic pattern." This statement indicates that there is the potential at the new permanent LAASF for more than one helicopter to take off at a given time and leave for their destination. Multi-ship flights are not typical for operations but have the potential to occur when needed.
9	Howard Evans, LCDR USN (ret)	E-mail	howardevans@bresnan.net	29-Feb-24	Traffic	Traffic generated by LAASF will not change, but will continue to be dangerous. Since I am retired and can usually control my schedule to avoid Highway 3 at peak traffic times, I can't speak personally about commuter traffic issues. However I've heard reports of congestion occurring at AJ Way, a city street, during those periods. This situation is dangerous given the uncontrolled highway speed, often at 70 mph. The congestion, to be fair, is not all LAASF caused, but involves the safety of the men and women of the Guard. I also have concerns of LAASF activity visible from the highway creating distractions for highway motorists	The MTARNG understands your concern regarding traffic on Highway 3 and appreciates the ongoing concern for the safety of the MTARNG soldiers. The selection and timing of improvements, as well as the posted speed limit and signage on Highway 3, is Montana Department of Transportation's jurisdiction. Determining which traffic-control method and constructing the improvements on Highway 3 is also Montana Department of Transportation's jurisdiction. The type of improvements and when they are constructed is outside of MTARNG's control. The traffic generated by ongoing MTARNG activities at the leased LAASF have not triggered a threshold that warrants changes to Highway 3. Traffic generated will remain the same if operations move to the permanent facility.
10	Alice and Chuck O'Reilly	E-mail	aliceorc@hotmail.com	5-Mar-24	Noise	We live near/under the Billings rimrocks, south and a bit west of the Billings Airport. We already have excess "air" noise from Billings Flying Service helicopters, etc, Rocky Mountain College student pilots in small aircraft and occasional commercial air traffic. I am concerned about more noise being added to our airspace by the new facility. I would hope that there is a plan in place to abate the level of noise generated by your aircraft over the residential area south of the facility. All take-offs and landings should come and go from the north over open land. Please consider those who will be impacted by this facility. (My son is retired Army with a purple heart, bronze star and several combat action badges, so I am a supporter of our military.)	The Montana Army National Guard (MTARNG) is currently conducting operations out of a leased hangar approximately 640 feet to the east of the proposed permanent facility location. These operations would continue from the new location. Changes in noise south of the rims would be negligible (less than 1 dBA) from current aviation operations. The flight paths used by MTARNG helicopters are as agreed upon and designated by the Billings Airport Traffic Control Tower. In the noise section (Section 4.3, page 38-42) of the EA, contour maps depict the anticipated noise as a result of MTARNG action, accounting for other flight activity from the airport as well as BFS. The noise contours west of the airport do not extend beyond the rim; based on this information, it is unlikely that conducting the same operations from the permanent LAASF facility just west of the leased hangar would affect your location. MTARNG maintains the Aviation Branch Operations SOP (12/2022) which discusses the site-specific noise abatement and **Fly Neighborly** policies that MTARNG practices. Response 17 discusses these measures in depth.
11	Paul Scarpari	E-mail	paul.scarpari@gmail.com	5-Mar-24	Noise	Will the helicopter fly at above 1000 ft during takeoff and landing to reduce the noise levels? If noise inside the houses increases to levels that make it difficult to talk or here TV will the army pay for additional insulation and soundproofing??	Helicopters are required by FAA regulations, specifically 14 CFR *Aeronautics and Space*, to maintain a flight altitude of 1,000 feet or more when traveling over populated areas. During takeoffs and landings, the helicopters are climbing to those heights, but are also following flight instructions given by the Air Traffic Control Tower. As for noise levels, since the human ear does not respond equally to all frequencies (or pitches), measured noise levels are often adjusted or weighted to correspond to the frequency of human hearing and the human perception of loudness. The weighted noise level is designated as the A-weighted noise level in decibels (otherwise known as dBA). Table 4-3, page 43 in the Final EA provides modeled noise levels for representative locations. In addition, contour maps follow the table. These provide information about noise in dBA. Noise mitigation is typically considered when noise levels exceed 65 dBA; based on the noise analysis in

							Appendix D of the EA, MTARNG flight operations will not exceed 65 dBA.
12	Paul Scarpari	E-mail	paul.scarpari@gmail.com	8-Mar-24	Accident Response	Will the base have their own fire and rescue in case of a crash or fire. ???	As described in Section 4.8.1, page 48 of the Environmental Assessment, the MTARNG Aviation program has a site-specific “Pre-Accident Plan” prepared in the event of an aviation emergency. The “Pre-Accident Plan” meets the requirements set forth in the “Army Aviation Accident Prevention Program” (DA PAM 385-90). In the event of an emergency at the proposed LAASF, established procedures direct the MTARNG to work with local emergency services. The City of Billings Fire Department will respond to fires, as needed.
13	Howard Evans, LCDR USN (ret)	E-mail	howardevans@bresnan.net	10-Mar-24	Fire Suppression	The addition of fuel storage and handling as well as increased human activity has heightened concern for adequate fire suppression in the areas surrounding the proposed facility. The Billings LAASF EAS contains 3 references to fire suppression, all within structures which, I’m sure, meet established standards; but there is no mention of fire suppression on the outdoor operating areas of the facility, nor is there mention of fire suppression in the surrounding areas. I’m certain that operating procedures cover fire suppression in the flight and refueling areas and that appropriate fire fighting resources are available in those areas. My concern is that there are adequate resources should a fire spread or start outside building areas. The introduction of non-agricultural activity, vehicular traffic, increased human activity as well as the introduction of 25,000 gallons of aviation fuel increases the odds of an accidental fire over that in a cultivated wheat field. Of particular concern are the residents and livestock abutting Montana Department of Military Affairs land including the LAASF parcel. Without adequate and immediate fire suppression the whole area on the north side of MT Highway 3 is at increased risk for a grassland fire spreading to occupied structures, including a primary school. What measures are being taken to assure that a fire originating on the LAASF property doesn’t spread to adjacent properties?	In the event of an emergency at the proposed permanent Limited Army Aviation Support Facility (LAASF), the MTARNG Aviation program has a site-specific "Pre-Accident Plan" documenting the required procedures that include working with local emergency services. The LAASF will maintain fire extinguishers on the flightline, which is a standard procedure. A fire suppression system will be installed within the facility. The underground storage tanks will be located within an area that has paved surfaces and gravel. Landscaped vegetation on the exterior on the permanent LAASF will be irrigated, which helps reduce the potential for fire to spread compared to areas that are unirrigated. The MTARNG Aviation site-specific "Pre-Accident Plan" requires the MTARNG to work directly with local emergency services. The City of Billings Fire Department will respond to fires, as needed.
14	Howard Evans, LCDR USN (ret)	E-mail	howardevans@bresnan.net	10-Mar-24	Fuel Delivery	An area resident asked to know how aviation fuel will be replenished in the storage tanks and, if by truck, what route will it take? His main concern is the already heavy traffic on Zimmerman Trail and the dangers present when navigating that roadway. He, and Rim Top residents, strongly object to adding hazardous material loads on the Trail.	Currently, fuel is being delivered to the leased facility on fuel trucks that come from Great Falls on Highway 3. This delivery process will continue with the permanent LAASF. The same fuel delivery vehicles deliver fuel to the Billings Airport and supporting facilities.

15	Morgan E. Tuss	E-mail	morgan.tuss@gmail.com	8-Mar-24		I understand that you are the contact point for public comment concerning the 2024 Environmental Assessment (herein, the "Environmental Assessment" and "assessment") of the Construction and Operation of a Permanent Limited Army Aviation Support Facility in Billings, Montana (the "LAASF"). I kindly request that this letter be added to the administrative record for the Environmental Assessment conducted for the LAASF. I am a neighboring resident located directly west of the proposed LAASF. My husband and I live at 2837 State Highway 3, Billings, MT 59106, approximately 1900 feet to the west of the proposed LAASF site build, which is part of the affected jurisdiction in Billings, Yellowstone County, Montana. I am a local attorny licensed in Montana, Wyoming and North Dakota, and I participate on the local board of adjustment, board of zoning and board of planning for the combined City of Billings and County of Yellowstone as a county representative. I also volunteer as a board member of Billings TrailNet. This letter is personal in nature and not associated with my professional or volunteer obligations. I reiterate the same concerns brought forth by neighboring resident, Howard Evans, in his email dated February 29, 2024. So, please incorporate those by reference into this letter. The specific questions, concerns and comments that I will add and annunciate concerning the LAASF Environmental Assessment are addressed below. My comments and questions can largely be tied to land use considerations outlined by the assessment. This assessment purports to consider several effects caused by the proposed LAASF land use: Criteria used to identify impacts on land use whether the changes would conflict with local land use plans and zoning ordinances; contribute to nuisance issues such as light, noise, or odors; or affect land uses by limiting current or future development capabilities. Land use impacts would be significant if the proposed LAASF would not comply with zoning ordinances, result in noise that violates acceptable standards (see Section 4.3), result in light that distrupts or vibrations that damages the use of the land or the structures nearby, or inhibit development plans that have been approved by the local municipality or governing agency. (emphasis added). Below, I include several points of discussion on the proposed LAASF land use that were purportedly considered in this assessment (as indicated above) but are instead lacking in explanation and inaccurate.	Thank you for your comment. Please see responses below.

16	Morgan E. Tuss	E-mail	morgan.tuss@gmail.com	8-Mar-24	Noise	1. Noise pollution. The Environmental Assessment findings state under the "Proposed Action Alternative - Option 1 and 2" state: [N]oise levels at all representative Points of Interest that were modeled would meet federal, state, and local noise regulations. The changes in noise would not result in any incompatible land use. Three percent of flights would occur at night....Noise abatement and fly-neighborly programs will be employed. Noise contours include cumulative noise of the leased hangar and the LAASF facility. Cumulative impact would be less than significant. The assessment describes a 66,000 square foot primary facility with various functions, structures and services that will be located 620 feet to the west of the current helicopter hangar leased from Billings Flying Service. The assessment describes support for six military helicopters, helicopter maintenance and washing, and regular flights to and from the facility totaling approximately 36 flights which may include "multi-ship" flights (i.e., several helicopters at once), suggesting possibly anywhere from 36 to 216 single flights on any given work week and drill weekends, which would "all approach and leave to the west to avoide land use conflicts." The assessment states that "[t]he flight altitude of helicopters is maintained at 1,000 feet or more above ground level." With respect to these statements, the following are comments and questions:	As described in Section 2.2 of the EA, there would be 2-3 helicopter flights per day for a total of 10-15 per week (total, not per helicopter). During drill weekend, the maximum number of flights would be 14-21 flights total.
17	Morgan E. Tuss	E-mail	morgan.tuss@gmail.com	8-Mar-24	Noise	a. While the assessment baldly refers to "[n]oise abatement and fly-neighborly programs," the assessment makes no definite reference and points to no specific document, link or location to find these supposed programs. While I have found some programs in other states, I am unaware of which program applies here. **Would you please respond with the applicable "Noise abatement and fly-neighborly program" to which the assessment refers and would adhere to concerning this LAASF?**	The MTARNG follows the requirements set forth in 14 CFR, *Aeronautics and Space*, along with the Federal Aviation Regulations (FAR) by the Federal Aviation Administration (FAA) when conducting aviation operations. The Army has then developed their own regulation, Army Regulation 95-1 (AR 95-1), *Flight Regulations,* incorporating the requirements of the 14 CFR and the FAR. AR 95-1 requires state ARNG to establish and maintain site specific noise abatement and **Fly Neighborly** policies. The ARNG drafted and maintains standard operating procedures (SOP) in the Aviation Branch Operations SOP (12/2022) which includes: Aircraft will not be flown below 500’ AGL unless directed by ATC or other than those instances authorized in NG Supplement to 95-1 or this SOP. Normal cruising altitude should be at or above 1000’ AGL. The following are exceptions: - Take offs and landings - ATC requirements and approved helicopter routes - Weather and cloud clearance requirements - In-flight emergencies - Flights planned as navigation training between 500 and 1000 feet AGL which remain clear of congested areas - Approved terrain flight areas The ARNG SOP is compliant with the FAA Federal Aviation Regulation/Air Nautical Manual.

18	Morgan E. Tuss	E-mail	morgan.tuss@gmail.com	8-Mar-24	Noise	b. While the assessment states that "[t]he flight altitude of helicopters is maintained at 1,000 feet or more above ground level," it notably omits the air flight levels allowable or expected for take-off and landing from the LAASF. Two houses (mine included) and a children's primary school are located directly to the west of the proposed LAASF, directly under the flight path and within 1900 feet of the proposed hangar locations, along with residences to the south by similar distances and residences in Rehberg Ranch subdivision. Since the inception of the lease between the Montana Army National Guard and Billings Flying Service, I have substantial video and photo records showing that these supposed 1000-foot flight levels this assessment proposes are not adhered to and will likely not be adhered to in the future. Rather, most flight heights that I have observed are anywhere from 100 to 300 feet above the ground, directly over my home and our livestock. This has caused our family substantial disturbance and disruption from inescapable helicopter noise and vibrations, and lack of privacy. **Would you please respond with the applicable ground height that will be allowed for these 216 individual weekly flights to fly over my home day and night, being that my home directly under the proposed flight path?**	As described in Section 2.2 of the EA, 2-3 helicopter flights per day for a total of 10-15 per week (total, not per helicopter). During drill weekend, the maximum number of flights would be 14-21 flights total. In the event a flight must go above your home, aircraft will be in compliance with Army regulation and standard operating procedure outlined in Response 17.
19	Morgan E. Tuss	E-mail	morgan.tuss@gmail.com	8-Mar-24	Noise	c. The assessment considers whether noise "(1) results in the violation of applicable federal, state, or local noise regulations; (2) creates appreciable areas of incompatible land use; or (3) casuses nighttime acceptable noise level to be consistently greater than existing levels." The assessment finds that "[t]he changes in noise would not result in any incompatible land use." Once again, I have livestock, and I live here on a small ranch plot that has existed for residential purposes since 1957. I live 1900 feet from your proposed operations and directly under your proposed flight path. Our home is often subject to the disturbing effects of low flying helicopter noise interference and rattling vibrations from the current temporary facility operations. The proposed LAASF will be even worse, given that the proposed LAASF is located approximately 620 feet closer to our home from the current leased facility. At no point was any assessment engineer, agent or employee present at our home or our land as assess the noise and vibrations caused by the existing low-flying military flights. **This noise assessment is patently misrepresentative of the effects to the surrounding neighbors and environment.**	The Noise Analysis, located in Appendix D of the Environmental Assessment, was conducted based on the Federal Interagency Committee on Urban Noise (FICUN) published Guidelines for Considering Noise in Land-Use Planning and Control. The guidelines provide for the consideration of noise in all land-use planning and interagency/intergovernmental processes. The study was prepared using the NoiseMap program, which is a computer program developed by the Air Force to predict noise levels associated with airport and aviation operations. It is considered the most accurate approach for comparing "before-and-after" community noise effects due to proposed activities. NoiseMap uses flight paths and numbers along with other information regarding MTARNG helicopters, BFS helicopters, civil air carrier, military transient aircraft, and general aviation aircraft operations as well as the elevation/terrain within the study area. On site noise measurements are not required to develop the noise model.

20	Morgan E. Tuss	E-mail	morgan.tuss@gmail.com	8-Mar-24	Lighting	2. **Light pollution**. This assessment states: "the change in land use is not anticipated to result in additional lightning or disruption to background views." However, the term "light," with regard to artificial illumination, is referenced exactly *four times* in this entire 78-page assessment. No recognition or study whatsoever appears to have been completed on the lighting effects of the proposed LAASF. If I understand this correctly, the LAASF is a significant military training base with dynamic air support operations, and this assessment appears to suggest that no lighting impacts exist? Do you plan to operate all 40 acres of your campus-like atmosphere consisting of several offices and training buildings, storage facilities, large parking lots, driveways, streets, a helipad and six helicopters in the pitch dark - because that's what's there now: farmlands and night sky. I am perplexed. Your assessment notably lacks any lighting study. **Would you please point to the lighting proposals and lighting pollution study that was conducted for this assessment or explain in detail the tools, theories, observations and technicalities that were employed in coming to the conclusion of no significant lighting effect?**	Lighting for the LAASF, including AT/FP, is in the design phase and your comments to the contracted Design Team so that minimizing impacts can be incorporated to the extent feasible. A qualitative assessment of lighting was used in Section 4.1.1 of the EA (page 33) given the preliminary design. Lighting on the apron will solely consist of a lighted wind cone. This would be an LED internally lit wind cone with a red obstruction light atop. The cone would be illuminated only when flight operations are underway. The property would be designed to meet lighting requirements for pole heights and shielding associated with the proximity to Billings Airport runways. Preliminary design includes LEED standard lighting and, in most cases, only illuminate when activated by use/activity. The LAASF would be constructed partially below existing surface levels (Response Comment 29) on the western side of the parcel which would also help minimize light exposure to the west. Lighting would be on exterior doors and poles along the street that would be lower than the cut. The apron would be lit from the building rather than separate lights on the apron. While the lighting on the MTARNG parcel would be new, it would block some of the existing light generated by BFS and/or the airport from direct view for some vantage points. The light associated with the LAASF would contribute to a cumulative lighting of the area. Landscaping is anticipated to include a mix of trees and shrubs along the western cut, southern boundary, and AJ Way. Minimizing light leaving the LAASF through design, use of landscaping, and meeting airport requirements would help reduce potential impacts.
21	Morgan E. Tuss	E-mail	morgan.tuss@gmail.com	8-Mar-24	Cumulative Impact	3. **Cumulative Impact**. This assessment states for both Option 1 and 2: "Given the minimal impact on infrastructure, contribution towards a cumulative impact would be negligible." I am a fifth-generation Montanan and a proud American. I intend to be a good neighbor and hope to foster a positive relationship with the Montana Army National Guard and its local service members. I was one of few individuals who voiced support at the initial hearing before Billings City Council members in which the Montana Army National Guard requested approval of zone change to P-3 zoning and for annexation into the City limits. **However, to call this LAASF proposal, which i) consists of a comprehensive military air support base supporting the 1-189th military battalion, ii) operates a half-dozen military aircraft and long-term training facilities, and iii) offers antiterrorism protection, hazardous waste storage, and offices of regular use, undoubtedly costing taxpayers hundreds of millions of dollars in design and construction along and drastically changing the environment of the iconic Billings rims, a "minimal" or "negligible" impact, is a wildly inaccurate, dismissive and offensive understatement.**	In the immediate area, the uses and structures are very similar to adjacent aviation/airport-related land uses consistent with areas that are within protected airspace. Per 40 CFR 1508.7 defines cumulative effect as an impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency... Section 4.10 (page 49) of the EA it states: Significant impacts would occur if a strain on utilities, solid waste disposal, or roadways such that they are unable to keep up with the increased demands would occur. In addition, a significant impact would occur if the traffic volumes or vehicle mix were to degrade the quality of the road surfaces resulting in a failure of the facility or unmanageable maintenance costs. The operations described in Section 4.10, starting on page 49 of the EA, are ongoing and not new. Only the proposed permanent LAASF facility would be new. There would be no long-term change in traffic/vehicle mix, solid waste generation or disposal. MTARNG would be responsible for the extension of utilities to the facility from AJ Way where they exist currently. The reduction of utility use at the existing hangar and the additional use at the proposed facility would not place an undue strain on utility capacity. The City of Billings has been involved in the annexation and ongoing utility coordination will continue during the design of the facility.

22	Morgan E. Tuss	E-mail	morgan.tuss@gmail.com	8-Mar-24		For *at least* the reasons I have stated above, this Environmental Assessment is incomplete, inaccurate and falsifies many true effects of the land use of this proposed LAASF project. Should you approve this project as proposed, you do so knowingly and willingly injuring neighboring home owners and my family, who for generations, have contributed to our community as masons, engineers, architects, farmers, miners, oil workers, healthcare workers, and lawyers forming the many reasons why we call Billings the Magic City and Montana the Last Best Place.	Thank you for your comment on the Environmental Assessment.
23	Gary LaFrnier	E-mail	gary.lafranier@cheyennenation.com	11-Mar-24		After reviewing the EA, Northern Cheyenne concurs with the findings of No Significant Impact.	Thank you for providing comment on the Environmental Assessment.
24	Michael Tuss	E-mail	mtuss.mt@gmail.com	9-Mar-24	Noise	We live directly west of the proposed LAASF facility at 2835 Highway 3. If you refer to Figure 1-1 in the EA, our house is under the "Preferred Alternative Location" text block. On 12 acres we have two houses, a shop, horse facilities and pasture. We purchased the property in 2006. We were accepting of the airplane activity because the majority of the air traffic and associated noise was well away from our property; the flight path to the main runway is nearly a mile to the north. A hill to the north of our property deflects much of the low altitude take-off and landing noise. As a result, our lives here were relatively quiet considering our proximity to the airport. That all changed when Billings Flying Service began helicopter flights at low levels over our property, and directly over our house. When Blains were petitioning Yellowstone County for a zone change, they held a public meeting for neighbors that were being impacted by the helicopter noise. The meeting was held at the office of the attorney representing Blains for the zone change, Ken Tolliver. At that meeting, several neighbors complained about the helicopter noise. In response, Kevin Ploehn, Director of Aviation and Transit, stated that BFS pilots would be required to fly the existing runway approach paths unless they requested a deviation from air traffic control, assuring the neighbors that most of helicopter flights would not be over their homes. Since construction of the BFS facility it has become obvious that the pilots are not flying the runway approach paths. In the EA, I was surprised to learn that there exists a written Leter of Agreement between Billings Airport Air Traffic Control, BFS, and MTARNG (Para. 3.1 Appendix D). Figure 3-1 shows the helicopter arrival and departure corridor directly over my property and my home. Needless to say, these helicopter flights directly impact our quality of life and property value; yet, we were not included in any discussions. The diagrammed flight corridor contradicts the public statement made by Kevin Ploehn. As you can surmise, my concerns are primarily about helicopter noise affecting our quality of life and negative effect on property value. We greatly disagree with the FONSI - - we are significantly impacted.	MTARNG was not party to any discussion between BFS and the Airport. MTARNG operations described in the EA are ongoing currently from the leased hangar on BFS property and in compliance with the SOPs and Army Regulations (AR 95-1). MTARNG flies along the routes directed by ATC and has no control over BFS operations. Please also refer to Comment Response 17.

						However, we also agree that the impacts on most neighbors would be much more acceptable if helicopter flight paths were more in line with Kevin Ploehn's statement, the pilots would fly the runway approach paths.	
25	Michael Tuss	E-mail	mtuss.mt@gmail.com	9-Mar-24	Flight Paths	Following are specific comments upon reviewing the EA. **Table ES-2. Impact Comparison Matrix** **Landing and takeoff would be limited to the west to avoid land use conflicts.** and **SECTION 2.0 Description of the Proposed Action and Alternatives** **Option 1, flights would all approach and leave to the west to avoid land use conflicts.** These two statements contradict the acoustic modeling in Appendix D pages 20 – 22. Appendix D states that both Option 1 and Option 2 modeling includes 40% flights to the west, 20% to the north, and 40% to the east. If the EA statement is correct, then the Option 1 acoustic modeling is invalid. If Appendix D is correct, then statements in the Executive Summary and Description of Proposed Action are incorrect.	The EA has been edited as shown below. This change was also carried through in Table ES-2 Page v, Table 2-3 Page 14, and Table 2-4 Page 18. The updated EA has been uploaded to the website. Section 2.2, Page 11 has been updated to state; Flight paths originate at the LAASF facility and travel over the airport property north of Highway 3. ~~Under Option 1, flights would all approach and leave to the west to avoid land use conflicts.~~ Under both Options 1 and 2, approximately 40 percent of the flights go to the east, 40 percent to the west, and 20 percent to the north.

26	Michael Tuss	E-mail	mtuss.mt@gmail.com	9-Mar-24	Noise	**Table ES-2. Impact Comparison Matrix** **Noise** **Three percent of the flights would occur at night. Night flights would occur primarily in the fall/winter when it gets dark early, so nighttime noise is not anticipated to be elevated regularly.** **This statement does not match the modeling in Appendix D, which includes closed patern operations.** Table 4-4 indicates 3% of arrivals and departures will occur during acoustic night, matching the comparison matrix statement. However, 25% of the closed patern operations will occur during acoustic night. Table 4-2 lists 904 annual departures, 904 annual arrivals, and 1628 annual closed patern operations, 3436 total annual opera□ons. 3% (904+904) + 25% (1628) = 461 acoustic night operations. 461/3436 = 13.4%. Therefore, Appendix D projects that 13.4% of helicopter operations will occur at night, not 3%. It is important to note that 488 (30% of 1628) annual closed patern operations are anticipated to occur on the southern route (Appendix D pp. 23, 28). This route passes directly over homes to the south of the airport and homes near the LAASF to the west. 146 (30% of 488) of those operations will be during acoustic night. Each closed patern flight represents two operations, one landing, one take-off. 146 night operations represents 73 night flights. Adding the other 54 night flights equals 200 annual night flights, averaging more than one flight every-other night. If you have experienced a Chinook or Blackhawk flying 500 feet or less over your bedroom (unfortunately, I now have), you will not agree that the impact is “less than significant” and you will not sleep through it unless on Ambien. I strongly disagree with the Table ES-2 statement “Cumulative impact would be less than significant”. Regardless of the technical definitions and scholarly studies referenced in the EA, I am living with BFS helicopter flights. Helicopter noise and vibrations at the altitudes they are flying significantly impact the airport neighbors. Flying at higher altitudes upon arrival and departure and flying paths closer to the runway flight paths will reduce noise impacts. After all, they are helicopters and can land and take-off vertical. I am guessing it is for fuel efficiency or pilot convenience they do not fly at higher altitudes. However, the neighbors should not have to pay the price for BFS and MTARNG convenience.	Flight operations as provided in Section 2.2 of the EA (page 11) reflect the authorized flight activity that is ongoing and would continue to take place at the LAASF. The modeling was based on 100% efficiency in launching and recovering the maximum number of flights per day/month. It was modeled this way to reflect the maximum scenario to ensure a conservative estimate of impacts. Military and civilian helicopter pilots are trained to operate helicopters effectively, efficiently, and most importantly safely. Although helicopters may be capable of performing steep or vertical takeoffs and landings (depending on the aircraft weight and environmental conditions), it is not a safe or common practice to utilize when launching and recovering to an airport or to the Billings Limited Aviation Support Facility. Helicopters operate more efficiently when closer to the ground (in ground effect) and with some airspeed (above effective translational lift). The engines of a helicopter can only provide so much power and high hovering requires significantly more power, which reduces the overall safe power margin. Military and civilian helicopter pilots are trained avoid unnecessary high hovers and high slow flight because the pilots have less ability to control the helicopter if there was a malfunction, such as an engine failure. This flight profile is known as flying in the “Dead Man’s Curve.” Although helicopters are designed to perform this type of flight, pilots are trained to avoid or minimize this kind of maneuvering, when possible, to reduce risk to aircrews and aircraft, people on the ground, and surrounding property. During a steep approach, the helicopter is less stable and susceptible to negative aerodynamic force to the helicopter increasing risk by reducing aircraft control. This article provides additional detail: https://verticalmag.com/features/understanding-the-dead-mans-curve/

27	Michael Tuss	E-mail	mtuss.mt@gmail.com	9-Mar-24	Stormwater	**Table ES-2. Impact Comparison Matrix** **Surface Water Resources** **Stormwater would be conveyed to a tributary to Alkali Creek.** It is good that the EA recognizes stormwater runoff from the Rims is an issue. The EA states water from the stormwater detention area will be conveyed to a tributary to Akali Creek. The ravine indicated on Figure 2-2 is 2000 feet from the detention area over a 30-foot rise. I assume MTARNG intends to pump stormwater to the ravine. The emergency generator should be sized to power this pump; loss of power will likely be related to a severe weather event generating much stormwater. MTARNG will be creating acres of impervious surface over the native, highly pervious surface. Utilize best practices to mimic the groundwater recharge of the natural condition, prior to transporting excess stormwater offsite. Unlike the existing condition, stormwater draining from the site will be contaminated due to the LAASF contaminant separation strategies should be employed prior to discharging stormwater into the ravine leading to Alkali Creek.	The stormwater management system at the permanent LAASF would meet local and state requirements and would include three fail safes: the system is oversized allowing for additional capacity, would be constructed to accommodate the 100-year storm (where only required to accommodate the 50-year storm), and has oversized and redundant pumps. The system would include a retention pond. Four pumps at a lift station and an emergency generator specific to the pumps for the movement of stormwater are also included in the design. The handling of stormwater will be in compliance with the Stormwater Pollution Prevention Permit during construction and stormwater plan during operations. The MTARNG is working with the City of Billings to develop a stormwater easement and to ensure all stormwater requirements are met.
28	Michael Tuss	E-mail	mtuss.mt@gmail.com	9-Mar-24	Lighting	**4.1.1 Effects of the Proposed Action** **…the change in land use is not anticipated to result in additional lighting or disruption to background views.** The EA has litle mention of lighting and does not directly address how it will be lit. Full cut-off light fixtures have been available for three decades. Competent lighting designers specify full cut-off fixtures in which light trespass is almost zero and direct view to the lamps is eliminated beyond the property line. Often, lighting in the middle of the night is eliminated or footcandles greatly reduced but increased upon motion detection. These strategies promote dark skies, reduce the impact on wildlife, and reduce the annoyance of stray lighting. The BSF and Yellowstone Landing lighting is terrible. It is visually annoying. It wastes energy by not concentrating light where it is needed, and not lighting where it is not. What kind of lighting strategies will be employed by the LAASF? If like BSF and Yellowstone Landing, the impact will be significant.	Your light information will be provided to the design team for consideration as the design is completed. Please refer to information provided in Comment Response 20 regarding light impacts.

29	Michael Tuss	E-mail	mtuss.mt@gmail.com	9-Mar-24	Visual	**4.1.1 Effects of the Proposed Action** **Residential development west of the Proposed Action would be somewhat to mostly shielded from view due to topography.** This is only true for most of Rehberg Ranch. The ground elevation gradually rises to the west. Properties directly west for over a mile have a direct view to the LAASF. If the hanger floor is around elevation 3725, a 30' tall hanger will be around elevation 3755. The hill between Rehberg Ranch and the LAASF peaks around 3723 to 3733, 22 to 32 feet below the upper walls or roof of the hanger. The southeastern section of Rehberg Ranch has ground elevations around 3720 to 3725. Therefore, several residences will be able to see the building and helicopter parking area lighting over the hill. Locating the ground floor of the building closer to the lower elevations of the site will create more earthwork but will make the building and associated operations less visible to the entire neighborhood.	Due to proximity to the Billings Airport runways, the proposed LAASF must comply with height restrictions and FAA/Billings Airport airspace surfaces. To accomplish this, the facility would be constructed below existing ground level by excavating the construction area. As a result, approximately half of the structures would be shielded from view. The hangar has a finish floor elevation of 3714.00', with a maximum height of 46' (3760' peak elevation). MTARNG had to shift this "downslope" to avoid the FAA/Billings Airport airspace surfaces. The ground height at the far northwest corner of the site is 3738', so the peak building height will only be 22' taller than the top of ground at the highest part of our site. Additionally, the terrain continues to rise off the existing property boundary.
30	Michael Tuss	E-mail	mtuss.mt@gmail.com	9-Mar-24	Noise	**4.3.1 Effects of the Proposed Action** **Figure 4-2** The 50 DNL contour lines move approximately 900' closer to my house and over the top of my neighbors to the southeast. The acoustic modeling predicts the Option 1 and 2 50 DNL contour to be about 500' away from my home rather than 1400' away. That represents a significant increase in sound pressure, associated acoustic disturbance, and reduction in quality of life. Pushing the helicopter flight paths closer to the runway flight paths and operating at higher altitudes would be an improvement.	Thank you for your comment. It has been added to the project record. Flight paths are at the discretion of the ATC. The noise mitigation and **Fly Neighborly** standard operating procedures described in Comment Response 17 will help minimize impacts associated with noise from MTARNG helicopters.

31	Michael Tuss	E-mail	mtuss.mt@gmail.com	9-Mar-24		**Summary** We disagree with the Finding of No Significant Impact. We invested over a million dollars in residential property near an airport, not a helicopter base or military base. While we are very supportive of the military, the current BFS operations and the proposed MTARNG operations as proposed have an unfair and unbalance effect upon residential neighbors of the helicopter facilities. The helicopter operations have a significant negative effect upon our quality of life and property values, putting an unfair burden upon us compared to others in the community. The following suggestions will make it easier for all neighbors to live cooperatively with the LAASF, and BFS: 1. Fly higher. Helicopters are capable of vertical landing and takeoff. Use it. Maintain higher altitudes over neighboring properties. 2. Fly closer to runway 10L and 10 R flight paths. Northerly flight paths from the helipad into to 10L and 10R alignments, then west 280 degrees will increase the flight distance to the nearest home to the west. Rather than crossing over the first home at 1900 feet to the west, this flight path increases the distance to the first home to 5000'. The added 3100 horizontal feet will increase the helicopter altitude whether landing or taking-off, and greatly reduce the sound pressure and associated DNL. It will also put the helicopter noise more along the lines of residences that purchased homes knowing they were under the airport flight paths rather than homes that were not under flight paths prior to BFS. 3. Discourage flights direct to the west and over properties to the south. 4. Utilize cut-off light fixtures for all outdoor lighting. Utilize time-of-day lumen reduction coupled with motion sensing for outdoor lighting. If you want an example of how not to do it, refer to BFS and Yellowstone Crossing. 5. Place the building ground floor elevation toward the lower elevations of the site. This will reduce the visual impact to the south, west, and northwest. Consider a low slope membrane roof in lieu of a pitched roof to reduce the height and visual impact of the building. 6. Promote groundwater recharge to be similar to the existing condition. Utilize bioremediation as best as possible then contaminant separation prior to discharging stormwater to the Alkali Creek tributary. Lastly, thank you for giving us a voice and for considering the impacts you will have on your neighbors.	Please see previous responses to your comments.

32	David Kinnard	E-mail	kinnlaw@bresnan.net	11-Mar-24	Noise	Since you are the contact person for public comment concerning the Feb. 2024 Environmental Assessment (herein, the "Environmental Assessment") of the Construction and Operation of a Permanent Limited Army Aviation Support Facility in Billings, Montana (the "LAASF") please add this letter to the administrative record for the Environmental Assessment conducted for the LAASF. I am a neighbor located across Highway 3 from the proposed LAASF. My wife and I live at 106 Sky Ranch Drive, Billings, MT 59106, to the southeast of the proposed LAASF site. By way of background, I have been a resident of Billings since 1964, other than when I was at college in Bozeman and law school in Missoula. I lived at several locations in the valley close to the rims and most recently on top of the rims at Sky Ranch for the past 23 years. I reiterate the same concerns submitted by neighboring resident, Howard Evans, in his email dated February 29, 2024 and those of Morgan E. Tuss in her email dated March 8, 2024. Please incorporate both of those by reference into this letter. The specific questions, concerns and comments that I would add concerning the Environmental Assessment are addressed below. 1. Why were outdated maps of the proposed location and nearby developments used in producing both the draft and current EA? It is unfortunate that in the development of the two crucial documents, outdated maps were utilized both by MANG and its contractors. It is difficult to make critical decisions based on old and outdated information, particularly in areas such as roads, traffic, surrounding developments and structures. By way of example, in the EA, other than Figure 2-2 and 2-3, the other maps of critical areas were based on old aerial photographs taken immediately after the first portion of the construction of the first Billings Flying Service hangar and helipad in 2017 without any of the subsequent surrounding structures, development and roads in the interim. Similarly, the Oct. 23 Noise Analysis Technical Report by the consultants was based on similar aerial photographs similarly outdated. With the technologies available today, how can an effective decision be made based on outdated resources?	The aerial maps in the Environmental Assessment and the Noise Analysis are the most up-to-date satellite images in Google maps at the time of analysis. Aerials maps are only one tool of many used in the development of the technical studies and EA. Please refer to Comment Response 19 and the Noise Analysis for the Environmental Assessment (Appendix D) regarding the development of the noise study.
33	David Kinnard	E-mail	kinnlaw@bresnan.net	11-Mar-24	Traffic	Traffic analysis, which is such an important issue here, is very dependent on traffic flows into and out of the particular area being studied. In the area at issue the traffic flows have changed materially given the BFS and its related developments that occurred in the past 7 years. Yet this was not available visually in the mapping for either the 2023 EA or the Noise Analysis.	Aside from additional equipment traffic during construction, there would be no change in the traffic volumes or patterns from current conditions, since the MTARNG already operates out of the leased hangar. Access to the new location and the leased hangar would the same. Changes on Highway 3 are MDT responsibility, and they have ultimate control and responsibility for any modifications or changes to Highway 3.

34	David Kinnard	E-mail	kinnlaw@bresnan.net	11-Mar-24	Noise	2. Facility and Site Improvements to Proposed Option 1 Site. While not identified in this EA, early public drawings presented to the City of Billings and Yellowstone County showed numerous additional structures such as barracks, office buildings, a swimming pool and other physical fitness facilities surrounding the proposed hangars and helipad. While realizing that those were probably more on someone's wish list than in an actual proposed support facility, it did encourage people in local government and some surrounding residents to support such a proposal at that stage. While I do not oppose the Option 1 site, I think that a number of site adjustments and improvements could greatly enhance the proposed development at that location while eliminating many objections or reservations to it. a. Relocate building location. One of the things BFS did in the final location of its hangars was to agree to locate them close together facing north and running east to west. While that probably has created some weather issues for wind and snow, it has certainly helped deflect and reduce the noise from the choppers when engines are operating on the pad and apron. Could that be reevaluated by MANG so that the hangar were to run east to west rather than north south? b. Landscaping and site improvements. The one item that BFS agreed to in its settlement of a lawsuit brought by neighboring property owners (of which I was the lead plaintiff) was to agree to the construction of a large earthen berm running east to west across the middle of its property and to vegetate it (which unfortunately they have failed to do so). That berm does a tremendous job in masking and deflecting the noise, masking the buildings, vehicles and other equipment on their site and blocking the view from Highway 3 of much of their activity. Would something similar (only vegetated) and integrated into security and landscaping fencing be reconsidered?	MTARNG site selection for the facility took into account reducing noise. Portions of buildings run north south and east and west. The design was restricted by geology, height restrictions due to proximity to the runways, infrastructure, and placement of the helipad in relation to runways and other existing development. Use of SOPs for noise would be implemented. Vegetation screening on the south side of the facility would also help reduce noise. Landscaping is being planned in the design. Elements such as berms and/or trees will be considered but ultimately the design for the perimeter of the facility must be compliant with AF/TP. Also, please refer to Comment Response 29 addressing that the facility would be constructed at elevations lower than existing ground level. This action is only for the construction of an LAASF as shown in the EA. Landscaping elements will include trees and shrubs along the west and south perimeters and plantings along AJ Way. MTARNG is working with the airport to ensure compatibility given proximity to the runways.
35	David Kinnard	E-mail	kinnlaw@bresnan.net	11-Mar-24	Traffic	3. Full support of MANG with the State of Montana for Needed Improvements to State Highway #3. During the past 23 years I have resided at Sky Ranch we have seen the traffic and speed mushroom to the point where it is very dangerous to try to enter and exit Highway 3 in our vicinity during much of the day and evening. This has been greatly compounded by several developments including but not limited to the overall growth of the city, increased heavy truck traffic, the reconstruction of Zimmerman Trail, the BFS property development bringing more employee, vendor and delivery traffic with its two entrances/exits at AJ Way and at Sky Ranch Drive directly across from two different residential neighborhoods. When coupled with the current North Bypass and the upcoming opening of the Inner Belt Loop, it will likely only get worse, particularly without the benefit of turning lanes or roundabouts at those two locations. The recent addition of the TrailNet bike trail immediately adjacent to the southside of the highway further complicates the issue for drivers entering and exiting the highway. There have already been several close calls. It is only a matter of time before	Thank you for your comment. It has been added to the project record for the Environmental Assessment.

						someone in a vehicle or on a bike gets seriously injured or killed at one or both of these two intersections. While we have repeatedly pushed for correction, frankly the City of Billings has consistently passed the buck on this issue to the State of Montana. We have little if no influence with the MDT in this regard. MANG, however, could insert itself into the discussion and could make a huge step in protecting its employees, the neighbors and the public from dire consequences of continued and potentially dire Highway 3 inaction by the MDT. Please, please consider such a conversation immediately before more time lapses. We would be happy to discuss it further with you.	
36	David Kinnard	E-mail	kinnlaw@bresnan.net	11-Mar-24	Noise	4. Noise Analysis. Turning to the final Noise Analysis for the project, I will make a couple of points. First of all, the mapping utilized by the consultant was outdated as discussed in Section 1 above, which could have a huge impact on the findings as related to those residential neighborhoods in close proximities to the proposed options. Secondly, I question their Option 1 DNL Results of some high levels in the valley below the rimrocks versus those for the Sky Ranch Community where we reside. Given the approximate 500 foot difference between the two elevations, it seems incongruous that could occur, which makes me question the causation for their findings. For example, look at the No Action or Option 1 readings for the two hospitals, the public library, Hilands Golf Club, MSU Billings and several churches. Are those readings skewed by the by the medical flight helicopter services rather than anything to do with MANG helicopters?	See Comment Response 19 and 32 re mapping and how the noise model was prepared. The elevation difference between the valley and rimrocks was taken into account in the noise analysis. Elevation and ground impedance, such as buildings, walls, etc., is taken into consideration with the noise model, and thus, elevation data was used for the noise analysis and the difference in elevations between the Sky Ranch Community and the valley below are part of the analysis. There is a drop off in noise in the valley, and the DNL values at those valley locations mentioned are due mostly from the airport aircraft and less so from the MTARNG or BFS helicopter operations. Medical emergency services helicopter flights were included in the model.
37	David Kinnard	E-mail	kinnlaw@bresnan.net	11-Mar-24	Flight Paths	5. Flight Paths. We are used to medical, law enforcement, government and even Santa Claus helicopter traffic over the City of Billings. We concede that in certain instances the tower might dictate or allow a shortest distance between two points for emergencies. I would note that the proposed flight paths included in the earlier draft LAASF Noise Analysis and EA did create some huge issues for the subdivisions along the south side of Highway #3 as well as to the west of proposed Option 1. From my perspective standing on our back deck, our historic experience with the BFS facility (in spite of the flight path requirements of our 2016 legal settlement with them) has frankly not been wholly satisfactory. That could be a product of control tower instructions or some pilots just on their own taking the shortest distance between two points. The latter has sometimes resulted in some Chinooks taking an extremely low altitude pass over our homes and those to the west of us in a straight line between their former facilities south of the Yellowstone River and their new location on the Rims. It appears with one exception that the final Flight Tracks for Option 1 are satisfactory in supporting intended noise control for our subdivision but	Closed patterns are conducted as directed by ATC, but the majority of the closed pattern work would occur on the northern loop which would be farther from houses along the rim. SOPs for noise abatement and **Fly Neighborly** policies would be followed (refer to Comment Response 17).

						perhaps not those west of the facility. The one glaring exception that I see is that on page 23 of the Final Noise Analysis entitled Helicopter Closed Pattern Flight Tracks which shows a flight pattern for 30% of the time in that instance as going immediately over the top of our subdivision in an oval fashion. Perhaps I missed something and you could explain that further. Above all, I cannot emphasize enough that aircrews need to not just participate in but make it their mantra (when missions and safety are not adversely affected) to use noise abatement and "fly-neighborly programs" to minimize annoyance to persons not just one the ground but in their residences. In doing so, we will all benefit.	
38	David Kinnard	E-mail	kinnlaw@bresnan.net	11-Mar-24	Accident Response	6. Accidents/Fire Protection. I almost hate to raise the issue but in the past several years the media has been quick to report instances of US military helicopter accidents in this country and elsewhere not caused by enemy fire. The sources I reviewed indicated there were 7 crashes in 2023 killing 30 service personnel and injuring over 40. So far in 2024 there was a January crash off Coronado, Calif. where all were ok, a February crash east of San Diego killing five and another in Utah where all were ok. While I trust Army training does everything humanly possible to prevent those, it raises a question of what we can expect in the way of fire protection the event of a crash or a facility fire whether or not it was caused by an accident. Knowing that we have fire protection from the City Fire Department, we are also painfully aware of how long it takes the heavy responding trucks to get up Airport Road or Zimmerman Trail and reach our vicinity. Are you aware if there is any provision for Airport firefighting resources to also fight fires offsite of airport, BFS or MANG property? In closing, I do wish to indicate we are not against the proposed facility, especially if my suggested changes could be incorporated into the Proposed Action. I warmly thank you and your superiors for the opportunity to comment.	As described in Section 4.8.1, page 48 of the Environmental Assessment, the MTARNG Aviation program is required to have a site-specific "Pre-Accident Plan" prepared in the event of an aviation emergency. The MTARNG Aviation site-specific "Pre-Accident Plan" requires the MTARNG to work directly with local emergency services. The "Pre-Accident Plan" meets the requirements set forth in the "Army Aviation Accident Prevention Program" (DA PAM 385-90). In the event of an emergency at the proposed LAASF, established procedures direct the MTARNG to work with local emergency services. The City of Billings Fire Department will respond to fires, as needed. Also, please refer to Comment Response 13.