

# ENVIRONMENTAL IMPACT STATEMENT

## FOR THE SENTINEL (GBSD) DEPLOYMENT AND MINUTEMAN III DECOMMISSIONING AND DISPOSAL



Air Force Global Strike Command  
Barksdale Air Force Base, Louisiana



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**OTHER SUPPORTING DOCUMENTATION FOR THE FINAL ENVIRONMENTAL IMPACT STATEMENT FOR THE SENTINEL (GBSD) DEPLOYMENT AND MINUTEMAN III DECOMMISSIONING AND DISPOSAL**



March 2023

Air Force Global Strike Command  
Barksdale Air Force Base, Louisiana



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## **PART 1: COMMENTS RECEIVED ON DRAFT EIS IN ORIGINAL FORMAT**

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**From:** [REDACTED]  
**To:** [EEC.gbsdeis](mailto:EEC.gbsdeis)  
**Subject:** Support for GBSD Program at Hill AFB  
**Date:** Friday, August 12, 2022 1:12:45 PM

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To Whom it May Concern:

Thank you for the opportunity to provide comments regarding the United States Air Force's Environmental Impact Statement (EIS) for the Ground Based Strategic Deterrent Deployment and Minuteman III Decommissioning and Disposal. On behalf of myself and Clearfield City, I wish to express our strong support for Hill AFB to provide support facilities and MMIII decommissioning activities for the Ground Based Strategic Deterrent. We understand the proposed action would involve construction and reconstruction of facilities, bring in additional personnel, and accomplish missile maintenance and security operations at Hill AFB.

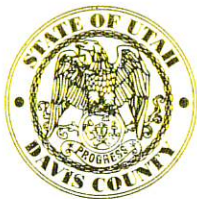
As a community adjacent to Hill Air Force base, we enjoy a close working relationship with the base and its people. We believe that a decision to utilize Hill AFB for support activities for GBSD and MMIII decommissioning activities is the best option for the Air Force to modernize the US land-based nuclear arsenal by replacing the aging MMIII with the Sentinel.

Our community prides itself on its support of the United States military, particularly Hill AFB. We house many of Hill's military and civilian members and their families in our community and do our best to make them welcome. As Mayor, I have direct and recurring association with all of Hill's senior leaders and often represent their concerns in our local Council of Governments, at the state legislature and with the Association of Defense Communities. Our residents understand and appreciate Hill's major contributions to our nation's defense posture and we want the GBSD mission in our community.

Once again, thank you for the opportunity to express our support.

Very respectfully,

Mark R. Shepherd  
CLEARFIELD CITY MAYOR  
55 S. State Street  
Clearfield, UT 84015  
[REDACTED]  
(801) 781-3100 (Office)



## Davis County Commission

Commissioner Randy B. Elliott      Commissioner Lorene M. Kamalu      Commissioner Bob J Stevenson

August 11, 2022

To Whom It May Concern:

On behalf of Utah's Davis County, I am writing to inform you that we are extremely supportive and excited about the role of Hill Air Force Base (AFB) in the modernization of our nation's ICBM capabilities. Hill AFB has provided outstanding support for the Minuteman III system for many years and the opportunity to play a big part in the replacement Sentinel ICBM system is very exciting for our community. We are proud to be one of the two counties which surround Hill AFB and are well aware of its contributions to our nation's defense.

We understand that Hill AFB will be directly involved in developing and fielding the Sentinel, as well as decommissioning the Minuteman III. Davis County welcomes the on-base construction activity that will be associated with the Sentinel program and our 15 cities stand ready to welcome the additional personnel who will manage the program.

Our community offers exceptional education opportunities for family members and our school district is one of very few across the country rated "Green" by the Air Force in their Military Families Scorecard. Utah also has one of the most comprehensive licensure reciprocity programs in the nation to facilitate job transition for military dependents - also rated "Green" in the Military Families Scorecard. In short, we believe our community support for Hill AFB is second to none and we are ready to assist the Air Force in any way to successfully deploy the Sentinel and decommission the Minuteman III.

Thank you for the opportunity to contribute. We look forward to hosting the Sentinel program at Hill AFB for many years.

Sincerely,

A handwritten signature in blue ink, appearing to read "BJ Stevenson", with a long horizontal flourish extending to the right.

Bob J Stevenson  
Commissioner





Community • Prosperity • Choice

Mayor • Joy Petro  
City Manager • Alex R. Jensen  
Asst. City Manager • Steve Garside

• Council Members •  
Zach Bloxham Brown  
Clint Morris  
Tyson Roberts  
Bettina Smith Edmondson  
Dave Thomas

To Whom It May Concern:

Thank you for the opportunity to provide comments regarding the United States Air Force's Environmental Impact Statement (EIS) for the Ground Based Strategic Deterrent Deployment and Minuteman III Decommissioning and Disposal. I wish to express my strong support for the GBSD related work scheduled to be accomplished at Hill AFB. I understand the proposed action would involve on-base construction and modification of some facilities, bring in additional personnel, and result in decommissioning activities associated with the retirement of the Minuteman III.

As a community adjacent to Hill Air Force base, my city enjoys a close working relationship with the base and its people which goes back decades. Our community prides itself on its support to Hill's military and civilian members and their families. These patriots live in our city, worship with us, recreate with us, and do important work for our nation's defense. As mayor, I have come to understand the many important missions conducted at Hill and am proud to be a member of our Utah Defense Alliance supporting Hill and the other military missions in our state. Our residents also understand and appreciate Hill's role in our nation's defense and we are proud to host a significant portion of the GBSD mission in our community.

Once again, thank you for the opportunity to express support for Hill's role in the GBSD program.

Sincerely,

Joy Petro

Mayor, Layton City



## Commissioner Ross Butcher

COMMISSIONER BUTCHER: Yes, sir. My name is Ross Butcher. R-O-S-S, B-U-T-C-H-E-R. I'm a county commissioner here in Fergus County. My comment would be geared towards an expectation that we are going to see good communication and consistency in that communication. We understand there's going to be impacts, and we want to make sure that we're in the chain of the decisionmaking on how to mitigate that. So I guess that's my comment. Other than that, I think the community is open to this project, and we're looking forward to working with you. Thank you.



## United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Denver Federal Center, Building 53  
Post Office Box 25207  
Denver, Colorado 80225-0007

*In reply refer to:*  
ER22/0293

August 08, 2022

Carla Pampe  
10306 Eaton Place, Suite 340  
Fairfax, VA, 22030

Subject: Department of the Interior Comments on the Draft Environmental Impact statement for Ground Based Strategic Deterrent Deployment and Minuteman III Decommissioning and Disposal Project

Dear Carla Pampe,

The U.S. Department of the Interior (Department), including the U.S. Fish and Wildlife Service's Wyoming Field Office (Service), has reviewed the U.S. Air Force's Draft Environmental Impact Statement (DEIS) for Ground Based Strategic Deterrent Deployment and Minuteman III Decommissioning and Disposal Project. As we understand the project, the U.S. Airforce is replacing their current Minuteman III Intercontinental Ballistic Missile (ICBM) system with the new Sentinel ICBM system. These comments reflect only the unclassified portions of the DEIS.

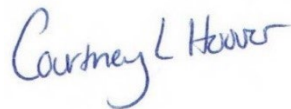
The Service supports the Proposed Action and Reduced Utility Corridors Alternative to minimize potential impacts to the Service's trust resources. Based on information provided in the DEIS and our understanding of the proposed Project, the Project has the potential to affect federally listed species and critical habitat listed under the Endangered Species Act of 1973, as amended (ESA; 16 U.S.C. 1531 *et seq.*). The Service has met routinely with the Air Force and their representatives since May of 2020, in the development and coordination of ESA-related information to inform the DEIS and the section 7 consultation, which is also underway. At this time, the Service has no comments on the DEIS.

If you have any questions regarding these comments, please contact Julie Reeves of the USFWS Wyoming Field Office at 334 Parsley Boulevard Cheyenne, Wyoming 82007 [REDACTED].

Carla Pampe

If you have any questions for the Department, please contact me at [REDACTED]  
[REDACTED]

Sincerely,

A handwritten signature in blue ink that reads "Courtney Hoover". The signature is written in a cursive style with a large initial 'C'.

Courtney Hoover  
Regional Environmental Officer  
Office of Environmental Policy and Compliance





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

1595 Wynkoop Street  
Denver, CO 80202-1129  
Phone 800-227-8917  
www.epa.gov/region8

**8/15/2022**

Ref: 8ORA-N

Carla Pampe  
GBSD Project EIS  
10306 Eaton Place, Suite 340  
Fairfax, Virginia 22030

Dear Ms. Pampe:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Air Force (USAF) Draft Environmental Impact Statement (EIS) for the Ground Based Strategic Deterrent (GBSD) Deployment and Minuteman III Decommissioning and Disposal (CEQ No. 20220088). In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and pursuant to Section 309 of the Clean Air Act (CAA), the EPA is providing comments on the Draft EIS. The CAA Section 309 role is unique to the EPA. It requires the EPA to review and comment publicly on every EIS.

The USAF has prepared the EIS to analyze the potential effects on the human and natural environments from the deployment of the GBSD intercontinental ballistic missile (ICBM) system and the decommissioning and disposal of the Minuteman III (MMIII) ICBM system. These activities would occur at F.E. Warren Air Force Base (AFB), WY; Malmstrom AFB, MT; Minot AFB, ND; Hill AFB, UT; Utah Test and Training Range (UTTR), UT; Camp Guernsey, WY; and Camp Navajo, AZ. In addition, all MMIII-related facilities, infrastructure, and technologies would be modernized or replaced as necessary to support the GBSD weapon system.

*EPA 309 Review Summary*

EPA identified environmental concerns and deficiencies in the analysis that should be addressed in the Final EIS. We provide our comments and recommendations for the Final EIS in the attached enclosure. These include clarifying wastewater requirements under current National Pollutant Discharge Elimination System permits, existing air quality and potential air quality impacts resulting from the action, considerations for meeting the requirements of General Conformity, and emissions from the destruction of missile components transported to the Hill AFB and UTTR.

We appreciate the coordination done by the USAF with federal agencies and the information provided in the Draft EIS to address public comments submitted during the project scoping process and we appreciate the opportunity to participate in the review of this Draft EIS. If you have any questions or comments, please contact me at [REDACTED], or VelRey Lozano of my staff at [REDACTED] or lozano.velrey@epa.gov.

Sincerely,



Melissa W. McCoy, Ph.D.  
Manager, NEPA Branch  
Office of the Regional Administrator

Enclosure

## **Ground Based Strategic Deterrent (GBSD) Deployment and Minuteman III (MMIII) Decommissioning and Disposal EPA's Draft EIS Comments**

The EPA offers the following recommendations to provide clarity in the Final EIS and support reviewing agencies and the public in understanding the proposal and its projected effects.

### **Clean Water Act Concerns**

**On-Base Wastewater Infrastructure** – The Draft EIS (p. 3-596) notes that *“the proposed on-base facilities would add a total of 91,700 GPD of wastewater for a total base-wide discharge of between 685,000 GPD and 777,000 GPD, representing an increase of between 40 percent and 76 percent of the remaining capacity. This increase is within the existing capacity of the system but would have long-term less-than-significant adverse effects on wastewater treatment utilities at the base.”*

While the Draft EIS notes that there is no limit on the volume of water that the base can discharge, we recommend that the USAF notify municipalities with approved Pretreatment programs or Control Authorities at the City of Cheyenne Publicly Owned Treatment Works (POTW) and the City of Great Falls POTW, as well as other municipalities without approved Pretreatment programs that own and operate POTWs. Notification will ensure the POTWs are aware of changes in discharges from the on-base facilities and determine if these changes in discharge may impact their POTW or wastewater collection system. Changes to the volume or quality in the discharge from the bases may not be considered “normal operating conditions” for the downstream receiving POTWs and may cause hydraulic or organic overloading, pass-through, interference, and permit violations. The municipalities are responsible for ensuring that their effluent discharges do not violate the Clean Water Act (CWA) and may need to increase treatment or resources to ensure the proper operation of their POTWs.

To this end, it is unclear if Pretreatment agreements are in place and up to date with the municipalities receiving wastewater from the identified on-base facilities. While the EIS notes that there is no limit on the volume of water that the base can discharge, consistent with the regulatory requirements in 40 CFR § 403.12(j),<sup>1</sup> we recommend that the USAF notify municipalities to ensure that discharge changes are anticipated, and budgetary needs are properly assessed and scheduled.

**Launch Facility Discharge Permits** – The Draft EIS currently provides limited information on the applicable National Pollutant Discharge Elimination System (NPDES) permits and their coverage. Where the GBSD project includes upgrades and cleaning of the launch facilities (LF), it is unclear if additional discharges due to cleaning of the LFs will be necessary. The current NPDES discharge permit for the F.E. Warren Air Force Base, Permit No. CO-0034789,<sup>2</sup> provides authorization to discharge only dewatering of surface water from nine of the LFs located within the state of Colorado. The required testing parameters in these permits are established to control discharge constituents expected to be found in surface water infiltration into the LFs. No industrial discharge activities are permitted at the silos, and

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<sup>1</sup> *Notification of changed Discharge* - All Industrial Users shall promptly notify the Control Authority (and the POTW if the POTW is not the Control Authority) in advance of any substantial change in the volume or character of pollutants in their Discharge, including the listed or characteristic hazardous wastes for which the Industrial User has submitted initial notification under paragraph (p) of this section.

<sup>2</sup> <https://www.epa.gov/system/files/documents/2022-03/co0034789-fe-warren-final-permit.pdf>

waters used for industrial purposes (e.g., process water, cleaning, etc.) are not covered under the current NPDES permit. The F.E. Warren NPDES permit also requires notifying the Permitting Authority if changes to the discharge are anticipated to occur. These permit conditions can be found in sections 3.9. *Toxic Pollutants* & 3.10. *Changes in Discharge of Toxic Substances* of the permit.

Discharges covered by current NPDES discharge permits, stormwater pollution control plans, and best management practices are established and permitted under routine and normal operating conditions. However, the LF procedures required to upgrade, remove, and replace the current missiles as they are prepared for the new missiles are not well discussed and it is not clear if changes to discharges may occur. We recommend including in the Final EIS additional information on the permitted discharges for all missile areas in Colorado, Wyoming, Montana, North Dakota, Nebraska, Utah, and Arizona, as well as information on whether and how they may change, to ensure full compliance with CWA NPDES federal and state permitting requirements.

**Off-Base Wastewater Infrastructure** – It is anticipated in the EIS that increases in utility use and wastewater disposal will occur due to labor camps supporting workforce hubs near Lewistown, MT, and Kimball, NE. The Draft EIS notes that consultation with officials in these towns was provided, however, we recommend specifically notifying the wastewater operators for any receiving POTWs. Additional chemical use, increase of holding times, and increases in discharge frequencies may be necessary to accommodate the increased flows and avoid permit violations for these facilities.

**Package Plants** – Where workforce hubs will have a designated package plant or other sanitary sewage treatment unit, we recommend providing additional information to the regulating authority/Permitting Authority on treatment specifications. This information may include the type of plant, anticipated location of the plant, receiving stream, discharge point, and chemicals utilized to treat the wastewater and expected to be in the effluent.

Where possible, we recommend notifying the NPDES Permitting Authority for the area well in advance of location selection to support optimal parameters for the discharge from the package plant. We recommend avoidance of impaired streams, low flow streams, or streams with Total Maximum Daily Load (TMDL) limitations.

**Drinking Water Wells** – The drilling of drinking water wells to support the proposed action will require mechanical integrity testing and shock chlorination before being put into service, both of which require the discharge of contaminated water and may require an NPDES permit. We recommend that the Final EIS include information on sampling requirements, proper treatment, and disposal of these waters to ensure that chemicals introduced during the installation process do not reach Waters of the U.S. or Waters of the State. If the need to discharge is anticipated, CWA NPDES regulations require the application for a permit to discharge be submitted 6 months prior to discharge.

We recommend discussing applicable groundwater regulations for each state in the Final EIS to ensure that process waters not covered under a discharge permit or waters anticipated to be discharged to upland areas to avoid waterway connection comply with regulations.

**Operational Changes to Minot AFB WWTF** – The Draft EIS (p. 3-608) notes that “*The wastewater discharge capacity at Minot AFB offers sufficient additional capacity to accommodate future mission requirements (Minot AFB 2017b). Notably, the WWTP is so effective, the base is authorized to discharge*



*wastewater from the lagoon cells to surface waters under an NDPDES<sup>3</sup> permit.”*

Our review of the Minot AFB NDPDES permit data identified violations within the last 5 years. Therefore, we recommend consulting with the wastewater operators and the North Dakota Department of Environmental Quality before releasing project-related discharges to the Minot AFB WWTF lagoons to ensure there are no adverse effects on the permitted receiving stream. It is unclear if the anticipated discharges from the base to the Minot AFB WWTF will be domestic wastewaters or non-domestic in nature. Wastewater lagoons provide limited treatment of wastewaters and are moderately effective in removing settleable solids, BOD, pathogens, fecal coliform, and ammonia. Additional treatment of wastes prior to discharge into the lagoons may be needed to ensure the existing facility can handle additional influent constituents and hydraulic loads.

As required under the Clean Water Act Section 402, the National Pollutant Discharge Elimination System (NPDES), any planned substantial changes to the existing sewage sludge facilities, the manner of their operations, or to current sewage sludge management practices of storage and disposal, requires the Permittee to give notice to the implementing authority.<sup>4</sup>

**Lagoons for Missile Alert Facilities (MAF)** – We recommend the inclusion of additional information in the Final EIS regarding the plans for upgrading the sewage lagoons at each MAF. Due to the age of the MMIII support facilities and to ensure the continued efficacy of these lagoons for the anticipated 50 years of GBSD support, draining and relining of these facilities to ensure proper containment may be needed or required by state regulations.

Where decommissioning of MAF wells and wastewater systems is anticipated, it is unclear what applicable regulations will be utilized. The CWA NPDES permitting program regulates the discharge of pollutants through “point sources” to “navigable waters”, and it is unclear if the lagoons servicing the MAF locations are permitted. If they are non-discharging lagoons and have no associated NPDES permit requirements, we recommend including discussion in the Final EIS on how the “less than significant effects” determination was made for these facilities. Where MAF lagoons will be serviced or upgraded, please clarify if sludge or liquids removal will be necessary and what permits may be required.

Non-discharging lagoons may have state requirements for maintenance, siting, and seepage rates. It is unclear in the Draft EIS if state-specific requirements for groundwater protection and/or seepage rates apply to the lagoons' upgrades. We recommend that the USAF provide additional information on the update of the lagoons at each MAF to ensure conformity with state regulations that may be more stringent than federal regulations. Where lagoon maintenance may require discharge, we recommend that state-specific regulatory information be provided to ensure that discharges are controlled. Additionally, where an NPDES permit is not in place, proper functioning and maintenance practices are strongly encouraged.

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<sup>3</sup> North Dakota Pollutant Discharge Elimination System (NDPDES)

<sup>4</sup> 40 CFR § 122.62 Modification or revocation and reissuance of permits

## Air Quality

**Existing Air Quality and Air Quality Related Values (AQRVs)** – The current approach taken to characterize existing air quality in the Draft EIS is to state whether areas affected by the project are in attainment or nonattainment of the National Ambient Air Quality Standards (NAAQS). This yes/no approach for current NAAQS attainment status does not fully characterize the existing air quality conditions and does not establish a useful baseline for comparison to the projected impacts of the alternatives. Therefore, we recommend presenting background pollutant concentrations as design values for each criteria pollutant relative to the NAAQS, using the latest three years of available monitoring data. These design values show how close an area is to the NAAQS, which provides a basis to determine whether additional pollutant emissions may or may not affect air quality. Data are available to the public through EPA’s outdoor air monitor webpage at: <https://www.epa.gov/outdoor-air-quality-data/interactive-map-air-quality-monitors>, as well as through the EPA’s Air Quality System (AQS) for AQS users. We also recommend working with states and the EPA to present data that will be most representative of air quality near planned activities.

Air Quality Related Values (AQRVs), including visibility and resources sensitive to deposition, are important for characterizing certain areas where sensitive resources occur. Areas where AQRVs are particularly valuable include Class I areas managed by Federal Land Managers (FLMs). Additionally, there may be Class II areas affected by the project where visibility and deposition may be important considerations, such as the Pawnee National Grasslands where Missile Wing facilities exist and will be upgraded/converted. Therefore, we recommend identifying areas that will be proximal to project activities where AQRVs may be important for presenting trends in visibility and deposition available through monitoring data. Visibility data are available through the IMPROVE monitoring network, as well as information prepared by the FLMs for areas they manage. It may be appropriate to work with the FLM regarding existing AQRVs in areas they manage. Information is also available online at:

- <https://www.epa.gov/outdoor-air-quality-data/interactive-map-air-quality-monitors>;
- <http://vista.cira.colostate.edu/Improve/>;
- <https://www.nps.gov/subjects/air/park-conditions-trends.htm> (for information at areas managed by the National Park Service); and
- [https://www.fs.fed.us/air/wilderness\\_monitoring.htm](https://www.fs.fed.us/air/wilderness_monitoring.htm).

Existing deposition may be characterized utilizing the National Atmospheric Deposition Program (NADP) monitoring network in conjunction with Total Deposition (TDEP) Science Committee estimates, as well as information available from the FLMs, bulleted above. See, <http://nadp2.slh.wisc.edu/committees/tdep/tdepmaps/>.

The Draft EIS notes that there are existing emissions from the Air Force bases that will increase during construction and upgrades resulting from this action and presents tables of stationary source emissions. However, the emissions presented in the Draft EIS appear to be less than the levels permitted by state air quality programs. As an example (see chart below), we reviewed the latest Montana Department of Environmental Quality (MTDEQ) permit for Malmstrom Air Force Base (Montana Air Quality Permit #1427-10) and found that the emissions do not match those presented in the Draft EIS. We recommend clarifying this discrepancy by explaining whether the emissions presented are actual emissions estimates reported to the state and disclosing how the estimates were generated, including which emission sources at the bases contribute to the stationary source totals. Since the emissions presented are not the

maximum permitted rates, we recommend including each AFB's potential to emit (PTE) since there would be nothing to restrict the USAF from operating sources at the bases at their PTE. We also recommend including the state permits that are relied on to present source PTEs in an appendix to the EIS. It is also important for the EIS to note that these stationary source emissions do not include emissions occurring from many activities on the base that are mobile sources such as aircraft and trucks.

Source of Estimate	PM (tpy)	PM <sub>10</sub> (tpy)	PM <sub>2.5</sub> (tpy)	NO <sub>x</sub> (tpy)	SO <sub>2</sub> (tpy)	CO (tpy)	VOC (tpy)
Draft EIS Table 3.1-4		0.9	0.8	24.0	3.7	14.2	0.7
MTDEQ permit #1427-10	52.6	52.6		78.5	52.8	43.7	1.55

**Air Quality and AQRV Impact Analysis** - The air quality impact analysis in the Draft EIS relies on the USAF's Air Conformity Applicability Model (ACAM) emissions calculations. In order to understand whether these emission estimates are reasonable, we prepared an estimate for NO<sub>x</sub> emissions from construction exhaust associated with LF conversion and upgrades. Chapter 2 of the Draft EIS indicates that up to 20 pieces of equipment would be needed to upgrade LFs. We used Appendix D to identify the equipment the USAF included in their ACAM calculations, as well as manufacturer specifications for specific equipment meeting the categories listed in Appendix D. Appendix D included 12 pieces of equipment. Since the Draft EIS indicated 20 pieces of equipment would be needed it is unclear why the equipment counts do not match. Therefore, for our estimate we assumed the remaining 8 pieces of equipment would be small miscellaneous sources with an average horsepower of 150 hp operated at 50% load. The addition of the equipment not included in the ACAM estimate resulted in a small part of the total emissions estimate and therefore the exclusion of the 8 pieces of equipment does not seem to account for the discrepancy between our estimate and the ACAM estimate, described more fully below.

We prepared our emission estimate using Microsoft Excel and have included it as an attachment to this enclosure (see GBSD emissions calculation.xlsx). Note that in our calculation of potential NO<sub>x</sub> emissions, we assumed Tier 3 equipment would be used (rather than Tier 0 – Tier 2). Tier standards are based on the year of the engine, and in general, Tier 3 engines would be 2006 to 2010 model years. The resulting EPA estimate for emissions associated with 20 pieces of equipment operating for a year to upgrade 30 LFs is approximately 18 to 56 tons per year (tpy) NO<sub>x</sub>. The range in emissions is the result of an assumption that the equipment would operate between 2.6 hours to the full eight hours of the work shift. We note that our estimate for upgrading 30 LFs per year is similar to or substantially greater than the Draft EIS's estimate for emissions from *all* F.E. Warren activities (23.9 tpy NO<sub>x</sub>). This disparity draws into question the emissions calculations generated from ACAM. In order to better understand the emission estimates, we recommend the Final EIS disclose and discuss the basis for emission factors used by ACAM and present emissions from each activity individually, in addition to presenting emission totals for each base (e.g., emissions from the construction of each MAF, LF, Coms Tower, emissions per mile of utility, etc.). Presenting emissions by activity will also assist the applicability analysis for General Conformity (GC) by clearly depicting the emissions from each activity that must be added together within a nonattainment area. We also recommend that all assumptions for the alternatives (e.g., equipment count and operating hours) match those used for emission estimates.

The current approach taken by the EIS to judge significance appears to compare project emissions to major source Prevention of Significant Deterioration (PSD) permitting thresholds (250 tpy of a pollutant) and General Conformity (GC) *de minimis* thresholds. The use of such thresholds as a metric for whether there will or will not be an air quality impact and whether an impact is significant is not appropriate since these thresholds were not developed for such purposes. Rather than using tons per year thresholds, and because of the spatial extent of the action, we recommend presenting emissions for individual activities (e.g., emissions from one LF conversion, from one MAF conversion, and from construction of one communication tower, etc.) prior to presenting emission totals. We recommend including documentation in the Final EIS of the emissions calculations and the projected duration of those emissions. This approach provides more specific information that can be used to understand the impact that could result from the project. Based on emissions for each activity and geographic considerations, we recommend the Final EIS provide conclusions regarding potential air quality impacts, including acknowledgement that there may be elevated pollutants near construction sites.

We also recommend that construction within ¼ mile from residences be limited to the use of Tier 4 (2015 or newer) construction equipment to reduce the possibility of unhealthy air quality for residents. If Tier 4 nonroad equipment can be committed for use emissions would be greatly reduced since the Tier 3 standard is 4 g NO<sub>x</sub>+NMHC/kW-hr while the Tier 4 standard is 0.4 g NO<sub>x</sub>/kW-hr (see, <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100OA05.pdf>).

**General Conformity (GC)** – We thank the USAF for its continued commitment to addressing GC under the Clean Air Act (CAA). An applicability analysis is required for each affected nonattainment area and only for those emissions which will originate within the nonattainment area. The current analysis does not break emissions out according to those that will originate in nonattainment areas for Missile Wing activity in Colorado and does not discretely address two of the four areas that must be considered. Therefore, we recommend the following:

- Verify that emission calculations using ACAM are representative (see comments above).
- Document any verification that has been conducted of the ACAM model and the source of nonroad and on-road emission factors used in ACAM, and that are ultimately used for the final applicability analyses (including a description of what type of equipment the emission factor is representative of, as compared to the equipment assumed for utilization by the project).
- Present an explanation of the yearly activity and equipment that will be used for the action within each nonattainment area.
- Present emissions that will originate within each of the four nonattainment areas during the course of each year (or for the maximum year should that year be lower than the *de minimis* rate). We recommend presenting this evaluation for each area individually. Please be aware that Colorado has two ozone nonattainment areas. The serious nonattainment area does not continue to the Wyoming border. However, the marginal nonattainment area does extend to the Wyoming border encompassing more LFs.
  - The applicability analysis should not include operational emissions from stationary sources that require a permit under the New Source Review (NSR) or Prevention of Significant Deterioration (PSD) air permitting program (40 CFR § 93.153(d)(1)).
  - Since the Draft EIS indicates that post-construction operational emissions would be the same, or slightly less, within missile fields, the provisions of 40 CFR § 93.153(c)(2)(x) may apply. If the USAF determines any of the activities listed in 40 CFR § 93.153(c) apply to their action, then GC does not apply to those activities, as explained in the rule.



- Document the applicability analysis for each area using the appropriate *de minimis* thresholds for each area's classification.
  - Colorado – marginal and serious ozone nonattainment areas (differing boundaries; see 40 CFR § 81.306).
  - Utah – serious PM<sub>2.5</sub> nonattainment area; marginal ozone nonattainment area (see 40 CFR § 81.345).
- Should a Conformity Determination be required, complete the necessary demonstration and determination for each nonattainment area separately.

We are available to assist with these efforts if desired.

### **Open Burn Safer Alternatives**

**Utah Test and Training Range (UTTR)** – The EPA appreciates the opportunity to attend the GBSD scoping meeting on March 11, 2021, to discuss open burning/open detonation (OB/OD) requirements under the Resource Conservation and Recovery Act (RCRA) and at 40 C.F.R. § 265.382. Following this meeting, on June 7, 2022, the EPA headquarters issued a memorandum<sup>5</sup> to communicate existing requirements, including a requirement to assess alternative technologies, and provide guidance to EPA Regions, states, and territories for permitting OB/OD units under RCRA. Upon review of the GBSD Draft EIS, no discussion of alternative technologies was noted.

We recommend that the EIS contain information on the current process for open burning or detonating of any explosive wastes, and that an alternative technology assessment occur for each waste stream designated as RCRA D003, reactive waste. Additional information can be found on the EPA website <https://www.epa.gov/hwpermitting/energetic-hazardous-wastes>.

Until the assessments occur, EPA and the state of Utah cannot support an exemption allowing for open detonation of the rocket motors or any other D003 wastes that may be generated (e.g., waste rocket fuel, conventional explosives, etc.). In addition, UTTR will also have to conduct alternative technology assessments for all their reactive waste streams prior to receiving a permit renewal to operate an OB/OD unit under the exemption.

Currently, the EPA has asked all states and Regions to put on hold any permit renewals for OB/OD until these assessments can be completed, or at least required under permit conditions. We recommend that the USAF re-evaluate the sections of the EIS that discuss decommissioning of explosive wastes and note that these alternative technology assessments must occur before a treatment method is chosen. It is not a certainty that UTTR will be able to conduct OB/OD once assessments are made for all their waste streams.

We recommend that the USAF work with EPA Regions and states to develop a public participation/community engagement/public notification plan. Where safe alternatives are available, facilities must use those alternatives in lieu of open burning and open detonation (OB/OD).

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<sup>5</sup> [https://www.epa.gov/system/files/documents/2022-06/OBOD\\_Policy\\_Memo\\_signed\\_6.7.22\\_508.pdf](https://www.epa.gov/system/files/documents/2022-06/OBOD_Policy_Memo_signed_6.7.22_508.pdf)

20 pieces of equipment  
1 drill rig  
453.592 g/lb  
2000 lb/ton  
0.7457 kW/hp

drill rig	hp	Tier 2 Emission Factor (g/hp-hr)	utilization	hours of operation	load factor	emissions
drill rig	1500	4.7	0.1	876	0.5	3.404

listed in EIS, appendix D	number of equipment	hours of operation	Unit	hp	KW	Tier/Age	Emissions Factor (g/hp-hr)	Emission Factor (g/kW-hr)	days per year	hours per day	load factor	NOx emissions (tpy) for 1 piece of equipment	NOx emissions for all equipment
gaders			CAT Motor Grader 140M2		193	143.9201 Tier 3	2.9828	4	312	8	0.5	0.791955258	6.335642068
composite other construction equipment	2	8	unknown - average hp assumed		300	223.71 Tier 3	2.9828	4	312	8	0.5	1.231018536	9.848148292
rubber tired dozers			CAT 324H wheeled dozer		354	263.9778 Tier 3	2.9828	4	312	8	0.5	1.452601873	11.62081498
composite scrapers	2	8	CAT 627H scrapers		407	303.4999 Tier 3	2.9828	4	312	8	0.5	1.670081814	13.36065452
tractors/loaders /backhoes			assume loaders with mean hp rating and excavators		300	223.71 Tier 3	2.9828	4	312	8	0.5	1.231018536	9.848148292
composite	2	8			300	223.71 Tier 3	2.9828	4	312	8	0.5	1.231018536	9.848148292
total		12											51.01340815 total NOx

deficit between emissions assumptions and chapter 2 equipment count (20 for LF)

8

missing equipment  
150 111.855 Tier 3 2.9828 4 312 8 0.5 0.615509268 4.924074146

total NOx with missing equipment  
55.9374823

assume equipment only runs 33% of 8 hour shift  
18.45936916 tpy NOx per 20 equipment crew



**DEPARTMENT OF THE ARMY**  
CORPS OF ENGINEERS, OMAHA DISTRICT  
HELENA REGULATORY OFFICE  
100 NEILL AVE, SUITE 200  
HELENA, MONTANA 59601

August 15, 2022

**SUBJECT: USACE Comments on Draft EIS for Ground-Based Strategic Deterrent  
Deployment and Minuteman III Decommissioning and Disposal Project, USACE File No.  
NWO-2020-01183-MT**

Jason Cook, P.E.  
Tetra Tech



Dear Mr. Cook:

This letter provides the official comments from the U.S. Army Corps of Engineers (USACE) on the Draft Environmental Impact Statement (DEIS) for the proposed Ground-Based Strategic Deterrent Deployment and Minuteman III Decommissioning and Disposal Project. The project will include (1) deploying the GBSD intercontinental ballistic missile (ICBM) system and (2) decommissioning and disposal of the Minuteman (MMIII) ICBM system. These activities would take place at F.E. Warren Air Force Base (AFB), WY; Malmstrom AFB, MT; Minot AFB, ND; Hill AFB, UT; Utah Test and Training Range, UT; Camp Guernsey, WY; and Camp Navajo, AZ.

Appendix A – Section A.5.1: The proposed action will require Real Estate permits (Right-of-Way easements), permissions under 33 U.S.C. Section 408 (Civil Works permissions) and Regulatory permitting pursuant to Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act of 1899 (RHA) (Section 10/404 permits) from USACE. Therefore, we suggest that the second sentence in the first paragraph should be modified to clarify the multiple USACE roles for the proposed action:

Since the Proposed Action involves activities that result in the discharge of dredged or fill material into waters of the United States and that cross over, through or under a navigable water of the United States requiring USACE permitting; that make alterations to, or temporarily or permanently occupy or use U.S. Army Corps of Engineers (USACE) federally authorized Civil Works projects; and/or require access to and activity on USACE-administered land, the Air Force requested...

Throughout A.5, access to and activities on "USACE-administered land" is discussed. The project will require the necessary permits for Right-of-Way (ROW) easements on USACE-administered land, but these will not be the only USACE-related activity. To clarify, USACE has Project Sites which consist of real property under the

control of the Army. “Real property” refers to any interest in land, including leaseholds, easements, and rights-of-way, together with the improvements, structures, and fixtures located thereon. The USACE section 408 evaluation process is intended to ensure that any alterations or modifications to Corps civil works projects are not injurious to the public interest and do not affect the civil works project’s ability to meet its authorized purposes. This authority is provided in section 14 of the Rivers and Harbors Act of 1899, as amended, and codified at 33 U.S.C. 408 (also known as Section 408). Under Section 408, “USACE project” refers to a USACE federally authorized Civil Works project, including those operated and/or maintained by USACE and those operated and maintained by a nonfederal sponsor. Through the Regulatory Program, USACE administers and enforces Section 10 of the Rivers and Harbors Act of 1899 (Section 10) (33 U.S.C. 403) and Section 404 of the Clean Water Act (Section 404) (33 U.S.C. 1344). Section 10 prohibits the construction, excavation, or deposition of materials in, over, or under navigable waters of the United States, or any work that would affect the course, location, condition, or capacity of those waters, unless the work has been authorized by a Department of the Army permit. Under Section 404, a permit is required for the discharge of dredged or fill material into waters of the United States, including wetlands, on both private and public lands. Regulatory permits do not grant any property rights or exclusive privileges and do not authorize any injury to the property or rights of others. A Regulatory permit does not authorize interference with any existing or proposed Federal project.

Appendix A – Section A.5.2: This section combines the multiple USACE roles, activities and authorities in several of the paragraphs. The first paragraph discusses Section 404 of CWA (authority); the second discusses nationwide permits (permitting mechanism); the third – Section 10 of RHA (authority); the fourth – Section 408 (authority); the fifth standard individual permits (permitting mechanism), 404(b)(1) guidelines, and EO 11990; the sixth discusses alternatives and Regulatory permitting; and the seventh discusses ROW easements (Real Estate permits), Regulatory permitting (Section 10/404), as well as Section 408 permissions. The Corps suggests reordering the paragraphs in this Section and clearly defining each of the USACE roles and responsibilities. We suggest moving the Section 408 discussion to before any discussion of Regulatory authorities (Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act of 1899) and permitting mechanisms (Nationwide and Standard permits) to help eliminate any confusion between these programs and their implementing regulations.

Appendix A - page 67: It states, “When the preferred alternative is selected and approved in the Record of Decision (ROD), it will reflect the agencies’ full consideration of impacts on wetlands and all other resources.” To the Corps knowledge, aquatic resource delineations have not been completed and Section 10/404 permitting has not occurred, therefore the Record of Decision (ROD) cannot reflect the agencies full consideration of impacts on waters of the U.S. (WOTUS). The transmission line routes and all related discharges of dredged or fill material regulated under Section 404 and impacts regulated under Section 10 will need to be identified for USACE to make a full consideration of impacts. Unavoidable impacts associated with the transmission lines,

-3-

Missel Alert Facilities, access roads, etc., must be identified. Those unavoidable impacts must be minimized, and the remaining impacts identified and included in the Section 10/404 permit application.

Thank you for the opportunity to review the DEIS. Please refer to identification number NWO-2020-01183-MT in any correspondence concerning this project. If you have any questions, please contact Jade Metzler at 100 Neill Ave, Suite 200, Helena, MT, 59601, by email at [REDACTED].

Sincerely,

Sage L. Joyce  
Montana Section Chief

Emmy Andrews, Tetra-Tech, [REDACTED],  
[REDACTED]

Comment and Response Matrix BLM, Agency Comments to the Draft EIS for the Ground Based Strategic Deterrent Deployment and Minuteman II Decommissioning and Disposal August 2022								
Comment #	Commenter	Page #	Line #	Section/Figure/ Table/Appendix	Comment	Suggested Fix or Suggested Text	Response	Adjudication
1	Dan Brunkhorst	3-5		3.1.1.1.3; 3.1.2.1.3; 3.1.3.1.3; 3.1.4.1.3; 3.1.5.1.2; 3.1.8.1.	Executive Order 13990 Protecting Public Health and the Environment and Restoring Science To Tackle the Climate Crisis, emphasizes the importance of ensuring federal agencies "capture the full costs of greenhouse gas emissions as accurately as possible, including by taking global damages into account." BLM uses the interim estimates of the social costs of carbon, methane and nitrous oxide published by the IWG in February 2021. An accurate social cost disclosure in NEPA documents helps agencies determine the social benefits of reducing greenhouse gas emission between alternatives. Disclosing the social costs of GHG emissions would allow BLM to better tier to the EIS and issue defensible step-down decisions. Specific to page 3-30, 3.1.8.1, there are criteria that identifies monetized values to be considered for NEPA.	Include a discussion SC GHG analysis.		
	Dan Brunkhorst	3-272		3.4.2.1.2	Square Butte has additional importance beyond being a high potential historic feature of the Lewis and Clark Trail. It is a state park known as First Peoples Buffalo Jump State Park which is believed to be the largest buffalo jump in the world. Human activity at the site dates back to at least 500 AD.	Add		
2	Dan Brunkhorst	3-275-3-277		3.4-4 and 3.5-5	Proximity and Effects to Nez Perce NHT should be discussed. Integrity of the trail would be impacted in the eastern half of the missile field.	Add		
	Dan Brunkhorst	3-297			There are effects to EJ populations beyond excluding anyone, denying benefits, or subjecting populations to discrimination. While the analysis did not identify significant adverse effects on human health or the environment, the EIS does disclose other effects (eg impacts to cultural resources and socio-economics) which can also be indicators for impacts to EJ populations. A no disproportionate effects finding may still appropriate, but other impacts to EJ populations should also be disclosed.	Disclose		
	Dan Brunkhorst	3-323		3.6.2.1.4	Unlike DOD and private lands, DOI is required to manage Paleontological Resources under Paleontological Resources Preservation subtitle of the Omnibus Public Land Management Act of 2009, also known by its popular name, the Paleontological Resources Preservation Act (PRPA). The PRPA directs land managers in DOI agencies and the USDA to manage and protect fossils using scientific principles and expertise. As a result, BLM characterizes paleontological resources using the PFYC system. There are geologic formations of high and very high potential for paleontological resources within the project area. In its practical application, the PFYC is intended to help managers plan where to focus resources during the planning or execution of ground-disturbing activities. Quantification of effects is difficult without inventory of such formations.	Include		
	Dan Brunkhorst	3-383		3.8.1.1.1	Since the stated Proposed Action does not involve nuclear material, no discussion of radiological hazards or effects is included in the analysis. While separate responsibilities for U.S. nuclear weapons may reside in other authorities in the Department of Defense (DoD) and the Department of Energy (DOE), there is a connected action between the proposed action and radiologic hazards. The health and safety section of the EIS would benefit from further explanation why the issue is not analyzed.	Clarify		
	Dan Brunkhorst	A-12		A.1.7	First paragraph Work "within the fence line" may still require a ROW. Location is not a requirement as to whether a ROW grant is necessary, but is the preferred citing location to reduce environmental effects.	Edit Work within the fence line may result in less resource effects, a ROW would still be required.		
	Dan Brunkhorst	A-13		A.1.7	Utility Corridors bullet Typo Thus, the Air Force should request grants for utility corridors instead of utility corridors.	Change to Thus, the Air Force should request ROW grants instead of utility corridors.		
	Dan Brunkhorst	A-17		A.1.8	Incidental occurrences of the proposed action may also exist on BLM in areas outside of the Malmstrom AFB. (There may be potential impacts to BLM in North Dakota and Wyoming. (Our records indicate possibly .25 miles in Minot and 4 miles in Ft. Warren)	Please consider adding a statement after the first paragraph to the effect that incidental portions of the proposed action may also exist on BLM-administered lands outside of the Malmstrom AFB. Applications for those facilities would be directed toward the appropriate field office and managed under the applicable land use plan for that area.		
	Dan Brunkhorst	3-151		3.3.2.1.3	Update new wolverine occurrences	Check MT NHP for new occurrences. There have been several since the Admin DEIS.		
	Dan Brunkhorst	3-158		3.3-30	Update new grizzly occurrences	Check MT NHP for new occurrences. There have been several since the Admin DEIS.		
	Matt Comer	A-12		A.1.7	Add the following design features for wildlife from 3/17 comment matrix. Suggest using a bullet for "Wildlife" below "Water Resources"	The Air Force is responsible for the proposed action submission to the Montana Sage-Grouse Habitat Conservation Program (MSGHCP) for disturbance calculations. BLM approval is contingent upon acceptable design criteria and mitigation through MSGHCP in coordination with BLM.		
	Matt Comer	A-12		A.1.7	Add the following design features for wildlife from 3/17 comment matrix. Suggest using a bullet for "Wildlife" below "Water Resources"	Design Criteria for installing new and replacing existing lines within PHMA		
	Matt Comer	A-12		A.1.7	Add the following design features for wildlife from 3/17 comment matrix. Suggest using a bullet for "Wildlife" below "Water Resources"	Timing restriction No activities between March 15 and July 15 for replacement lines.		
	Matt Comer	A-12		A.1.7	Add the following design features for wildlife from 3/17 comment matrix. Suggest using a bullet for "Wildlife" below "Water Resources"	Avoid new surface disturbance in PHMA where possible.		
	Matt Comer	A-12		A.1.7	Add the following design features for wildlife from 3/17 comment matrix. Suggest using a bullet for "Wildlife" below "Water Resources"	Co-locate replacements for existing lines with existing road disturbance where possible.		
	Matt Comer	A-12		A.1.7	Add the following design features for wildlife from 3/17 comment matrix. Suggest using a bullet for "Wildlife" below "Water Resources"	Co-locate existing lines to the new proposed lines adjacent to roads to minimize disturbance in habitat (Fox lane example).		
	Matt Comer	A-12		A.1.7	Add the following design features for wildlife from 3/17 comment matrix. Suggest using a bullet for "Wildlife" below "Water Resources"	No vegetation clearing will occur around existing or replacement lines.		
	Matt Comer	A-12		A.1.7	Add the following design features for wildlife from 3/17 comment matrix. Suggest using a bullet for "Wildlife" below "Water Resources"	Rip in replacement lines to minimize disturbance. <a href="https://www.youtube.com/watch?v=E_3zoRJMv0">https://www.youtube.com/watch?v=E_3zoRJMv0</a>		

Comment and Response Matrix BLM, Agency Comments to the Draft EIS for the Ground Based Strategic Deterrent Deployment and Minuteman II Decommissioning and Disposal August 2022								
Comment #	Commenter	Page #	Line #	Section/Figure/ Table/Appendix	Comment	Suggested Fix or Suggested Text	Response	Adjudication
	Matt Comer	A-12		A.1.7	Add the following design features for wildlife from 3/17 comment matrix. Suggest using a bullet for "Wildlife" below "Water Resources"	<a href="https://www.youtube.com/watch?v_RVtb8BFUXaY">https://www.youtube.com/watch?v_RVtb8BFUXaY</a>		
	Matt Comer	A-12		A.1.7	Add the following design features for wildlife from 3/17 comment matrix. Suggest using a bullet for "Wildlife" below "Water Resources"	New lines will be placed in existing disturbance between fences along roads.		
	Matt Comer	A-12		A.1.7	Add the following design features for wildlife from 3/17 comment matrix. Suggest using a bullet for "Wildlife" below "Water Resources"	No new roads will be created as a result of the proposed action.		
	Matt Comer	A-12		A.1.7	Add the following design features for wildlife from 3/17 comment matrix. Suggest using a bullet for "Wildlife" below "Water Resources"	Noxious weeds will be monitored and managed along new and existing lines.		
	Matt Comer	A-12		A.1.7	Add the following design features for wildlife from 3/17 comment matrix. Suggest using a bullet for "Wildlife" below "Water Resources"	Fire suppression equipment will be accessible during installation and maintenance activities.		
	Matt Comer	A-12		A.1.7	Add the following design features for wildlife from 3/17 comment matrix. Suggest using a bullet for "Wildlife" below "Water Resources"	Compensatory mitigation should occur in the vicinity of impacted leks. Potential compensatory areas include mesic/riparian habitat improvements along Ford's Creek and Box Elder Creek.		
	Matt Comer	A-12		A.1.7	Incorporate GBSD_line advice and design features listed above during implementation			
	Jade Peterson/Dan Brunkhorst	A-12		A.1.4	If site-specific maps can't be included, please add a sentence to the end of A.1.4 to the effect: <i>Site-specific locations and detailed maps will be available prior to implementation.</i>			
	Jade Peterson	A-12		A.1.7	seven ROW grant applications	We made this same comment on the last review. Unsure if it will be exactly 7. Suggest saying 'multiple'?		





DEPARTMENT OF THE ARMY  
U.S. ARMY CORPS OF ENGINEERS, SACRAMENTO DISTRICT  
1325 J STREET  
SACRAMENTO CA 95814-2922

August 5, 2022

Regulatory Division (SPK-2021-00540)

U.S. Air Force  
Attn: Howard N. Kosht, GS-15 DAF  
Executive Director, Strategic Plans, Programs, and Requirements  
GBSD Project EIS  
10306 Eaton Place, Suite 340  
Fairfax, VA 22030

Dear Mr. Kosht,

We are responding to your July 1, 2022, request for the U.S. Army Corps of Engineers (Corps) to participate as a cooperating agency under the National Environmental Policy Act for the preparation of an Environmental Impact Statement (EIS) for the U.S. Air Force's Ground Based Surface Defense (GBSD) project, Hill Air Force Base site. The project site is located at Hill Air Force Base, 7981 Georgia Street, Hill AFB, Latitude 41.108653°, Longitude -111.990813°, Davis County, Utah.

Based on the information submitted, it appears the proposed action would not require a permit under Section 404 of the Clean Water Act and/or Section 10 of the Rivers and Harbors Act as indicated in correspondence dated August 4, 2021, (Enclosure 1). Because the Corps lacks jurisdiction over this project, we are declining your request to be a cooperating agency on the EIS at this time. A copy of this letter is being provided to the Council on Environmental Quality.

Please refer to identification number SPK-2021-00540 in any correspondence concerning this project. If you have any questions, please contact Nicole Fresard at 533 West 2600 South, Suite 150, Bountiful, Utah 84010, by email at [REDACTED] or by telephone at [REDACTED]. For more information regarding our program, please visit our website at [www.spk.usace.army.mil/Missions/Regulatory.aspx](http://www.spk.usace.army.mil/Missions/Regulatory.aspx).

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Jewell".

Michael S. Jewell  
Chief, Regulatory Division

Enclosure

cc: Council on Environmental Quality, 730 Jackson Place NW, Washington, DC 20503



DEPARTMENT OF THE ARMY  
U.S. ARMY CORPS OF ENGINEERS, SACRAMENTO DISTRICT  
1325 J STREET  
SACRAMENTO CA 95814-2922

August 4, 2021

Regulatory Division (SPK-2021-00540)

James D. Hunsicker, GS-15, DAFC  
AFGSC Site Activation Task Force Lead  
HQ AFGSC A5F  
66 Kenney Avenue  
Barksdale AFB LA 71110  
[james.hunsicker.1@us.af.mil](mailto:james.hunsicker.1@us.af.mil)

Dear Mr. Hunsicker:

This concerns the U.S. Air Force's Ground Based Surface Defense (GBSD) project, Hill Air Force Base site. The project site is located near 7981 Georgia Street, Latitude 41.108653°, Longitude -111.990813°, Davis County, Utah (enclosure 1).

Based on the information provided, the GBSD project involves maintenance, training, storage, testing, and support activities at Hill Air Force Base (enclosure 2). We have determined that the project will not result in the discharge of dredged or fill material within waters of the United States. Therefore, a Department of the Army Permit is not required for this work. Measures should be taken to prevent construction materials and/or activities from entering any waters of the United States. Appropriate soil erosion and sediment controls should be implemented on site to achieve this end.

Our disclaimer of jurisdiction is only for this activity as it pertains to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act of 1899, and does not refer to, nor affect, jurisdiction over any waters present on site. Other federal, state, and local laws may apply to your activities. Therefore, in addition to contacting other federal and local agencies, you should also contact state regulatory authorities to determine whether your activities may require other authorizations or permits.

We appreciate your feedback. At your earliest convenience, please tell us how we are doing by completing the customer survey on our website under Customer Service Survey at [www.spk.usace.army.mil/Missions/Regulatory.aspx](http://www.spk.usace.army.mil/Missions/Regulatory.aspx)

-2-

Please refer to identification number SPK-2021-00540 in any correspondence concerning this project. If you have any questions, please contact me at 533 West 2600 South, Suite 150, Bountiful, Utah 84010, by email at [REDACTED] or telephone at [REDACTED]

Sincerely,



Nicole Fresard  
Senior Project Manager  
Nevada-Utah Section

Enclosures

cc:

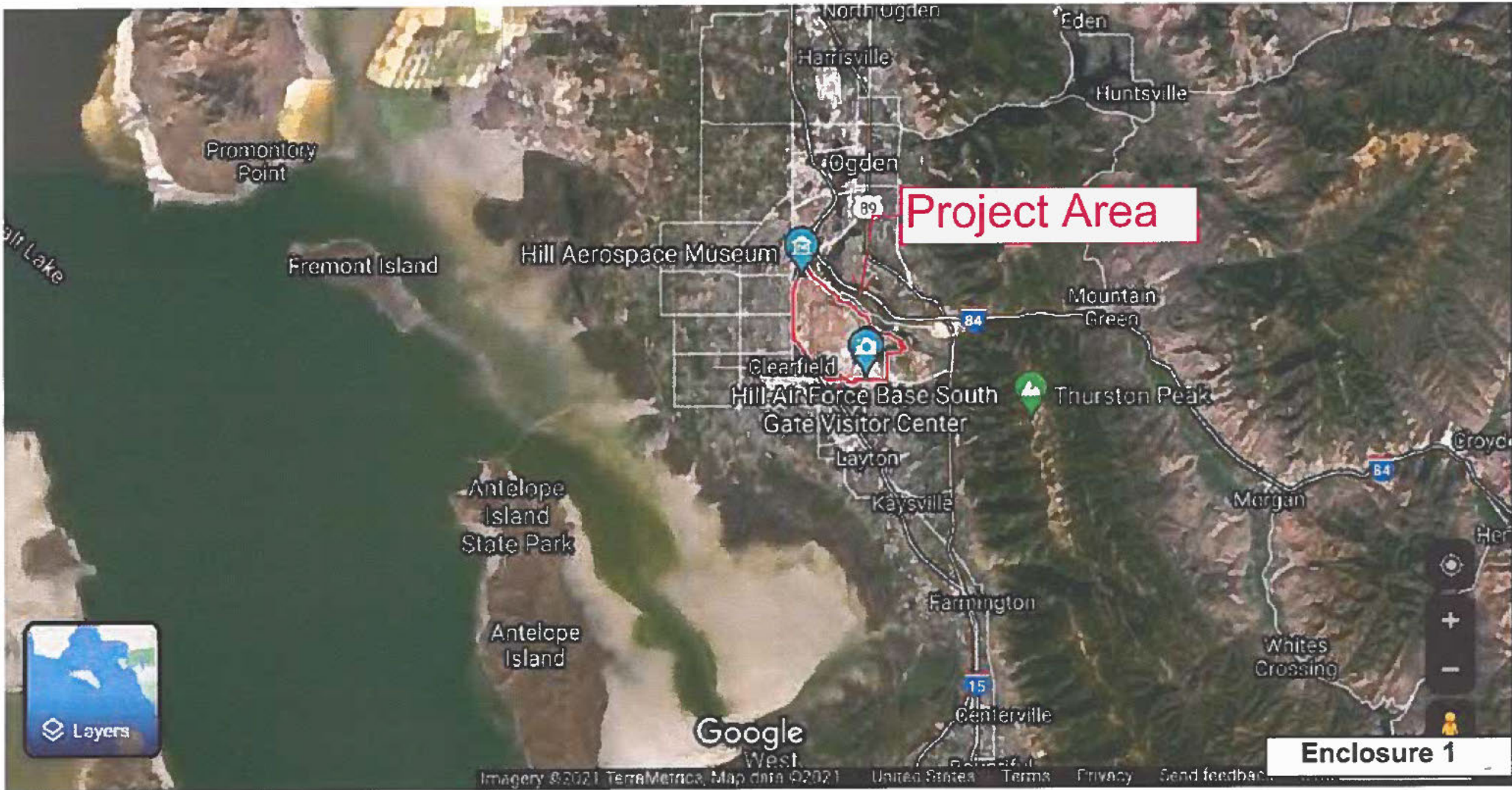
CARMICHAEL, JOE E GS-14 USAF AFGSC AFGSC/A5F  
[REDACTED]

BARTHOLOMEW, RUSSELL G GS-13 USAF AFMC AFNWC/NX  
[REDACTED]

NEWCOMER, STEPHANIE H GS-13 USAF AFMC AFCEC/CZN  
[REDACTED]

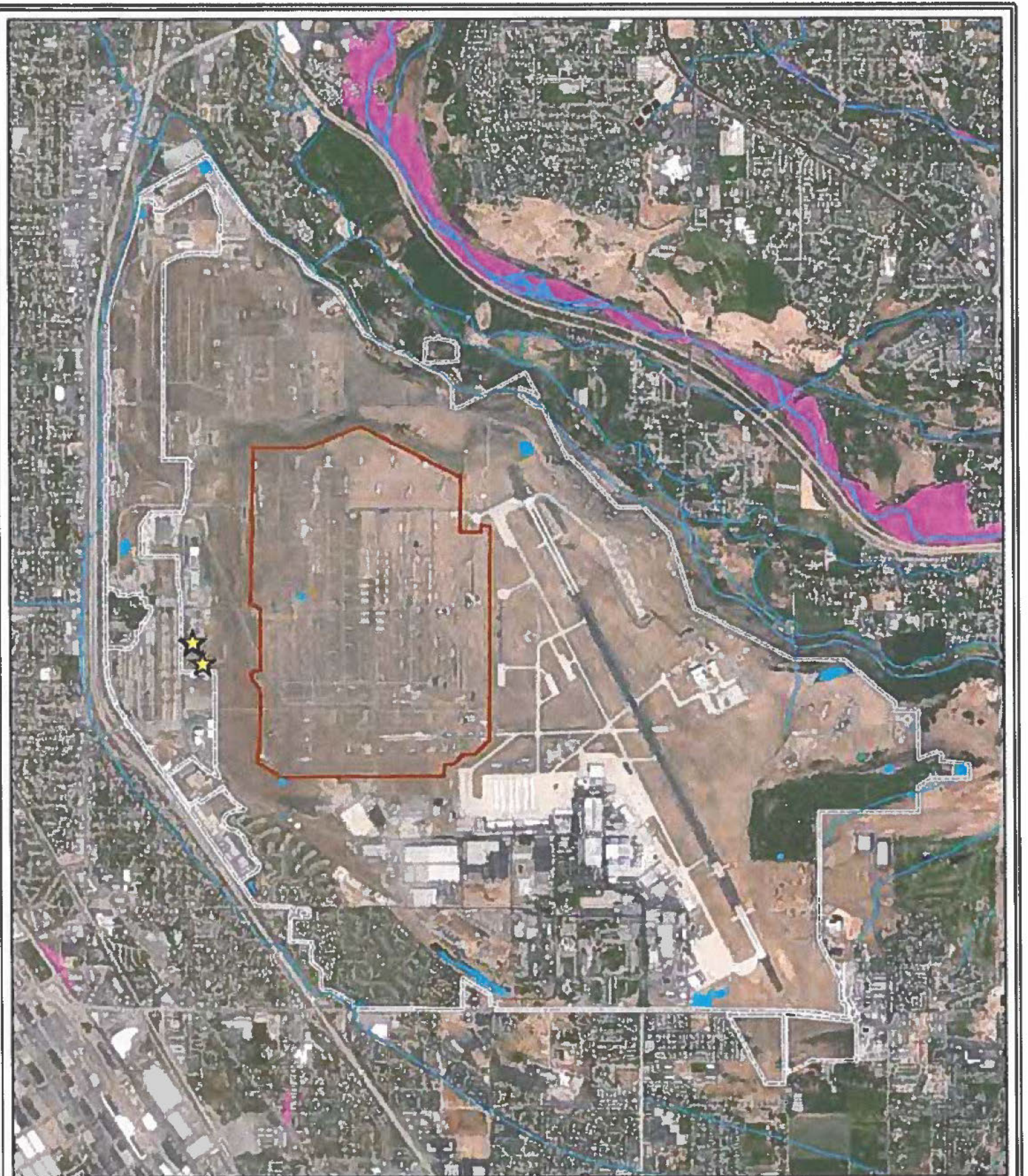
Michael Stanley, U.S. Army Corps of Engineers  
[REDACTED]

Jason Cook, Tetra Tech [REDACTED]



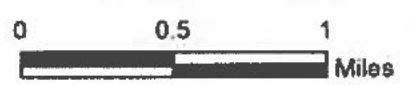
Enclosure 1





**LEGEND**

-  Installation Boundary
-  Munitions Storage Area
-  Proposed Facilities
-  Waterbody
-  100-yr Floodplain
-  NHD Flowline



**Enclosure 2**  
SOURCES AFCEC 2019, FEMA 2020,  
USGS 2019



Karen Potts

I live in one of the areas and I just want to stay informed. I live in town.

## Dan Martin

I have a small gravel pit located on section 12, 3 miles east and 3 miles north of Kimball Nebraska. I believe using local people's resources would help the local economy. I am a small rancher and would like to lease my pit for this project. It is zoned commercial but the county is the main buyer of my gravel.



**From:** [REDACTED]  
**To:** [EEC.gbsdeis](mailto:EEC.gbsdeis)  
**Date:** Friday, July 1, 2022 10:06:01 PM

---

I have a small gravel pit that is zoned commercial. It is located 3 miles east and 3 miles north of Kimball Nebraska on section 12. I believe using local people's resources will help the local people and local economy. I'm a small rancher and would like to lease my gravel pit for this missile projects. The county is my main customer. I'm small time and older and don't have special business numbers of the gravel pit but hope you will take the time to consider my pit and the convenience of my location to several missile sites. Dan Martin [REDACTED]  
[REDACTED]

## Gordon Whirry

I oppose this project and believe it is not a beneficial expenditure of public funds. The ICBM wing is a destabilizing and unnecessary component of our nuclear defense and should be retired.

Larry H. Odegaard



7-14-22

Public Comment:

To Whom it may  
Concern:



I treasure living in this relatively free country, as long as we can keep Biden from screwing it up too badly.

My comment is to ask you to proceed as planned with the GBSD-FCBM weapons systems update.

Thank you for your service  
Larry & Linda Odegaard

THE GREATEST CASUALTY IS BEING FORGOTTEN.

01-446-002251119



7-18-2022

## GBSD EIS Comments:

We know that in reality nuclear missiles are a weapon which cannot be used without destroying the human race. (This makes them obsolete)

Therefore I prefer the no action alternative, or second choice, the reduced action alternative,

Construction activity related to the proposed action will have a negative, disruptive impact upon the local population, water supplies, livestock, wildlife, vehicle traffic, Law Enforcement, and housing availability. There will be increases in dust and major crimes.

Missiles within 50 miles of major population centers (Ex. Great Falls, MT.) should be decommissioned and not replaced.

Because of the Federal budget deficit, This project needs to be cost efficient, or not funded at all. Instead, monies should be spent on defensive missiles (anti-missile missiles) or laser antimissile systems. These are more likely to be useful,

Economic benefits to an area are not a good excuse to build this useless project.

Also citizens in this area do not appreciate being made a prime target for enemy attack!

Sincerely,  
Stephen Mayernik

Privacy Advisory: Providing personal information is voluntary. If you choose to not provide personal information, your comments will be given the same weight and consideration as any other comments submitted. Private addresses provided will be compiled to develop the mailing list for future project information dissemination. Only the names of the individuals making comments and specific comments will be disclosed.

**Draft EIS Comment Form | Comments on the Draft EIS should be submitted by August 15, 2022**

For more information regarding this project or to submit comments electronically visit: <https://www.qbsdeis.com>

Name: KENDALL G. COX and wife Maxim S. Cox  
Organization: Retired Teacher - Developer  
Address: [Redacted]  
Email: [Redacted]

**Affiliation (please check a box):**

- Private citizen
- Nongovernmental organization
- Historic preservation organization
- Native American Tribe member
- Native American Tribe government representative
- Business/commercial organization
- Elected official
- Local government
- State government
- Federal government
- Other: Private Developer of Land

**Please check the box next to the topic area(s) that you have comments/concerns about:**

- Air quality
- Airspace use
- Biological resources
- Cultural resources
- Environmental justice
- Geology and soils
- Hazardous materials and waste
- Health and safety
- Land use
- Noise
- Proposed action and alternatives
- Socioeconomics
- Transportation and traffic
- Utilities and infrastructure
- Visual resources
- Water resources
- Other: Land site for workforce of project.

Comments: I have property which may be suitable for your projects temporary workforce living quarters. If you desire to inquire further, call my phone # which is [Redacted]

# Jon Johnson

What happens when you hit water and tree roots

**Cook, Jason1**

---

**From:** Tom Kotynski [REDACTED]  
**Sent:** Friday, July 22, 2022 7:14 AM  
**To:** EEC.gbsdeis  
**Subject:** i oppose sentinel missiles upgrade

For the record on the Draft EIS on the new Ground Based Sentinel missile upgrade:

I am opposed because this expensive and wasteful system would only further the Great Falls, Montana area as a nuclear sponge in the event of a nuclear war.

The ICBM leg of the nuclear triad is unnecessary. Our air and sea nuclear defenses adequately protect our country. There is plenty of documentation to support this.

Tom Kotynski  
[REDACTED]

Sent from [Mail](#) for Windows





To whom it may concern,

2 Aug 2022

I would like to make the following comments about the proposed Minot Air Force Base USAF Ground Based Strategic Deterrent cable route running from Minot, North Dakota to Velva, North Dakota along US Highway #52.

My first comment concerns the highway flooding that occurs along this stretch of highway from the Mouse (Souris) River. During the 2011 flood, US Hwy #52 was impassable for 10+ days due to river flooding at mile markers 100, 108, and 115. Since that flood, no actions have been taken in the valley region southeast of Minot to mitigate or prevent flooding and road closures from taking place along this section of US Hwy #52. Furthermore, there are numerous tributaries that flow north into the Mouse river from the south side of US Hwy #52. During heavy rains and spring snow melt, these tributaries can turn into fast flowing rivers due to the extreme hilly terrain on the south side of US Hwy #52. Within 3 miles of Sawyer, North Dakota alone there are three FEMA designated flood zones on both the south and north side of US Hwy #52 as can be seen on FEMA Flood Maps 38101C1029D, 38101C1031D and 38101C1033D. I am enclosing a copy of these maps.

My second comment concerns the flowage and ponding easement the City of Sawyer has on my private property [REDACTED], giving me ownership of 135 acres more or less. On 11Feb1999, The City of Sawyer was granted an easement to store and pond water on nearly 12 acres of my property for as long as needed during flood and high water events. The agreement contains no time limit as how long water can be ponded on this piece of property and based on personal observations in the nearly 20 years we have owned this property, nearly every spring we have water ponded due to the controlled flow under US Hwy #52 to prevent flooding to the City of Sawyer. I am enclosing a copy of this Flowage/Ponding agreement with maps.

My third comment concerns the extreme topographical nature of the terrain between milemarkers 109 and 112 on US Hwy #52 in the Sawyer, ND area. This area would be a poor choice to route a cable route due to the steep hills, erosion concerns and inherent safety concerns that come doing digging on said hills. Attempting to repair a cable break in the winter would be difficult at best, given the snow drifting, steep hills, trees and lack of access points from Hwy #52. The north side of US Hwy #52 would be a slightly better option between these milemarkers but still a poor option. I am enclosing a topographical map to better show the difficult terrain in this area.

My fourth and last comment concerns the highly sensitive ecological area in this area of the proposed cable route. Personally, nearly 120 of our 135 acres have never been plowed and is virgin prairie. And there are numerous similar parcels east and west of our property that are very similar. Trenching a cable route through this virgin prairie will disrupt the soil and root systems leading to soil erosion during rain and spring run off events. No amount of caution will prevent soil and environmental damage due to the size and weight of the equipment required to dig a trench 4-8 feet deep and no amount of caution will prevent invasive and noxious weeds from overtaking the disturbed soil areas. Our property has native tall grasses that reach 6 feet tall, Dakota Skipper butterflies, Great Horned Owls, bats and nearly every animal native to North



Dakota. It also contain at least four natural springs on the east side of our property that run year round that I would to see destroyed by digging a trench through them.

I may be personally biased but their are numerous and far better and flatter routes to run a cable then via the proposed US Hwy #52 routing from Minot, ND to Velva, ND. The extreme hills and water issues along this route alone deserve extra scrutiny. Trying to access a hillside cable break in the dead of winter with deep snow drifts could be deadly if a backhoe operator slides on snow or ice and tips over while working on one of these hills.



Tim Folden

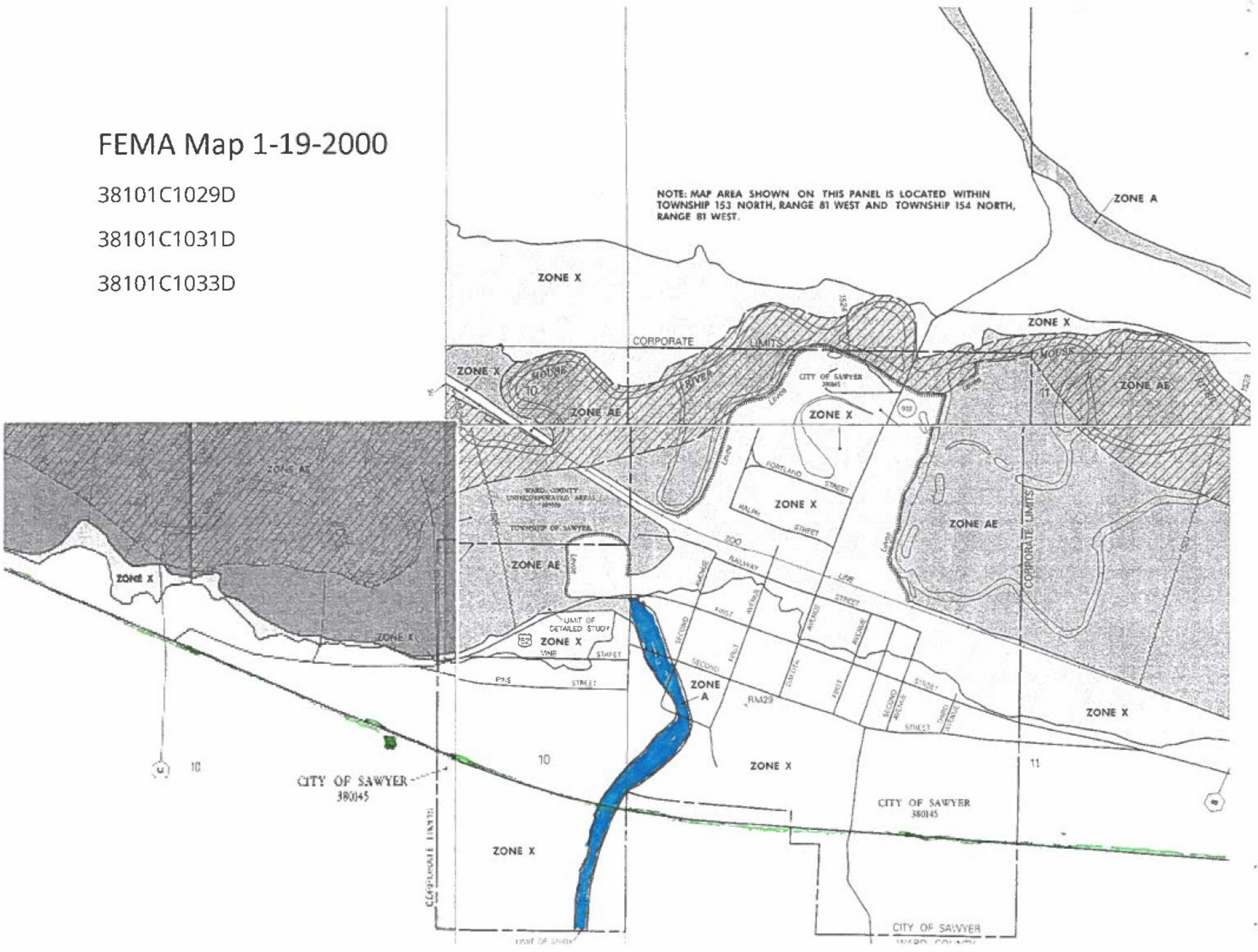


# FEMA Map 1-19-2000

38101C1029D

38101C1031D

38101C1033D





**FLOWAGE EASEMENT**

THIS INDENTURE, made this 11<sup>th</sup> day of February, 1999, by and between Harold Iverson and Lorraine Iverson, husband and wife of Sawyer, North Dakota, party of the first part, and the City of Sawyer, Sawyer, North Dakota, party of the second part, WITNESSETH:

WHEREAS, the first parties are the legal owners of the real estate hereinafter described and desire to grant to the City of Sawyer, its successors and assigns, a flowage easement for the purpose of backing up water behind a proposed controlled release storm water detention facility across the following described property for and in consideration of [REDACTED]:

All that portion of the E½ of the SE¼ of Section 10, Township 153 North, Range 81 West, described as follows:

The East 500 feet of said Section 10 lying southerly and within 1400 feet of the centerline of N.D. State Highway No. 52, excepting all that portion lying within 33 feet of the Section Line and excepting all that portion previously acquired. The tract contains 11.87 acres, more or less, and is shown on the plat attached hereto as Exhibit 1, as a shaded area.

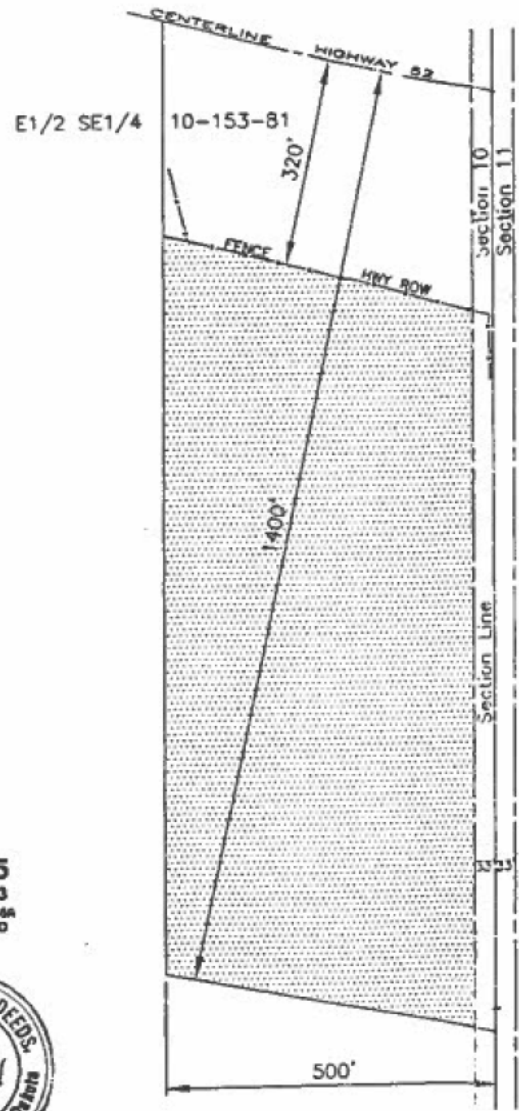
The City of Sawyer, its successors and assigns, shall fully use and enjoy the aforesaid described premises for the purposes hereinabove specified, and to have and to hold said easement rights for perpetuity commencing with effective date of this indenture. This easement is intended for the temporary storage of storm water to prevent flooding in Sawyer.

IN WITNESS WHEREOF, the said parties of the first part have caused these presents to be executed the day and year first above written.

Harold Iverson

Lorraine Iverson

PROJECT NO.	PARCEL	PLAT NO.	SUPPLEMENTS
MILE 1	1	1 OF 1	OF



E1/2 SE1/4 10-153-81  
PARCEL NO. 1 - PONDING EASEMENT

All that portion of the E1/2 of the SE1/4 of Sec. 10, T.153 N., R.81 W, described as follows:  
 The East 500 feet of said Sec. 10 lying Southerly and within 1400 feet of the centerline of N.D. State Highway No. 52, excepting all that portion lying within 33 feet of the Section Line and excepting all that portion previously acquired.  
 Tract contains 11.87 acres more or less and is shown on the plat as shaded area.

2772025  
 Page: 3 of 3  
 02/24/1998 09:46A  
 PRINGLE & HERIGSTA SR 13.00 Ward County, ND

*John H. Dale*



**W**  
 Wold Engineering, P.C.  
 MEMBER  
 CONSULTING ENGINEERS COUNCIL

**BOTTORRAL WOKER DAKOTA**  
 815 East 11th Street  
 P.O. Box 237  
 58518  
**WISOT, WOKER DAKOTA**  
 720 Waterloo Avenue  
 P.O. Box 1813  
 58702  
**BERNARD, WOKER DAKOTA**  
 316 Eastdale Drive  
 P.O. Box 1277  
 58002

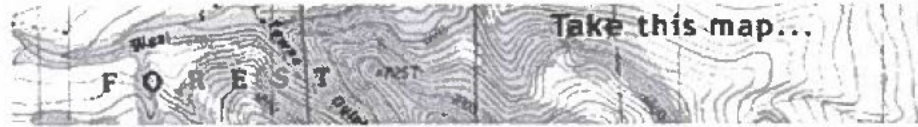
**RIGHT OF WAY PLAT**

PROJECT NO. \_\_\_\_\_  
 WARD \_\_\_\_\_ COUNTY  
 APPROVED *Herbert W. Bargman*  
 SCALE: 1"=200' DATE Sept. 22, 1997





# topozone



VIEW MAPS GET DATA MY TOPOZONE WEB SERVICES ABOUT US HELP!

UTM 14 346306E 5327745N (WGS84/NAD83)

USGS Sawyer Quad

View TopoZone Pro aerial photos, shaded relief, street maps, interactive coordinate display, and elevation

- Map/Photo Info
- Topo Download
- Photo Download

US HWY #52

### USGS Topo Maps

- 1:24K/25K Series
- 1:100K Series
- 1:250K Series

#### Map Size

- Small
- Medium
- Large

#### View Scale

1 : 25,000

Update Map

#### Coordinate Format

UTM

#### Coordinate Datum

WGS84/NAD83

Show target

- Email this map
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- Print this map

GET A CUSTOM PRINT OF THIS MAP



CITY of SAWYER

US HWY #52

FOLDEN PROPERTY IN ORANGE



## Garrett Purdy

MR. PURDY: As a landowner, the new easement, two-mile area as far as wind towers are concerned, it's really hurt the relationship between the landowners and the Air Force as far as our desire to help and assist in any way we have throughout the past as far as opening roads for them when it snows to anything that --letting them know when an airman has left a gate open on a site to every last little detail we've done. It's completely taken away our opportunity at building a revenue source in a hard economic time --

THE REPORTER: I'm sorry. Can you repeat that?

MR. PURDY: What?

THE REPORTER: I just couldn't hear you very well.

LT. COL. KIDD: She just needs you to repeat it.

MR. PURDY: Oh.

LT. COL. KIDD: What part?

THE REPORTER: Just your last sentence or two.

LT. COL. KIDD: You can turn off the fan, if that --

MR. PURDY: As far as the -- as far as our relationship with the Air Force and farmers, as far as every last little thing we've done, as far as opening roads for them, letting the base know when an airman has left the gate open on a missile site, which happens more than it should, to every last little detail we do. Sharing the roads, everything else. We all know these are young kids from town that don't know gravel roads. We tolerate them. Taking our ability to -- at another additional revenue source has completely ruined that relationship. And at 2 nautical miles, the amount of money we're talking on that 5.6 million acres across the whole project, at \$15 an acre is a lot of money across all five states. And it needs to be addressed, because just the tax revenue base for the county at -- it would be roughly \$5 million just in tax base. That affects more than just the landowners, and it just needs to be addressed.

## Gerald Arnold

MR. ARNOLD: Thank you, sir. I'm Gerald Arnold. My brief comment is on the socioeconomic impact. With the goal of the 20 percent local workforce hire, if there was an apprenticeship utilization requirement adopted for the project, I think it would significantly help long-term impacts for those local communities. Due to the size of the projects and the length of the projects or the proposed action, you can give local residents the opportunity to complete a registered apprentice program. And so not only will they have short-term benefits with the jobs that are immediately created, but also gain the skills, certifications, and licenses for a lifelong career in their choice of trade. Thank you.

## Dan Meyer

MR. MEYER: Thank you. Thank you. My name is Dan Meyer. My question is a two-part question. And Matt helped answer some of those. But the local workforce, making sure they have a fair shot at the work, and does the Air Force and the prime contractor have a plan in place to make sure that local established registered apprenticeship programs that are already in place are going to be able to get utilized as needed on this project. That's my comment. Thank you.

## Cathy Barta

MS. BARTA: Hello. My name is Cathy Barta. C-A-T-H-Y, B-A-R-T-A. I'm sorry. This is cutting out.

First of all, I'm in support of the Sentinel program, and I appreciate the opportunity to comment. I actually did read through the EIS, and Section 3.3.1.2.2, Effects from Off-Base Elements of the GBSD Deployment, falls a little short of the mitigation efforts for any of the dirt work that's going to occur off the roads. Right now it just requires washing of the buckets of removing equipment. And we'd respectfully request that any vehicle that leaves established roads gets a washdown to prevent the further spread of noxious weeds.

Also, Figure 3.3-30, the grizzly bear range falls short. Grizzlies have been present in our local area, which was excluded on your map.

Section 6.0, Hazardous Materials and Waste. I was pleased to see in your presentation you addressed asbestos and lead paint, because that was not identified in Section 6.0. I just want to make sure that any of the workers working on decommissioned sites are not exposed to hazardous substances.

So thank you for the opportunity to comment.

## Paul Descheemaeker

LT. COL. KIDD: Thank you, sir. All right. So Mr. Don Kitchenmaster, and then -- and I know he said his name earlier but I'm going to mess it up, Paul Descheemaeker. Is Mr. Kitchenmaster here? And it's possible that I'm misreading this from the thing, so if somebody has a name that you think might look like Kitchenmaster. Okay. We'll circle back on that one too. Is Mr. Descheemaeker here?

MR. DESCHEEMAERKER: I'll give you an "A" for effort.

LT. COL. KIDD: Thank you.

MR. DESCHEEMAERKER: Paul Descheemaeker. P-A-U-L, D-S-H-E-M-A-K-E-R.

LT. COL. KIDD: I'm sorry. We had mics cutting out, and I'm not sure if that's due to where it's located, but if you could respell that.

MR. DESCHEEMAERKER: Paul, P-A-U-L, Descheemaeker, D-E-S-C-H-E-E-M-A-E-K-E-R.

LT. COL. KIDD: Thank you.

MR. DESCHEEMAERKER: Can I move to that other mic?

LT. COL. KIDD: It seems to be working a little better. I'm not sure if that's the issue or not.

MR. DESCHEEMAERKER: I was trying to take advantage of the shade. Thank you for taking our comments today. Before I forget, a gal approached me that spoke earlier, and she forgot to mention something and she asked me to comment on it. And it's on the sites that are being decommissioned. If those could be offered back to the adjacent landowners as a right of first refusal, that would be a great thing for the adjacent landowners.

I've got two things to talk about. One is noxious weeds. I would just like to first say noxious weeds and the potential spread during and after construction of this project, landowners and the community in general need assurance that the Air Force and its contractors will do everything possible to prevent the spread of noxious weeds by being aware of noxious weeds as you pass through, cleaning equipment often, and working with landowners and the county weed boards. If noxious weeds are spread, those effects may not become noticeable until months or years after construction. Again, I urge you to work with landowners and the county weed boards by providing financial assistance to mitigate the spread of noxious weeds.

My second comment deals with the clarification question I asked earlier. And if I understand it right, culverts and gates and that type of infrastructure will exist going forward. And I would just ask that this infrastructure -- again, working with the landowners to maintain this infrastructure in a timely manner. In the last 60 years -- well, of course, the first 20 years it was new, but since then there's been some challenges with fences falling down and not a timely response to getting those fixed. Thank you. That's all I have.

## Jerry Van Haur

MR. VAN HAUR: Thank you for giving us this opportunity. My name is Jerry Van Haur. J-E-R-R-Y, V-A-N, H-A-U-R. My concern is the man camps, if that's how you refer to them. I hope the local communities get some input on the location. I did speak with one of your other cohorts here, and he assured me that it's going to be mostly bus transportation in and out, and so the 2,000, 3,000 people will not be on our local highways, because they can't handle that. We're maxed out now in situations. So hopefully you'll take that into consideration. Thank you.

## Bruce Spencer

MR. SPENCER: Thank you very much. My family has some recreational property in the Monarch, Montana area. And studying the EIS, the maps that were provided, I was unable to determine exact location of the proposed 300-foot communications towers in the area. I did send an email to the address that was listed earlier, and got back that indicated folks from the real estate area will be getting me some specific maps. But I also noticed in the EIS that the description regarding the 300-foot communications towers didn't describe any noise they might make, any, I don't know, microwave transmissions or transmissions at all that may be adverse. It just doesn't contain a lot of information about the 300-foot communications towers. so I would urge more information and analysis on that, if another analysis hasn't already been done. Thank you.

## Logan Davis

LOGAN DAVIS: I'm here.

LT.COL. SHAD KIDD: Would you like to make a comment now?

LOGAN DAVIS: [Unintelligible] I guess I'm actually here as a reporter/journalist, a Native American. I have some history with nuclear warheads and what not. In the military. I've learned quite a bit. I know the dangers that go with the nuclear arms race and changes. I'm here just to [unintelligible] to let them know what this meeting is about. Not too many people heard about it, or choose to come to speak. So, I am here to just kind of record everything that's said. Hopefully other people will come up. I guess the only thing I can say is that the thing that's going to be – disposal. Could you clarify a little bit? It sounds, according to the general earlier – the disposal part – is what I think people are kind of concerned about. What is being disposed? Is it radioactive? Or, what parts of the Minute Man III are being taken apart I guess just the missile part and not the warhead?

LT.COL. SHAD KIDD: As far as that you can definitely talk to one of the experts after legal comment period, but what this part is for us to receive whatever comments and information you have to share. If you have questions or other things like that that would be during –

LOGAN DAVIS >> Okay, I'm just going to come and say that I'm hoping that the Air Force will do their best or use their best judgment to protect the environment. We are being destroyed right now by climate change. We have all these [unintelligible] nuclear waste or what not. Whatever the case may be. I think it's quite obvious some pros and cons with this entire project. My comment is this I'm hoping that my faith in the United States that they will protect the people and every house in the state.



## Sharon White Bear

SHARON WHITE BEAR: Thank you Colonel for giving me time to speak. I grew up here in White Shield. Just south of here. My whole there's little places that have been all around. One of the things I was wondering about when I started hearing this. This is the very first time I heard about this. So, I think that if we can get more opportunities and with our elders, that's another thing that helps if you could go into the communities that are here. Because that's how you do it. They can't all just come here to you. I would like to see that happen to go to the other communities. Get more information out there ahead of time. Have some of you there to explain some of this and then try to get organized so that each area can comment about that. I think that would be something really good. One of the things I thought about as you were talking was how you said there are going to, the other gentleman mentioned like waste, so then I asked the question earlier about how this was going to be done or if it was just going to be a new spot or not. So now I understand that it's not, there's going to be replacement of some of these things and I'm glad it's that because many times no matter what it is, the government wants we always have to move. We always have to get aside. That's what I don't want to see. More of that happening all of the time. That's one of the things I really don't want to wind up. Cultural, the cultural piece of this. I question what happened before. Probably no one in this room can make that statement. But there must be some kind of record that showed why we are going here, or we're going to go over there. There must be something. Did they do any of this kind of logistics and kind of look to see if they affected cultural things and environment there. Maybe the government or state, or city rules weren't there but did they do any of that. I think that they should look at that and see of course, we're talking about underground and I worry about the water and I really want to make sure we hear more about this so that I understand that we have a lot of ground water systems just south of where I grew up. There's a field and there is an old pump. One of the old pumps that you have to pump up and down for water that my uncle had. When that pump was moved away and everything was kind of gone and that old house was – you can just hear that water rushing under there. You can see that and hear that spot. We know that's the big thing here. Water. To protect that. So, when you're going to other areas to really look at those kinds of things. Those are besides you know, all the kinds of hazards that come with that. Health and safety. Those are the two biggest things I can think of right now. If I knew more I might be able to comment on that. But I don't know much more about this. Again, it's just kind of like when the dam came. We didn't know about that. A lot of people didn't know about that. I only know that from my grand folks and stuff and comments I've heard from other people and statements and testimonies. It was just like a done deal. I think that getting the word out more to the people and going right to the people that live around these – you guys are all from different states. Any of you from North Dakota that you live right here? Any of you gentlemen? From right here, that live right here? Well, that's what I say is that you know, you got to do your things and I appreciate all of your service. But then you get to go home from where you're from. You don't have to live in this. Thanks for giving us the opportunity to see what's there. Thank you.

## Jerry Ruth Birds Bill Ford

JERRY RUTH BIRDS BILL FORD: My name is Jerry Ruth Birds Bill Ford and I'm from this reservation and my family has lived here for hundreds of years. I would just like to say thank the military for coming. I'm married to a retiree military. My daughter is an active duty JAG and we always knew there were these silos around the reservation but no one ever came and talked to us about it. Our daughter, who is in Hawaii at the time, came on TDY with a contingent from the Minot Air Force Base about four or five years ago and they met, but not with the Tribal Council or anybody really important. They were assigned to a lower level group of people and they showed them around and learned as much as they could. Would I would like to suggest to the Air Force, that they develop a permanent partnership with the Tribal Council itself and the representatives of a higher level. Because her visit was sort of lost in the noise. Nothing really came of it and no one still knew what was going on. It barely even made the papers. So, what we need is more of a handshake with the military so we know exactly what your doing. We appreciate this. This is a very first step but I think we need to go a lot further in the future. That's it.

**Draft EIS Comment Form | Comments on the Draft EIS should be submitted by August 15, 2022**

For more information regarding this project or to submit comments electronically visit: <https://www.qbsdeis.com>

Name:

Sarah Orms

Organization:

private citizen

Address:

Email:

**Affiliation (please check a box):**

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Private citizen                      | <input type="checkbox"/> Elected official   |
| <input type="checkbox"/> Nongovernmental organization                    | <input type="checkbox"/> Local government   |
| <input type="checkbox"/> Historic preservation organization              | <input type="checkbox"/> State government   |
| <input type="checkbox"/> Native American Tribe member                    | <input type="checkbox"/> Federal government |
| <input type="checkbox"/> Native American Tribe government representative | <input type="checkbox"/> Other: _____       |
| <input type="checkbox"/> Business/commercial organization                | _____                                       |

**Please check the box next to the topic area(s) that you have comments/concerns about:**

- |   |  |
|---|--|
| <input type="checkbox"/> Air quality                              | <input type="checkbox"/> Noise                                       |
| <input type="checkbox"/> Airspace use                             | <input checked="" type="checkbox"/> Proposed action and alternatives |
| <input type="checkbox"/> Biological resources                     | <input type="checkbox"/> Socioeconomics                              |
| <input type="checkbox"/> Cultural resources                       | <input type="checkbox"/> Transportation and traffic                  |
| <input type="checkbox"/> Environmental justice                    | <input type="checkbox"/> Utilities and infrastructure                |
| <input type="checkbox"/> Geology and soils                        | <input checked="" type="checkbox"/> Visual resources                 |
| <input checked="" type="checkbox"/> Hazardous materials and waste | <input type="checkbox"/> Water resources                             |
| <input type="checkbox"/> Health and safety                        | <input type="checkbox"/> Other: _____                                |
| <input checked="" type="checkbox"/> Land use                      | _____  |

**Comments:**

Hello,

Our property is located on [REDACTED] near an existing missile site. I'm wondering what, if any, activity will be happening at that site? It's near a reservoir recreation area, and I'm concerned about potential visual impacts.

I'd also like to know where there are new communication towers planned, can you please send me a map of these?

Lewistown is a small community with limited infrastructure to support an influx of workers like this. Great Falls is much more equipped to handle the increase in population.

Thank you,

Sarah Orms



August 10, 2022

Howard N Kosht, GS-15, DAF  
Reply to: GBSD Project EIS  
10306 Eaton Place, Suite 340  
Fairfax, VA 22030

Executive Director Kosht,

Thank you for the opportunity for the State of Wyoming to comment on the Draft Environmental Impact Statement (DEIS) for the Ground Based Strategic Deterrent Deployment and Minuteman III Decommissioning and Disposal.

Wyoming is proud to be home to F.E. Warren Air Force base and values the contributions it makes to our state. The Ground Based Strategic Deterrent Deployment and Minuteman III Decommission and Disposal is very important to our Air Force Base, State, and citizens. The on and off base construction and operation activities will be vital to our economy.

The State of Wyoming is committed to this critical project and we are willing to address potential issues for the smooth and efficient development of this project. The State of Wyoming supports either the Proposed Action or the implementation of the Reduced Utility Corridor.

Attached you will find comments from the State of Wyoming. In an effort to be as helpful and clear as possible, some comments include suggested language changes. There are also a number of general comments that apply to either an entire resource section of the DEIS or the DEIS as a whole. Please review the comments provided by Wyoming state agencies closely, and please contact us if you have any questions or need further clarification. If you have any questions please contact Erica Legerski in my office at [REDACTED]. On behalf of our state cooperating agencies, we would welcome the opportunity to discuss the potential agency preferred alternative.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark Gordon", is written over the word "Sincerely,".

Mark Gordon  
Governor

cc: The Adjutant General, Gregory C. Porter, MG, WY NG



Air Force's Draft EIS for the Ground Based Strategic Deterrent Deployment and Minuteman III Decommissioning and Disposal - August 2022							
Commenter	Document	Section	Page #	Component #	2022 EIS Language	Cooperator Recommended Language	Cooperator Explanation of Recommended Language
WYDOT	DEIS			General Comment			All work within the WYDOT right-of-way will require permitting.
WYDOT	DEIS			General Comment			All Highway crossings will require a utility license, M-54 and have certain requirements.
WYDOT	DEIS			General Comment			Any operation/maintenance of roads will need access permits.
WYDOT	DEIS			General Comment			Disturbed areas will need to be restored to original conditions within the right-of-way.
WYDOT	DEIS			General Comment			Traffic control as per the Manual on Uniform Traffic Control Devices for streets and highways.
WYDOT	DEIS			General Comment			Provide a traffic control plan for component deliveries with input from WYDOT, Wyoming Highway Patrol, and local law enforcement.
WYDOT	DEIS			General Comment			Detailed plans for OWL turnarounds/closures at interchanges, intersections, or median crossovers. Reference WYDOT standard plan for Planned Event Turnaround.
WYDOT	DEIS			General Comment			Provide operational analysis/design for major intersections or interchanges affected and identify temporary improvements/changes to accommodate OWL's.
WYDOT	DEIS			General Comment			All OWL hauling companies MUST have proper experience and certifications.
WYDOT	DEIS			General Comment			Any modifications to I-80 Interchange ramps will require a submittal to FHWA for approval.

Air Force's Draft EIS for the Ground Based Strategic Deterrent Deployment and Minuteman III Decommissioning and Disposal - August 2022							
Commenter	Document	Section	Page #	Component #	2022 EIS Language	Cooperator Recommended Language	Cooperator Explanation of Recommended Language
WYDOT	DEIS			General Comment			Ensure WYDOT right-of-way markers are not disturbed.
WYDOT	DEIS			General Comment			Any incoming or outgoing utilities within the WYDOT ROW will need to be licensed through the District Maintenance Office.
WDA	DEIS		3-62	General Comment	At Camp Guernsey, construction would occur within a small portion of the Cantonment Area and South Training Area (STA).		Camp Guernsey is unique and incorporates a leased livestock grazing program. Livestock grazing on Camp Guernsey benefits local livestock producers, but also benefits Camp Guernsey as grazing is used as a vegetation management tool to reduce wildfire in the surrounding areas. WDA supports the DEIS to acknowledge and include livestock grazing under the vegetation resources section for Camp Guernsey and FE Warren, Chapter 3, Effected Environment. It remains unclear from the DEIS if livestock grazing pastures or the permittees would be impacted from the range of alternatives. We believe it is imperative to ensure current livestock grazing lessees are notified of this project and provide them the opportunity to comment based on concise and clear information. Finally, we are unaware if livestock grazing occurs in other areas managed by FE Warren. If livestock grazing does occur, in areas where vegetation is removed due to construction, we believe the DEIS must address this as a direct impact.
WDA	DEIS		3-72	Table 3.34			The Table 3.34 neglects to include Wyoming, only Nebraska and Colorado for any wildlife, plant, or insect. While Colorado Butterfly Plant is delisted from the USFWS, the plant does occur and is monitored on FE Warren property. See map on page 3 - 94 and 3 - 111. We recommend the DEIS modify the table to include Wyoming and the Colorado Butterfly Plant.
WSGS	DEIS						The project sites are located in areas of generally low geologic hazards (far from known active faults, light to moderate ground shaking hazard according to USGS NSHM 2% in 50 years exceedance levels, no mapped landslides, no known expansive soils, etc). As long as the applicant and contractors avoid obviously unstable locations like cliff escarpments (e.g. Pine Bluffs), active floodplains, and dune fields, there should not be any geologic hazard-related issues with the construction.
WSGS	DEIS						Some roads and utility corridors will cross active floodplains - mitigation for this is adequately discussed in the EIS.

Air Force's Draft EIS for the Ground Based Strategic Deterrent Deployment and Minuteman III Decommissioning and Disposal - August 2022							
Commenter	Document	Section	Page #	Component #	2022 EIS Language	Cooperator Recommended Language	Cooperator Explanation of Recommended Language
WSGS	DEIS		455				On page 455 of the PDF (numbered 3-319 in the EIS), there is a sentence that says "The State of Wyoming does not regulate the collection or removal of fossils on state or private lands." the state DOES regulate collection and removal on state lands (overseen by State Lands).
WSEO	V.1.DEIS	3.15.1.1	641 - 690	General Comment		Additional language to 3.15.1.1 following pgr.1 : Article 8. Section I of the Wyoming Constitution states "The water of all natural streams, springs, lakes or other collections of still water, within the boundaries of the state, are hereby declared to be the property of the state." Therefore, any impoundments or diversion of waters of the State will require proper permitting. The Wyoming State Engineer's Office will be coordinated with as to specific plans for alterations or diversions from groundwater and from or to surface water sources in the State of Wyoming prior to commencing work.	After review of the document as a whole there is no mention of quantities or permitting beneficial uses of water. Throughout 3.15 there is language that reflects having waters trucked in for construction purposes but without details of where that water will be trucked in from, e.g. 3-652, 3-656, 3-664, 3-669. The state of Wyoming requires a permit for any Temporary Water Hauls that incorporate construction projects along side of any other diversion of surface or groundwater.
WSEO	V.1.DEIS	3.3	3-53	General Comment	Regarding description of relevant statutes and regulations	Platte River Recovery Implementation Program (PRRIP) description and addition of acronym to list	PRRIP is an important regulatory program in the Platte River drainage which numerous of the LF's, MAF's, Cheyenne, and Camp Guernsey are part of.
WSEO	V.1.DEIS	3.15.1.2	3-651	General Comment	Groundwater in Wyoming is classified as Groundwater of the State	Surface and groundwater in Wyoming are classified as Waters of the State	Repetitive inclusion of statements including both the surface and groundwater status in Wyoming is valuable
WSEO	V.1.DEIS	3.15.1.2	3-651	General Comment	Additional language to follow "Wyo. Stat. § 35-11-302 (Air Force 2013b).	Title 41-3-308 (d) The state engineer shall provide for the regulation and supervision of all dams, diversion systems and reservoirs by the state to the extent required to protect the public safety and property. The state engineer is authorized and directed to promulgate regulations and standards for the design, construction, enlargement, alteration, abandonment, maintenance, monitoring, operation, repair and removal of dams, reservoirs, and diversion systems as are necessary and proper to carry out the purposes of this act.	Describing the contact, relationship and involvement of the Safety of Dams (SOD) Division at the Wyoming State Engineer's Office is valuable in the event there is issue with any impoundments falling within the guidelines of SOD in Wyoming.
WSEO	V.2.DEIS	Stakeholder Mailing List	7	Correction	Stakeholder Mailing List	The Stakeholder Mailing list needs to be updated as many position holders have changed. Noted inaccuracies: Brandon Gebhart is now the Wyoming State Engineer, formerly WWDO Director, please add the State Engineer's Office to the Mailing List. The WWDO Interim Director is Jason Mead, subject to change before the final version of the EIS, please check back.	Addressing discrepancies in the document

## Daniel Marriott

I am a landowner near Lewistown, MT and currently have a launch facility located on my land. We'd prefer not to see an expansion (new easements, new utility corridors, communication tower etc) on our land as we are in the process of converting the land into a small farm and building our homestead prior to relocating there permanently. Additionally, our land has multiple legacy coal mines and disturbing these would likely cause a significant amount of environmental issues to the local area. Instead, we would like to see the "No Action Alternative". We will need all of our acreage to establish a farm that is productive enough to support our family.

Thank you!



## Bruce Marsden

When I read in the News Argus, and in reading through the eis, about the proposed missile project I will have to say my concern level increased dramatically. The negative impact to the cultural, educational, recreational, health care, and law enforcement resources on Central Montana, in my mind, far outweighs any positive economic benefit this project may impose upon us. And the economic benefit is questionable (Montana has a long, dark history of boom/ bust cycles).

This project also begs the question; how much ability to blow up the world many times over is deterrent enough?

Lewistown is a hidden gem. A wonderful, healthy place to recreate, work and raise a family. The opportunity to pursue recreational activities in a pristine, uncrowded environment abound. Although not economically prosperous, a hard working person can easily find meaningful employment which allows them to live comfortably and raise a family while enjoying the beauty all around. Where else in this country can one leave their car running in the grocery store parking lot on a sub zero evening and be assured it will be waiting and warm when you are done shopping? Where else in this country can you leave your door unlocked and not worry about a break in? Where else in this country can you go to a local camping site, fishing stream, hiking trail, etc on a weekend and still find open and uncrowded spaces? One would be hard pressed to find such a place. All of this will be lost if this project goes through.

The place I have called home for almost 40 years, the place where my wife and I raised our children, pursued our careers, entertained company who could not believe we lived in such a paradise, and plan to spend our remaining years will be forever changed in a negative way. All we have come to enjoy and appreciate will be negatively impacted, or worse, gone forever.

If this new system is so important to our security why are you so willing to sacrifice this remote part of America? Why not place these missiles in, say, Fairfax, VA. Or outside New York City. Or any multitude of populated places these missiles are meant to protect? You know why; instead of a couple of hundred voices rising up in opposition there would be millions. So we hide our projects in far, unseen corners of America where the populace will not see them. The far, unseen corner of America we in Central Montana call home.

We are tired of being sacrificed. We say NO to this project.

## DENNIS ARMSTRONG

Comments based upon 4.2.2 wind energy development in draft EIS. the language of this section talks about mitigation measures that would be developed during proposed project review by DoD clearing house as it relates to the 2 NM easement being sought around each MAF and LF. Of the proposed 150 or more turbines within the F.E. Warren AFB missile field, land area that would be impacted and restricted would be in the range of 1,173,150 acres of land. the number is based upon calculation of land area within the 2 NM area surrounding the LF minus the land area within the current 1,750 foot radius easement for each LF. the magnitude of land area that is impacted and potential of significant economic impacts and loss of a revenue stream should be evaluated and presented in the EIS with a discussion of how mitigation of this loss would be accounted for landowners within the 2 NM easement around LF. this would also apply to the MAF facilities as well. Finally, this should also address the Minot and Malstrom AFB for any proposed wind trubines as well. The Air Force has stated that preparation of ICEMAPS have been prepared for evaluation of the wind farm development and that information should be made available for public access and review.

## Stanley Holmes

Please accept this DEIS comment stating my opposition to development and deployment of the nuclear Ground Based Strategic Deterrent (aka. Sentinel) ICBMs as a replacement for the Minuteman III ICBM nuclear missiles. The GBSD/Sentinel program should be halted for several reasons. The DEIS fails to address important shortcoming of the proposed GBSD/Sentinel plan and the ways in which this program's implementation could pose an existential threat to the United States of America and its people. The GBSD/Sentinel program warrants a No Action Alternative. GBSD/Sentinel is ill-advised from a national strategic standpoint, since ICBMs are the most vulnerable leg of the strategic triad and the most tempting targets of an adversary. This program would perpetuate this vulnerability.

GBSD/Sentinel is ill-advised from both international and national security standpoints, because it represents an abrogation of U.S. commitment under Article VI of the 1968 Treaty on the Non-Proliferation of Nuclear Weapons (NPT) and may be seen in some quarters as justification for non-nuclear weapons signatory states to similarly abrogate the treaty and acquire nuclear weapons that could be used against the United States homeland and national interests abroad. [NPT copied below]

The DEIS for the proposed GBSD deployment and Minuteman III decommissioning/disposal fails to identify potential effects on the human and natural environments should deterrence fail and a deployed GBSD/Sentinel precipitate a nuclear attack on the United States. What would be the range of damages from such an attack on the U.S.? And should the GBSD/Sentinel be used against foreign entities, what would be the extent of both global and national impacts of the limited or full nuclear weapons exchange(s) that might ensue.

The DEIS fails to in any meaningful way address the fact that GBSD/Sentinel would be a weapons system of mass destruction that would cause catastrophic damages on an unprecedented scale if the lethality of its development and construction were ever utilized as a weapons system in nuclear combat.

In the nation's best interests, a No Action Alternative makes the best sense as regards GBSD/Sentinel.

/s/ Stanley T. Holmes

Treaty on the Non-Proliferation of Nuclear Weapons (NPT)

Text of the Treaty

The States concluding this Treaty, hereinafter referred to as the Parties to the Treaty,  
Considering the devastation that would be visited upon all mankind by a nuclear war and the consequent need to make every effort to avert the danger of such a war and to take measures to safeguard the security of peoples,

Believing that the proliferation of nuclear weapons would seriously enhance the danger of nuclear war,

In conformity with resolutions of the United Nations General Assembly calling for the conclusion of an agreement on the prevention of wider dissemination of nuclear weapons,

Undertaking to co-operate in facilitating the application of International Atomic Energy Agency

safeguards on peaceful nuclear activities,

Expressing their support for research, development and other efforts to further the application, within the framework of the International Atomic Energy Agency safeguards system, of the principle of safeguarding effectively the flow of source and special fissionable materials by use of instruments and other techniques at certain strategic points,

Affirming the principle that the benefits of peaceful applications of nuclear technology, including any technological by-products which may be derived by nuclear-weapon States from the development of nuclear explosive devices, should be available for peaceful purposes to all Parties to the Treaty, whether nuclear-weapon or non-nuclear-weapon States,

Convinced that, in furtherance of this principle, all Parties to the Treaty are entitled to participate in the fullest possible exchange of scientific information for, and to contribute alone or in co-operation with other States to, the further development of the applications of atomic energy for peaceful purposes,

Declaring their intention to achieve at the earliest possible date the cessation of the nuclear arms race and to undertake effective measures in the direction of nuclear disarmament,

Urging the co-operation of all States in the attainment of this objective,

Recalling the determination expressed by the Parties to the 1963 Treaty banning nuclear weapons tests in the atmosphere, in outer space and under water in its Preamble to seek to achieve the discontinuance of all test explosions of nuclear weapons for all time and to continue negotiations to this end,

Desiring to further the easing of international tension and the strengthening of trust between States in order to facilitate the cessation of the manufacture of nuclear weapons, the liquidation of all their existing stockpiles, and the elimination from national arsenals of nuclear weapons and the means of their delivery pursuant to a Treaty on general and complete disarmament under strict and effective international control,

Recalling that, in accordance with the Charter of the United Nations, States must refrain in their international relations from the threat or use of force against the territorial integrity or political independence of any State, or in any other manner inconsistent with the Purposes of the United Nations, and that the establishment and maintenance of international peace and security are to be promoted with the least diversion for armaments of the world's human and economic resources,

Have agreed as follows:

#### Article I

Each nuclear-weapon State Party to the Treaty undertakes not to transfer to any recipient whatsoever nuclear weapons or other nuclear explosive devices or control over such weapons or explosive devices directly, or indirectly; and not in any way to assist, encourage, or induce any non-nuclear-weapon State to manufacture or otherwise acquire nuclear weapons or other nuclear explosive devices, or control over such weapons or explosive devices.

#### Article II

Each non-nuclear-weapon State Party to the Treaty undertakes not to receive the transfer from any transferor whatsoever of nuclear weapons or other nuclear explosive devices or of control over such weapons or explosive devices directly, or indirectly; not to manufacture or otherwise acquire nuclear weapons or other nuclear explosive devices; and not to seek or receive any assistance in the manufacture of nuclear weapons or other nuclear explosive devices.

#### Article III

1. Each non-nuclear-weapon State Party to the Treaty undertakes to accept safeguards, as set forth in an agreement to be negotiated and

concluded with the International Atomic Energy Agency in accordance with the Statute of the International Atomic Energy Agency and the Agency's safeguards system, for the exclusive purpose of verification of the fulfilment of its obligations assumed under this Treaty with a view to preventing diversion of nuclear energy from peaceful uses to nuclear weapons or other nuclear explosive devices. Procedures for the safeguards required by this Article shall be followed with respect to source or special fissionable material whether it is being produced, processed or used in any principal nuclear facility or is outside any such facility. The safeguards required by this Article shall be applied on all source or special fissionable material in all peaceful nuclear activities within the territory of such State, under its jurisdiction, or carried out under its control anywhere.

2. Each State Party to the Treaty undertakes not to provide: (a) source or special fissionable material, or (b) equipment or material especially designed or prepared for the processing, use or production of special fissionable material, to any non-nuclear-weapon State for peaceful purposes, unless the source or special fissionable material shall be subject to the safeguards required by this Article.

3. The safeguards required by this Article shall be implemented in a manner designed to comply with Article IV of this Treaty, and to avoid hampering the economic or technological development of the Parties or international co-operation in the field of peaceful nuclear activities, including the international exchange of nuclear material and equipment for the processing, use or production of nuclear material for peaceful purposes in accordance with the provisions of this Article and the principle of safeguarding set forth in the Preamble of the Treaty.

4. Non-nuclear-weapon States Party to the Treaty shall conclude agreements with the International Atomic Energy Agency to meet the requirements of this Article either individually or together with other States in accordance with the Statute of the International Atomic Energy Agency. Negotiation of such agreements shall commence within 180 days from the original entry into force of this Treaty. For States depositing their instruments of ratification or accession after the 180-day period, negotiation of such agreements shall commence not later than the date of such deposit. Such agreements shall enter into force not later than eighteen months after the date of initiation of negotiations.

#### Article IV

1. Nothing in this Treaty shall be interpreted as affecting the inalienable right of all the Parties to the Treaty to develop research, production and use of nuclear energy for peaceful purposes without discrimination and in conformity with Articles I and II of this Treaty.

2. All the Parties to the Treaty undertake to facilitate, and have the right to participate in, the fullest possible exchange of equipment, materials and scientific and technological information for the peaceful uses of nuclear energy. Parties to the Treaty in a position to do so shall also co-operate in contributing alone or together with other States or international organizations to the further development of the applications of nuclear energy for peaceful purposes, especially in the territories of non-nuclear-weapon States Party to the Treaty, with due consideration for the needs of the developing areas of the world.

#### Article V

Each Party to the Treaty undertakes to take appropriate measures to ensure that, in accordance with this Treaty, under appropriate international observation and through appropriate international procedures, potential benefits from any peaceful applications of nuclear explosions will be made available to non-nuclear-weapon States Party to the Treaty on a non-discriminatory basis and that the charge to such Parties for the explosive devices used will be as low as possible and exclude any charge for research and development. Non-nuclear-weapon States Party to the Treaty shall be able

to obtain such benefits, pursuant to a special international agreement or agreements, through an appropriate international body with adequate representation of non-nuclear-weapon States. Negotiations on this subject shall commence as soon as possible after the Treaty enters into force. Non-nuclear-weapon States Party to the Treaty so desiring may also obtain such benefits pursuant to bilateral agreements.

#### Article VI

Each of the Parties to the Treaty undertakes to pursue negotiations in good faith on effective measures relating to cessation of the nuclear arms race at an early date and to nuclear disarmament, and on a treaty on general and complete disarmament under strict and effective international control.

#### Article VII

Nothing in this Treaty affects the right of any group of States to conclude regional treaties in order to assure the total absence of nuclear weapons in their respective territories.

#### Article VIII

1. Any Party to the Treaty may propose amendments to this Treaty. The text of any proposed amendment shall be submitted to the Depositary Governments which shall circulate it to all Parties to the Treaty. Thereupon, if requested to do so by one-third or more of the Parties to the Treaty, the Depositary Governments shall convene a conference, to which they shall invite all the Parties to the Treaty, to consider such an amendment.

2. Any amendment to this Treaty must be approved by a majority of the votes of all the Parties to the Treaty, including the votes of all nuclear-weapon States Party to the Treaty and all other Parties which, on the date the amendment is circulated, are members of the Board of Governors of the International Atomic Energy Agency. The amendment shall enter into force for each Party that deposits its instrument of ratification of the amendment upon the deposit of such instruments of ratification by a majority of all the Parties, including the instruments of ratification of all nuclear-weapon States Party to the Treaty and all other Parties which, on the date the amendment is circulated, are members of the Board

of Governors of the International Atomic Energy Agency. Thereafter, it shall enter into force for any other Party upon the deposit of its instrument of ratification of the amendment.

3. Five years after the entry into force of this Treaty, a conference of Parties to the Treaty shall be held in Geneva, Switzerland, in order to review the operation of this Treaty with a view to assuring that the purposes of the Preamble and the provisions of the Treaty are being realised. At intervals of five years thereafter, a majority of the Parties to the Treaty may obtain, by submitting a proposal to this effect to the Depositary Governments, the convening of further conferences with the same objective of reviewing the operation of the Treaty.

#### Article IX

1. This Treaty shall be open to all States for signature. Any State which does not sign the Treaty before its entry into force in accordance with paragraph 3 of this Article may accede to it at any time.

2. This Treaty shall be subject to ratification by signatory States. Instruments of ratification and instruments of accession shall be deposited with the Governments of the United Kingdom of Great Britain and Northern Ireland, the Union of Soviet Socialist Republics and the United States of America, which are hereby designated the Depositary Governments.

3. This Treaty shall enter into force after its ratification by the States, the Governments of which are designated Depositaries of the Treaty, and forty other States signatory to this Treaty and the deposit of their instruments of ratification. For the purposes of this Treaty, a nuclear-weapon State is one which has manufactured and exploded a nuclear weapon or other nuclear explosive device prior to 1 January 1967.

4. For States whose instruments of ratification or accession are deposited subsequent to the entry into force of this Treaty, it shall enter into force on the date of the deposit of their instruments of ratification or accession.

5. The Depositary Governments shall promptly inform all signatory and acceding States of the date of each signature, the date of deposit of each instrument of ratification or of accession, the date of the entry into force of this Treaty, and the date of receipt of any requests for convening a conference or other notices.

6. This Treaty shall be registered by the Depositary Governments pursuant to Article 102 of the Charter of the United Nations.

#### Article X

1. Each Party shall in exercising its national sovereignty have the right to withdraw from the Treaty if it decides that extraordinary events, related to the subject matter of this Treaty, have jeopardized the supreme interests of its country. It shall give notice of such withdrawal to all other parties to the Treaty and to the United Nations Security Council three months in advance. Such notice shall include a statement of the extraordinary events it regards as having jeopardized its supreme interests.

2. Twenty-five years after the entry into force of the Treaty, a conference shall be convened to decide whether the Treaty shall continue in force indefinitely, or shall be extended for an additional fixed period or periods. This decision shall be taken by a majority of the Parties to the Treaty. 1

#### Article XI

This Treaty, the English, Russian, French, Spanish and Chinese texts of which are equally authentic, shall be deposited in the archives of the Depositary Governments. Duly certified copies of this Treaty shall be transmitted by the Depositary Governments to the Governments of the signatory and acceding States.

IN WITNESS WHEREOF the undersigned, duly authorized, have signed this Treaty.

DONE in triplicate, at the cities of London, Moscow and Washington, the first day of July, one thousand nine hundred and sixty-eight.

Note:

On 11 May 1995, in accordance with article X, paragraph 2, the Review and Extension Conference of the Parties to the Treaty on the Non-Proliferation of Nuclear Weapons decided that the Treaty should continue in force indefinitely (see decision 3).

**From:** [REDACTED]  
**To:** [EEC.gbsd@hqs.mil](mailto:EEC.gbsd@hqs.mil)  
**Subject:** Comments on GBSD Project His  
**Date:** Monday, August 15, 2022 11:23:16 PM

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## Comments on the **USAF Draft DEIS for proposed GBSD Deployment and Minuteman III Decommissioning and Disposal**

If it was still the 1950's, I could support this venture. But given it is the 21st Century where the United States has sufficient and sophisticated global 24/7 **mobile** nuclear deterrents in the air (aircraft) and under the oceans (submarines), I feel continuing to have **stationary** nuclear deterrents is an unnecessary risk to specific populations and land masses in the American west and upper mid-west.

A quick google search indicates the relative locations of many of these missile site locations .... with nuclear weapons, exact locations are not required for an aggressor's actions (accidental or intentional) to be catastrophic.

So why are we willing to continue maintaining **stationary**, ground base deterrents which threatens specific land base areas and human populations from potential aggressor actions, while we have enough **mobile** nuclear weaponry to silence the globe several times over?

I support, over a strategized time period, the complete decommissioning of **ALL** land base nuclear deterrents.

Let's spend the tax payer's dollars for this proposal to arrest climate change .... the other existential threat to humanity already in motion, and only to get worse.

Thank you for the opportunity to comment.

With sincerity and a solid dose of sanity,

Rick Kerr [REDACTED]



**Draft EIS Comment Form | Comments on the Draft EIS should be submitted by August 15, 2022**

For more information regarding this project or to submit comments electronically visit: <https://www.qbsdeis.com>

Name: Anton P (Tony) Jaska

Organization: \_\_\_\_\_

Address: \_\_\_\_\_

Email: \_\_\_\_\_

**Affiliation (please check a box):**

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Private citizen                      | <input type="checkbox"/> Elected official   |
| <input type="checkbox"/> Nongovernmental organization                    | <input type="checkbox"/> Local government   |
| <input type="checkbox"/> Historic preservation organization              | <input type="checkbox"/> State government   |
| <input type="checkbox"/> Native American Tribe member                    | <input type="checkbox"/> Federal government |
| <input type="checkbox"/> Native American Tribe government representative | <input type="checkbox"/> Other: _____       |
| <input type="checkbox"/> Business/commercial organization                | _____                                       |

**Please check the box next to the topic area(s) that you have comments/concerns about:**

- |  |  |
|--|--|
| <input type="checkbox"/> Air quality                   | <input type="checkbox"/> Noise                                 |
| <input type="checkbox"/> Airspace use                  | <input type="checkbox"/> Proposed action and alternatives      |
| <input type="checkbox"/> Biological resources          | <input type="checkbox"/> Socioeconomics                        |
| <input type="checkbox"/> Cultural resources            | <input checked="" type="checkbox"/> Transportation and traffic |
| <input type="checkbox"/> Environmental justice         | <input type="checkbox"/> Utilities and infrastructure          |
| <input checked="" type="checkbox"/> Geology and soils  | <input type="checkbox"/> Visual resources                      |
| <input type="checkbox"/> Hazardous materials and waste | <input type="checkbox"/> Water resources                       |
| <input checked="" type="checkbox"/> Health and safety  | <input type="checkbox"/> Other: _____                          |
| <input type="checkbox"/> Land use                      | _____  |

**Comments:**

1) My first concern is about the traffic that will be on the county roads. Ag equipment is frequently on these roads with no flag vehicle to alert oncoming traffic over hills. This is customary even with equipment that is 16'-20' ~~foot~~ transport width.

2) I am also concerned with the erosion that comes off missile sites. We are currently having problems on an existing site, (0-3) and I would like to see the potential problems addressed in the new construction.

**From:** [REDACTED]  
**To:** [EEC.qbsdeis](mailto:EEC.qbsdeis)  
**Subject:** Potential impacts on human and environments with proposed changes to missiles in our area  
**Date:** Friday, August 26, 2022 5:41:24 PM  
**Attachments:** [SAVE OUR LAND AIR FORCE ISSUE done2.docx](#)

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Hello,

We have received a letter from James Hunsicker concerning looking at land to use to build infrastructure for the new missile system. I have attached a letter addressing the impact to our Family Homesteaded Farm.

Please let me know if you have any questions that would be helpful in your planning decisions.

We are a 4th generation farm on this ground. This ground is sacred to us. From 9/1909 it has seen births, weddings, and deaths. The history and the hardships to save it have been costly, but we have persevered.

There are other alternatives where there aren't the human and environmental concerns 1 mile east or 1 mile west. Please look into that for us. Thank you for the consideration of this important matter.

Sincerely,  
Rick and Earlene

8/26/2022

Tetra Tech, Inc. c/o Jennifer Jarvis  
10306 Eaton Place Suite 340  
Fairfax, VA 22030



Dear Mr. Hunsicker and Jennifer Jarvis,

This is my second communication to hopefully have you reconsider any plan to use our land for your new infrastructure. Our land was homesteaded by my grandfather in September of 1909. My wife and I and our son and family live on this homesteaded ground. It has remained in the family since 1909 and is being farmed by the 4<sup>th</sup> generation of family farmers with our intent to keep it for future generations. If we had to sell due to adverse issues, this would decrease the price due to this area being encumbered.

This ground is very precious to all of the Ostberg families who have worked it, nurtured it and struggled to keep it. We have raised 4 generations here. Through all the devastating years of drought, excess rain, wind and snow at harvest, insects, blight, fungus, and high input costs and low prices, we have been able to hold on to it. This was accomplished quite literally by, blood, sweat and tears. We worked many other jobs to support the family and keep the land. The State Land was being purchased at \$1.00/acre, but was lost during the Great Depression. We now lease this ground.

There are many issues on this ground that you may want to consider as it may not make this ground the best option as; our driveway into our homes would be in the way, underground lines for telephone/internet, field drain lines and underground irrigation pipes, irrigation pump located by the water source, pivots and swamp/alkali ground in the state land and the home place. We also have

animals pastured here. We have many different birds that nest here and we protect/ preserve these areas. Our fields are also on the migration path for

Canadian Geese and Swans. They have stopped here for many years to eat and rest as they make their way to and from Canada.

The ground is some of the best crop ground in this area. There are no rocks and wonderful topsoil. Digging through the field will expose the ground underneath that is never as good as the topsoil nearby. The few rocks were handpicked as we walked the field. The ground is on a lifetime lease and is seeded usually in March.

On tenth lane, one lane east of us between 5<sup>th</sup> and 7<sup>th</sup> Lane NE, on the west side of the road, or on 8<sup>th</sup> lane between 5<sup>th</sup> and 7<sup>th</sup> NE do not have homes, telephone/internet lines, underground water lines, driveways, drain/irrigation lines and pump, nesting areas or swamp ground. There are more options that would not have the issues as on our farm.

Please consider another route to place your new infrastructure and leave our precious homesteaded farm as it is and has been. Thank you for your consideration of this vitally important matter to our families past, present and future.

Sincerely,

Rick and Earlene Ostberg and Family

## Teton County Montana

I am the Planner for Teton County and received the letter in the mail regarding the project and materials available online. I hope your project intends on contacting LOCAL newspapers, not just the Great Falls Tribune. The Choteau Acantha newspaper would be the appropriate one in our area. I have had citizens reach out to my office regarding letters they received last year and they are curious about the utility corridor. I am also the Floodplain Administrator and would like to notify you that any work being done within the floodplain in Teton County will require appropriate permits. Those can be found on our website <https://tetoncomt.org/planner/> Our questions include which parcels of land are you requesting permission to access and what types of work will be done on them to create this utility corridor? We need much more specific information, please. Also, know that this many additional people working in these small towns will most certainly impact the local economy and infrastructure. My contact info is: Danielle Arps, Teton County Planner/Floodplain Administrator, PO Box 610 Choteau, MT 59422. [REDACTED]

[REDACTED]

## Fergus County Sheriff

SHERIFF VAUGHN: Rick Vaughn. R-I-C-K, V-A-U-G-H-N. I'm currently the Fergus County Sheriff. And my comment would be there is a concern for public safety and the services that the sheriff's office provides as far as protecting communities, enforcing criminal acts, and stuff with the uptick in the public and more people coming to our community. Our law enforcement has concerns about the size of our detention facility and even down to that we need more streetlights on our Main Street and providing public safety. Thank you.

**From:** [REDACTED]  
**To:** [EEC.gbsdeis](mailto:EEC.gbsdeis)  
**Subject:** GBSD Letter of Support  
**Date:** Thursday, August 11, 2022 3:33:08 PM

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To Whom it May Concern,

Utah's Weber County is one of two counties surrounding Hill AFB and I am writing to inform you that we are extremely supportive and excited about Hill Air Force Base's role in the development and deployment of the Sentinel ICBM and the decommissioning of the Minuteman III.

We understand that Hill AFB is expected to provide support facilities for fielding and sustainment of the Sentinel system and will be involved in decommissioning activities for the Minuteman III. We also understand these activities would involve construction and modification of on-base facilities and bring in additional personnel. Our community stands ready to support the Air Force in these endeavors and will warmly welcome the additional personnel to our community.

Weber County has a long history of supporting Hill AFB, going back to one of our communities donating much of the land on which the base sits today. The largest unit on Hill, the Ogden Air Logistics Complex, takes its name from our largest city in the county and many of our residents either work at Hill today, have worked there in the past, or have family members who have been, or are today, part of the Hill workforce. In short, we know how important Hill's role is in our nation's defense and we are well prepared to continue supporting the base as it's role expands to host the Sentinel program.

Thank you for this opportunity to express our continuing support for Hill AFB and the Sentinel program.

Sincerely,

James H. Harvey  
Weber County Commissioner

James H. "Jim" Harvey  
Commissioner  
Weber County  
2380 Washington Blvd., Suite 360 | Ogden UT | 84401 USA  
E [REDACTED]  
#WinninginWeber



## Fergus Electric Cooperative, Inc.

I presented this speech in Lewistown and was asked to submit it online due to technical issues during the in person event.

Colonel Little, Welcome to Montana, thank you for your service and leadership, and thank you for taking the time to accept public comment on this complex project. I am Carson Sweeney, General Manager of Fergus Electric Cooperative in Lewistown Montana. Fergus Electric Cooperative provides electric service to 67 of the 150 Missile Alert Facilities and Missile Launch Facilities in Central Montana. These facilities provide consistent and reliable electric loads and revenues which help keep rates stable across our entire membership. We have a long-standing partnership with the United States Air Force and look forward to working with Northrup Grumman on the Sentinel project. We are grateful for Northrup Grumman's commitment to our community throughout this process. They have been instrumental in partnering with the Small Business Association, Montana's Procurement Technical Assistance program, and Snowy Mountain Development Corporation here in Lewistown. Northrup's Tracy Jerman has been working closely with Snowy Mountain Development to ensure that businesses in our local communities who are interested in providing services throughout this project are prepared to do so. I recently attended one of Northrup's Strategic Teaming Alliance Roundtables held at the Snowy Mountain Development office. The event was well attended and very informative. I commend Northrup and Tracy for their transparency and commitment to our community. Their progress reports have been helpful to us in understanding the steps in this process, including the necessity for this Environmental Impact Statement.

Regarding the draft environmental impact statement, I would like to recommend that the United States Air Force work with our local electric utility to strategically locate the new communication towers, material laydown yards, and workforce hubs near existing electric utility infrastructure to minimize buildout of additional power lines. Working collectively will decrease the impact and disturbance on our environment while also reducing our maintenance expense during the lifespan of this national defense asset. The draft EIS also states that the project team will work with local community stakeholders to develop plans for post construction activities and infrastructure assets. I believe these types of partnerships provide opportunities for our community to decide what best meets our local needs upon the completion of this substantial project.

The environmental impact statement is detailed and thorough. I am confident that our Department of Defense will recognize value and considerable cost savings from a committed partnership with local businesses, community stakeholders, Montana PTAC, Snowy Mountain Development Corporation and Fergus Electric Cooperative.

Thank you for this opportunity to provide public comment on the draft EIS. This initiative holds significant promise to improve our economy and community in many ways. We look forward to opportunities to help shape that future with you.

## Shane Etzwiler

MR. ETZWILER: Well, good evening. Shane Etzwiler with the Great Falls Area Chamber of Commerce. And while I represent the Great Falls Area Chamber of Commerce here in Great Falls, I also live 35 miles northwest of Great Falls, outside of Fairfield about four or five miles east of that.

I think one of the things that we talked about and we have met with Northrop Grumman as they have come to town, Boeing and Lockheed Martin ahead of time and always wanting to hear from our community eaders about the potential impacts any concerns we might have and any input on the front end so they can kind of put that in their plan and proposal for the Air Force.

One of the things that we talked about recently, you mentioned in one of your slides was just the noxious weeds that we have and, again, the concern would be these invasive species.

So as we're going out to the different farmlands speaking on behalf of the farmers and the people that own land, the consideration that as they go out onto that person's property, one person might not control their weeds very well, and as the vehicles pick up those seeds and things like that and then they leave that property, go onto another farmer or landowner's property could spread that noxious weed.

So I think that is just something that we need to be aware of as we continue with this project. But we're excited about it. Again, we have been working hand in hand with the companies with the Air Force and so we're excited about this missile upgrade, so, thank you.

## Brad Bauman

Good evening. I'm Brad Bauman, the general manager for Sun River Cooperative located in Fairfield, Montana. Our cooperative provides service to 20 missile sites and two control centers. Our experience with the missile defense has been a positive one for many years.

The impact of the missile system has made on the service area is commendable. The three-phase electric systems would not be as robust if it had not been for the missiles first coming to the area in the 1960s.

The road infrastructure getting to the various sites would not be at the level it is now if not for the missile complex. The electric load for the complex accounts for approximately two percent of our system load and we welcome any new load that the new complex may offer.

The men and women that represent the Air Force come into our smaller communities and use our restaurants and our convenience stores. They always represent the Air Force and themselves in a very professional manner.

These young people are the best of the best when it comes to performing the mission of the missile complex. One only need to review the past winners of the missile competitions to verify my comment.

We live around these missile sites and the environmental impact of the site is a minimal at best. The amount of good that the missiles have brought compared to our environmental concerns have been enormous benefit to North Central Montana.

I'm here to offer the support to the missile project and to advocate for the acceptance of the reduced utility corridors alternative, thank you.

## Catholic Diocese of Salt Lake City

The development, testing and maintenance of nuclear weapons is an affront to all human life. The EIS addresses some of the immediate environmental impacts of weapons development, but ignores the long term effects of nuclear testing and development of more nuclear weapons. The impacts of this proposal and prior development, testing and storage include the suffering and death of down-winders who have died and continue to experience the deathly effects of nuclear fallout from testing in the 1940s and 50s. The impacts include the thousand deaths from uranium mining that continues to poison primarily First Nations peoples in New Mexico, Arizona and Utah. The impacts include the detrimental effects of radiation and toxic chemical exposure on members of the Air Force who will conduct the nuclear weapons work. The environmental impacts are felt by countless individuals living in areas where toxic waste is buried in unlined pits, leading to seepage into soils and water supplies. The impacts include the millions of people living in poverty who will remain in poverty as the U.S. earmarks \$1.7 trillion to revamping old nuclear warheads and developing ever more weapons capable of mass annihilation.

The U.S. should lead the way in ending the development and stockpiling of nuclear weapons and stop adding to the millions of victims of nuclear weapons.



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August 11, 2022

GBSD EIS Comments  
 10306 Eaton Place, Suite 340  
 Fairfax, VA 22030

To Whom it May Concern:

Snowy Mountain Development Corporation (SMDC) appreciates the opportunity to provide public comments on the following environmental impact statement recently completed for the Ground Based Strategic Deterrent program. We support this needed critical upgrade to our national defense system and provide the following comments for review and consideration in providing the least possible environmental impact during the process:

**Section 3.3.2.1.1 Vegetation** (pg. 3-145)

We encourage the Air Force to coordinate with the Montana Department of Agriculture's Noxious Weed Program (406) 444-3140 and local county weed departments to identify, map and prevent further spread of noxious weeds in the areas outside of Malstrom AFB. The Natural Resources and Conservation Service identifies 34 state-listed noxious weeds<sup>1</sup> with most occurring within the area of consideration. Known weeds prevalent in the area, not identified in the plan, include leafy spurge (*Euphorbia esula* L.)<sup>2</sup>

In addition, on page 3-173, the statement below is not accurate:

"The effects on plant species of concern and the introduction and spread of noxious weeds and invasive plants from off-base construction would be as described for F.E. Warren AFB in Section 3.3.1.2.2: short- and long-term less-than-significant adverse effects."

Noxious weeds have a destructive impact on Montana's landscape by displacing native plant species, increasing soil erosion, and decreasing wildlife habitat and recreational opportunities. Rangeland, pastureland, cropland, forests, and wildlands cover 92 million acres, 98% of the total land area, in Montana. These lands are vital for agricultural production and protecting the integrity of ecosystems.

1

<https://plantsorig.sc.egov.usda.gov/java/noxious?rptType=State&statefips=30#:~:text=%20%20%20%20%20%20%20%20%20,%28%29%2C%20CAN%20%28%29%20%2023%20more%20rows%20>

<sup>2</sup><https://www.eddmaps.org/state.cfm?sub=3405&country=926&stateid=30>

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### Section 3.3.1.2.2 Effects from Off-Base Elements of the GBSD Deployment

In addition, on page 3-117, the statement is also not accurate for the same reason listed previously:

“Ground disturbance and movement of construction vehicles and personnel for off-base construction could introduce and spread noxious weeds and invasive plants. By implementing mitigation measures (as discussed in sections 3.3.1.2.1, 3.3.7, and 6.0), however, the Air Force would reduce the short- and long-term adverse effects related to the introduction and spread of noxious weeds and invasive plants to less than significant.

Based on the information presented above, construction of the off-base elements would have both short- and long-term less-than-significant adverse effects on vegetation resources.”

The mitigation efforts identified in **BIO-21 of Section 3.3.7** to address weed spread are not adequate. Prevention of the spread of weeds should also be included. **GEN-21 of Section 6.0** falls short of mitigation measures to prevent the spread of weeds. **ALL vehicles that leave established roads should be required to receive an undercarriage wash and thorough wash-down DAILY to prevent the further spread of weeds.**

**BIO-11 of Section 3.3.7** should include *all lands* not just federally managed lands that would be covered with weed-free straw or other erosion control materials. Considerations for weed control should include approaches that will not compromise the integrity of Certified Organic agriculture producers.

Additionally, consideration for the ongoing severe drought should be applied to all mitigation measures but especially Biological Resources, Geology & Soils, and Land Use.

**GEN-20 of Section 6.0** should consider access for nearby landowners and coordinate with them so that access to agricultural assets will not be not blocked or restricted.

### Figure 3.3-30 Grizzly Bear Range in Vicinities of Malstrom AFB and the Missile Field

Confirmed grizzly bear sightings have been increasing in the Big Snowy Mountains and the area surrounding Lewistown<sup>3</sup>. We have nothing to add regarding habitat or mitigation measures, but thought it was important to note for service personnel working the area to be aware of. Montana Fish, Wildlife and Parks are continuing to educate the local public of grizzly bear safety.

<sup>3</sup> <https://www.montanaoutdoor.com/2022/05/grizzly-bear-confirmed-in-north-moccasin-mountains-near-lewistown/>

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### Section 5.2.4 Economic Productivity

The decommissioning of sites could have a potential beneficial economic effect if the properties are made available for public purchase after all hazardous substance have been abated. It's recommended the original property owner be offered the "first right of refusal" for the purchase initially.

### Section 6.0 Hazardous Materials and Waste

This section only identifies Per/Poly Fluoroalkyl Substances (PFAS) as a hazardous substance and **does NOT address commonly known potential hazards** that may exist.

As stated by the Army Corps of Engineers regarding formerly used defense sites (FUDS), "The type of cleanup required varies from property to property, and can include cleaning up hazardous, toxic and radioactive waste sites; removing munitions and explosives of concern and munitions constituents; or doing building demolition and debris removal if the building or structure was unsafe at the time of transfer."<sup>4</sup>

Threats generally encountered at FUDS may include but are not limited to: hazardous and solid waste landfills; ordnance and explosives; radioactive wastes; and contaminated environmental media from a wide variety of sources, such as solvents, petroleum, oil, lubricants, and other contaminants such as trichloroethylene (TCE), asbestos, PCB's, etc. A more thorough hazard assessment should be conducted prior to exposing any civilian workers to the decommissioned sites.

Snowy Mountain Development Corporation appreciates the opportunity to provide these comments and looks forward to the successful completion of this important mission.

Sincerely,

Cathy Barta  
 Brownfields Program Director  
 Snowy Mountain Development Corporation  
 507 West Main Street  
 Lewistown, MT 59457  
 (406) 535-2591

<sup>4</sup> <https://www.usace.army.mil/Missions/Environmental/>

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## Snowy Mountain Development Corporation

MS. HUDSON: Sara Hudson. S-A-R-A, H-U-D-S-O-N. I am the executive director of the Snowy Mountain Development Corporation here in Lewistown.

We are a nonprofit economic development organization that serves the six counties in Central Montana. We are comprised of an 18-member board that governs us, and those are typically our elected officials in that six-county area.

We work very closely with the cities and counties in all of the economic development in this region. And we do work with a lot of our businesses. We are hooking them into the contracting opportunities that are going to result from this process.

In the EIS, it talks about what the economic impacts are going to be, especially on our workforce. We have heard some concerns about businesses being concerned that we might be hiring their folks away to work on that. We have cleared up that misconception by letting them know that no, we'll contract your business and put your people on this job.

So that's one of the things that I wanted to make sure to mention to you, that in the economic impact statement where we are honoring that there are going to be the significant impacts, it actually is going to contribute a significant economic impact to our area in terms of tax base growth, employment growth, and our businesses being able to capture more market share in the industries that they're in.

We are also working very closely with our counties and cities on helping to develop a schematic for a workforce hub. We're most interested in what's going to be left behind. And we would like to work with you on any opportunity that we would have to be able to communicate consistently with you about what we're talking about on the ground on what we would like to see in that.

We understand that this is not a Bakken and it's not a man camp, that what we're bringing in are structural engineers, civil engineers, and it's more like Silicon Valley than what we experienced over in the Bakken. And so we're working diligently with our community members and our businesses to make sure that they understand the true significance of this project and how it's going to help benefit not only our businesses but our community and our next generation.

So I'm in full support of the implementation of Sentinel and I offer whatever services that I can to support you further.

## Fergus Electric Cooperative

MR. SWEENEY: Carson Sweeney. C-A-R-S-O-N, S-W-E-E-N-E-Y.

Col. Little, welcome to Montana, sir. Thank you for your service and leadership and taking the time to accept public comment on this complex project.

I am Carson Sweeney, general manager of Fergus Electric Cooperative in Lewistown, Montana. Fergus Electric Cooperative provides electric service to 67 of the 150 Missile Alert facilities and Missile Launch facilities in Central Montana. That electric load is consistent and reliable and provides significant revenue for our electric cooperative, providing stable rates across our entire membership.

We have a long-standing partnership with the United States Air Force and look forward to working with Northrop Grumman on the Sentinel project. We are grateful for Northrop Grumman's commitment to our community throughout this process. They have been instrumental in partnering with the Small Business Association, Montana's Procurement Technical Assistance program, and Snowy Mountain Development Corporation here in Lewistown.

Northrop's Tracy Jerman has been working closely with Snowy Mountain Development to ensure that businesses in our local communities who are interested in providing services throughout this project are prepared to do so. I recently attended one of Northrop's Strategic Teaming Alliance Roundtables held at the Snowy Mountain Development office. The event was well attended and very informative.

I commend Northrop and Tracy for their transparency and commitment to our community. Their progress reports have been helpful to us in understanding the steps in this process, including the necessity for this Environmental Impact Statement.

Regarding the Draft Environmental Impact Statement, I would like to propose that the United States Air Force work with our local electric utilities to strategically locate the new communication towers, material laydown yards, and workforce hubs near existing electric utility infrastructure to minimize buildout of additional power lines. Working collectively will decrease the impact and disturbance on our environment while also reducing our maintenance expense during the lifespan of this national defense asset.

The Draft EIS also states that the project team will work with local community stakeholders to develop plans for post-construction activities for infrastructure assets. I believe these types of partnerships provide opportunities for our community to decide what best meets our local needs prior to the completion of this substantial project.

The Environmental Impact Statement is detailed and thorough. I am confident that the Department of Defense will recognize value and considerable cost savings from a committed partnership with local businesses, local stakeholders, Montana PTAC, Snowy Mountain Development Corporation, and Fergus Electric Cooperative.

Thank you for this opportunity to provide public comments on the Draft EIS. This initiative holds significant promise to improve our economy and community in many ways. We look forward to opportunities to help shape that future with you. Thank you.

## Snowy Mountain Development Corporation

MS. WHEATLEY: Hello. My name is Carly Wheatley. C-A-R-L-Y, W-H-E-A-T-L-E-Y. I am the deputy director at Snowy Mountain Development Corporation. We're a regional economic development corporation serving six counties here in Central Montana, including four that are directly related to this project. My primary duty is to provide technical assistance to businesses seeking government opportunities.

In the Environmental Impact Statement, you address filling an estimated 20 percent of jobs using local workers and a construction investment specifically from Malmstrom Air Force Base reaching \$2.8 billion. This is a significant opportunity for Montana and the communities supporting national defense.

What this initiative presents is an opportunity for businesses to expand their customer base and increase their market share, which, together, grows our gross domestic product. So this is an incredible opportunity for Montana. And we are available and anxious to help prepare our community for the new Sentinel weapon systems.

I wanted to formally thank the project partners for the beginning work and preparing our area businesses to compete for this project, specifically through their Strategic Teaming Alliance Roundtables and any future trainings and matchmaking events they may choose to do. We look forward to supporting this project and partnering with the Air Force, Northrop Grumman, and the additional large prime contractors to match the 1800 small businesses we work with.

Thank you for the opportunity to provide public comment.

## Big Sky Economic Development

MS. LANGMAN: Good afternoon. Deanna Langman, Big Sky Economic Development in Billings and also Montana Procurement Technical Assistance. I am the state program manager for the Montana PTAC. And for those that may not know, PTACs are funded primarily by the Department of Defense. Our only job is to help businesses realize government contracting opportunities by learning how to contract with the government, finding opportunities, how to become responsible, responsive contractors, whether that's at the prime or the subcontract level. All the states have PTACs, and our U.S. Territories. In Montana we have six PTAC locations. My organization, Big Sky Economic Development, holds the cooperative agreement with DoD, and we accomplish service to companies throughout Montana by partnerships. Snowy Mountain Development here in Lewistown has a PTAC; Great Falls Development Authority has a PTAC; Montana West Economic Development in Kalispell; University of Montana in Missoula; and Headwaters RC&D in Butte. Our only job is to provide one-on-one consultation to companies that are interested in government contracting opportunities, whether it's with DoD agencies or civilian agencies. And we do that through the one-on-one and a lot of training. We're very excited to work with Northrop Grumman and the Air Force on this project to help companies get prepared for these business opportunities that may come out of this project, the Sentinel project, or any other DoD or civilian agency government contracting opportunity. Thank you.

## Utah Campaign to Abolish Nuclear Weapons

MS. KREUTER: Okay. Got it. Thank you. My name is Catherine, C-a-t-h-e-r-i-n-e, Kreuter, K-r-e-u-t-e-r. I am a member of the Utah Campaign to Abolish Nuclear Weapons. And I'm a member of the Catholic church, and with great respect for Pope Francis, who has asked us to -- actually, I like his words very much. He says spending on nuclear weapons squanders the wealth of nations and would be far better invested in education and the health and the fight against extreme poverty. I am -- I guess I have to respond as if I were taking this whole thing seriously. There's -- it's really hard to do for me. It sounds like billions and billions of dollars going toward destruction, machines that destruct, destruct property and people, people and property. And in our local UCAN organization, we've studied some writing by Bruce Blair, a former Minuteman launch control officer, and Frank von Hippel, former white house advisor on nuclear security, and we were impressed by their belief that we don't really need a land-based part of the triad. We can go to a diad -- I guess that's to planes and submarines -- in their opinion actually keep us safe adequately. And so the whole idea of everything that you've planned for here is -- actually, some experts believe it's unnecessary. And that is what we believe in the organization UCAN. I know -- when I thought about what to say here, I just thought immediately of Pope Francis and his words, and also former president and military leader Dwight Eisenhower. He had warnings for us, which seemed very pertinent, that every gun that is made, every warship launched, every rocket fired signifies, in the final sense, of threats from those who hunger and are not fed, those who are cold and not clothed. Yet he was concerned that --that there was a great danger in allowing the military industrial conflicts to take control of the U.S. And it does sound like you will be taking control of a lot of resources, certainly a lot of power. I don't know how that will affect the country, but -- So I think -- I think this is enough said, really. I am strongly opposed to spending money to upgrade a system which ought to just be dismantled, that would certainly -- it's certainly disrespectful of the United Nations' recent ban on nuclear weapons, rendering them illegal. Illegal means that other countries can sue manufacturers involved in -- in this work that is being proposed by Northrop Grumman and the Air Force. So out of respect for the many, many, many millions of us who think very differently on these matters, I do appreciate this EIS. It's very, very important. And I would look forward to reading the report when you send it to me. Thank you for the time.



## Utah Campaign to Abolish Nuclear Weapons

MR. PREHN: Hello. Can you hear me?

LT. COL. KIDD: Yes, sir.

MR. PREHN: You can. Okay. Let me just say that your historical -- oh, my name is John Prehn, J-o-h-n P-r-e-h-n, and I'm with the Utah Campaign to Abolish Nuclear Weapons, or UCAN. And my name is J-o-h-n P-r-e-h-n, John Prehn. Let me just say that your historical introduction was an insult to our intelligence. It's propaganda like from the '50s. And the rest of the EIS was rose-colored glasses, right? You're going to -- if -- the environmental impacts would be tiny, and we got them all taken care of. So that was also very insulting. But let me start out with my comment. We understand that nothing will stop you from building this project, no matter what. So this hearing is really in bad faith. It's a joke. The major, huge environmental impact of this project, which wasn't mentioned, is that these billions and billions, hundreds of billions dollars, will not be used by our country to avert the oncoming climate catastrophe. You are building a doomsday machine. Its detonation will destroy the possibility of human life in the northern hemisphere at the minimum. Is that your intention? That's a pretty big environmental impact. But let's ask what its intended use is. And I think its intended use is just building it and raking in the billions of profit. But it could be claimed to be deterring the Russians and Chinese by posing a threat. But we know that doesn't work. In the Ukraine, they -- Putin was not deterred from attacking the country, and is not being deterred, even with all of our nuclear weapons in Europe. The other thing you didn't mention was the missile field as a sponge to attract nuclear weapons from Russia and China, and thereby obliterating most of the United States. That doesn't seem like a good intention either. So the last intention must be to detonate the doomsday machine on Russia and China. And that's going to have a big environmental downside. So this is my main point, just building this project, which we don't really need at all for our security, has severe environmental consequences. All the billions of dollars spent on it will not be spent to avert our oncoming global climate catastrophe, which is -- is a huge threat to us all. So thank you for letting me speak my piece.





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lands are vital for agricultural production and protecting the integrity of ecosystems.

### **Section 3.3.1.2.2 Effects from Off-Base Elements of the GBSD Deployment**

In addition, on page 3-117, the statement is also not accurate for the same reason listed previously:

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### **Section 6.0 Hazardous Materials and Waste**

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A more thorough hazard assessment should be conducted prior to exposing any civilian workers to the decommissioned sites.

Snowy Mountain Development Corporation appreciates the opportunity to provide these comments and looks forward to the successful completion of this important mission.

Sincerely,

Cathy Barta  
 Brownfields Program Director  
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<sup>4</sup> <https://www.usace.army.mil/Missions/Environmental/>

## Utah Campaign to Abolish Nuclear Weapons, UCAN

The United States needs to affirm its commitment to work with the international community to abolish nuclear weapons. Instead of modernizing them, we need to verifiably and transparently take steps to decrease the dangers of nuclear war including reducing the number of weapons we have. The most logical place to begin is with the ground-based nuclear weapons. This entire project should be terminated.

**From:** [REDACTED]  
**To:** [EEC.gbsdeis](#); [Kj Sullivan](#)  
**Subject:** Sentinel Pogram Comments  
**Date:** Friday, August 12, 2022 12:32:52 PM  
**Attachments:** [image001.png](#)

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To Whom it May Concern,

In behalf of the Utah Defense Alliance (UDA), I would like to offer the following comments in support of the continuing ICBM modernization program. As the principal statewide community support organization for military missions in Utah, UDA understands the importance of a robust ICBM mission and notes that the nation is protected every minute by its presence. UDA is extremely supportive of Hill Air Force Base's role in the modernization of our nation's ICBM capabilities as they work to bring on the Sentinel program and decommission the MMIII. Hill AFB has provided outstanding support for the Minuteman III system for many years and the opportunity to play a big part in the replacement Sentinel ICBM system is very exciting for our community. The Utah Defense Alliance has been supporting Utah's military installations, missions, and people for many years and we know Hill is the right place to manage and execute a large portion of the Sentinel development and deployment programs.

We have also reviewed the GBSD EIS Executive Summary and are pleased to see that virtually all areas rated for Hill are in the "Less than Significant" and "Negligible" categories. Our cities stand ready to welcome the additional personnel associated with the program and we welcome the required on-base construction activity as well. We have also been pleased to welcome the off-base construction associated with the prime contractor's decision to locate it's GBSD headquarters in Hill's enhanced use lease project area.

The Utah Defense Alliance has worked hard with state and local leaders to help make our communities as military friendly as possible. Our Air Force host communities offer exceptional education opportunities for family members and our two school districts supporting Air Force installations are among very few across the country rated 'Green' by the Air Force in their Military Families Scorecard. Utah also has one of the most comprehensive licensure reciprocity programs in the nation to facilitate job transition for military dependents - also rated 'Green' in the Military Families Scorecard and held up as a model by Air Force leadership. In short, we believe our community support for Hill AFB is second to none and we're ready to help ensure the successful deployment of the Sentinel and decommissioning of the Minuteman III.

Thanks for the opportunity to contribute and we look forward to hosting the Sentinel program at Hill AFB for many years.

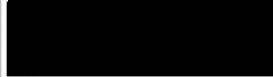
Sincerely,

Tage I. Flint  
President, Utah Defense Alliance





Tage I. Flint, P.E.  
Managing Partner  
[Utah Northern Properties, LLC](#)



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To the Global Strike Team:

August 14, 2022

Pursuant to the National Environmental Policy Act (NEPA), we offer public review and comments to the Air Force Draft Environmental Impact Statement (EIS) analyzing the potential environmental consequences associated with the proposed deployment of the Ground Based Strategic Deterrent (GBSD) Intercontinental Ballistic Missile (ICBM) weapons system, called Sentinel at Francis E. Warren Air Force Base (AFB), WY, Malmstrom AFB, MT, and Minot AFB, ND, and throughout the missile fields over the next 15 years.

We strongly recommend the inclusion into the final EIS of the evaluation and environmental assessment to power the GBSD silos and systems with advanced nuclear reactors meet the critical need for reliable, assured power regardless of the condition of commercial power grids, while reducing carbon emissions from energy sources. We recognize that energy resilience is a critical need for the Department's mission assurance, and indeed our national security. Nuclear energy is reliable and resilient, producing zero-carbon emissions electricity around the clock 24/7, 365 days a year. Nuclear facilities provide nearly 20% of the U.S. electricity, and over 50% of the zero-carbon emissions energy. Nuclear facilities are one of the most durable sources of energy on the U.S. electric grid, built to withstand extreme natural events including earthquakes, hurricanes, floods and extreme weather conditions, and many of the defense installations get their power from nuclear energy.

The federal government has completed EIS's for the deployment of advanced reactors. In April, 2022, the Department of Defense's Strategic Capabilities Office (SCO) released a Record of Decision (ROD) for Project Pele, a program intended to design, build, and demonstrate a mobile microreactor. This reactor will be assembled and initially operated at Idaho National Laboratory (INL), and will be the first electricity-generating Generation IV nuclear reactor built in the United States. In May, 2022, the Department of Energy released an environmental impact statement and ROD that found building a test reactor in Idaho would have minimal impacts on the environment.

Our industry is in the process of commercializing advanced nuclear reactors this decade that will offer reliable, clean power. Nuclear energy and the Department of Defense have a long history together. The Department helped launch the commercial nuclear sector with an initial 60MWe Naval reactor at Shippingport, PA and military veterans are valued members of the commercial nuclear industry's workforce. Nuclear energy not only powers naval submarines and aircraft carriers, it also provides clean reliable power for many of defense installations.

The Department of Defense's goals to reduce carbon emissions can be met with the inclusion of a nuclear energy. The nuclear industry is developing advanced nuclear reactor technologies that will provide even greater resilience benefits for the Department. Many of these technologies are being designed to operate independent of the grid, with enhanced protection against cyber threats and electromagnetic pulses, and with the capability to operate without refueling for up to 10 years or more.

Advanced nuclear technology has developed rapidly and the industry has plans to deploy more than 20 plants of more than 12 new designs by the early 2030s, and these plans continue to grow rapidly.

The following table shows several current plans:

<b>Developer</b>	<b>Utility / User</b>	<b>Location</b>	<b>Size</b>	<b>Target Online</b>
NuScale	UAMPS	Idaho, USA	462MW	2029
	KGHM Polska Miedz	Poland	462MW	2029
	Nuclearelectrica	Romania	462MW	2028
GEH BWR X-300	OPG	ON, Canada	300 MW	2028
	TVA	TN, USA	300 MW	2032
	SaskPower	Sask., Canada	~300 MW (4 plants)	2032 to 2042
	Synthos & Orlen	Poland	300 MW (> 10 plants)	Early 2030s
Holtec SMR-160	Entergy & Oyster Creek, NJ	NJ, USA	160 MW	TBD
X-energy Xe-100	Grant County PUD	WA, USA	320MW	2027
	DOW Chemical	Gulf Coast, USA	TBD	2030
TerraPower	Pacific Corp.	WY, USA	345/500MW	2028
ARC	NB Power	NB, Canada	100 MW	2030
Moltex	NB Power	NB, Canada	300 MW	2032
Oklo	Oklo	Idaho, USA	1.5 MW	2025
	Compass Mining	TBD	TBD (total 150 MW)	TBD
Terrestrial Energy	KBR	UK	195 MW	TBD
	Invest Alberta	Alberta, Canada	195 MW	
Ultra Safe Nuclear	Global First / OPG	CRL, Canada	5 MW	2025
	University of Illinois	Illinois, USA	5 MW	2027
	Copper Valley (CVEA)	Alaska, USA	5 MW	TBD
Westinghouse	Saskatchewan Research Council	Saskatchewan, Canada	5 MW	Not announced
	Bruce Power	ON, Canada	5 MW	2027
	Penn State Univ.	USA	5 MW	2027
Radiant	TBA	Idaho, USA	1.2 MW	2026
TBD	Eielson AFB	Alaska, USA	1 – 10 MW	2027
BWXT	DoD SCO	Idaho, USA	1.5 MW	2025
Kairos Power	Kairos	TN, USA	35 MW	2026

In 2021, TerraPower announced Kemmerer, Wyoming as the location for the first Natrium™ plant, developed with GE Hitachi. A 345 MWe sodium fast reactor featuring an energy storage system that can boost output to 500 MWe during peak demand built near one of PacificCorp's retiring coal plants in Wyoming, with early construction activities will likely begin in 2024. TerraPower and PacificCorp are also assessing other sites in Wyoming for the installation of nuclear power plants. X-Energy's XE-100 consisting of a four pack of 80MW units is slated for the Energy Northwest's Columbia Generating Station adjacent to the U.S. Department of Energy's Hanford, Washington site, which currently maintains 1207MW of nuclear energy for the region. Both projects were selected for funding by the DOE's Advanced Reactor Demonstration Program, including splitting \$2.5B in funding under the Infrastructure Investment and Jobs Act.

Micro-reactors, roughly 1 MW to 10 MW in size (up to 20MW by definition), and capable of being sited with a footprint as small as 1,000 square feet, can reliably provide both electricity and heat on one or a series of missile silos connected through a microgrid, thereby removing the mission risk associated with disruptions to the local commercial power grid. A micro-reactor connected to a microgrid could also serve as a zero-emission back-up power source replacing hundreds of diesel generators and limited fuel storage tanks at critical installations. In the event of a regional commercial power loss, reliance on diesel fuel for back-up power for more than 48 hours would be precarious at best without the installation of significant storage.

Section 327 of the 2019 National Defense Authorization Act (NDAA) requires the Secretary of Energy to develop a report to describe the requirements for and components of a pilot program for micro-reactors. The pilot program would contract with a commercial entity to site, construct and operate micro-reactors of no greater than 50 MWe to provide resilience for national security infrastructure at DoD and DOE facilities by December 31, 2027. In response, the Air Force has announced plans to deploy the first micro-reactor at Eielson AFB, Alaska by 2027 to eliminate dependence on a local coal plant. The Air Force is in the process of releasing a Request for Proposals for the demonstration of an advanced nuclear reactor to meet the electricity and thermal needs for Eielson AFB, Alaska. The GBSD program would benefit from reviewing the progress of this demonstration and applying lessons learned to meet energy resilience and assurance requirements.

Micro-reactors that include mobility features can decarbonize operational energy, enable the electrification of forces, and cut the tether of the fuel resupply line. The Department's Strategic Capabilities Office's Project Pele will demonstrate a mobile micro-reactor by 2025 and has received strong Congressional support and funding. Mobile nuclear reactors have the potential to enhance the operational capabilities similar to what nuclear energy has done for the Navy. Project Pele is also important to inform the Department's efforts to evaluate spin-off technologies – such as kilowatt scale designs for operational uses – and the use of micro-reactors at domestic installations. The size and safety profiles of grid-scale advanced reactors, ranging from tens of MW to hundreds of MW, would allow them to be built on or next to defense installations. The close proximity would allow for secure and dedicated power lines from the advanced reactor to the defense installation and would allow the defense installation to receive assured power in the event of a grid outage to ensure continuity of mission critical needs for days or even months. By also serving the electric grid during normal conditions, these advanced reactors are expected to be cost-competitive against other clean and resilient generation technologies. This and other technologies are mature enough to begin entering into power purchase agreements that would begin delivering power by 2030.

We believe nuclear power, as noted in the White House’s updated list of Critical and Emerging Technologies released in February 2022, is an ideal technology to help the GBSD team meet its needs for assured, resilient power compatible with the intent to reduce the number of utility corridors outlined in the draft EIS. We would appreciate the opportunity to meet and discuss how the nuclear energy industry can help the GBSD team achieve its energy resilience and assurance goals before release of the final EIS. The use of advanced nuclear reactors for primary or back-up power will reduce detrimental impact to the environment, reduce construction requirements for the modernization of the GBSD, and provide the assured power our country needs to meet the national security imperative of a resilient land—based nuclear weapon fleet. The GBSD Final EIS and ROD must allow for future consideration of advanced nuclear reactor power to meet national security objectives over the next 15 years of GBSD development.

*Lucian Niemeyer*

Lucian Niemeyer  
Principal  
United Coalition for Advanced Nuclear Power (UCAN Power)



507 West Main Street, Lewistown, MT 59457, (406) 535-2591  
[www.snowymountaindevelopment.com](http://www.snowymountaindevelopment.com)

August 11, 2022

GBSD EIS Comments  
 10306 Eaton Place, Suite 340  
 Fairfax, VA 22030

To Whom it May Concern:

Snowy Mountain Development Corporation (SMDC) appreciates the opportunity to provide public comments on the following environmental impact statement recently completed for the Ground Based Strategic Deterrent program. We support this needed critical upgrade to our national defense system and provide the following comments for review and consideration in providing the least possible environmental impact during the process:

**Section 3.3.2.1.1 Vegetation (pg. 3-145)**

We encourage the Air Force to coordinate with the Montana Department of Agriculture's Noxious Weed Program (406) 444-3140 and local county weed departments to identify, map and prevent further spread of noxious weeds in the areas outside of Malstrom AFB. The Natural Resources and Conservation Service identifies 34 state-listed noxious weeds<sup>1</sup> with most occurring within the area of consideration. Known weeds prevalent in the area, not identified in the plan, include leafy spurge (*Euphorbia esula* L.)<sup>2</sup>

In addition, on page 3-173, the statement below is not accurate:

"The effects on plant species of concern and the introduction and spread of noxious weeds and invasive plants from off-base construction would be as described for F.E. Warren AFB in Section 3.3.1.2.2: short- and long-term less-than-significant adverse effects."

Noxious weeds have a destructive impact on Montana's landscape by displacing native plant species, increasing soil erosion, and decreasing wildlife habitat and recreational opportunities. Rangeland, pastureland, cropland, forests, and wildlands cover 92 million acres, 98% of the total land area, in Montana. These lands are vital for agricultural production and protecting the integrity of ecosystems.

<sup>1</sup>

<https://plantsorig.sc.egov.usda.gov/java/noxious?rptType=State&statefips=30#:~:text=%20%20%20%20Symbol%20%20%20.%28%29%2C%20CAN%20%28%29%20%2023%20more%20rows%20>

<sup>2</sup><https://www.eddmaps.org/state.cfm?sub=3405&country=926&stateid=30>

**BUILDING COMMUNITY & ECONOMIC CAPITAL**

507 West Main Street Lewistown, MT 59457 406.535.2591 snowymountaindevelopment.com  
 info@snowymountaindevelopment.com

SMDC is a 501(c)3 non-profit Economic Development District (EDD) and a Certified Regional Development Corporation (CRDC)  
 SMDC is an equal opportunity employer, lender, & provider





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[www.snowymountaindevelopment.com](http://www.snowymountaindevelopment.com)

### **Section 3.3.1.2.2 Effects from Off-Base Elements of the GBSD Deployment**

In addition, on page 3-117, the statement is also not accurate for the same reason listed previously:

“Ground disturbance and movement of construction vehicles and personnel for off-base construction could introduce and spread noxious weeds and invasive plants. By implementing mitigation measures (as discussed in sections 3.3.1.2.1, 3.3.7, and 6.0), however, the Air Force would reduce the short- and long-term adverse effects related to the introduction and spread of noxious weeds and invasive plants to less than significant.

Based on the information presented above, construction of the off-base elements would have both short- and long-term less-than-significant adverse effects on vegetation resources.”

The mitigation efforts identified in **BIO-21 of Section 3.3.7** to address weed spread are not adequate. Prevention of the spread of weeds should also be included. **GEN-21 of Section 6.0** falls short of mitigation measures to prevent the spread of weeds. **ALL vehicles that leave established roads should be required to receive an undercarriage wash and thorough wash-down DAILY to prevent the further spread of weeds.**

**BIO-11 of Section 3.3.7** should include *all lands* not just federally managed lands that would be covered with weed-free straw or other erosion control materials. Considerations for weed control should include approaches that will not compromise the integrity of Certified Organic agriculture producers.

Additionally, consideration for the ongoing severe drought should be applied to all mitigation measures but especially Biological Resources, Geology & Soils, and Land Use.

**GEN-20 of Section 6.0** should consider access for nearby landowners and coordinate with them so that access to agricultural assets will not be not blocked or restricted.

### **Figure 3.3-30 Grizzly Bear Range in Vicinities of Malstrom AFB and the Missile Field**

Confirmed grizzly bear sightings have been increasing in the Big Snowy Mountains and the area surrounding Lewistown<sup>3</sup>. We have nothing to add regarding habitat or mitigation measures, but thought it was important to note for service personnel working the area to be aware of. Montana Fish, Wildlife and Parks are continuing to educate the local public of grizzly bear safety.

<sup>3</sup> <https://www.montanaoutdoor.com/2022/05/grizzly-bear-confirmed-in-north-moccasin-mountains-near-lewistown/>

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### **Section 5.2.4 Economic Productivity**

The decommissioning of sites could have a potential beneficial economic effect if the properties are made available for public purchase after all hazardous substance have been abated. It's recommended the original property owner be offered the "first right of refusal" for the purchase initially.

### **Section 6.0 Hazardous Materials and Waste**

This section only identifies Per/Poly Fluoroalkyl Substances (PFAS) as a hazardous substance and **does NOT address commonly known potential hazards** that may exist.

As stated by the Army Corps of Engineers regarding formerly used defense sites (FUDS), "The type of cleanup required varies from property to property, and can include cleaning up hazardous, toxic and radioactive waste sites; removing munitions and explosives of concern and munitions constituents; or doing building demolition and debris removal if the building or structure was unsafe at the time of transfer."<sup>4</sup>

Threats generally encountered at FUDS may include but are not limited to: hazardous and solid waste landfills; ordnance and explosives; radioactive wastes; and contaminated environmental media from a wide variety of sources, such as solvents, petroleum, oil, lubricants, and other contaminants such as trichloroethylene (TCE), asbestos, PCB's, etc. A more thorough hazard assessment should be conducted prior to exposing any civilian workers to the decommissioned sites.

Snowy Mountain Development Corporation appreciates the opportunity to provide these comments and looks forward to the successful completion of this important mission.

Sincerely,

Cathy Barta  
 Brownfields Program Director  
 Snowy Mountain Development Corporation  
 507 West Main Street  
 Lewistown, MT 59457  
 (406) 535-2591

<sup>4</sup> <https://www.usace.army.mil/Missions/Environmental/>

#### **BUILDING COMMUNITY & ECONOMIC CAPITAL**

507 West Main Street Lewistown, MT 59457 406.535.2591 [snowymountaindevelopment.com](http://snowymountaindevelopment.com)  
[info@snowymountaindevelopment.com](mailto:info@snowymountaindevelopment.com)

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## Utah Campaign to Abolish Nuclear Weapons

Dear Air Force: The best way to eliminate the environmental impacts of the GBSD is to eliminate totally the land based nuclear weapon armed missiles. This would save \$500 billion. The 400 silo sites containing ICBMs are well known by the Russians. If they are attacked the resulting explosions would destroy the environment and kill millions of people. Land based ICBMs are by far the most vulnerable of the nuclear weapons triad to attack and the least likely to be stopped after launching. US land based missile would likely be launched almost immediately on warning with only a few minutes of Presidential delay and could not be called back like submarine a bomber launches. Some say nuclear weapons are the greatest national security risk. This risk factor is greater than their deterrence factor. The U.S has been lucky that we have not suffered a nuclear weapon disaster. There have been many near misses. The silo based nuclear weapon missile silos are subject to mistakes, accidents and cyber attack. Therefore, the land based portion of the nuclear triad should be abolished. In fact all nuclear weapons globally should be abolished as soon as possible to save earth and humans from a nuclear weapons disaster. According to the UN Treaty on the Prohibition of Nuclear Weapons, nuclear weapons are illegal. And religious leaders including Pope Francis they are also immoral



## Comments on GBS D DESS

Dear Air Force

13 August 2022

The best way to eliminate the environmental impacts of the GBS D is to eliminate totally the land based nuclear weapon armed missiles. This would save \$500 billion.

The 400 silo sites containing ICBMs are well known by the Russians. If they are attacked the resulting explosions would destroy the environment and kill millions of people.

Land based ICBMs are by far the most vulnerable of the nuclear weapons triad to attack and the least likely to be stopped after launching. US land based missile would likely be launched almost immediately on warning with only a few minutes of Presidential delay and could not be called back like submarine or bomber launches.

Some say nuclear weapons are the greatest national security risk. This risk factor is greater than their deterrence factor.

The US has been lucky that we have not suffered a nuclear weapon disaster, there has been many near misses. The silo based nuclear weapon missile silos are subject to mistakes, accidents and cyber attacks.

Therefore the land based portion of the nuclear triad should be abolished. In fact all nuclear weapons globally should be abolished ~~globally~~ as soon as possible to save earth and humans from a nuclear weapons disaster.

According to the UN Treaty on the Prohibition of Nuclear Weapons, nuclear weapons are illegal. And religious leaders including Pope Francis they are also immoral.

Sincerely Douglas Stark

a member of Utah Campaign to Abolish Nuclear Weapons (UCAN)



July 14, 2022

GBSD Project EIS  
10306 Eaton Place, Suite 340  
Fairfax, VA 22030

RE: GBDEIS (DBPR\_WY\_2022\_607)

Dear GBDEIS Coordinator,

Our staff has received information concerning the aforementioned project. Thank you for allowing us the opportunity to comment.

Our office is currently working with the U.S. Air Force (USAF) to develop a Programmatic Agreement (PA) to guide compliance with Section 106 of the National Historic Preservation Act for this undertaking. Provided the PA is completed prior to the signing of the Record of Decision (ROD), and the language in the ROD and the PA are consistent, we have no objection to this undertaking.

Please refer to DBPR\_WY\_2022\_607 on any future correspondence dealing with this project. If you have any questions contact me at [REDACTED]

Sincerely,

A handwritten signature in blue ink, appearing to read 'Richard L. Currit'.

Richard L. Currit  
Senior Archaeologist

Mark Gordon | Governor  
Darin J. Westby, PE. | Director  
Sara Needles | SHPO Officer



**ARTS. PARKS.  
HISTORY.**  
State Parks & Cultural Resources

**Cook, Jason1**

---

**From:** [REDACTED]  
**Sent:** Tuesday, July 19, 2022 11:15 AM  
**To:** EEC.gbsdeis  
**Cc:** Ralph Tarango  
**Subject:** GBSD Project EIS Comments  
**Attachments:** 20220719\_GBSD Project EIS\_USAF.pdf

Hello,

Please see the attached letter containing WYDOT's input on the Draft GBSD Project EIS. Feel free to reach out with any questions.

Thank you,

--

Casey Johnson  
Environmental Services - Environmental Coordinator  
Wyoming Department of Transportation  
5300 Bishop Blvd.,  
Cheyenne, Wyoming 82009-3340  
Office (307) 777 3997

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Mark Gordon  
Governor

# WYOMING Department of Transportation

*"Providing a safe, high quality, and efficient transportation system"*

5300 Bishop Boulevard, Cheyenne, Wyoming 82009-3340



K. Luke Reiner  
Director

July 19, 2022

Howard N. Kosht, GS-15, DAF  
Attn: GBSD Project EIS  
10306 Eaton Place, Suite 340  
Fairfax, VA 22030

RE: GBSD Project EIS

Dear Mr. Kosht,

The staff at Wyoming Department of Transportation (WYDOT) has reviewed the information for the proposed GBSD Project EIS. We offer the following comments for your consideration:

- All work within the WYDOT right-of-way will require permitting.
- All Highway crossings will require a utility license, M-54 and have certain requirements.
- Any operation/maintenance of roads will need access permits.
- Disturbed areas will need to be restored to original conditions within the right-of-way.
- Traffic control as per the Manual on Uniform Traffic Control Devices for streets and highways.
- Provide a traffic control plan for component deliveries with input from WYDOT, Wyoming Highway Patrol, and local law enforcement.
- Detailed plans for OWL turnarounds/closures at interchanges, intersections, or median crossovers. Reference WYDOT standard plan for Planned Event Turnaround.
- Provide operational analysis/design for major intersections or interchanges affected and identify temporary improvements/changes to accommodate OWL's.
- All OWL hauling companies MUST have proper experience and certifications.
- Any modifications to I-80 Interchange ramps will require a submittal to FHWA for approval.



- Ensure WYDOT right-of-way markers are not disturbed.
- Any incoming or outgoing utilities within the WYDOT ROW will need to be licensed through the District Maintenance Office.

Please contact WYDOT District 1 (Laramie) at 307-745-2100 concerning permits and project related issues. If you have any further questions or concerns, please contact Scott Gamo at [REDACTED]

Sincerely,



Scott Gamo, Ph.D.  
Environmental Services Manager

---

cc: Ralph Tarango, P.E., District Engineer

July 11, 2022

Howard Kosht GS-15, DAF  
 Executive Director Strategic Plans, Programs  
 Department of the Air Force  
 10306 Eaton Place, Suite 340  
 Fairfax, VA 22030

Re: GBSD Project EIS in Bottineau, Burke, McHenry, Mountrail, Renville, Ward Counties

Dear Mr. Kosht:

The North Dakota Department of Environmental Quality has reviewed the information concerning the above-referenced project received at the department on July 1, 2022 with respect to possible environmental impacts.

This department believes that environmental impacts from the proposed construction will be minor and can be controlled by proper construction methods. With respect to construction, we have the following comments:

1. Care is to be taken during construction activity near any water of the state to minimize adverse effects on a water body. This includes minimal disturbance of stream beds and banks to prevent excess siltation, and the replacement and revegetation of any disturbed area as soon as possible after work has been completed. Caution must also be taken to prevent spills of oil and grease that may reach the receiving water from equipment maintenance, and/or the handling of fuels on the site. Guidelines for minimizing degradation to waterways during construction are attached.
2. Projects disturbing one or more acres are required to have a permit to discharge stormwater runoff until the site is stabilized by the reestablishment of vegetation or other permanent cover. Further information on the stormwater permit may be obtained from the department's website or by calling the Division of Water Quality (701-328-5210). Also, cities may impose additional requirements and/or specific best management practices for construction affecting their storm drainage system. Check with the local officials to be sure any local stormwater management considerations are addressed.
3. The proposed construction project may include individual projects located within Bottineau, Burke, McHenry, and Mountrail Counties. It is possible that some projects may be located over defined glacial drift aquifers, defined sensitive groundwater areas, or within wellhead or source water protection areas. Care should be taken to avoid spills of any materials that may have an adverse effect on groundwater quality. All spills must be immediately reported to this Department and appropriate remedial actions performed.

Mr. Kosht

2

July 11, 2022

4. All necessary measures must be taken to minimize the disturbance of any asbestos-containing material and to prevent any asbestos fiber release episodes. Any facility that is to be renovated or demolished must be inspected for asbestos. Notification of the department's Division of Waste Management (701-328-5166) is required before any demolition. Removal of any friable asbestos-containing material must be accomplished in accordance with section 33.1-15-13-02 of the North Dakota air pollution control rules.
5. All solid waste materials must be managed and transported in accordance with the state's solid and hazardous waste rules. Appropriate efforts to reduce, reuse and/or recycle waste materials are strongly encouraged. As appropriate, segregation of inert waste from non-inert waste can generally reduce the cost of waste management. Further information on waste management and recycling is available from the department's Division of Waste Management at (701)328—5166.

These comments are based on the information provided about the project in the above-referenced submittal. The U.S. Army Corps of Engineers may require a water quality certification from this department for the project if the project is subject to their Section 404 permitting process. Any additional information which may be required by the U.S. Army Corps of Engineers under the process will be considered by this department in our determination regarding the issuance of such a certification.

The department owns no land in or adjacent to the proposed improvements, nor does it have any projects scheduled in the area. In addition, we believe the proposed activities are consistent with the State Implementation Plan for the Control of Air Pollution for the State of North Dakota.

If you have any questions regarding our comments, please feel free to contact this office.

Sincerely,



L. David Glatt, P.E., Director  
North Dakota Department of Environmental Quality

LDG:csc  
Attach.

## Construction and Environmental Disturbance Requirements

The following are the minimum requirements of the North Dakota Department of Environmental Quality for projects that involve construction and environmental disturbance in or near waters of the State of North Dakota. They ensure that minimal environmental degradation occurs as a result of construction or related work which has the potential to affect waters of the state. All projects must be constructed to minimize the loss of soil, vegetative cover, and pollutants (chemical or biological) from a site.

### **Soils**

Prevent the erosion and sediment loss using erosion and sediment controls. Fragile and sensitive areas such as wetlands, riparian zones, delicate flora, and land resources must be prohibited against compaction, vegetation loss and unnecessary damage.

### **Surface Waters**

All construction must be managed to minimize impacts to aquatic systems. Follow safe storage and handling procedures to prevent the contamination of water from fuel spills, lubricants, and chemicals. Stream bank and stream bed disturbances must be contained to minimize silt movement, nutrient upsurges, plant dislocations, and any physical chemicals, or biological disruption. The use of pesticides or herbicides in or near surface waters is allowed under the department's pesticide application permit with notification to the department.

### **Fill Material**

Any fill material placed below the ordinary high-water mark must be free of topsoil, decomposable materials, and persistent synthetic organic compounds; including, but not limited to, asphalt, tires, treated lumber, and construction debris. The department may require testing of fill material. All temporary fills must be removed. Debris and solid waste must be properly disposed or recycled. Impacted areas must be restored to near original condition.



July 26, 2022

Howard N. Kosht, GS-15, DAF  
Executive Director  
Strategic Plans, Programs, and Requirements  
GBSD Project EIS  
10306 Eaton Place, Suite 340  
Fairfax, VA 22030

REPLACE ALL LAND-BASED MINUTEMAN III MISSILES DEPLOYED IN THE  
CONTINENTAL U.S. WITH THE TECHNOLOGICALLY ADVANCED GBSD SYSTEM,  
NORTH DAKOTA

We have reviewed your July 1, 2022, letter.

This project should have no adverse effect on the North Dakota Department of Transportation highways.

However, if because of this project any work needs to be done on highway right of way, appropriate permits and risk management documents will need to be obtained from the Department of Transportation District Engineer, Korby Seward, Minot at [REDACTED]

A handwritten signature in blue ink, appearing to read "Chad M. Orn", is written over the typed name and title.

CHAD M. ORN, P.E., DIRECTOR – OFFICE OF PROJECT DEVELOPMENT

57\cmo\js

c: Korby Seward, Minot District Engineer





August 2, 2022

Howard N. Kosht, GS-15, DAF  
Reply to: GBSD Project EIS  
10306 Eaton Place STE 340  
Fairfax, VA 22030

Dear Mr. Kosht:

This is in response to your request for a review of the environmental impacts associated the GBSD Project EIS.

The proposed project has been reviewed by Department of Water Resources, and the following comments are provided:

- There are no FEMA regulatory floodplains identified and/or mapped where this proposed project is to take place. No permits relative to the NFIP are required based on the current effective FIRM and State minimum standards.
  
- The Mouse River is a navigable stream and therefor sovereign to the State of North Dakota. North Dakota takes title up the ordinary high-water mark (OHWM) of navigable streams, including the Mouse River. Any project occurring at least partially below the OHWM of a navigable stream requires authorization from the Department in the form of a sovereign land permit. It is difficult to determine from what has been provided if the project will involve sate sovereign lands. Greater detail is required to make that determination. Enclosed, you will find a copy of the sovereign land permit application form. For more information or questions concerning state sovereign lands, please contact Tia Jones at [REDACTED]
  
- The Department of Water Resources (DWR) Engineering and Permitting Section reviewed the Project location and determined that no drainage or construction permits are likely required. However, any changes to the watercourse or drainage patterns may require a DWR permit. North Dakota Stream Crossing Standards will apply to any culvert or bridge placed within a drainageway. Any crossing located within a roadway reconstruction, such as a full-depth reconstruction or grade raise, requires the existing crossings to be upgraded to meet North Dakota Stream Crossing Standards also. For more information on these requirements, please visit the Regulation & Appropriation tab on the DWR's website ([dwr.nd.gov](http://dwr.nd.gov)) or contact the DWR's Regulatory Division at 701-328-4956 or [dwrregpermits@nd.gov](mailto:dwrregpermits@nd.gov).
  
- In accordance with North Dakota Century Code §61-16.1-38, any new construction of or construction modifications to dams, ponds or other devices that retain water, may require a construction permit from the Department of Water Resources (DWR) based on the storage volume and hazard classification of the structure. Please contact the DWR Regulatory Division at 701-328-4956 if you have any questions.

- Initial review indicates the project does not require a conditional or temporary permit for water appropriation. However, if surface water or groundwater will be diverted for construction of the project, a water permit will be required per North Dakota Century Code § 61-04-02. Please consult with the Department of Water Resources Water Appropriation Division if you have any questions at 701-328-2754 or [appropinfo@nd.gov](mailto:appropinfo@nd.gov).

- The Department of Water Resources maintains a network of observation wells across the state for monitoring the water levels and quality in glacial and bedrock aquifers. These wells are often installed in road and highway rights-of-way to limit inconvenience to the adjacent landowners. Department of Water Resources observation wells have a yellow protective casing extending between 1 and 3 feet above ground surface, and their locations are marked with a stake. If an observation well is encountered during project activities and must be removed, please contact the Water Appropriation Division. The Department of Water Resources hopes to keep all observation wells, but otherwise will ensure the well is properly abandoned.

Thank you for the opportunity to provide review comments. Should you have further questions, please contact me at [REDACTED].

Sincerely,



Steven Best  
Planner III

SB:dm/1570



## Montana DNRC, Lewistown Region

MR. HAMILTON: My name is Steven Hamilton. S-T-E-V-E-N, H-A-M-I-L-T-O-N. I'm the regional manager for DNRC Water Resources for the Lewistown Region. One of the things I just wanted to remind everybody to keep in mind was that if there's the need for water rights or water right changes, know that those processes take time. We work on those as fast as we can, and we're working on the process for those as fast as we can, but just know that they take time. So people just need to start early if they need additional water rights or changes in water rights as part of some of the impact to the area. Thank you.

STATE OF UTAH  
OFFICE OF THE LIEUTENANT GOVERNOR



DEIDRE M. HENDERSON  
LIEUTENANT GOVERNOR

Aug. 11, 2022

To Whom it May Concern:

Thank you for the opportunity to provide comments regarding the United States Air Force's Environmental Impact Statement for the Ground Based Deterrent Deployment and Minuteman III Decommissioning and Disposal. I wish to express the support of the State of Utah for Hill Air Force Base and the Utah Test and Training Range to provide support facilities and decommissioning activities for the Ground Based Strategic Deterrent. We understand the proposed action would involve construction and reconstruction of facilities, bring in additional personnel, and accomplish missile maintenance and security operations at both areas.

As a state, we enjoy a close working relationship with the base and its people. We believe that a decision to utilize Hill AFB and the UTTR for support activities for GBSD and MMIII decommissioning activities will allow the Air Force to modernize the US land-based nuclear arsenal by replacing the aging MMIII with the Sentinel and leverage the facilities and processes that are already here.

Our state and local communities are proud of the United States military and installations that call Utah home. We work closely with the military and civilian leaders in Utah, especially Hill AFB, to support their missions, workforce, and families, just as we have done since the base was established over eighty years ago, and we look forward to doing so for many years to come.

Once again, thank you for the opportunity to express our support and we look forward to working collaboratively to ensure the success of this effort.

Sincerely,

Deidre M. Henderson  
Lieutenant Governor

## North Dakota Department of Trust Lands

The North Dakota Department of Trust Lands (NDDTL) manages multiple tracts of land within the proposed project area. NDDTL has a project review and agreement acquisition process for proposed projects such as this project. Contact should be made via email to [landrow@nd.gov](mailto:landrow@nd.gov) or by calling 701-328-1916 to begin the process prior to construction.

Any proposed projects crossing NDDTL managed property would need to apply for a Rights of Way and would be subject to review and approval by the Board of University and School Lands. NDDTL reviews the financial benefit to the trusts; availability of alternate encumbrance site or route; least environmentally damaging site or route regardless of property ownership; physical stability of the landscape; other potential future uses for the trust lands, including urban development; potential mineral and other material development including oil, gas, coal, construction aggregate, sodium sulfate, chemical substances, metallic ore, or uranium ore; feasibility for reclamation; maintenance of existing wetlands and water flows; any cultural, historical, archeological, and paleontological resources; habitat for federally listed threatened and endangered species; location of the proposed route or site in relation to section lines, quarter section lines and corridors; potential liability to the trusts; applicant's past encumbrances on trust lands; applicant's financial stability; and any other information relevant to the application which would assist in the determination.

[BACKGROUND] In 1889, Congress passed the Enabling Act "to provide for the division of Dakota [Territory] into two states, and to enable the people of North Dakota, South Dakota, Montana, and Washington to form constitutions and state governments, and to be admitted into the union on an equal footing with the original states, and to make donations of public lands to such states." Act of February 22, 1889, Ch.180, 25 Statutes at Large 676. Section 10 of this Act granted sections 16 and 36 in every township to the new states "for the support of common schools." In cases where portions of sections 16 and 36 had been sold prior to statehood, indemnity or "in lieu" selections were allowed. In North Dakota, this grant of land totaled nearly 2.6 million acres.

The Enabling Act provided further land grants to the State of North Dakota for the support of colleges, universities, the state capitol, and other public institutions. Revenues are generated through the prudent management of trust assets, which assets include approximately 706,600 surface acres and nearly 2.6 million mineral acres. Article IX, Section 2 of the North Dakota Constitution that the "net proceeds of all fines for violation of state laws and all other sums which may be added by law, must be faithfully used and applied each year for the benefit of the common schools of the state and no part of the fund must ever be diverted, even temporarily, from this purpose or used for any purpose other than the maintenance of common schools as provided by law."

# NEBRASKA

Good Life. Great Water.

DEPT. OF NATURAL RESOURCES

## Project Review

DATE: August 12, 2022  
 TO: Howard N. Kosht, Department of the Air Force  
 FROM: John Miller, NeDNR  
 SUBJECT: Draft Environmental Impact Statement – Ground Based Strategic Deterrent (GBSD)

As requested, the Nebraska Department of Natural Resources (NeDNR) has reviewed the GBSD deployment-related actions located within the State of Nebraska. The review has found that the proposed project may have affects on our agency’s programs including jurisdictional dams, floodplain management, registered groundwater wells, stream gages, and surface water rights, and has listed the comments below:

### **Jurisdictional Dams**

According to NeDNR records, there are 24 Jurisdictional dams within Banner County, 22 within Cheyenne County, and 23 in Kimball County. For more detailed location information please reference the Departments Inventory of Dams Interactive Map at <https://gis.ne.gov/portal/apps/webappviewer/index.html?id=2aab04a13817421992dc5398ad462e22>. Care should be taken to avoid completing any work within dam embankments or their appurtenances, and measures should be taken to avoid making changes to the reservoir storage areas. Should any work need to be completed within dam embankments, or dam appurtenances, then plans must to be submitted to the NeDNR Dam Safety Section for review and approval before construction can begin. If you have any questions concerning work to be completed contact the Chief of Dam Safety, Tim Gokie at [REDACTED]

### **Floodplain Management**

Banner and Kimball Counties have no floodplain mapping. Since these are unmapped communities, preventive actions should be taken to minimize flood hazards and losses in connection with constructing buildings, roads, and other infrastructure associated with the GBSD project. Regulatory paper maps and preliminary maps for Cheyenne County can be found by accessing the Department’s Floodplain Management Interactive Map located on the web at: <https://gis.ne.gov/portal/apps/webappviewer/index.html?id=7bc8738d3d8f4e87823cc604543b7ddf>. The preliminary maps are not yet regulatory, but encouraged to be used as best available data, as they will become regulatory in the future. All development within a regulated floodplain and/or floodway needs to comply with local floodplain regulations, which includes obtaining a floodplain development permit. If you have any questions concerning floodplain management and permitting please contact the local floodplain administrators, Colleen Terman, at [REDACTED] or [REDACTED] and Bill Hinton, at [REDACTED]. If you have any further floodplain questions, please contact Jamie Reinke, NeDNR Head of Floodplain Management, at [REDACTED].



August 12, 2022

NeDNR Project Review - Ground Based Strategic Deterrent (GBSD)

Page 2

### **Public Supply wells and wells in project area**

According to NeDNR records, there are seven (7) public supply wells within Banner County, fifty five (55) in Cheyenne County and eighteen (18) in Kimball County for the proposed project area. Please note that the attached map does not show the public supply well locations. Please contact the local municipality for more information on public supply well names and locations. All other registered wells are shown on the map, for more detailed location information please reference the Departments Groundwater Interactive Map at <https://dnr.nebraska.gov/groundwater/groundwater-interactive-maps>. Special care should be taken to locate and avoid impacting these wells in any significant way. If the registration status, use, or ownership of a well changes due to the project, one or both of the following forms must be filed with NeDNR: the water well registration modification form and/or the change of ownership form. Furthermore, the appropriate Natural Resources District (NRD), which may have additional rules and regulations regarding such changes, should be notified.

### **New wells**

Any new wells must be registered with NeDNR.

### **Groundwater Resources**

If proposed construction activities include groundwater use, then permits to transfer groundwater may need to be filed with NeDNR and/or the local Natural Resources District (NRD). Each administration should be contacted to discuss permitting requirements.

If you have any questions on groundwater well registrations or groundwater transfer permit requirements, please contact Mike Thompson at [REDACTED] or reference the groundwater links below.

### **Groundwater Links:**

*Interactive Map:* <https://dnr.nebraska.gov/groundwater/groundwater-interactive-maps>

*Groundwater general information:* <http://dnr.nebraska.gov/groundwater>

*Groundwater well data:* <http://nednr.nebraska.gov/dynamic/wells/Memu.aspx>

*Groundwater forms:* <https://dnr.nebraska.gov/groundwater/forms>

*Local NRD Information:* <https://www.nrdnet.org/nrds/find-your-nrd>

### **Stream Gaging – USGS Gages in project area**

NeDNR records indicate that active U.S. Geological Survey (USGS) stream gage, Lodgepole Creek at Bushnell, Station 06762500, is located within the general project area in Kimball County, please see the enclosed figure. Contact the regional USGS office in Lincoln at (402) 328-4100 concerning the impact the project may have on the gage and/or stream.

### **Stream Gaging-NeDNR Gages in project area**

Two (2) active NeDNR stream gages on Lodgepole Creek, Stations 219500 and 219000, are located within the general project area in Kimball County, please see the enclosed figure. NeDNR relies upon the data that stream gages provide to effectively carry out its water administration activities. If the project will impact the stream gage or has a potential to impact the flow in Lodgepole Creek, contact the NeDNR Bridgeport Field Office Supervisor Jim Ostdiek, at [REDACTED] [REDACTED] and Jim Williams at [REDACTED] [REDACTED] or

August 12, 2022

NeDNR Project Review - Ground Based Strategic Deterrent (GBSD)

Page 3

[REDACTED] a month prior to the commencement of actual construction. If you have any questions about the location of stream gages or the potential to impact stream flow, please contact Jeremy Gehle at [REDACTED].

### **Surface Water Rights**

There are several surface water appropriations located in close proximity to the proposed project sites, please see the enclosed figure showing the general locations. Detailed location information can be found on the Departments Surface Water Interactive Map at <https://gis.ne.gov/portal/apps/webappviewer/index.html?id=13cdc423f46a48e4aba069632c8f15c8>. If the details of the surface water right are permanently modified in some way by the project, appropriate modification requests will need to be provided to the Department for review. If you have any questions about surface water appropriations, please contact Mike Thompson at [REDACTED] or reference the surface water links below.

### **Surface Water Links:**

*Interactive Map:* <https://gis.ne.gov/portal/apps/webappviewer/index.html?id=13cdc423f46a48e4aba069632c8f15c8>

*Surface water general information:* <http://dnr.nebraska.gov/surface-water>

*Surface water rights:* <http://nednr.nebraska.gov/dynamic/waterrights/SelectSearchOptions.aspx>

*Surface water rights forms:* <http://dnr.nebraska.gov/surface-water/forms>

*Ownership Change:* <https://dnr.nebraska.gov/sites/dnr.nebraska.gov/files/doc/surface-water/permits/49CHG-OWN2008.pdf>

*Relinquishment by landowner:* <https://dnr.nebraska.gov/sites/dnr.nebraska.gov/files/doc/surface-water/permits/51IndividualRelinquishmentForm.pdf>

### **General Comment as it Relates to Land Acquisition**

It is essential any review of water projects evaluate appropriate alternatives that minimize impact to stakeholders including producers, residents, businesses, and political subdivisions that may not receive direct benefit from those projects. Projects must include the input of the stakeholders and strive for transactions that are willing seller and willing buyer based.

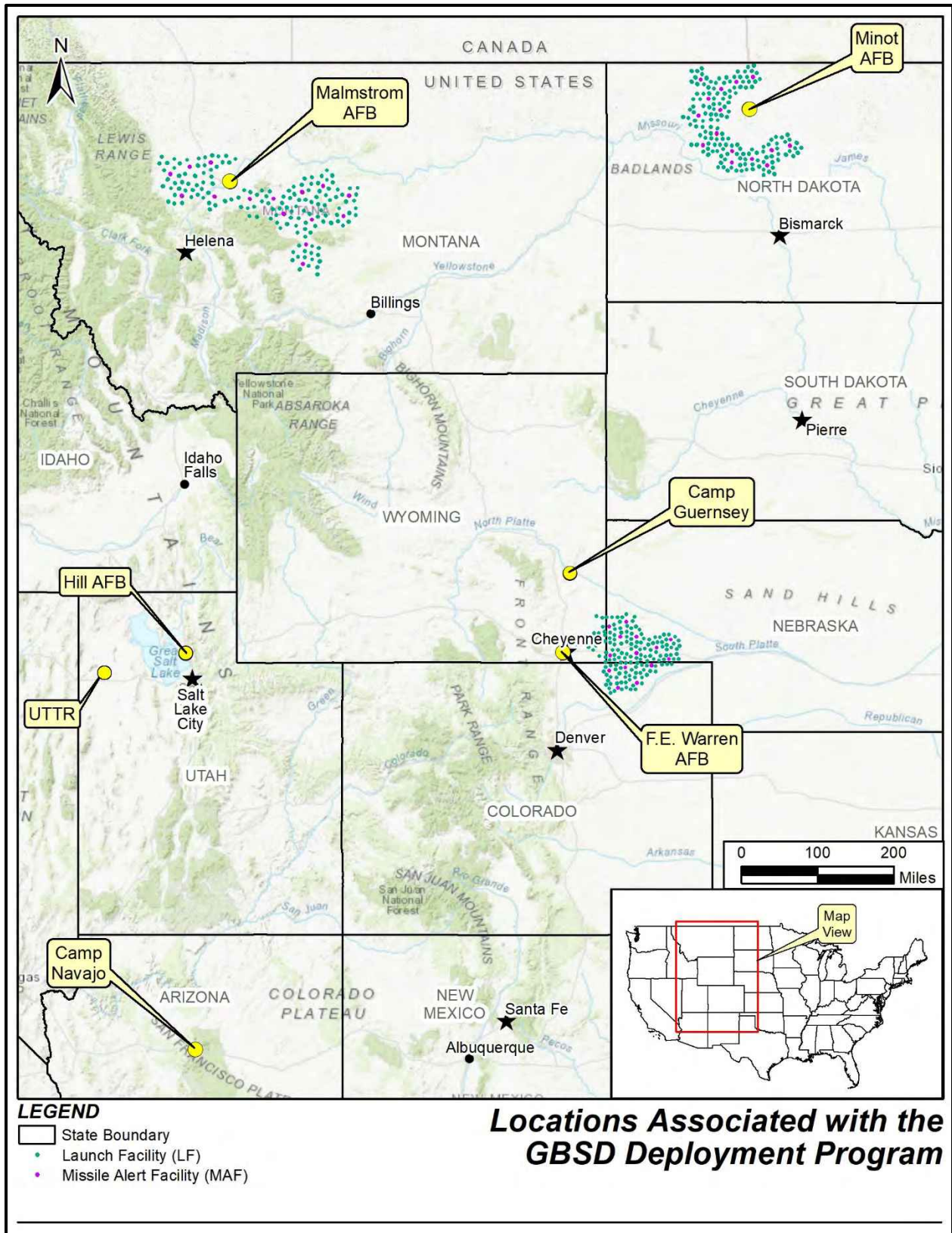
If you have any questions about this review, please feel free to contact me at [REDACTED] or [john.j.miller@nebraska.gov](mailto:john.j.miller@nebraska.gov).

Enclosures

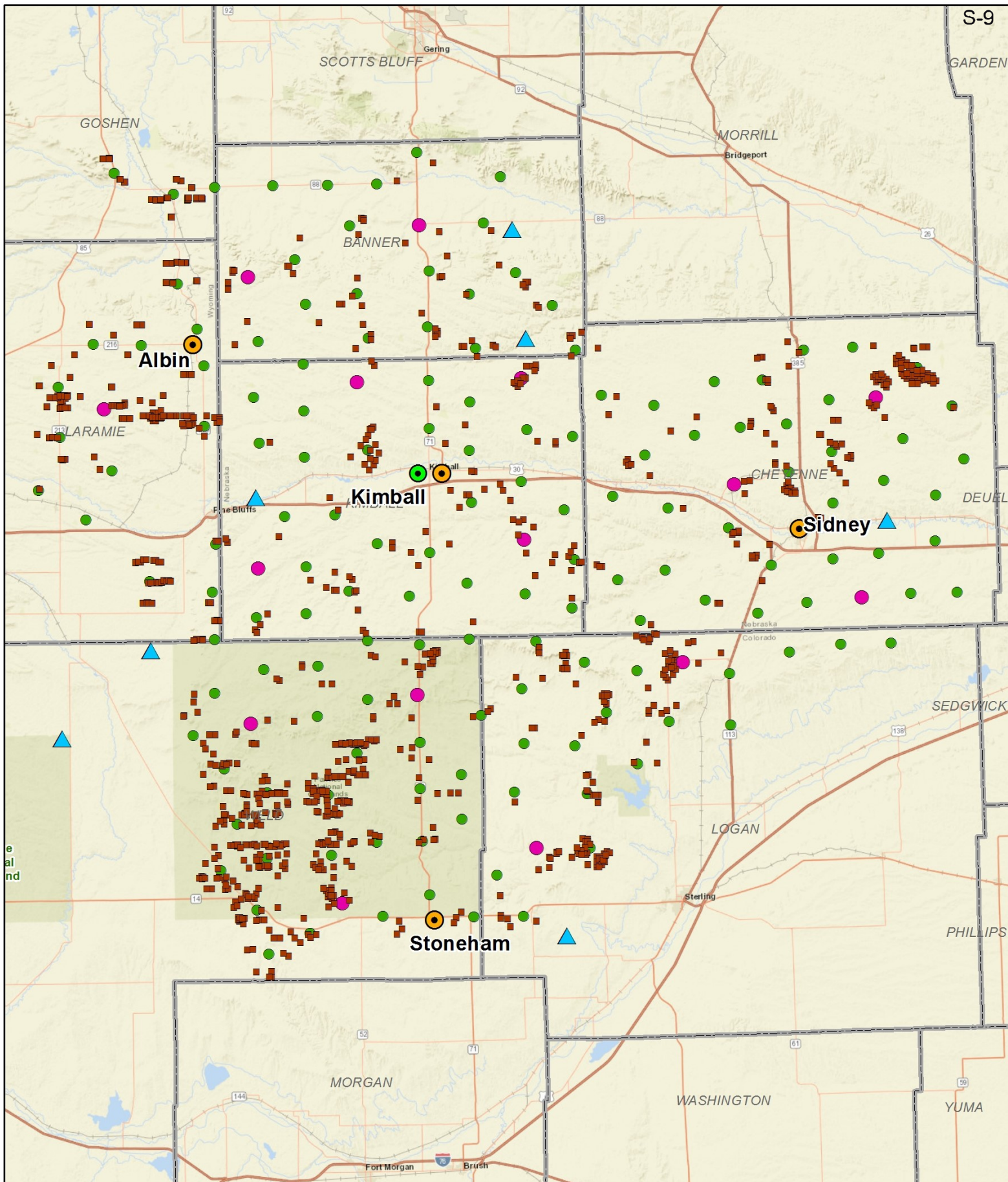
Cc: Mike Thompson, NeDNR

Locations Associated with the  
USAF GBDS Deployment Program



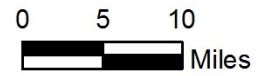






**LEGEND**

- Launch Facility (LF)
- Missile Alert Facility (MAF)
- ▲ Proposed Communication Towers
- Active Oil and Gas Wells within 2NM of LF/MAF
- Workforce Hub
- Laydown Area
- County Boundary



Sources: AFCEC 2019; COGCC 2021; ESRI World StreetMap 2021; HIFLD 2021; WOGCC 2021

Nebraska Department of Natural Resources (NeDNR)  
Area Maps of Resources Managed by NeDNR through  
Jurisdiction by Law or Special Expertise for  
Banner, Cheyenne and Kimball Counties  
USAF GBDS Project

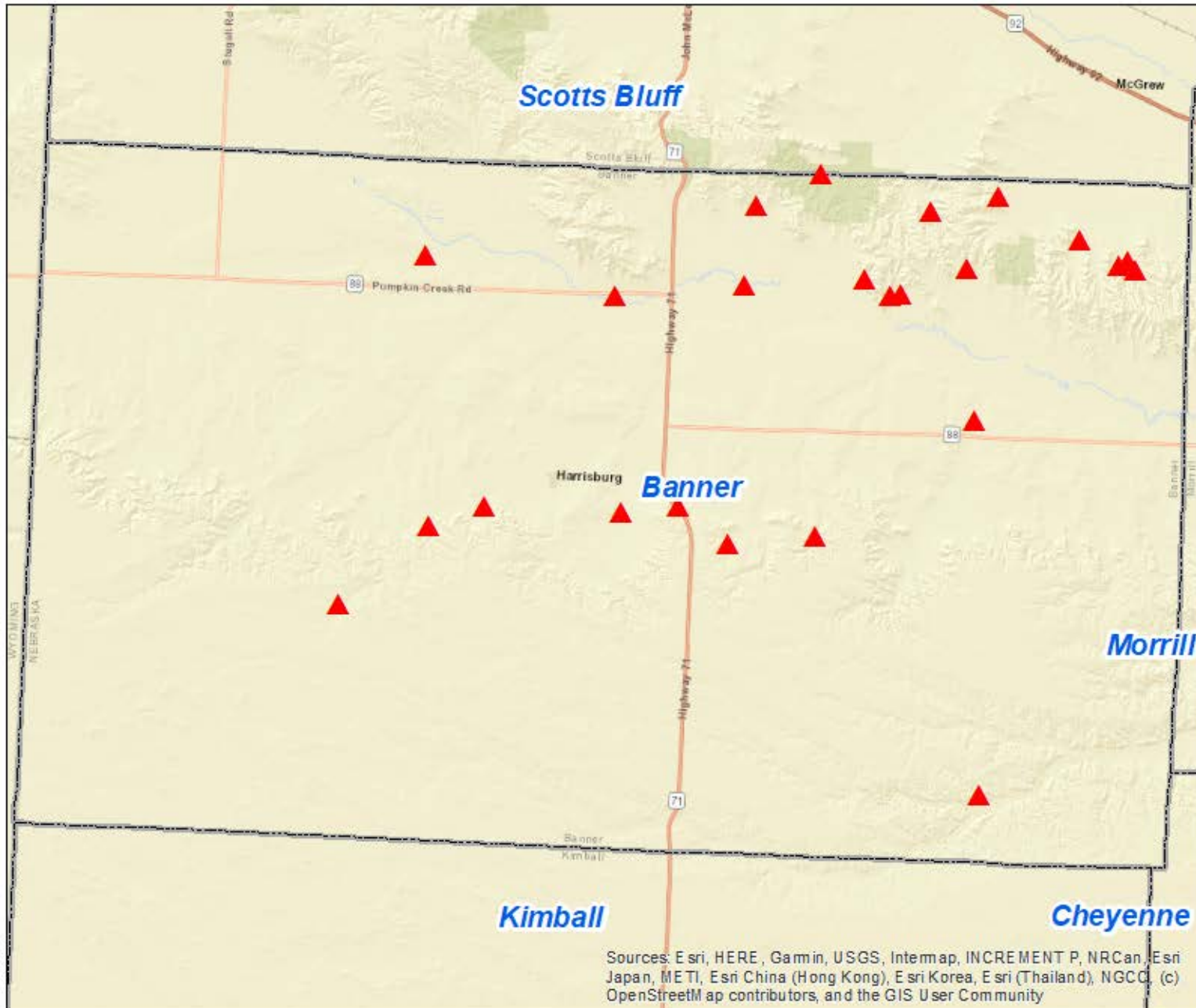
# Jurisdictional Dams Banner, Cheyenne and Kimball Counties

For more detailed location information please reference the Departments Inventory of Dams Interactive Map at:

<https://gis.ne.gov/portal/apps/webappviewer/index.html?id=2aab04a13817421992dc5398ad462e22>



# United States Air Force - Ground Based Deterrent System Draft EIS Banner, Cheyenne & Kimball Counties, Nebraska 7/11/2022



**Legend**

- Approximate Project Area
- 1,000 ft Buffer
- Registered Wells**
- Registered Wells
- Abandoned Wells
- Irrigated Fields
- Major Stream
- NDNR Stream Gage
- USGS Stream Gage
- Jurisdictional Dam

**Flood Hazard Zones**

- Zone Type**
- 1% Annual Chance Flood Hazard
  - Regulatory Floodway
  - Special Floodway
  - Area of Undetermined Flood Hazard
  - 0.2% Annual Chance Flood Hazard
  - Future Conditions 1% Annual Chance Flood Hazard
  - Area with Reduced Risk Due to Levee

**Effective Flood Zone - Paper Map**

- 1PCT Annual Flood Chance

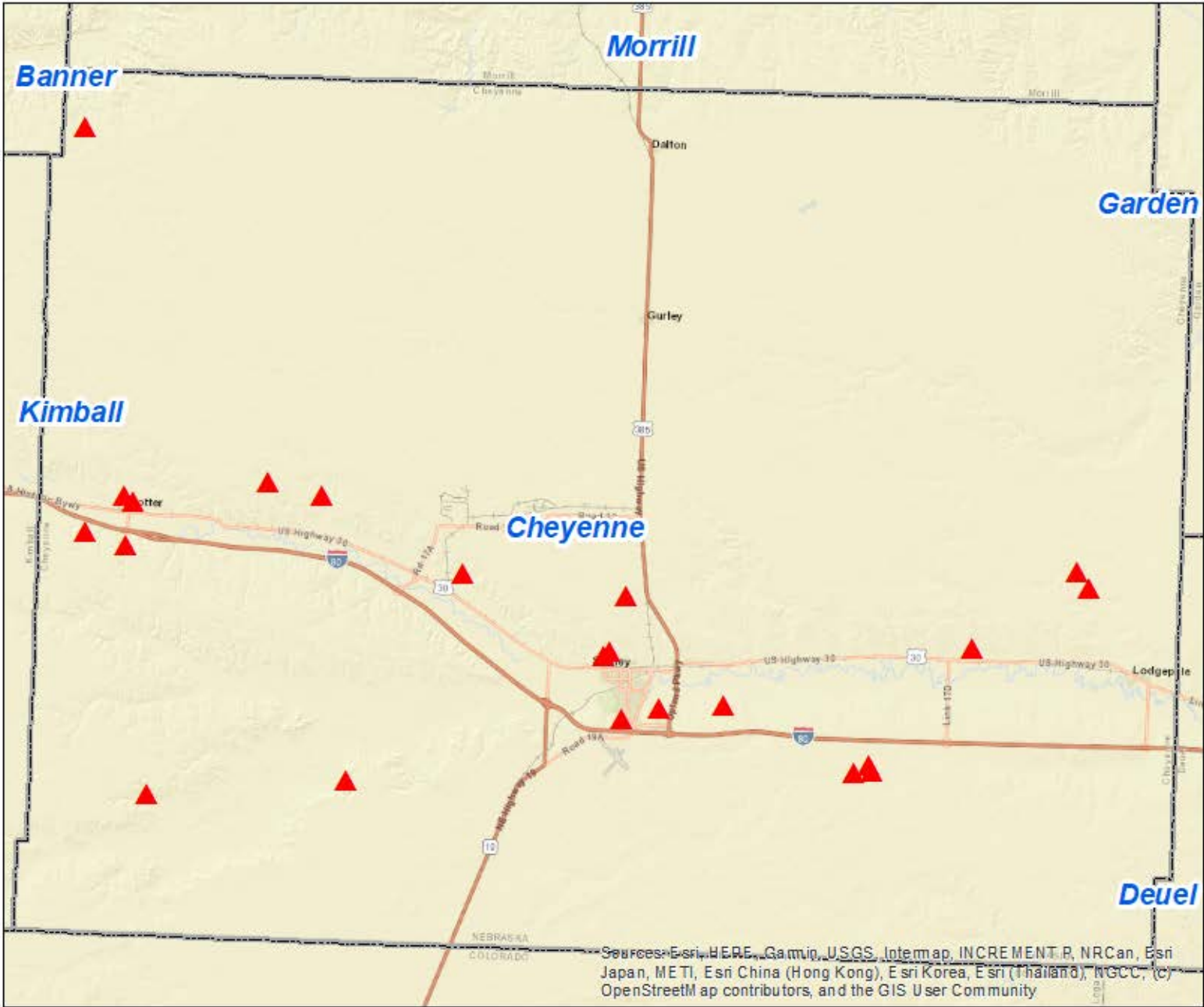


Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

# United States Air Force - Ground Based Deterrent System Draft EIS

## Banner, Cheyenne & Kimball Counties, Nebraska

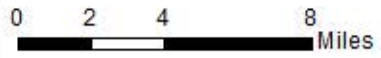
7/11/2022



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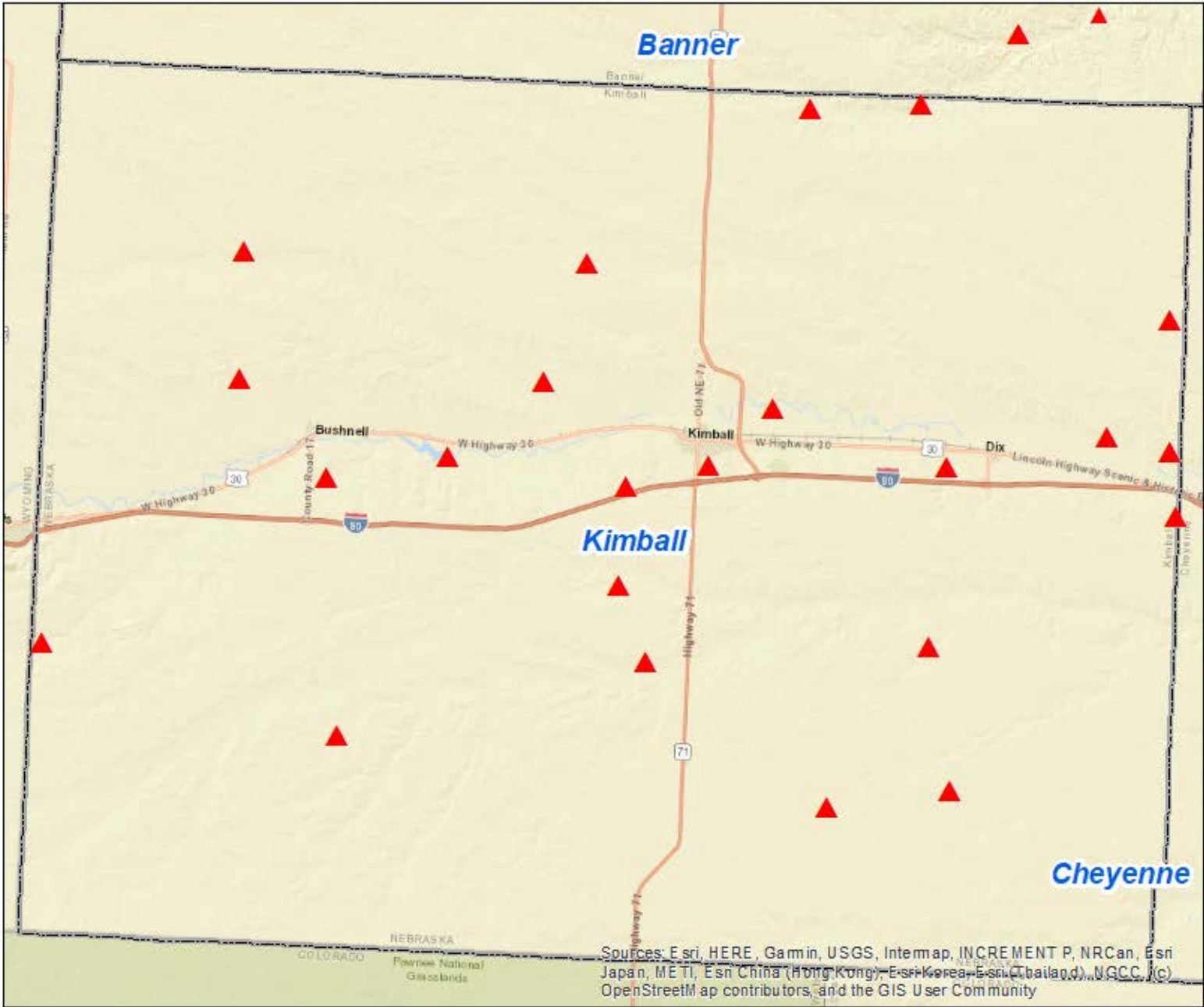
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# United States Air Force - Ground Based Deterrent System Draft EIS

## Banner, Cheyenne & Kimball Counties, Nebraska

7/11/2022



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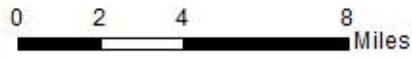
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**Effective Flood Zone - Paper Map**

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## Registered Wells Banner, Cheyenne and Kimball Counties

\*Please note that the attached maps do not show the public water supply well locations. Please contact the local municipality for more information on public water supply well names and locations. All other registered wells are shown on the maps\*

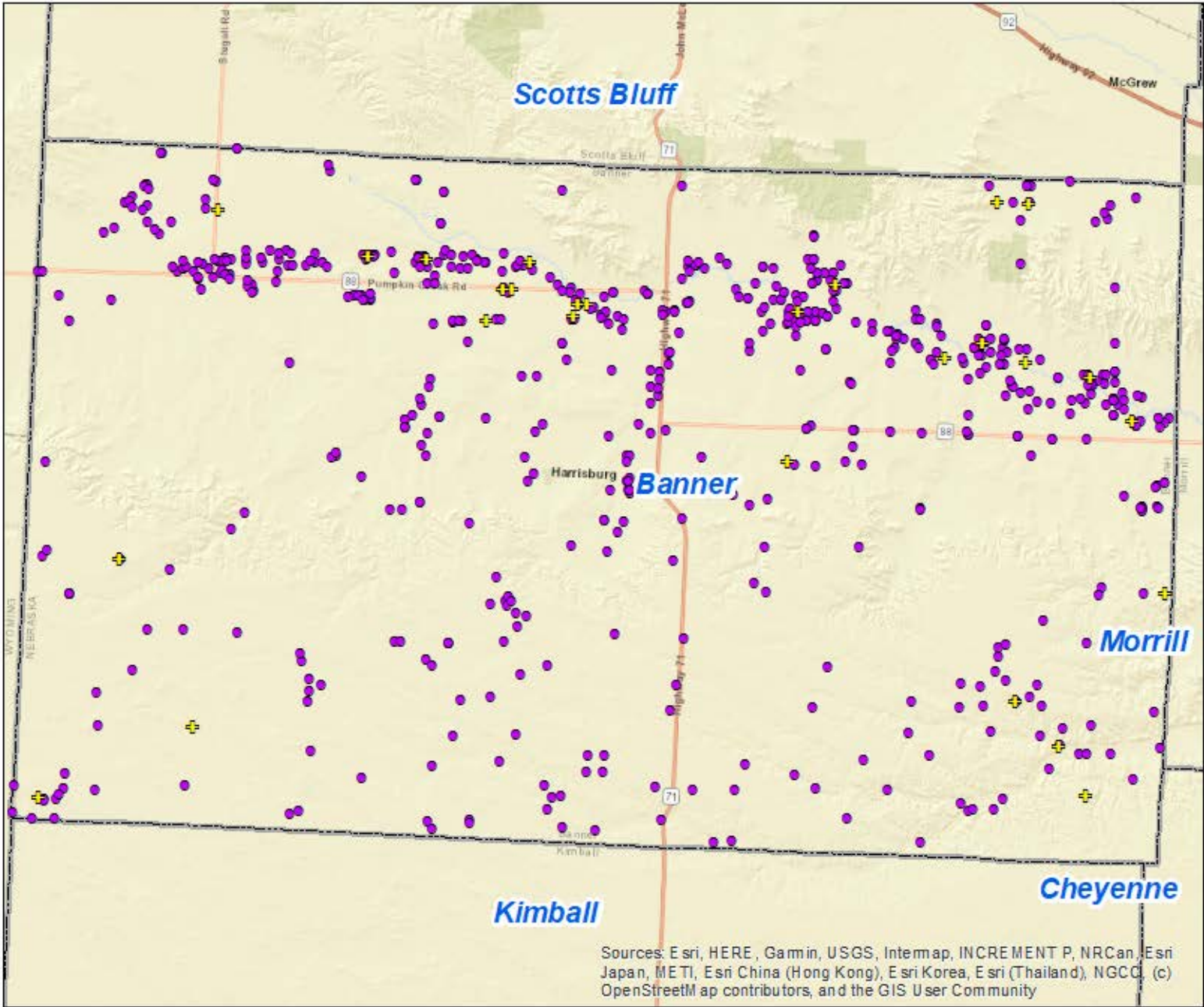
For more detailed location information please reference the Departments  
Groundwater Interactive Map at:

<https://dnr.nebraska.gov/groundwater/groundwater-interactive-maps>

# United States Air Force - Ground Based Deterrent System Draft EIS

## Banner, Cheyenne & Kimball Counties, Nebraska

7/11/2022



**Legend**

- Approximate Project Area
- 1,000 ft Buffer

**Registered Wells**

- Registered Wells
- Abandoned Wells

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- 1PCT Annual Flood Chance



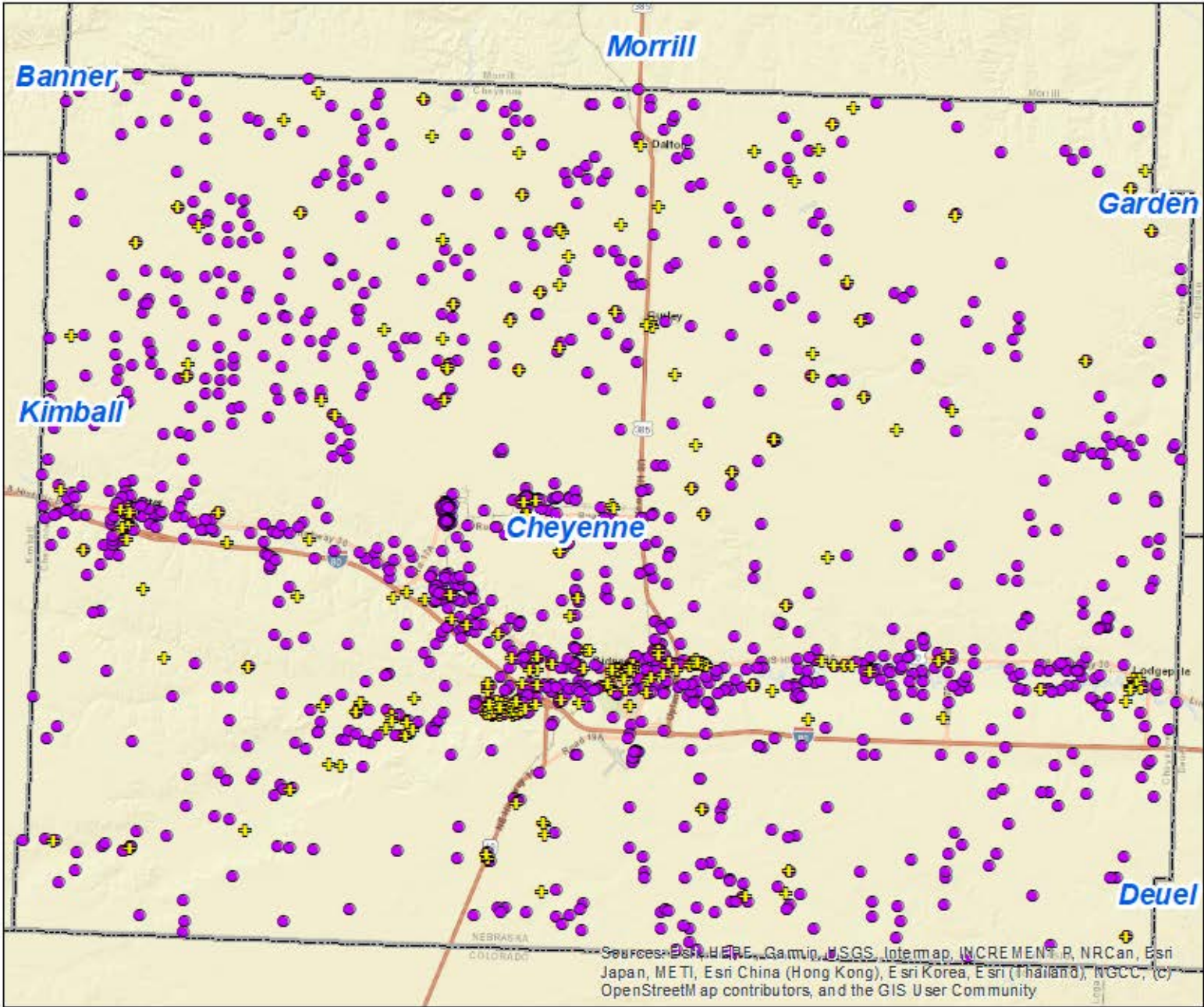
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# United States Air Force - Ground Based Deterrent System Draft EIS

## Banner, Cheyenne & Kimball Counties, Nebraska

7/11/2022



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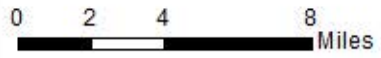
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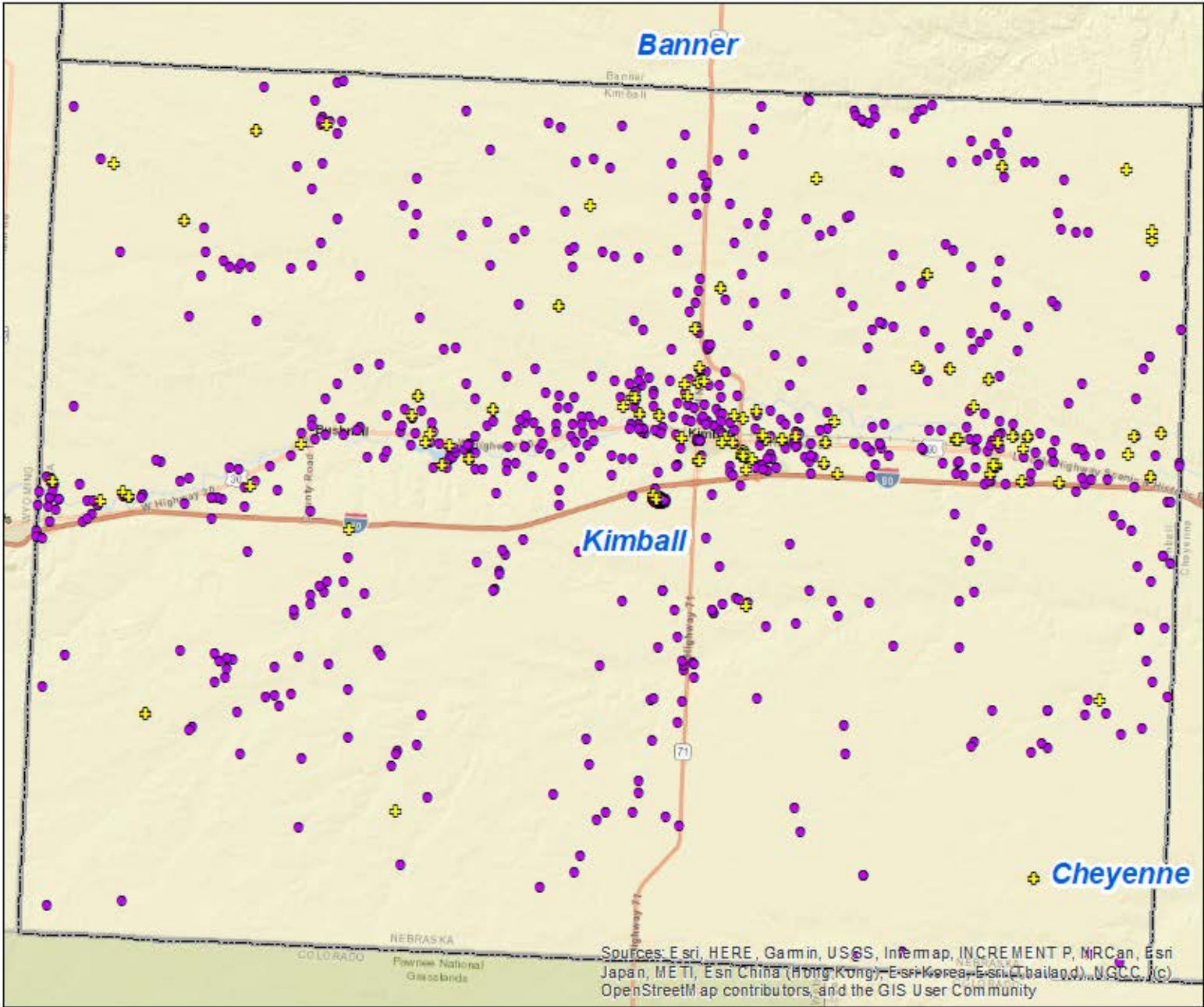
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community



# United States Air Force - Ground Based Deterrent System Draft EIS

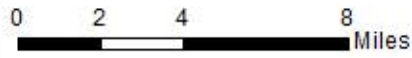
## Banner, Cheyenne & Kimball Counties, Nebraska

7/11/2022



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Sources: Esri, HERE, Garmin, USGS, Intel, mapbox, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

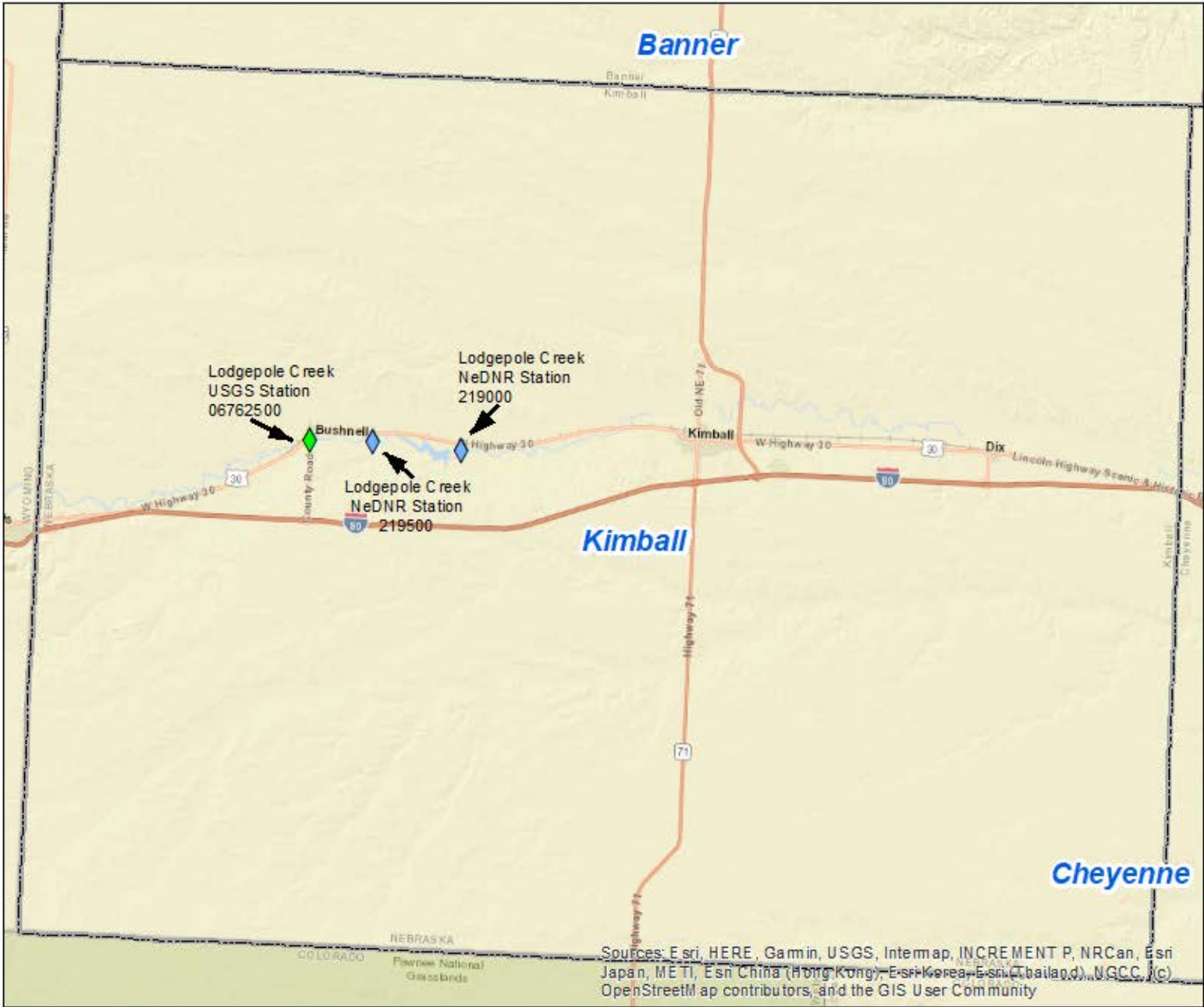
Stream Gages  
Kimball County



# United States Air Force - Ground Based Deterrent System Draft EIS

## Banner, Cheyenne & Kimball Counties, Nebraska

7/11/2022



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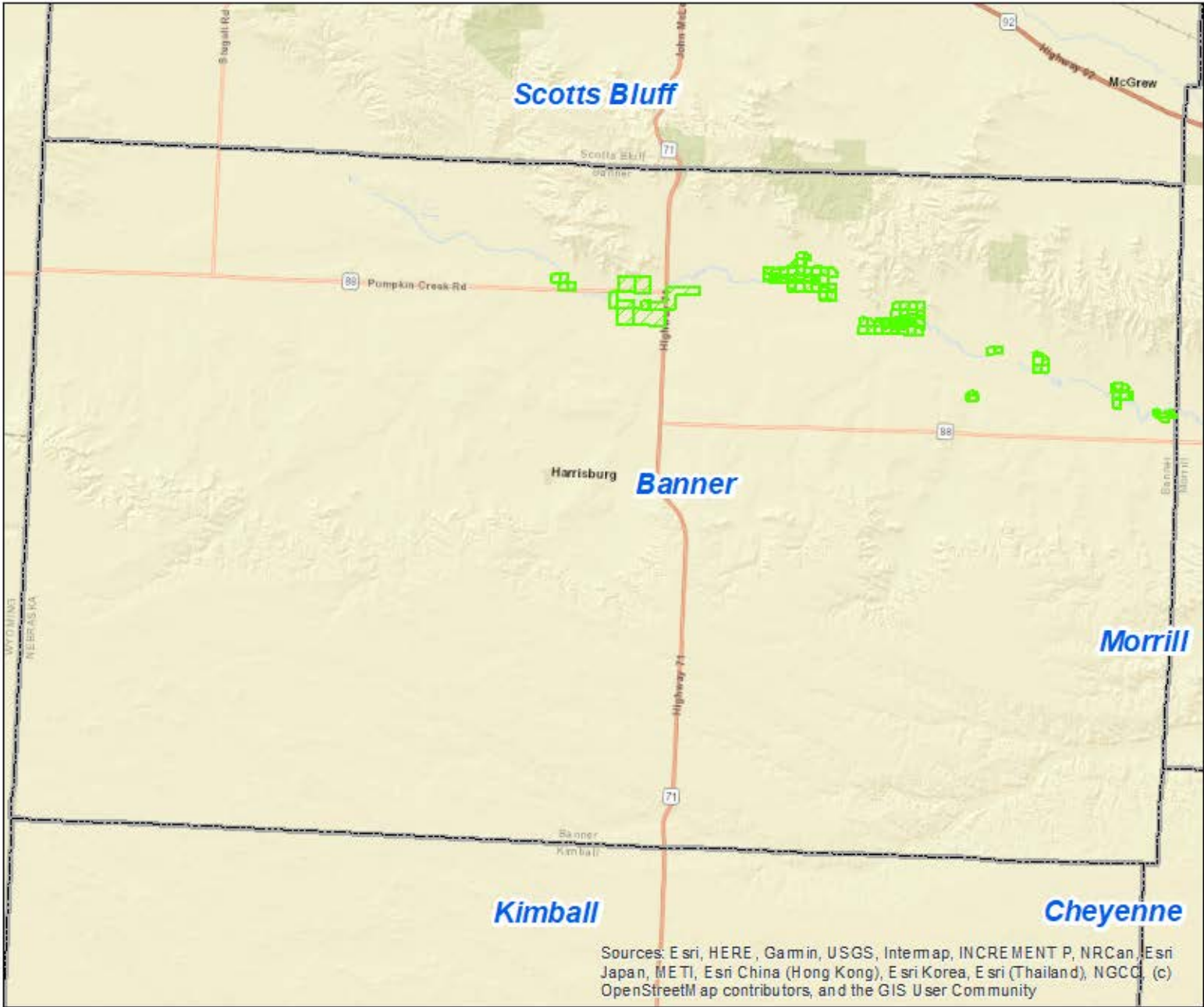
## Surface Water Appropriations Banner, Cheyenne and Kimball Counties

Detailed location information can be found on the Departments Surface Water Interactive Map at:  
<https://gis.ne.gov/portal/apps/webappviewer/index.html?id=13cdc423f46a48e4aba069632c8f15c8>

# United States Air Force - Ground Based Deterrent System Draft EIS

## Banner, Cheyenne & Kimball Counties, Nebraska

7/11/2022



### Legend

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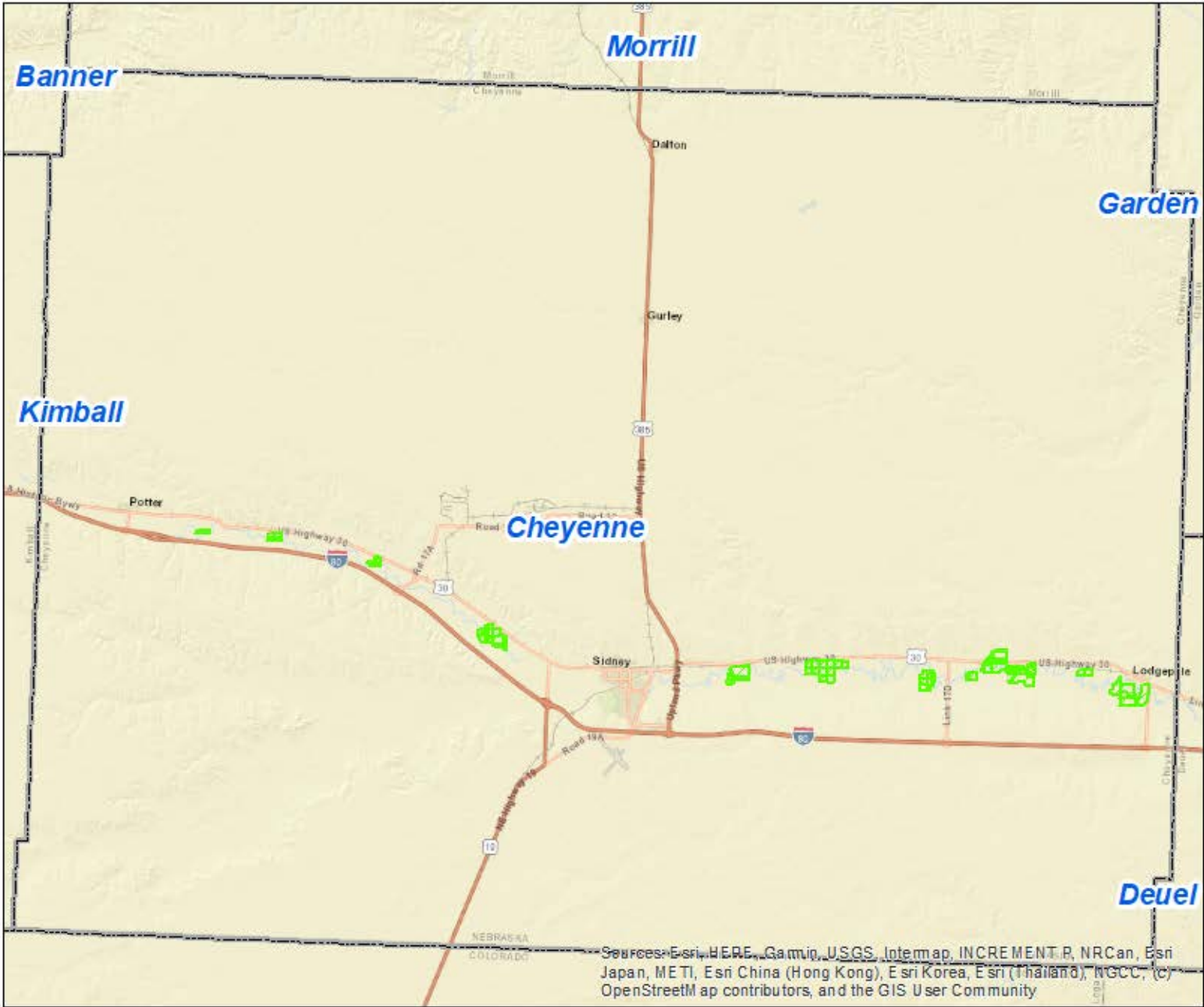
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# United States Air Force - Ground Based Deterrent System Draft EIS

## Banner, Cheyenne & Kimball Counties, Nebraska

7/11/2022



### Legend

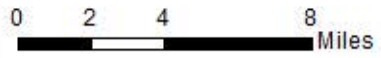
- Approximate Project Area
- 1,000 ft Buffer
- Registered Wells**
- Registered Wells
- Abandoned Wells
- Irrigated Fields
- Major Stream
- NDNR Stream Gage
- USGS Stream Gage
- Jurisdictional Dam

### Flood Hazard Zones

- Zone Type**
- 1% Annual Chance Flood Hazard
  - Regulatory Floodway
  - Special Floodway
  - Area of Undetermined Flood Hazard
  - 0.2% Annual Chance Flood Hazard
  - Future Conditions 1% Annual Chance Flood Hazard
  - Area with Reduced Risk Due to Levee

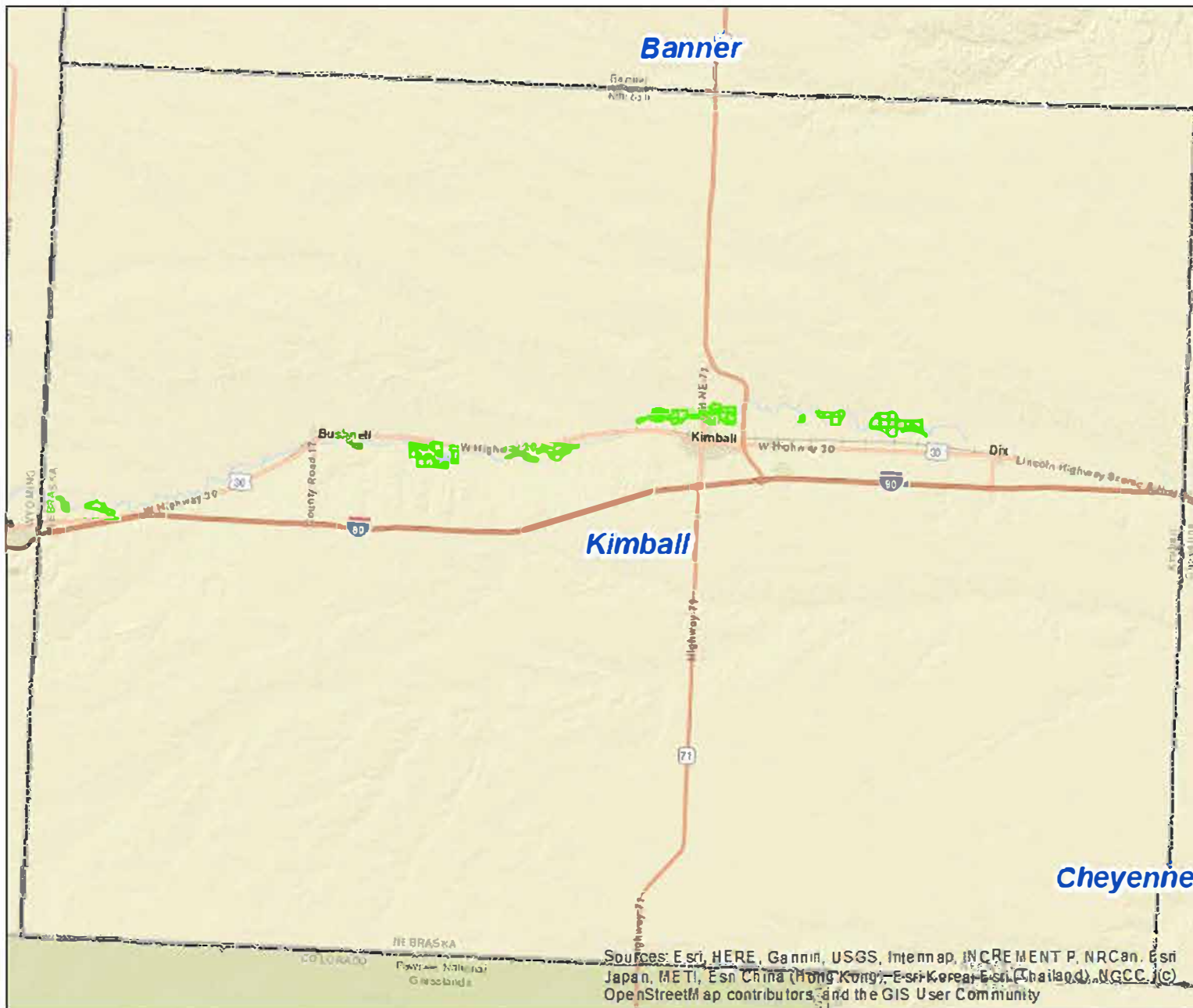
### Effective Flood Zone - Paper Map

- 1PCT Annual Flood Chance



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

# United States Air Force - Ground Based Deterrent System Draft EIS Banner, Cheyenne & Kimball Counties, Nebraska 7/11/2022



- Legend**
- Approximate Project Area
  - 1,000 ft Buffer
  - Registered Wells**
  - Registered Wells
  - ⊗ Abandoned Wells
  - Irrigated Fields
  - Major Stream
  - ◆ NDNR Stream Gage
  - ◆ USGS Stream Gage
  - ▲ Jurisdictional Dam

- Flood Hazard Zones**
- Zone Type**
- 1% Annual Chance Flood Hazard
  - Regulatory Floodway
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  - Area of Undetermined Flood Hazard
  - 0.2% Annual Chance Flood Hazard
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  - Area with Reduced Risk Due to Levee

- Effective Flood Zone - Paper Map**
- 1PCT Annual Flood Chance



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community



## WYOMING GAME AND FISH DEPARTMENT

5400 Bishop Blvd. Cheyenne, WY 82006

Phone: (307) 777-4600 Fax: (307) 777-4699

wgfd.wyo.gov

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ASHLEE LUNDVALL

August 12, 2022

WER 14866.00  
U.S. Air Force  
Draft Environmental Impact Statement  
Ground Based Strategic Deterrent Deployment and  
Minuteman III Decommissioning and Disposal

GBSD EIS  
10306 Eaton Place, Suite 340  
Fairfax, VA 22030  
gbsdeis@tetrattech.com

Dear Sir/Madam,

The staff of the Wyoming Game and Fish Department (Department) has reviewed the Draft Environmental Impact Statement (EIS) for the Ground Based Strategic Deterrent Deployment and Minuteman III Decommissioning and Disposal. The Department is statutorily charged with managing and protecting all Wyoming wildlife (W.S. 23-1-103). Pursuant to our mission, we offer the following comments for your consideration.

The proposed action entails decommissioning and disposing of the existing Minuteman III Intercontinental Ballistic Missile (ICBM) weapons system and replacing it with a newer Sentinel ICBM system at Wyoming's F.E. Warren Air Force Base (F.E. Warren AFB), Camp Guernsey, and a number of existing missile launch and missile alert facilities in southeastern Wyoming. The project would construct an extensive network of missile fields with interconnected utility corridors, co-locating them with existing corridors when feasible. Facilities for equipment assemblage and testing, personnel training, and other related actions would also be constructed. Proposed utility corridors would have a 100-foot temporary easement and 16-foot permanent easement, with approximately 3,000 miles of corridors constructed across several states. A number of <300-foot lighted communication towers would also be constructed, each with a 5-acre footprint and probable guy wires. Also proposed in the EIS is a "Reduced Utility Corridor Alternative", which would entail 75-80% fewer new utility corridor miles and 80-90% fewer affected landowners than the proposed action.

F.E. Warren AFB, Camp Guernsey, and the missile launch and alert sites in southeastern Wyoming are generally characterized by extensive mixed-grass prairie interspersed with riparian meadows and shrublands. Camp Guernsey also contains substantial ponderosa pine woodlands. Both F.E. Warren AFB and Camp Guernsey also contain significant introduced vegetative types, and



GBSD EIS

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developed and landscaped areas. The proposed utility corridor locations are dominated by shortgrass prairie, shrubland, wetlands, coniferous forest, and agriculture. No designated greater sage-grouse core area habitat, big game crucial ranges, or designated big game migration corridors overlap the project areas.

Based on the Department's statutory responsibility to protect Wyoming's fish and wildlife, we offer the following recommendations for this project.

**Select the Reduced Utility Corridor Alternative to minimize disturbance** – Compared to the Proposed Action, the Reduced Utility Corridor Alternative, wherein corridor miles would be reduced by approximately 75-80%, would disturb much less sensitive habitat, significantly reduce impacts to sensitive wildlife and fish, and require significantly less reclamation and mitigation efforts to alleviate impacts. Therefore, the Department recommends:

- Selecting the Reduced Utility Corridor Alternative.

**Protect crucial aquatic habitat areas at Lodgepole and Crow Creeks** - Lodgepole Creek in southeastern Wyoming is designated in Wyoming's 2017 State Wildlife Action Plan (SWAP) as an Aquatic Conservation Area, meaning the management of fishes and habitats in this stream is critical to conserve Wyoming's rarest native fishes. Lodgepole Creek contains some of the highest densities of native fish in the region, including a number of Wyoming Species of Greatest Conservation Need (SGCN). Recent impacts from development have impacted fish passage, affecting native species abundance and diversity. Crow Creek in southeastern Wyoming also provides important aquatic habitat for native species. As such, the Department recommends:

- Installing all project-associated utilities and utility corridors under Lodgepole and Crow Creeks, not through or above the water bodies.
- Preventing any barriers to fish passage via the construction of new roads, corridors, or utilities.
- If roads through these or any other creeks/riparian areas are necessary, constructing bridges with bottomless arches, rather than building roads through the creek and installing culverts.
- Avoiding disturbance to ephemeral wetlands, including playas, dune ponds, and shallow oxbows. If disturbance is necessary, avoid disturbing sites until they are completely dry.
- Using Best Management Practices (BMPs) to prevent disturbances into aquatic systems from construction activities, including impacts from sedimentation and dewatering.

**Consider and protect Wyoming Species of Greatest Conservation Need** – *Table 3.3-4 – Special Status Species Known or with Potential to Occur at F.E. Warren AFB, Missile Field, or Camp Guernsey* includes federal, Nebraska, and Colorado special status species, but does not list Wyoming special status species. Wyoming uses a different terminology than the other two states. Wyoming's special status species are called Species of Greatest Conservation Need (SGCN) rather

GBSD EIS

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than State Endangered or State Threatened. These SGCN should receive equal consideration in conservation, land use, and development planning. Therefore, the Department recommends:

- Including SGCN Tier I and Tier II species that have the potential to occur at F.E. Warren AFB, Missile Field, or Camp Guernsey in *Table 3.3-4* and considering them for avoidance, minimization, and mitigation measures when planning the proposed action. These SGCN are northern long-eared bat, Preble's mountain jumping mouse, swift fox, black-tailed prairie dog, burrowing owl, upland sandpiper, mountain plover, long-billed curlew, northern goshawk, ferruginous hawk, orangethroat darter, plains killifish, plains topminnow, Iowa darter, brassy minnow, common shiner, northern leopard frog, plains spadefoot toad, plains hog-nose snake, greater short-horned lizard, and eastern spiny softshell turtle. Additionally, plains sharp-tailed grouse are a Wyoming species of concern that will be added to the SGCN in the next revision, and thus should be included.

**Include Wyoming SGCN in mitigation measures for biological resources** – *Table 3.3-32 – Mitigation Measures – Biological Resources* lists a number of important measures to avoid, minimize, and mitigate impacts to sensitive biological resources in the vicinity of project-related actions. The Department supports these measures and encourages the U.S. Air Force to follow all listed actions. Additionally, to protect Wyoming's SGCN, the Department recommends the following edits and additions to this table and to discussions of avoidance, minimization, and mitigation measures in the text of the EIS:

- **BIO-58** – adding reference to following U.S. Fish and Wildlife Service (Service) guidance around active raptor nests. The Service has jurisdiction over nesting raptors via the federal Migratory Bird Treaty Act, regardless of nest location or surface ownership.
- **BIO-85** – eliminating reference to Nebraska and conducting these swift fox surveys across all project areas. At the minimum, the Department recommends adding all Wyoming lands, as swift fox are a SGCN.
- **Black-tailed prairie dog colonies:** avoid siting utility corridors in active prairie dog colonies, particularly when corridors are not co-located with existing disturbance. Prairie dog colonies provide important habitat for a number of other Wyoming SGCN.
- **Burrowing owl, mountain plover, upland sandpiper, and long-billed curlew:** if pre-construction surveys document occupied breeding habitat (i.e., individuals observed acting territorially during the spring avian breeding season), avoiding surface disturbance within 0.25-miles of the occupied habitat between April 1 and July 31.
- **SGCN fish, northern leopard frog, plains spadefoot toad, and eastern spiny softshell turtle:** avoiding impacting aquatic habitat quality via the BMPs suggested in this letter's second paragraph of recommendations.
- **Plains hog-nosed snake and greater short-horned lizard:** minimizing disturbance to open sandy areas and sandy blow-outs within grasslands and mixed-grass shrublands whenever feasible.

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- **Plains sharp-tailed grouse:** maintaining no surface occupancy of any project development within 0.25 miles of the boundary of an occupied lek, and avoiding ground-disturbing activity within 2 miles of the boundary of an occupied lek during April 1 to July 15.

**Target reclamation efforts to restore native vegetation and avoid the spread of weeds and invasive species** – The Department recommends reclamation efforts be targeted to restore native vegetation to the site, as well as to avoid the spread of noxious weeds and annual invasive grasses (IAGs) such as cheatgrass. To achieve successful reclamation, the Department recommends:

- Planting herbaceous vegetation that matches the native species composition present in and around the site.
- At rangeland/grassland sites, including at least three to four grass species in each seed mix, targeted to the specific site.
- In riparian areas, the planting of willows and/or cottonwoods can replace woody cover removed through disturbance. Deciduous shrubs such as currant, chokecherry, native plum, wild rose, and buffaloberry may also be considered.
- Preventing weed and IAG introduction and establishment by cleaning vehicles and equipment prior to movement to a new location in order to minimize the potential for transporting seeds.
- Working with land managers to develop and implement a plan to assess, treat, and monitor for weeds and IAGs at the project scale and in the adjacent landscape where they are present.
- Working with local Weed and Pest districts to implement and fund long-term plans for successful restoration of disturbed sites.

**Minimize risk of bird collisions with communication towers** - Many species of birds, particularly nocturnal migrants, are at risk of death by collision with towers and associated infrastructure. Tower height and lighting are the most significant contributors to substantial bird mortality from collisions with towers. Risk of death for birds can be substantially reduced by implementing BMPs. In addition to the BMPs listed in *Table 3.3-32*, we recommend:

- Constructing towers under 200 feet tall with no lighting.
- If lighting is required, pursuing permitting of an Aircraft Detection Lighting System (ADLS), which triggers tower lighting only when nearby aircraft is in radar range.
- If ADLS is not feasible, using only white or red flashing lights, with the minimum number of lights, minimum intensity (<2,000 candela), and minimum number of flashes per minute allowable.
- Constructing self-supporting structures that do not require guy wires. If guy wires must be used, attach bird diverter markers at 3-foot intervals along the length of all guy wires.
- Co-locating towers with existing development when feasible.
- When siting towers, avoiding habitat features that congregate wildlife, such as water resources, habitat edges, and high-use movement areas.

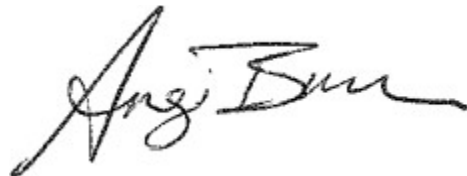
GBSD EIS

August 12, 2022

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Thank you for the opportunity to comment. If you have any questions or concerns, please contact Lauren Throop, Habitat Protection Biologist, at [REDACTED]  
[REDACTED]

Sincerely,

A handwritten signature in black ink that reads "Angi Bruce". The signature is written in a cursive, flowing style.

Angi Bruce  
Deputy Director

AB/lc/ct

cc: U.S. Fish and Wildlife Service  
Keaton Weber, Wyoming Game and Fish Department  
Lee Knox, Wyoming Game and Fish Department  
Ryan Amundson, Wyoming Game and Fish Department  
Martin Hicks, Wyoming Game and Fish Department  
Christina Barrineau, Wyoming Game and Fish Department  
Bobby Compton, Wyoming Game and Fish Department  
Zack Walker, Wyoming Game and Fish Department  
Chris Wichmann, Wyoming Department of Agriculture



August 10, 2022

Howard N Kosht, GS-15, DAF  
Reply to: GBSD Project EIS  
10306 Eaton Place, Suite 340  
Fairfax, VA 22030

Executive Director Kosht,

Thank you for the opportunity for the State of Wyoming to comment on the Draft Environmental Impact Statement (DEIS) for the Ground Based Strategic Deterrent Deployment and Minuteman III Decommissioning and Disposal.

Wyoming is proud to be home to F.E. Warren Air Force base and values the contributions it makes to our state. The Ground Based Strategic Deterrent Deployment and Minuteman III Decommission and Disposal is very important to our Air Force Base, State, and citizens. The on and off base construction and operation activities will be vital to our economy.

The State of Wyoming is committed to this critical project and we are willing to address potential issues for the smooth and efficient development of this project. The State of Wyoming supports either the Proposed Action or the implementation of the Reduced Utility Corridor.

Attached you will find comments from the State of Wyoming. In an effort to be as helpful and clear as possible, some comments include suggested language changes. There are also a number of general comments that apply to either an entire resource section of the DEIS or the DEIS as a whole. Please review the comments provided by Wyoming state agencies closely, and please contact us if you have any questions or need further clarification. If you have any questions please contact Erica Legerski in my office at [REDACTED]. On behalf of our state cooperating agencies, we would welcome the opportunity to discuss the potential agency preferred alternative.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark Gordon", is written over the word "Sincerely,".

Mark Gordon  
Governor

cc: The Adjutant General, Gregory C. Porter, MG, WY NG

Air Force's Draft EIS for the Ground Based Strategic Deterrent Deployment and Minuteman III Decommissioning and Disposal - August 2022							
Commenter	Document	Section	Page #	Component #	2022 EIS Language	Cooperator Recommended Language	Cooperator Explanation of Recommended Language
WYDOT	DEIS			General Comment			All work within the WYDOT right-of-way will require permitting.
WYDOT	DEIS			General Comment			All Highway crossings will require a utility license, M-54 and have certain requirements.
WYDOT	DEIS			General Comment			Any operation/maintenance of roads will need access permits.
WYDOT	DEIS			General Comment			Disturbed areas will need to be restored to original conditions within the right-of-way.
WYDOT	DEIS			General Comment			Traffic control as per the Manual on Uniform Traffic Control Devices for streets and highways.
WYDOT	DEIS			General Comment			Provide a traffic control plan for component deliveries with input from WYDOT, Wyoming Highway Patrol, and local law enforcement.
WYDOT	DEIS			General Comment			Detailed plans for OWL turnarounds/closures at interchanges, intersections, or median crossovers. Reference WYDOT standard plan for Planned Event Turnaround.
WYDOT	DEIS			General Comment			Provide operational analysis/design for major intersections or interchanges affected and identify temporary improvements/changes to accommodate OWL's.
WYDOT	DEIS			General Comment			All OWL hauling companies MUST have proper experience and certifications.
WYDOT	DEIS			General Comment			Any modifications to I-80 Interchange ramps will require a submittal to FHWA for approval.



Air Force's Draft EIS for the Ground Based Strategic Deterrent Deployment and Minuteman III Decommissioning and Disposal - August 2022							
Commenter	Document	Section	Page #	Component #	2022 EIS Language	Cooperator Recommended Language	Cooperator Explanation of Recommended Language
WYDOT	DEIS			General Comment			Ensure WYDOT right-of-way markers are not disturbed.
WYDOT	DEIS			General Comment			Any incoming or outgoing utilities within the WYDOT ROW will need to be licensed through the District Maintenance Office.
WDA	DEIS		3-62	General Comment	At Camp Guernsey, construction would occur within a small portion of the Cantonment Area and South Training Area (STA).		Camp Guernsey is unique and incorporates a leased livestock grazing program. Livestock grazing on Camp Guernsey benefits local livestock producers, but also benefits Camp Guernsey as grazing is used as a vegetation management tool to reduce wildfire in the surrounding areas. WDA supports the DEIS to acknowledge and include livestock grazing under the vegetation resources section for Camp Guernsey and FE Warren, Chapter 3, Effected Environment. It remains unclear from the DEIS if livestock grazing pastures or the permittees would be impacted from the range of alternatives. We believe it is imperative to ensure current livestock grazing lessees are notified of this project and provide them the opportunity to comment based on concise and clear information. Finally, we are unaware if livestock grazing occurs in other areas managed by FE Warren. If livestock grazing does occur, in areas where vegetation is removed due to construction, we believe the DEIS must address this as a direct impact.
WDA	DEIS		3-72	Table 3.34			The Table 3.34 neglects to include Wyoming, only Nebraska and Colorado for any wildlife, plant, or insect. While Colorado Butterfly Plant is delisted from the USFWS, the plant does occur and is monitored on FE Warren property. See map on page 3 - 94 and 3 - 111. We recommend the DEIS modify the table to include Wyoming and the Colorado Butterfly Plant.
WSGS	DEIS						The project sites are located in areas of generally low geologic hazards (far from known active faults, light to moderate ground shaking hazard according to USGS NSHM 2% in 50 years exceedance levels, no mapped landslides, no known expansive soils, etc). As long as the applicant and contractors avoid obviously unstable locations like cliff escarpments (e.g. Pine Bluffs), active floodplains, and dune fields, there should not be any geologic hazard-related issues with the construction.
WSGS	DEIS						Some roads and utility corridors will cross active floodplains - mitigation for this is adequately discussed in the EIS.

Air Force's Draft EIS for the Ground Based Strategic Deterrent Deployment and Minuteman III Decommissioning and Disposal - August 2022							
Commenter	Document	Section	Page #	Component #	2022 EIS Language	Cooperator Recommended Language	Cooperator Explanation of Recommended Language
WSGS	DEIS		455				On page 455 of the PDF (numbered 3-319 in the EIS), there is a sentence that says "The State of Wyoming does not regulate the collection or removal of fossils on state or private lands." the state DOES regulate collection and removal on state lands (overseen by State Lands).
WSEO	V.1.DEIS	3.15.1.1	641 - 690	General Comment		Additional language to 3.15.1.1.1 following pgr.1 : Article 8. Section I of the Wyoming Constitution states "The water of all natural streams, springs, lakes or other collections of still water, within the boundaries of the state, are hereby declared to be the property of the state." Therefore, any impoundments or diversion of waters of the State will require proper permitting. The Wyoming State Engineer's Office will be coordinated with as to specific plans for alterations or diversions from groundwater and from or to surface water sources in the State of Wyoming prior to commencing work.	After review of the document as a whole there is no mention of quantities or permitting beneficial uses of water. Throughout 3.15 there is language that reflects having waters trucked in for construction purposes but without details of where that water will be trucked in from, e.g. 3-652, 3-656, 3-664, 3-669. The state of Wyoming requires a permit for any Temporary Water Hauls that incorporate construction projects along side of any other diversion of surface or groundwater.
WSEO	V.1.DEIS	3.3	3-53	General Comment	Regarding description of relevant statutes and regulations	Platte River Recovery Implementation Program (PRRIP) description and addition of acronym to list	PRRIP is an important regulatory program in the Platte River drainage which numerous of the LF's, MAF's, Cheyenne, and Camp Guernsey are part of.
WSEO	V.1.DEIS	3.15.1.2	3-651	General Comment	Groundwater in Wyoming is classified as Groundwater of the State	Surface and groundwater in Wyoming are classified as Waters of the State	Repetitive inclusion of statements including both the surface and groundwater status in Wyoming is valuable
WSEO	V.1.DEIS	3.15.1.2	3-651	General Comment	Additional language to follow "Wyo. Stat. § 35-11-302 (Air Force 2013b).	Title 41-3-308 (d) The state engineer shall provide for the regulation and supervision of all dams, diversion systems and reservoirs by the state to the extent required to protect the public safety and property. The state engineer is authorized and directed to promulgate regulations and standards for the design, construction, enlargement, alteration, abandonment, maintenance, monitoring, operation, repair and removal of dams, reservoirs, and diversion systems as are necessary and proper to carry out the purposes of this act.	Describing the contact, relationship and involvement of the Safety of Dams (SOD) Division at the Wyoming State Engineer's Office is valuable in the event there is issue with any impoundments falling within the guidelines of SOD in Wyoming.
WSEO	V.2.DEIS	Stakeholder Mailing List	7	Correction	Stakeholder Mailing List	The Stakeholder Mailing list needs to be updated as many position holders have changed. Noted inaccuracies: Brandon Gebhart is now the Wyoming State Engineer, formerly WWDO Director, please add the State Engineer's Office to the Mailing List. The WWDO Interim Director is Jason Mead, subject to change before the final version of the EIS, please check back.	Addressing discrepancies in the document



**Draft EIS Comment Form | Comments on the Draft EIS should be submitted by August 15, 2022**

For more information regarding this project or to submit comments electronically visit: <https://www.gbsdeis.com>

Name: Sharon White Bear

Organization:

Address:

Email:

**Affiliation (please check a box):**

- Private citizen
- Nongovernmental organization
- Historic preservation organization
- Native American Tribe member
- Native American Tribe government representative
- Business/commercial organization
- Elected official
- Local government
- State government
- Federal government
- Other: \_\_\_\_\_

**Please check the box next to the topic area(s) that you have comments/concerns about:**

- Air quality
- Airspace use
- Biological resources
- Cultural resources
- Environmental justice
- Geology and soils
- Hazardous materials and waste
- Health and safety
- Land use
- Noise
- Proposed action and alternatives
- Socioeconomics
- Transportation and traffic
- Utilities and infrastructure
- Visual resources
- Water resources
- Other: \_\_\_\_\_

**Comments:**

Why is it that we always have to move?  
Why can't the project find another way, so  
as not to effect Cultural

water

## MHA Nation

NELSON HEART: Good evening. For the record, my name is Nelson Heart. N-E-L-S-O-N last name Heart, common spelling, H-E-A-R-T. Currently employed with MHA Nation Three Affiliated Tribes as the Chief of Police for the law enforcement program here. But also, an enrolled member of the MHA Nation. Like some of the ones that have gone before me, you know, just hearing this yesterday – I'm probably not in tune with the news or I missed it in the news or newspapers, but see, that you all were calling with those that came before you yesterday and you know, with the short meeting we had. This evening in speaking with one of our veterans beforehand spoken about you know, you know doing the construction of these silos within Fort Berthold Reservation back in the I believe you said the 70s or maybe it was in the 60s. With the workforce, looking at the paper that you all provided, one of the concerns that I have is when I see that the workforce grow over the man camps that kind of came in the early 2000's or late 2000's, 2008 or 07 when we started having an influx of the energy development within North Dakota here. Looking at the slides when you just gave the presentation was the increased activity in terms of personnel, or [unintelligible] what Logan talked about was with the disposal. I was wondering what disposal? What are they talking about that? I wasn't really queued in as to what that meant. The possibility of if they are renovating or some of their stuff there where are you going to take some of the rubble or whatever from these silos as you do pass work or add on or if you wrecked the facility within the communication towers, looking at that, I was kind of curious to see how many are within Fort Berthold Indian Reservation. If there are any that are preplanned or if any, have been determined. Also, the existing silos that are already, missile facilities within the reservation I'm kind of curious as to see what we are going to be – what's in store for us. I think further down here whether the it's 2029 or something I heard from one of the officers that I was having a conversation with. One of you all. Like I said, you talk about the increase of people coming in and looking at within our department. You know, trying to match as the people come in, whether they are on the reservation or off the reservation, it's possible that during their down time they are going to go to the casino or is that something we are going to come across being a law enforcement program and go there the person that we currently have, what do we have to get, wanting some numbers as to what we can expect the longevity or the duration of these projects within the Fort Berthold Indian Reservation. Those are some of the things I talked about. Lisa and her staff also said that they had these meetings and brought in our cultural department for them and this program where there's sites and there is potential digging which it shows there are wiring and what else. Those are some of the issues or concerns that I have as far as potential crime and the people that were going to get and those that bring on the temporary workforce and whether they are going to be checked and whether their backgrounds and what not. If there is anything that would be a red flag. That you would bring that personnel to the reservation. We can't control what people do when they are not working. Thank you.

## **PART 2: PUBLIC HEARING TRANSCRIPTS**

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1  
2 THREE AFFILIATED TRIBES  
3 FORT BERTHOLD RESERVATION

IN THE DISTRICT COURT  
NEW TOWN, NORTH DAKOTA

4  
5 Public Hearing Transcript

6  
7 DRAFT ENVIRONMENTAL IMPACT  
8 STATEMENT FOR THE GROUND BASED  
9 STRATEGIC DETERRENT DEPLOYMENT  
10 AND MINUTEMAN III  
11 DECOMMISSIONING AND DISPOSAL

12 APPEARANCES:

13 Hearing Officer:

14 Lt.Col. Shad Kidd  
15 Hearing Judge and Wing  
16 Leadership

C O N T E N T S

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TESTIMONY:	PAGE
LOGAN DAVIS	4-6
SHARON WHITE BEAR	6-8
JERRY RUTH BIRDS	9
BILL FORD	
NELSON HEART	10-12

1 P R O C E E D I N G S

2 LT.COL. SHAD KIDD: We've reached the  
3 third part of this hearing which is your opportunity to provide  
4 the Air Force with your comments and Draft EIS by making statements  
5 for the record. The court recorder is recording everything stated  
6 during this portion of the hearing so that it will become part of  
7 the record. The public hearings and commentary are part of the  
8 environmental impact analysis process. This comment process gives  
9 you, the public, the opportunity to provide the Air Force with  
10 your concerns about the draft EI information on your community  
11 that is relevant to it. These comments will be part of the official  
12 project and substantive comments will be addressed in the final  
13 EIS. This will insure that the Air Force decision maker benefits  
14 from your local knowledge and is aware of your concerns about the  
15 environmental analysis. Throughout the comment process I ask that  
16 keep in mind that this is not hearing up for debate. Nor is this  
17 hearing designed as a question and answer portion. Rather this  
18 hearing is a venue for the Air Force to gather your concerns and  
19 any additional data or recommended changes that you may have.  
20 Whether they are through the oral or written comment process  
21 regarding the environmental analysis and the environmental impacts  
22 identified under the proposed action and alternatives. We ask  
23 that you focus your comments on the issues related to the GBSD

1 proposal and the Draft EIS. So, what will happen is, I will  
2 announce the names of the people who have signed up. Right now,  
3 there is just one person who has signed up and indicated that he'd  
4 like to make a comment. So, if there are any others then you can  
5 go ahead and sign up back up at the back there, they'll help you  
6 sign up so we can get it on the record. Usually we have kind of  
7 a tight time limit but there's just one person signed up so far.  
8 Then it's not quite as tight on the timing. At this time, we'll  
9 go ahead and get to the comments. So, the one person that signed  
10 up and indicated you would like to possibly make a comment is Mr.  
11 Logan Davis. Is he here?  
12  
13

14  
15 LOGAN DAVIS: I'm here.

16 LT.COL. SHAD KIDD: Would you like to  
17 make a comment now?  
18

19 LOGAN DAVIS: [Unintelligible] I guess I'm  
20 actually here as a reporter/journalist, a Native American. I have  
21 some history with nuclear warheads and what not. In the military.  
22 I've learned quite a bit. I know the dangers that go with the  
23 nuclear arms race and changes. I'm here just to [unintelligible]  
24 to let them know what this meeting is about. Not too many people  
25 heard about it, or choose to come to speak. So, I am here to just  
26 kind of record everything that's said. Hopefully other people  
27

1 will come up. I guess the only thing I can say is that the thing  
2 that's going to be - disposal. Could you clarify a little bit?  
3 It sounds, according to the general earlier - the disposal part -  
4 is what I think people are kind of concerned about. What is being  
5 disposed? Is it radioactive? Or, what parts of the Minute Man III  
6 are being taken apart I guess just the missile part and not the  
7 warhead?  
8

9 LT.COL. SHAD KIDD: As far as that you can  
10 definitely talk to one of the experts after legal comment period,  
11 but what this part is for us to receive whatever comments and  
12 information you have to share. If you have questions or other  
13 things like that that would be during -  
14

15 LOGAN DAVIS >> Okay, I'm just going to  
16 come and say that I'm hoping that the Air Force will do their best  
17 or use their best judgment to protect the environment. We are  
18 being destroyed right now by climate change. We have all these  
19 [unintelligible] nuclear waste or what not. Whatever the case may  
20 be. I think it's quite obvious some pros and cons with this entire  
21 project. My comment is this I'm hoping that my faith in the United  
22 States that they will protect the people and every house in the  
23 state.  
24

25 LT.COL. SHAD KIDD: Thank you sir.  
26 Alright so, we will leave the mics open for about 15 minutes in  
27

1 case anyone else wants to make a comment. Again, we do ask that  
2 you sign up in the back just so that we have it for our record and  
3 it will actually to the legal record we maintain. It makes it  
4 easier for the court recorder so that she has the names there and  
5 we can accurately record a name. So, if there are any others that  
6 would like to make a comment we'll leave the mics open for about  
7 another 14 minutes. You can sign up in the back and come up  
8 forward to make your comment.

10 LT.COL. SHAD KIDD: The next comment will  
11 be Ms. Sharon White Bear.

13 SHARON WHITE BEAR: Thank you Colonel for  
14 giving me time to speak. I grew up here in White Shield. Just  
15 south of here. My whole there's little places that have been all  
16 around. One of the things I was wondering about when I started  
17 hearing this. This is the very first time I heard about this. So,  
18 I think that if we can get more opportunities and with our elders,  
19 that's another thing that helps if you could go into the  
20 communities that are here. Because that's how you do it. They  
21 can't all just come here to you. I would like to see that happen  
22 to go to the other communities. Get more information out there  
23 ahead of time. Have some of you there to explain some of this and  
24 then try to get organized so that each area can comment about that.  
25 I think that would be something really good. One of the things I



1 thought about as you were talking was how you said there are going  
2 to, the other gentleman mentioned like waste, so then I asked the  
3 question earlier about how this was going to be done or if it was  
4 just going to be a new spot or not. So now I understand that it's  
5 not, there's going to be replacement of some of these things and  
6 I'm glad it's that because many times no matter what it is, the  
7 government wants we always have to move. We always have to get  
8 aside. That's what I don't want to see. More of that happening  
9 all of the time. That's one of the things I really don't want to  
10 wind up. Cultural, the cultural piece of this. I question what  
11 happened before. Probably no one in this room can make that  
12 statement. But there must be some kind of record that showed why  
13 we are going here, or we're going to go over there. There must be  
14 something. Did they do any of this kind of logistics and kind of  
15 look to see if they affected cultural things and environment there.  
16 Maybe the government or state, or city rules weren't there but did  
17 they do any of that. I think that they should look at that and  
18 see of course, we're talking about underground and I worry about  
19 the water and I really want to make sure we hear more about this  
20 so that I understand that we have a lot of ground water systems  
21 just south of where I grew up. There's a field and there is an  
22 old pump. One of the old pumps that you have to pump up and down  
23 for water that my uncle had. When that pump was moved away and

1 everything was kind of gone and that old house was - you can just  
2 hear that water rushing under there. You can see that and hear  
3 that spot. We know that's the big thing here. Water. To protect  
4 that. So, when you're going to other areas to really look at those  
5 kinds of things. Those are besides you know, all the kinds of  
6 hazards that come with that. Health and safety. Those are the  
7 two biggest things I can think of right now. If I knew more I  
8 might be able to comment on that. But I don't know much more about  
9 this. Again, it's just kind of like when the dam came. We didn't  
10 know about that. A lot of people didn't know about that. I only  
11 know that from my grand folks and stuff and comments I've heard  
12 from other people and statements and testimonies. It was just  
13 like a done deal. I think that getting the word out more to the  
14 people and going right to the people that live around these - you  
15 guys are all from different states. Any of you from North Dakota  
16 that you live right here? Any of you gentlemen? From right here,  
17 that live right here? Well, that's what I say is that you know,  
18 you got to do your things and I appreciate all of your service.  
19 But then you get to go home from where you're from. You don't  
20 have to live in this. Thanks for giving us the opportunity to see  
21 what's there. Thank you.

22  
23  
24  
25  
26 LT.COL. SHAD KIDD: Thank you ma'am. We  
27 will leave the mics open for another seven minutes if anyone else

1 wants to comment. Go ahead and sign up back there. I think there's  
2 a Miss Ford who'd like to make a comment. Is that right? If you  
3 could just state your name for the record please.

4  
5 JERRY RUTH BIRDS BILL FORD: My name is  
6 Jerry Ruth Birds Bill Ford and I'm from this reservation and my  
7 family has lived here for hundreds of years. I would just like to  
8 say thank the military for coming. I'm married to a retiree  
9 military. My daughter is an active duty JAG and we always knew  
10 there were these silos around the reservation but no one ever came  
11 and talked to us about it. Our daughter, who is in Hawaii at the  
12 time, came on TDY with a contingent from the Minot Air Force Base  
13 about four or five years ago and they met, but not with the  
14 Tribal Council or anybody really important. They were assigned to  
15 a lower level group of people and they showed them around and  
16 learned as much as they could. Would I would like to suggest to  
17 the Air Force, that they develop a permanent partnership with the  
18 Tribal Council itself and the representatives of a higher level.  
19 Because her visit was sort of lost in the noise. Nothing really  
20 came of it and no one still knew what was going on. It barely  
21 even made the papers. So, what we need is more of a handshake  
22 with the military so we know exactly what your doing. We  
23 appreciate this. This is a very first step but I think we need to  
24 go a lot further in the future. That's it.

1 LT.COL. SHAD KIDD: Thank you ma'am.

2 Alright ladies and gentlemen. That concludes the public hearing.

3 Thank you for your participation and input. I would like to remind

4 you that a copy of the Draft EIS is available on the GBSD website.

5 We may have one more comment now. Mr. Nelson Heart.

6 NELSON HEART: Good evening. For

7 the record, my name is Nelson Heart. N-E-L-S-O-N last name Heart,

8 common spelling, H-E-A-R-T. Currently employed with MHA Nation

9 Three Affiliated Tribes as the Chief of Police for the law

10 enforcement program here. But also, an enrolled member of the MHA

11 Nation. Like some of the ones that have gone before me, you know,

12 just hearing this yesterday - I'm probably not in tune with the

13 news or I missed it in the news or newspapers, but see, that you

14 all were calling with those that came before you yesterday and you

15 know, with the short meeting we had. This evening in speaking with

16 one of our veterans beforehand spoken about you know, you know

17 doing the construction of these silos within Fort Berthold

18 Reservation back in the I believe you said the 70s or maybe it was

19 in the 60s. With the workforce, looking at the paper that you all

20 provided, one of the concerns that I have is when I see that the

21 workforce grow over the man camps that kind of came in the early

22 2000's or late 2000's, 2008 or 07 when we started having an influx

23 of the energy development within North Dakota here. Looking at

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27  
28 DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE GROUND BASED STRATEGIC DETERRENT  
DEPLOYMENT AND MINUTEMAN III DECOMMISSIONING AND DISPOSAL - 10

1 the slides when you just gave the presentation was the increased  
2 activity in terms of personnel, or [unintelligible] what Logan  
3 talked about was with the disposal. I was wondering what disposal?  
4 What are they talking about that? I wasn't really queued in as to  
5 what that meant. The possibility of if they are renovating or  
6 some of their stuff there where are you going to take some of the  
7 rubble or whatever from these silos as you do pass work or add on  
8 or if you wrecked the facility within the communication towers,  
9 looking at that, I was kind of curious to see how many are within  
10 Fort Berthold Indian Reservation. If there are any that are  
11 preplanned or if any, have been determined. Also, the existing  
12 silos that are already, missile facilities within the reservation  
13 I'm kind of curious as to see what we are going to be - what's in  
14 store for us. I think further down here whether the it's 2029 or  
15 something I heard from one of the officers that I was having a  
16 conversation with. One of you all. Like I said, you talk about  
17 the increase of people coming in and looking at within our  
18 department. You know, trying to match as the people come in,  
19 whether they are on the reservation or off the reservation, it's  
20 possible that during their down time they are going to go to the  
21 casino or is that something we are going to come across being a  
22 law enforcement program and go there the person that we currently  
23 have, what do we have to get, wanting some numbers as to what we  
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28

1 can expect the longevity or the duration of these projects within  
2 the Fort Berthold Indian Reservation. Those are some of the things  
3 I talked about. Lisa and her staff also said that they had these  
4 meetings and brought in our cultural department for them and this  
5 program where there's sites and there is potential digging which  
6 it shows there are wiring and what else. Those are some of the  
7 issues or concerns that I have as far as potential crime and the  
8 people that were going to get and those that bring on the temporary  
9 workforce and whether they are going to be checked and whether  
10 their backgrounds and what not. If there is anything that would  
11 be a red flag. That you would bring that personnel to the  
12 reservation. We can't control what people do when they are not  
13 working. Thank you.

16 LT.COL. SHAD KIDD: Thank you sir.  
17 Alright, so we'll check one more time. If there aren't any more  
18 comments - so, that's going to conclude this. If you want to remind  
19 everybody there is a copy of the Draft EIS on the GBSD project  
20 website at [www.gbsdeis.com](http://www.gbsdeis.com). So, this is not the only opportunity  
21 that you have to provide public comments. It was mentioned early  
22 that public comment for the Draft EIS will extend through August  
23 15 and you can leave your written comments here at the meeting.  
24 You can submit them via the project website, or email or send them  
25  
26  
27



1 to the address show on the slides. We'd like to thank you everyone  
2 for attending. The public hearing is now adjourned.

3  
4 COURT TRANSCRIBER'S CERTIFICATE

5 STATE OF ND )  
6 )  
7 County of Mountrail )

8 I, Jenean G. Jessen, a Court Transcriber for the MHA Nation  
9 District Court, do hereby certify that I transcribed the audio  
10 of the proceedings had upon the hearing of this cause,  
11 previously captioned herein, before LT. COL. SHAD KIDD, Hearing  
12 Judge and Wing Leadership; that I thereafter had reduced to  
13 typewriting the foregoing transcript; consisting of Pages 1 -  
14 15, inclusive, constitutes a full, true and accurate record of  
15 the proceedings had upon the hearing of said cause, and of the  
16 whole thereof.  
17

18  
19 WITNESS my hand as Court Transcriber this 10<sup>th</sup> day of  
20 August, 2022.

21  
22 \_\_\_\_\_  
23 Jenean G Jessen  
24 Court Transcriber  
25 701-627-4803  
26  
27

EIS PUBLIC HEARING

MINOT AIR FORCE BASE

TRANSCRIPT OF

PROCEEDINGS

Taken At  
Minot, North Dakota  
July 21, 2022

1                   Public Hearing commenced at 6:00 P.M.,  
2 Thursday, July 21, 2022, at Minot Municipal  
3 Auditorium, Old Armory Room, 430 - 3rd Avenue  
4 Southwest, Minot, North Dakota.

5                   Project Presentation for EIS for Ground  
6 Based Strategic Deterrent Deployment and Minuteman  
7 III Decommissioning and Disposal.

8                   (Recess taken from 6:47 P.M. to 7:02 P.M.,  
9 the same day.)

10                  LT COL KIRK: We'll call the meeting back  
11 to order. This is the last phase of the hearing  
12 now. What this part of the hearing is for is your  
13 opportunity to provide the Air Force with your  
14 comments on the draft EIS by making statements for  
15 the record. The court reporter is recording  
16 everything stated during this portion of the  
17 hearing.

18                  Public hearings and comment periods are  
19 part of the environmental impact analysis process.  
20 This comment process gives you, the public, the  
21 opportunity to provide the Air Force with your  
22 concerns about the draft EIS and information on  
23 your community relevant to the analysis. These  
24 comments will be part of the official project  
25 record and substantive comments will be addressed

1 in the final EIS. This will ensure that the Air  
2 Force decision-maker benefits from your local  
3 knowledge and is aware of your concerns about the  
4 environmental analysis.

5           Throughout the comment process, I ask that  
6 you keep in mind that this is not an arena for  
7 debate; nor is this hearing designed as a question  
8 and answer session. Rather, this hearing is the  
9 venue the Air Force uses to gather your concerns  
10 and any additional data or recommended changes you  
11 may have, whether they are through the oral or  
12 written comment process, regarding the  
13 environmental analysis and the environmental  
14 impacts identified under the proposed action and  
15 alternatives. We ask that you focus your comments  
16 on the issues related to this GBSD proposal and the  
17 draft EIS.

18           I was notified nobody has signed up to  
19 make any comments. We have given notification and  
20 so people have the right to come in and make  
21 comments this evening. Anyone here, if you want to  
22 make comments, if you want to you can still sign up  
23 and let them know you're making a comment. Come up  
24 to one of the mikes and then you can make whatever  
25 comments that you would like to make.

1           So we will leave it open for a reasonable  
2 period of time, and some of us will be here until  
3 8:30 if you want to make comments. So now is the  
4 time you have the opportunity to make a comment.

5           Just to clarify if people are wondering,  
6 there isn't any portion after this. So if there  
7 aren't any comments, that will be the end of the  
8 hearing. That's fine. But we do need to stay here  
9 in case people -- there was notice that went out  
10 that said we would be here until 8:30, so we'll be  
11 here until then. But there isn't like another  
12 portion of the hearing after this or any further  
13 presentations. The whole rest of the hearing is  
14 only if people want to make comments from the  
15 public. If you want to make comment, you can; then  
16 if not, there's not another portion of the hearing.

17           Since there aren't any comments here,  
18 we're going to take a recess. And if there are any  
19 comments, we'll reconvene, and at 8:30 we'll  
20 adjourn.

21           (Recess taken from 7:11 P.M. to 8:30 P.M.  
22 the same day.)

23           LT COL KIDD: So we're at 8:30 and we are  
24 now adjourned.

25           (Adjourned at 8:30 P.M., the same day.)

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CERTIFICATE OF COURT REPORTER

I, Sharon A. Bakken, a Professional Court Reporter,

DO HEREBY CERTIFY that I recorded in shorthand the foregoing proceedings had and made of record at the time and place hereinbefore indicated.

I DO HEREBY FURTHER CERTIFY that the foregoing typewritten pages contain an accurate transcript of my shorthand notes then and there taken.

Dated at Minot, North Dakota, this 26th day of July, 2022.

\_\_\_\_\_  
Sharon A. Bakken  
Professional Court Reporter



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UNITED STATES AIR FORCE

DRAFT ENVIRONMENTAL IMPACT STATEMENT  
FOR THE GROUND BASED STRATEGIC DETERRENT  
DEPLOYMENT AND MINUTEMAN III DECOMMISSIONING  
AND DISPOSAL: PUBLIC HEARING

-----  
BEFORE LIEUTENANT COLONEL SHAD KIDD,  
Hearing Judge and Wing Leadership

TRANSCRIPT OF PROCEEDINGS

Great Falls, Montana  
Tuesday, July 26, 2022  
7:07 - 8:30 P.M.

1           LT.COL. KIDD: We have now reached the third  
2 part of this hearing, which is your opportunity to  
3 provide the Air Force with your comments on the draft  
4 EIS by making statements for the record.

5           A court reporter is recording everything  
6 stated during this portion of the hearing. The  
7 public hearings and comment period are part of the  
8 environmental impact analysis process. This comment  
9 process gives you, the public, the opportunity to  
10 provide the Air Force with your concerns about the  
11 draft EIS and information on your community relevant  
12 to the analysis.

13           These comments will be part of the official  
14 project record and substantive comments will be  
15 addressed in the final EIS. I just want to ensure  
16 that the Air Force decision-maker benefits from your  
17 local knowledge and is aware of your concerns about  
18 the environmental analysis.

19           Throughout the comment process I ask that  
20 you keep in mind that this is not an arena for  
21 debate, nor is this hearing designed as a question  
22 and answer session; rather, this hearing is the venue  
23 that the Air Force uses to gather your concerns and  
24 any additional data or recommended changes you may  
25 have, whether they are through the oral or written

1 comment process regarding the environmental analysis  
2 and the environmental impacts identified in the  
3 proposed action and alternatives. We ask that you  
4 focus your comments on the issues related to this  
5 proposal and the draft EIS.

6 So, so far two people have signed up to  
7 provide comments and so what we'll do is, shortly  
8 I'll turn the time over to them to provide their  
9 comments. And then we are here until 8:30 and so  
10 after those two people have spoken, then we will  
11 recess, but people, if you want to give a comment,  
12 then you would just go to the front desk over there,  
13 sign up and then we would reopen the hearing and  
14 record your comments at that point.

15 So the first person who has signed up to  
16 make a comment is Mr. Brad Bauman. So just go to one  
17 of the mics and you can make your comment.

18 MR. BAUMAN: Good evening. I'm Brad Bauman,  
19 the general manager for Sun River Cooperative located  
20 in Fairfield, Montana. Our cooperative provides  
21 service to 20 missile sites and two control centers.  
22 Our experience with the missile defense has been a  
23 positive one for many years.

24 The impact of the missile system has made on  
25 the service area is commendable. The three-phase

1 electric systems would not be as robust if it had not  
2 been for the missiles first coming to the area in the  
3 1960s.

4 The road infrastructure getting to the  
5 various sites would not be at the level it is now if  
6 not for the missile complex. The electric load for  
7 the complex accounts for approximately two percent of  
8 our system load and we welcome any new load that the  
9 new complex may offer.

10 The men and women that represent the Air  
11 Force come into our smaller communities and use our  
12 restaurants and our convenience stores. They always  
13 represent the Air Force and themselves in a very  
14 professional manner.

15 These young people are the best of the best  
16 when it comes to performing the mission of the  
17 missile complex. One only need to review the past  
18 winners of the missile competitions to verify my  
19 comment.

20 We live around these missile sites and the  
21 environmental impact of the site is a minimal at  
22 best. The amount of good that the missiles have  
23 brought compared to our environmental concerns have  
24 been enormous benefit to North Central Montana.

25 I'm here to offer the support to the missile

1 project and to advocate for the acceptance of the  
2 reduced utility corridors alternative, thank you.

3 LT.COL. KIDD: Thank you, Mr. Bauman. The  
4 next commenter is Shane Etzwiler.

5 MR. ETZWILER: Well, good evening. Shane  
6 Etzwiler with the Great Falls Area Chamber of  
7 Commerce. And while I represent the Great Falls Area  
8 Chamber of Commerce here in Great Falls, I also live  
9 35 miles northwest of Great Falls, outside of  
10 Fairfield about four or five miles east of that.

11 I think one of the things that we talked  
12 about and we have met with Northrop Grumman as they  
13 have come to town, Boeing and Lockheed Martin ahead  
14 of time and always wanting to hear from our community  
15 leaders about the potential impacts any concerns we  
16 might have and any input on the front end so they can  
17 kind of put that in their plan and proposal for the  
18 Air Force.

19 One of the things that we talked about  
20 recently, you mentioned in one of your slides was  
21 just the noxious weeds that we have and, again, the  
22 concern would be these invasive species.

23 So as we're going out to the different  
24 farmlands speaking on behalf of the farmers and the  
25 people that own land, the consideration that as they

1 go out onto that person's property, one person might  
2 not control their weeds very well, and as the  
3 vehicles pick up those seeds and things like that and  
4 then they leave that property, go onto another farmer  
5 or landowner's property could spread that noxious  
6 weed.

7 So I think that is just something that we  
8 need to be aware of as we continue with this  
9 project. But we're excited about it. Again, we have  
10 been working hand in hand with the companies with the  
11 Air Force and so we're excited about this missile  
12 upgrade, so, thank you.

13 LT.COL. KIDD: Thank you, Mr. Etzwiler.

14 All right. So, as I mentioned before, we're  
15 going to go ahead and we're going to take a recess  
16 here shortly, but we will leave the comment period  
17 open until 8:30. And so if anybody wants to make a  
18 comment, just go sign up over there and then we  
19 would reopen the hearing and allow you to make your  
20 comment. So we'll go ahead and be in recess.

21 (Whereupon, a brief recess was taken at 7:12  
22 to 8:30 P.M.)

23 LT.COL. KIDD: This public hearing is  
24 adjourned.

25 PROCEEDINGS CONCLUDED



CERTIFICATE OF REPORTER

STATE OF MONTANA )  
 ) ss.  
County of Cascade )

I, Gregory A. Frank, RPR, Court Reporter and  
Notary Public for the State of Montana, residing in  
Great Falls, Montana, do hereby certify:

That I was duly authorized to and did report  
the transcript of proceedings in the above-entitled  
hearing;

That the foregoing pages of this transcript  
constitute a true and accurate transcription of my  
stenotype notes of the testimony.

I further certify that I am not an attorney  
nor counsel of any of the parties, nor a relative or  
employee of any attorney or counsel connected with  
the action, nor financially interested in the action.

IN WITNESS WHEREOF, I have hereunto set my  
hand and seal on this the 1st day of August, 2022.

---

Gregory A. Frank, RPR  
Notary Public, State of Montana  
Residing in Great Falls, Montana.  
My Commission expires: 2/10/2023.

<b>1</b>	<b>B</b>	<b>consideration</b> [1] - 5:25	<b>experience</b> [1] - 3:22	<b>impacts</b> [2] - 3:2, 5:15
1960s [1] - 4:3	<b>BASED</b> [1] - 1:7	<b>constitute</b> [1] - 7:11	<b>expires</b> [1] - 7:22	<b>IN</b> [1] - 7:17
1st [1] - 7:18	<b>Bauman</b> [2] - 3:16, 3:18	<b>continue</b> [1] - 6:8	<b>F</b>	<b>information</b> [1] - 2:11
<b>2</b>	<b>bauman</b> [1] - 5:3	<b>control</b> [2] - 3:21, 6:2	<b>Fairfield</b> [2] - 3:20, 5:10	<b>infrastructure</b> [1] - 4:4
2/10/2023 [1] - 7:22	<b>BAUMAN</b> [1] - 3:18	<b>convenience</b> [1] - 4:12	<b>Falls</b> [7] - 1:16, 5:6, 5:7, 5:8, 5:9, 7:6, 7:21	<b>input</b> [1] - 5:16
20 [1] - 3:21	<b>BEFORE</b> [1] - 1:13	<b>Cooperative</b> [1] - 3:19	<b>far</b> [1] - 3:6	<b>interested</b> [1] - 7:16
2022 [2] - 1:17, 7:18	<b>behalf</b> [1] - 5:24	<b>cooperative</b> [1] - 3:20	<b>farmer</b> [1] - 6:4	<b>invasive</b> [1] - 5:22
26 [1] - 1:17	<b>benefit</b> [1] - 4:24	<b>corridors</b> [1] - 5:2	<b>farmers</b> [1] - 5:24	<b>issues</b> [1] - 3:4
<b>3</b>	<b>benefits</b> [1] - 2:16	<b>counsel</b> [2] - 7:14, 7:15	<b>farmlands</b> [1] - 5:24	<b>J</b>
35 [1] - 5:9	<b>best</b> [3] - 4:15, 4:22	<b>County</b> [1] - 7:3	<b>final</b> [1] - 2:15	<b>Judge</b> [1] - 1:13
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## Y

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-----  
UNITED STATES AIR FORCE

DRAFT ENVIRONMENTAL IMPACT STATEMENT  
FOR THE GROUND BASED STRATEGIC DETERRENT  
DEPLOYMENT AND MINUTEMAN III DECOMMISSIONING  
AND DISPOSAL: PUBLIC HEARING

-----

BEFORE LT. COL. SHAD KIDD,  
Hearing Judge and Wing Leadership

TRANSCRIPT OF PROCEEDINGS

Lewistown, Montana  
July 28, 2022  
3:00 P.M. - 6:00 P.M.

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1           WHEREUPON, the proceedings were had as follows:

2           (Welcoming remarks by Col. Barry Little.)

3           (Poster session.)

4           (Introductions by Russell Bartholomew.)

5           (Formal presentation, video shown.)

6

7

CLARIFYING QUESTIONS

8

9           MR. DESCHEEMAER: Paul Descheemaeker. I  
10          live east of here near the site on the other side of  
11          Divide on Highway 87. I just want to clarify the  
12          aboveground infrastructure comment that was in the  
13          presentation. Does that include gates and culverts,  
14          that type of thing, or will those still exist?

15          MR. BARTHOLOMEW: So everything that's in  
16          the existing corridors is going to be maintained. So  
17          everything, you know, the gates, the culverts, the  
18          crossings will be going forward, primarily used in  
19          whole. Then there is also the new pieces of it  
20          that -- same thing. You know, if we put a line in  
21          the ground, the intent is to maintain the  
22          infrastructure that's there and not remove what's  
23          been put in place.

24          MR. DESCHEEMAER: Okay. So it, it will  
25          basically be the same as it is now.



1 MR. BARTHOLOMEW: Correct.

2 MR. DESCHEEMAEKER: Well, I have a comment  
3 on that, but I'll wait for that.

4 LT. COL. KIDD: All right. Thank you, sir.  
5 Are there any other clarifying questions?

6 MR. ATHERTON: Drew Atherton. You guys said  
7 you were going to be hiring 20 percent local  
8 contractors. Are you guys going to be having job  
9 fairs or anything like that to recruit them?

10 MR. BARTHOLOMEW: So the prime contractor,  
11 which is Northrop Grumman, they do have a rep in the  
12 area that is coordinating with the locals on exactly  
13 what you're talking about. And if you weren't a  
14 little bit more established, you know, because that's  
15 going to be the first -- As they pick up, they're  
16 going to be moving into this area and doing similar  
17 types of things that they're doing in those regions.

18 I know that to date they've been talking  
19 with community colleges. Because, I mean, 20 percent  
20 of the workforce, a few thousand people, skilled  
21 workers, you know, they're thinking they may not find  
22 the total number, and so they're trying to develop  
23 the workforce here to be able to meet the need and  
24 the requirement.

25 MR. ATHERTON: Thank you.

1 MR. BARTHOLOMEW: You're welcome.

2 LT. COL. KIDD: Are there any other  
3 clarifying questions before we take a break and then  
4 get to the public comment portion?

5 Okay. We'll go ahead and take a 15-minute  
6 break. So I've got 4:22. We'll come back on at  
7 4:37. During this time, you can sign up if you want  
8 to make a comment, and then we'll have the public  
9 comment session after this 15-minute break.

10 (A recess was taken at 4:22 p.m.)

11

12

COMMENTS

13

14 LT. COL. KIDD: All right. We've now  
15 reached the third part of this hearing, which is your  
16 opportunity to provide the Air Force with your  
17 comments on the Draft EIS by making statements for  
18 the record. The court reporter is recording  
19 everything stated during this portion of the hearing.

20

21 The public hearings and comment period are  
22 part of the environmental impact analysis process.  
23 This comment process gives you, the public, the  
24 opportunity to provide the Air Force with your  
25 concerns about the Draft EIS and information on your  
community relevant to the analysis. These comments

1 will be part of the official project record, and  
2 substantive comments will be addressed in the final  
3 EIS. This will ensure that the Air Force  
4 decisionmaker benefits from your local knowledge and  
5 is aware of your concerns about the environmental  
6 analysis.

7           Throughout the comment process, I ask you to  
8 keep in mind that this is not an arena for debate,  
9 nor is this hearing designed as a question-and-answer  
10 session. Rather, this hearing is the venue the  
11 Air Force uses to gather your comments and any  
12 additional data or recommended changes you may have,  
13 whether they are through the oral or written comment  
14 process, regarding the environmental analysis and the  
15 environmental impacts identified under the proposed  
16 action and alternatives. We ask that you focus your  
17 comments on the issues related to the GBSD proposal  
18 and the Draft EIS.

19           So far, we've had 12 people sign up to make  
20 comments. To make sure that everybody has the  
21 opportunity to make contents while we still have the  
22 mics and the facilities here, we're going to limit  
23 comments to five minutes. And what we'll do on that  
24 is there will be a timekeeper down there (indicating)  
25 who will show a yellow card when you've got

1 30 seconds left and will hold up the red card when  
2 it's your time to stop.

3           You're free to talk for less than  
4 five minutes, you don't have to take the whole  
5 five minutes, but we just want to make sure that  
6 everybody has an opportunity. If there's additional  
7 time at the end and you have more that you want to  
8 say, then we can address it at that point. Everybody  
9 always has the option of submitting written comments  
10 on the GBSD website. Essentially, people will be  
11 speaking in the order that they've signed up, except  
12 there's one public official that will be speaking  
13 first.

14           Just to make you aware, we left one mic up  
15 here that's front and center, but then we also put  
16 one mic over by the shade just so that you don't have  
17 to stare into the sun or have the sun on you while  
18 you are making your comment. But I would ask you to  
19 be mindful of the timekeeper just so that we can  
20 allow everybody who wants to make a comment the  
21 opportunity to make their comments.

22           When you come up -- I'm going to do my best  
23 to say your name properly, but if you could state  
24 your name and spell it. We think we have the  
25 spellings from the handwritten ones, but some of them

1 we weren't quite sure on, so if you could just do  
2 that so we can make sure we have a clear record, we'd  
3 appreciate that.

4 And so the person who is up first is going  
5 to be Mr. Ross Butcher, and then after him will be  
6 Sara Hudson.

7 COMMISSIONER BUTCHER: Yes, sir. My name is  
8 Ross Butcher. R-O-S-S, B-U-T-C-H-E-R. I'm a county  
9 commissioner here in Fergus County.

10 My comment would be geared towards an  
11 expectation that we are going to see good  
12 communication and consistency in that communication.  
13 We understand there's going to be impacts, and we  
14 want to make sure that we're in the chain of the  
15 decisionmaking on how to mitigate that. So I guess  
16 that's my comment.

17 Other than that, I think the community is  
18 open to this project, and we're looking forward to  
19 working with you. Thank you.

20 LT. COL. KIDD: Thank you, sir.

21 All right. So up next we'll have  
22 Ms. Sara Hudson, and then after that will be  
23 Carson Sweeney.

24 MS. HUDSON: Sara Hudson. S-A-R-A,  
25 H-U-D-S-O-N. I am the executive director of the

1 Snowy Mountain Development Corporation here in  
2 Lewistown.

3 We are a nonprofit economic development  
4 organization that serves the six counties in  
5 Central Montana. We are comprised of an 18-member  
6 board that governs us, and those are typically our  
7 elected officials in that six-county area.

8 We work very closely with the cities and  
9 counties in all of the economic development in this  
10 region. And we do work with a lot of our businesses.  
11 We are hooking them into the contracting  
12 opportunities that are going to result from this  
13 process.

14 In the EIS, it talks about what the economic  
15 impacts are going to be, especially on our workforce.  
16 We have heard some concerns about businesses being  
17 concerned that we might be hiring their folks away to  
18 work on that. We have cleared up that misconception  
19 by letting them know that no, we'll contract your  
20 business and put your people on this job.

21 So that's one of the things that I wanted to  
22 make sure to mention to you, that in the economic  
23 impact statement where we are honoring that there are  
24 going to be the significant impacts, it actually is  
25 going to contribute a significant economic impact to



1 our area in terms of tax base growth, employment  
2 growth, and our businesses being able to capture more  
3 market share in the industries that they're in.

4 We are also working very closely with our  
5 counties and cities on helping to develop a schematic  
6 for a workforce hub. We're most interested in what's  
7 going to be left behind. And we would like to work  
8 with you on any opportunity that we would have to be  
9 able to communicate consistently with you about what  
10 we're talking about on the ground on what we would  
11 like to see in that.

12 We understand that this is not a Bakken and  
13 it's not a man camp, that what we're bringing in are  
14 structural engineers, civil engineers, and it's more  
15 like Silicon Valley than what we experienced over in  
16 the Bakken. And so we're working diligently with our  
17 community members and our businesses to make sure  
18 that they understand the true significance of this  
19 project and how it's going to help benefit not only  
20 our businesses but our community and our next  
21 generation.

22 So I'm in full support of the implementation  
23 of Sentinel and I offer whatever services that I can  
24 to support you further.

25 LT. COL. KIDD: Thank you, ma'am.

1 All right. So Mr. Carson Sweeney is up, and  
2 then Carly Wheatley will be up after him.

3 MR. SWEENEY: Carson Sweeney. C-A-R-S-O-N,  
4 S-W-E-E-N-E-Y.

5 Col. Little, welcome to Montana, sir. Thank  
6 you for your service and leadership and taking the  
7 time to accept public comment on this complex  
8 project.

9 I am Carson Sweeney, general manager of  
10 Fergus Electric Cooperative in Lewistown, Montana.  
11 Fergus Electric Cooperative provides electric service  
12 to 67 of the 150 Missile Alert facilities and  
13 Missile Launch facilities in Central Montana. That  
14 electric load is consistent and reliable and provides  
15 significant revenue for our electric cooperative,  
16 providing stable rates across our entire membership.

17 We have a long-standing partnership with the  
18 United States Air Force and look forward to working  
19 with Northrop Grumman on the Sentinel project. We  
20 are grateful for Northrop Grumman's commitment to our  
21 community throughout this process. They have been  
22 instrumental in partnering with the Small Business  
23 Association, Montana's Procurement Technical  
24 Assistance program, and Snowy Mountain Development  
25 Corporation here in Lewistown.

1           Northrop's Tracy Jerman has been working  
2           closely with Snowy Mountain Development to ensure  
3           that businesses in our local communities who are  
4           interested in providing services throughout this  
5           project are prepared to do so. I recently attended  
6           one of Northrop's Strategic Teaming Alliance  
7           Roundtables held at the Snowy Mountain Development  
8           office. The event was well attended and very  
9           informative.

10           I commend Northrop and Tracy for their  
11           transparency and commitment to our community. Their  
12           progress reports have been helpful to us in  
13           understanding the steps in this process, including  
14           the necessity for this Environmental Impact  
15           Statement.

16           Regarding the Draft Environmental Impact  
17           Statement, I would like to propose that the  
18           United States Air Force work with our local electric  
19           utilities to strategically locate the new  
20           communication towers, material laydown yards, and  
21           workforce hubs near existing electric utility  
22           infrastructure to minimize buildout of additional  
23           power lines. Working collectively will decrease the  
24           impact and disturbance on our environment while also  
25           reducing our maintenance expense during the lifespan

1 of this national defense asset.

2 The Draft EIS also states that the project  
3 team will work with local community stakeholders to  
4 develop plans for post-construction activities for  
5 infrastructure assets. I believe these types of  
6 partnerships provide opportunities for our community  
7 to decide what best meets our local needs prior to  
8 the completion of this substantial project.

9 The Environmental Impact Statement is  
10 detailed and thorough. I am confident that the  
11 Department of Defense will recognize value and  
12 considerable cost savings from a committed  
13 partnership with local businesses, local  
14 stakeholders, Montana PTAC, Snowy Mountain  
15 Development Corporation, and Fergus Electric  
16 Cooperative.

17 Thank you for this opportunity to provide  
18 public comments on the Draft EIS. This initiative  
19 holds significant promise to improve our economy and  
20 community in many ways. We look forward to  
21 opportunities to help shape that future with you.

22 Thank you.

23 LT. COL. KIDD: Thank you, sir.

24 Carly Wheatley is up next, and after her  
25 will be Cathy Barta. And again, anybody who wants to

1 make comments that hasn't signed up yet, you can  
2 still sign up over there (indicating) to make your  
3 comment.

4 MS. WHEATLEY: Hello. My name is  
5 Carly Wheatley. C-A-R-L-Y, W-H-E-A-T-L-E-Y. I am  
6 the deputy director at Snowy Mountain Development  
7 Corporation. We're a regional economic development  
8 corporation serving six counties here in  
9 Central Montana, including four that are directly  
10 related to this project. My primary duty is to  
11 provide technical assistance to businesses seeking  
12 government opportunities.

13 In the Environmental Impact Statement, you  
14 address filling an estimated 20 percent of jobs using  
15 local workers and a construction investment  
16 specifically from Malmstrom Air Force Base reaching  
17 \$2.8 billion. This is a significant opportunity for  
18 Montana and the communities supporting national  
19 defense.

20 What this initiative presents is an  
21 opportunity for businesses to expand their customer  
22 base and increase their market share, which,  
23 together, grows our gross domestic product. So this  
24 is an incredible opportunity for Montana. And we are  
25 available and anxious to help prepare our community

1 for the new Sentinel weapon systems.

2 I wanted to formally thank the project  
3 partners for the beginning work and preparing our  
4 area businesses to compete for this project,  
5 specifically through their Strategic Teaming Alliance  
6 Roundtables and any future trainings and matchmaking  
7 events they may choose to do. We look forward to  
8 supporting this project and partnering with the  
9 Air Force, Northrop Grumman, and the additional large  
10 prime contractors to match the 1800 small businesses  
11 we work with.

12 Thank you for the opportunity to provide  
13 public comment.

14 LT. COL. KIDD: Thank, you ma'am.

15 All right. Cathy Barta is up next, and then  
16 it will be Deanna Langman.

17 MS. BARTA: Hello. My name is Cathy Barta.  
18 C-A-T-H-Y, B-A-R-T-A. I'm sorry. This is cutting  
19 out.

20 First of all, I'm in support of the Sentinel  
21 program, and I appreciate the opportunity to comment.  
22 I actually did read through the EIS, and  
23 Section 3.3.1.2.2, Effects from Off-Base Elements of  
24 the GBSD Deployment, falls a little short of the  
25 mitigation efforts for any of the dirt work that's

1 going to occur off the roads. Right now it just  
2 requires washing of the buckets of removing  
3 equipment. And we'd respectfully request that any  
4 vehicle that leaves established roads gets a washdown  
5 to prevent the further spread of noxious weeds.

6 Also, Figure 3.3-30, the grizzly bear range  
7 falls short. Grizzlies have been present in our  
8 local area, which was excluded on your map.

9 Section 6.0, Hazardous Materials and Waste.  
10 I was pleased to see in your presentation you  
11 addressed asbestos and lead paint, because that was  
12 not identified in Section 6.0. I just want to make  
13 sure that any of the workers working on  
14 decommissioned sites are not exposed to hazardous  
15 substances.

16 So thank you for the opportunity to comment.

17 LT. COL. KIDD: Thank you.

18 Ms. Langman is up next, and then it will be  
19 Drew Atherton after that.

20 MS. LANGMAN: Good afternoon.

21 Deanna Langman, Big Sky Economic Development in  
22 Billings and also Montana Procurement Technical  
23 Assistance. I am the state program manager for the  
24 Montana PTAC.

25 And for those that may not know, PTACs are



1 funded primarily by the Department of Defense. Our  
2 only job is to help businesses realize government  
3 contracting opportunities by learning how to contract  
4 with the government, finding opportunities, how to  
5 become responsible, responsive contractors, whether  
6 that's at the prime or the subcontract level.

7 All the states have PTACs, and our  
8 U.S. Territories. In Montana we have six PTAC  
9 locations. My organization, Big Sky Economic  
10 Development, holds the cooperative agreement with  
11 DoD, and we accomplish service to companies  
12 throughout Montana by partnerships. Snowy Mountain  
13 Development here in Lewistown has a PTAC; Great Falls  
14 Development Authority has a PTAC; Montana West  
15 Economic Development in Kalispell; University of  
16 Montana in Missoula; and Headwaters RC&D in Butte.

17 Our only job is to provide one-on-one  
18 consultation to companies that are interested in  
19 government contracting opportunities, whether it's  
20 with DoD agencies or civilian agencies. And we do  
21 that through the one-on-one and a lot of training.  
22 We're very excited to work with Northrop Grumman and  
23 the Air Force on this project to help companies get  
24 prepared for these business opportunities that may  
25 come out of this project, the Sentinel project, or

1 any other DoD or civilian agency government  
2 contracting opportunity.

3 Thank you.

4 LT. COL. KIDD: Thank you, ma'am.

5 All right. Mr. Atherton, and then after  
6 him, it will be Steven Hamilton.

7 Is Mr. Atherton here?

8 It looks like a no, so -- Oh, wait.  
9 Somebody is pointing to somebody.

10 We'll circle back to Mr. Atherton. So  
11 Mr. Steven Hamilton is up next, and then I believe  
12 it's Don Kitchenmaster after that.

13 MR. HAMILTON: My name is Steven Hamilton.  
14 S-T-E-V-E-N, H-A-M-I-L-T-O-N. I'm the regional  
15 manager for DNRC Water Resources for the Lewistown  
16 Region.

17 One of the things I just wanted to remind  
18 everybody to keep in mind was that if there's the  
19 need for water rights or water right changes, know  
20 that those processes take time. We work on those as  
21 fast as we can, and we're working on the process for  
22 those as fast as we can, but just know that they take  
23 time. So people just need to start early if they  
24 need additional water rights or changes in water  
25 rights as part of some of the impact to the area.

1 Thank you.

2 LT. COL. KIDD: Thank you, sir.

3 All right. So Mr. Don Kitchenmaster, and  
4 then -- and I know he said his name earlier but I'm  
5 going to mess it up, Paul Descheemaeker.

6 Is Mr. Kitchenmaster here? And it's  
7 possible that I'm misreading this from the thing, so  
8 if somebody has a name that you think might look like  
9 Kitchenmaster.

10 Okay. We'll circle back on that one too.

11 Is Mr. Descheemaeker here?

12 MR. DESCHEEMAEKER: I'll give you an "A" for  
13 effort.

14 LT. COL. KIDD: Thank you.

15 MR. DESCHEEMAEKER: Paul Descheemaeker.  
16 P-A-U-L, D-S-H-E-M-A-K-E-R.

17 LT. COL. KIDD: I'm sorry. We had mics  
18 cutting out, and I'm not sure if that's due to where  
19 it's located, but if you could respell that.

20 MR. DESCHEEMAEKER: Paul, P-A-U-L,  
21 Descheemaeker, D-E-S-C-H-E-E-M-A-E-K-E-R.

22 LT. COL. KIDD: Thank you.

23 MR. DESCHEEMAEKER: Can I move to that other  
24 mic?

25 LT. COL. KIDD: It seems to be working a

1 little better. I'm not sure if that's the issue or  
2 not.

3 MR. DESCHEEMAEKER: I was trying to take  
4 advantage of the shade.

5 Thank you for taking our comments today.  
6 Before I forget, a gal approached me that spoke  
7 earlier, and she forgot to mention something and she  
8 asked me to comment on it. And it's on the sites  
9 that are being decommissioned. If those could be  
10 offered back to the adjacent landowners as a right of  
11 first refusal, that would be a great thing for the  
12 adjacent landowners.

13 I've got two things to talk about. One is  
14 noxious weeds. I would just like to first say  
15 noxious weeds and the potential spread during and  
16 after construction of this project, landowners and  
17 the community in general need assurance that the  
18 Air Force and its contractors will do everything  
19 possible to prevent the spread of noxious weeds by  
20 being aware of noxious weeds as you pass through,  
21 cleaning equipment often, and working with landowners  
22 and the county weed boards.

23 If noxious weeds are spread, those effects  
24 may not become noticeable until months or years after  
25 construction. Again, I urge you to work with

1 landowners and the county weed boards by providing  
2 financial assistance to mitigate the spread of  
3 noxious weeds.

4 My second comment deals with the  
5 clarification question I asked earlier. And if I  
6 understand it right, culverts and gates and that type  
7 of infrastructure will exist going forward. And I  
8 would just ask that this infrastructure -- again,  
9 working with the landowners to maintain this  
10 infrastructure in a timely manner. In the last  
11 60 years -- well, of course, the first 20 years it  
12 was new, but since then there's been some challenges  
13 with fences falling down and not a timely response to  
14 getting those fixed.

15 Thank you. That's all I have.

16 LT. COL. KIDD: Thank you, sir.

17 All right. So the next up is  
18 Jerry Van Haur, who said he might want to make a  
19 comment, so if he's here and wants to make a  
20 comment -- and it looks like he is, and then after  
21 that, it will Glenna Gillett.

22 MR. VAN HAUR: Thank you for giving us this  
23 opportunity. My name is Jerry Van Haur. J-E-R-R-Y,  
24 V-A-N, H-A-U-R.

25 My concern is the man camps, if that's how

1       you refer to them. I hope the local communities get  
2       some input on the location. I did speak with one of  
3       your other cohorts here, and he assured me that it's  
4       going to be mostly bus transportation in and out, and  
5       so the 2,000, 3,000 people will not be on our local  
6       highways, because they can't handle that. We're  
7       maxed out now in situations. So hopefully you'll  
8       take that into consideration.

9               Thank you.

10              LT. COL. KIDD: Thank you, sir.

11              Is there a Glenna Gillett here? I might be  
12       mispronouncing that.

13              Somebody with that name signed up twice, so  
14       either one of those or just the only one of those,  
15       we'll leave it open if she wants to comment.

16              And I'll circle back to Drew Atherton. Is  
17       he here? And I know that he had a question earlier.  
18       It may be that he addressed whatever comment he  
19       wanted to make with that question, but if he wanted  
20       to make a comment, I'm giving him the opportunity to.

21              And then Don Kitchenmaster.

22              Okay. So what we're going to do is we will  
23       be here until 6 o'clock, and so we've got another  
24       hour, but we're going to put the hearing into a  
25       recess. If you do want to make a comment during this

1 time, then you would just sign up over there  
2 (indicating), they'd let me know, and then we'd  
3 reopen the hearing, get the recording going again,  
4 and then allow you to make your public comment.

5 But if nobody else makes any comments, then  
6 there isn't really anything else after this. So just  
7 so you're aware, we'll go into recess and you're free  
8 to get up and move around, whatever you want to do.  
9 So we are in recess now.

10 (A recess was taken at 5:00 p.m.)

11 LT. COL. KIDD: We are reopening the hearing  
12 now. We have another commenter, Sheriff Rick Vaughn.

13 SHERIFF VAUGHN: Rick Vaughn. R-I-C-K,  
14 V-A-U-G-H-N. I'm currently the Fergus County  
15 Sheriff. And my comment would be there is a concern  
16 for public safety and the services that the sheriff's  
17 office provides as far as protecting communities,  
18 enforcing criminal acts, and stuff with the uptick in  
19 the public and more people coming to our community.  
20 Our law enforcement has concerns about the size of  
21 our detention facility and even down to that we need  
22 more streetlights on our Main Street and providing  
23 public safety.

24 Thank you.

25 LT. COL. KIDD: Thank you, sir.



1           All right. With that, we'll go ahead and go  
2 back into recess. Again, if you have any comments  
3 that you want to make, we'll be here until 6 o'clock,  
4 so you can just go sign up over there (indicating).

5           (A recess was taken at 5:10 p.m.)

6           LT. COL. KIDD: All right. So I'm just  
7 checking again to see if these three people who had  
8 signed up have come here and want to make a  
9 statement: Drew Atherton, Don Kitchenmaster, or  
10 Glena Gillett. Are any of those three people here  
11 and want to make a comment?

12           All right. That looks like a negative, but  
13 we'll stay here until 6 o'clock.

14           (A recess was taken at 5:50 p.m.)

15           LT. COL. KIDD: This hearing is adjourned.

16           (The proceedings concluded at 6:00 p.m.)

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CERTIFICATE OF REPORTER

STATE OF MONTANA )  
 ) ss.  
County of Lewis and Clark )

I, Cheryl Romsa, Court Reporter and  
Notary Public for the State of Montana, residing in  
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hearing;

That the foregoing pages of this transcript  
constitute a true and accurate transcription of my  
stenotype notes of the testimony.

I further certify that I am not an attorney  
nor counsel of any of the parties, nor a relative or  
employee of any attorney or counsel connected with  
the action, nor financially interested in the action.

IN WITNESS WHEREOF, I have hereunto set my  
hand and seal on this the 5th day of August, 2022.

/s/Cheryl A. Romsa  
Cheryl A. Romsa, Court Reporter  
Notary Public, State of Montana  
Residing in Helena, Montana  
My Commission expires: 8/4/2023

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EIS PUBLIC HEARING

F.E. WARREN AIR FORCE BASE

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Draft EIS for the Ground Based  
Strategic Deterrent (GBSD) Deployment and  
Minuteman III Decommissioning and Disposal  
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TRANSCRIPT OF PUBLIC HEARING PROCEEDINGS

PURSUANT TO NOTICE duly given to all parties  
in interest, this matter convened for Public hearing on  
Tuesday, the 2nd day of August, 2022, at the hour of  
6:00 p.m., at Kimball County High School, 901 South Nadine  
Street, Kimball, Nebraska, before Lt. Col. Shad Kidd,  
Hearing Officer, presiding.

1 P R O C E E D I N G S

2 (Public hearing proceedings commenced

3 6:00 p.m., August 2, 2022.)

4 (Project presentation.)

5 LT. COL. KIDD: So the next part of the  
6 hearing is going to be the public comment. But before we  
7 take a break, we want to give the opportunity, if anybody  
8 has any clarifying questions. So this is not the  
9 opportunity for public comment, but if you have any  
10 questions based on the slides or information you got up  
11 front that you're just seeking clarification that would be  
12 helpful for the entire audience, now would be your  
13 opportunity to come up to one of these mics up here and ask  
14 whatever clarifying questions you may have.

15 If you are going to ask a question, just ask that  
16 you state your name, and if it's a confusing spelling, then  
17 spell it, just so we can make sure to get it accurate for  
18 the record.

19 All right. Doesn't look like we have any  
20 clarifying questions. So what we'll do is we'll take a 15-  
21 minute break, and then we'll come back and open it up for  
22 public comments. And if you want to make any public  
23 comments, again, just a reminder that you would just sign  
24 up on one of the comment cards up at the doors by the  
25 front.

1 (Public hearing proceedings recessed  
2 6:49 p.m. to 7:04 p.m.)

3 LT. COL. KIDD: All right. If people could  
4 go ahead and take their seats. We're going to get started  
5 with the third part of the hearing, the opportunity for  
6 people to give public comments.

7 If there are any persons who want to give public  
8 comments, that's what we're going to move into right now.

9 All right. So we've reached the third part of  
10 this hearing, which is your opportunity to provide the Air  
11 Force with the comments on the draft EIS, by making  
12 statements for the record. A court reporter and audio  
13 equipment are recording everything stated during this  
14 portion of the hearing.

15 The public hearings and comment period are part  
16 of the environmental impact analysis process. This comment  
17 process gives you, the public, the opportunity to provide  
18 the Air Force with your concerns about the draft EIS and  
19 information on your community relevant to the analysis.  
20 These comments will be part of the official project record  
21 and substantive comments will be addressed in the final  
22 EIS. This will ensure that the Air Force decision maker  
23 benefits from your local knowledge and is aware of your  
24 concerns about the environmental analysis.

25 Throughout the comment process, I ask that you

1 keep in mind that this is not an arena for debate, nor is  
2 this hearing designed as a question-and-answer session.  
3 Rather, this part of the hearing is the venue that the Air  
4 Force uses to gather your concerns and any additional data  
5 or recommended changes that you may have, whether they are  
6 through the oral or written comment process regarding the  
7 environmental analysis and the environmental impacts  
8 identified under the proposed action and alternatives. We  
9 ask that you focus your comments on the issues relative to  
10 this GBSD proposal and the draft EIS.

11           So what I'm told is that nobody has signed up to  
12 make any comments. And so what we'll do is we will  
13 actually -- we'll be here until 8:30, if anybody changes  
14 their mind and wants to make a comment, or if people are  
15 coming in from their way from work, or whatever, that want  
16 to make comments, we will stay here until 8:30, but I  
17 will put the hearing into recess. And what will happen, if  
18 anybody signs up to make a comment, they'll let me know,  
19 and then we will reopen the hearing and allow them to make  
20 their comment and record it and make sure that it goes into  
21 the official record.

22           But if nobody elects to make any comment -- they  
23 don't have to. Nobody has to make any comments if you  
24 don't want to. We'll just be here until 8:30. We'll be in  
25 recess. And then at 8:30, we'd close out the hearing.

1           So there aren't any other presentations after  
2 this, but there are people that will be by the boards back  
3 there, if you have questions and want do ask any questions  
4 or receive any additional information.

5           If you decide that you want to make a comment,  
6 you just sign up out by the front, and then they will let  
7 me know and we'll reopen the hearing. So for now we're  
8 going to put the hearing into recess, awaiting any public  
9 comments.

10   (Hearing proceedings recessed

11   7:07 p.m. to 8:06 p.m.)

12                           LT. COL. KIDD: All right. So we've got  
13 one person to make a comment.

14                   Sir, you can just come on up. I believe Garrett  
15 Purdy. If you are representing anybody beyond just  
16 yourself, then just go ahead say who you're representing,  
17 and otherwise go ahead and make your comment.

18                           MR. PURDY: As a landowner, the new  
19 easement, two-mile area as far as wind towers are  
20 concerned, it's really hurt the relationship between the  
21 landowners and the Air Force as far as our desire to help  
22 and assist in any way we have throughout the past as far as  
23 opening roads for them when it snows to anything that --  
24 letting them know when an airman has left a gate open on a  
25 site to every last little detail we've done.

1                   It's completely taken away our opportunity at  
2 building a revenue source in a hard economic time --

3                   THE REPORTER: I'm sorry. Can you repeat  
4 that?

5                   MR. PURDY: What?

6                   THE REPORTER: I just couldn't hear you  
7 very well.

8                   LT. COL. KIDD: She just needs you to  
9 repeat it.

10                  MR. PURDY: Oh.

11                  LT. COL. KIDD: What part?

12                  THE REPORTER: Just your last sentence or  
13 two.

14                  LT. COL. KIDD: You can turn off the fan,  
15 if that --

16                  MR. PURDY: As far as the -- as far as our  
17 relationship with the Air Force and farmers, as far as  
18 every last little thing we've done, as far as opening roads  
19 for them, letting the base know when an airman has left the  
20 gate open on a missile site, which happens more than it  
21 should, to every last little detail we do. Sharing the  
22 roads, everything else. We all know these are young kids  
23 from town that don't know gravel roads. We tolerate them.

24                  Taking our ability to -- at another additional  
25 revenue source has completely ruined that relationship.



1 And at 2 nautical miles, the amount of money we're talking  
2 on that 5.6 million acres across the whole project, at \$15  
3 an acre is a lot of money across all five states. And it  
4 needs to be addressed, because just the tax revenue base  
5 for the county at -- it would be roughly \$5 million just in  
6 tax base. That affects more than just the landowners, and  
7 it just needs to be addressed.

8 LT. COL. KIDD: Thank you, sir.

9 All right. So we'll go ahead and go back into  
10 recess. If there are any other comments or any other  
11 people that want to make comments, just sign up at the  
12 front there.

13 (Public hearing proceedings recessed  
14 8:09 p.m. to 8:30 p.m.)

15 LT. COL. KIDD: The hearing is adjourned at  
16 8:30.

17 (Public hearing proceedings concluded  
18 8:30 p.m., August 2, 2022.)

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C E R T I F I C A T E

I, KATHY J. KENDRICK, a Registered Professional Reporter, do hereby certify that I reported by machine shorthand the foregoing proceedings contained herein, constituting a full, true and correct transcript.

Dated this 5th day of August, 2022.

  
KATHY J. KENDRICK  
Registered Professional Reporter



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EIS PUBLIC HEARING

F.E. WARREN AIR FORCE BASE

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Draft EIS for the Ground Based  
Strategic Deterrent (GBSD) Deployment and  
Minuteman III Decommissioning and Disposal  
-----

TRANSCRIPT OF PUBLIC HEARING PROCEEDINGS

PURSUANT TO NOTICE duly given to all parties  
in interest, this matter convened for public hearing on  
Wednesday, the 3rd day of August, 2022, at the hour of  
6:00 p.m., at Prairie High School, County Road 133,  
Raymer, Colorado, before Lt. Col. Shad Kidd, Hearing  
Officer, presiding.

1 P R O C E E D I N G S

2 (Public hearing proceedings commenced

3 6:00 p.m., August 2, 2022.)

4 (Project presentation.)

5 LT. COL. KIDD: All right. So we're about  
6 to take a break, but before we take a break, we want to  
7 open the floor if anybody has any clarifying questions.  
8 This is not the opportunity for public comment. That will  
9 be after the break. But if you have any clarifying  
10 questions that would be helpful for everybody, then you can  
11 come up to one of the mics and ask those clarifying  
12 questions.

13 If you have questions that are just for your own  
14 personal benefit, then you can ask any of the experts that  
15 will be available during the break.

16 So does anybody have any clarifying questions  
17 that they'd like to ask at this time?

18 MR. JOSKA: Are you talking about one  
19 single workforce hub in --

20 LT. COL. KIDD: Okay. So if you're going  
21 to ask a clarifying question, I just need you to come down  
22 to the mic so we can record it. And then say your name so  
23 we can record it for the record. And then direct your  
24 questions over there, because I don't know anything about  
25 the project.

1 MR. JOSKA: All right. Tony Joska.

2 Question is you were talking about the one single  
3 workforce hub, and it's only going to be Kimball, right?

4 MR. BARTHOLOMEW: That's correct. That  
5 workforce hub would be in Kimball, Nebraska. That's the  
6 one that would house, at its peak period, 2500 to 3,000  
7 personnel. The other four areas are laydown yards  
8 approximately 13 acres in size. The ones that I said would  
9 be Albin, Wyoming, Kimball and Sidney, Nebraska, and then  
10 Stoneham, Colorado.

11 MR. JOSKA: So that means as far as  
12 affecting schools and stuff, that Kimball should be the  
13 only place affected?

14 MR. BARTHOLOMEW: Yes. It's likely that  
15 that's the only affected place.

16 MR. JOSKA: All right. Thank you.

17 LT. COL. KIDD: Are there any other  
18 clarifying questions?

19 All right. So then what we're going to do is  
20 we're going to take a 15-minute break. After that you'll  
21 have the opportunity to provide public comment. If you  
22 haven't signed -- if you want to give a public comment and  
23 haven't signed up already, then just go to the desk out  
24 front and sign up, and we'll make sure to give you the  
25 opportunity to make a comment.

1                   So we'll go ahead and be on a break for  
2 15 minutes.

3                                   (Public hearing proceedings recessed  
4                                   6:47 p.m. to 7:02 p.m.)

5                   LT. COL. KIDD: We're going to get started  
6 with the third and final portion of the hearing now, so if  
7 everybody could take their seats.

8                   So this portion of the hearing is your  
9 opportunity to provide the Air Force with your comments on  
10 the draft EIS by making statements for the record. A court  
11 reporter is recording everything stated during this portion  
12 of the hearing.

13                   The public hearings and comment period are part  
14 of the environmental impact analysis process. This comment  
15 process gives you, the public, the opportunity to provide  
16 the Air Force with your concerns about the draft EIS and  
17 information on your community relevant to the analysis.  
18 These comments will be part of the official project record,  
19 and substantive comments will be addressed in the final  
20 EIS. This will ensure that the Air Force decision maker  
21 benefits from your local knowledge and is aware of your  
22 concerns about the environmental analysis.

23                   Throughout the comment process, I ask that you  
24 keep in mind this is not an arena for debate, nor is this  
25 hearing designed as a question-and-answer session. Rather,

1 this hearing is the venue the Air Force uses to gather your  
2 concerns and any additional data or recommended changes you  
3 may have, whether they are through the oral or written  
4 comment process regarding the environmental analysis and  
5 the environmental impacts identified under the proposed  
6 action and alternatives. We ask that you focus your  
7 comments on the issues related to this GBSD proposal and  
8 the draft EIS.

9           So far only one person has indicated that they  
10 would like to make a public comment. And so what we do is  
11 in just a minute I'll open it up for -- well, and he  
12 actually indicated he may or may not want to make public  
13 comment. So I'll open it up for him in just a minute. But  
14 what we'll do is once he -- if he makes a comment, or if he  
15 doesn't make a comment, then we'll just put the hearing in  
16 recess, since we have advertised that we're going to be  
17 here until 8:30, then at least some of us will stay here  
18 until 8:30, leave the hearing available for people to make  
19 public comments, but we would actually go into a recess  
20 where we would just basically wait and see if anybody  
21 wanted to make any public comments. There aren't any other  
22 presentation portions from our end in this hearing, so  
23 that's just kind of the way forward.

24           So now the person who signed up, indicated he may  
25 want to make a comment, is Gerald Arnold. So if he's here



1 and wants to make a comment, he can come down here to one  
2 of the mics.

3 MR. ARNOLD: Thank you, sir. I'm Gerald  
4 Arnold. My brief comment is on the socioeconomic impact.

5 With the goal of the 20 percent local workforce  
6 hire, if there was an apprenticeship utilization  
7 requirement adopted for the project, I think it would  
8 significantly help long-term impacts for those local  
9 communities. Due to the size of the projects and the  
10 length of the projects or the proposed action, you can give  
11 local residents the opportunity to complete a registered  
12 apprentice program. And so not only will they have  
13 short-term benefits with the jobs that are immediately  
14 created, but also gain the skills, certifications, and  
15 licenses for a lifelong career in their choice of trade.  
16 Thank you.

17 LT. COL. KIDD: Thank you.

18 All right. So as I indicated, we're doing --  
19 going into a recess. But if anybody decides that they want  
20 to make a public comment or if anybody comes in, then you  
21 would just follow the same process, sign up at the front  
22 table, and they will let me know that somebody wants to  
23 make a comment, then we'd reopen the hearing and make sure  
24 we get the comments recorded for the record. So we'll be  
25 in recess now.

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(Public hearing proceedings recessed  
7:06 p.m. to 8:30 p.m.)  
LT. COL. KIDD: We are adjourned.  
(Public hearing proceedings concluded  
8:30 p.m., August 3, 2022.)

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C E R T I F I C A T E

I, KATHY J. KENDRICK, a Registered Professional Reporter, do hereby certify that I reported by machine shorthand the foregoing proceedings contained herein, constituting a full, true and correct transcript.

Dated this 5th day of August, 2022.

  
KATHY J. KENDRICK  
Registered Professional Reporter



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EIS PUBLIC HEARING

F.E. WARREN AIR FORCE BASE

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Draft EIS for the Ground Based  
Strategic Deterrent (GBSD) Deployment and  
Minuteman III Decommissioning and Disposal  
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TRANSCRIPT OF PUBLIC HEARING PROCEEDINGS

PURSUANT TO NOTICE duly given to all parties  
in interest, this matter convened for public hearing on  
Thursday, the 4th day of August, 2022, at the hour of  
6:00 p.m., at Laramie County Community College, Pathfinder  
Building, ANB Leadership Center, 1400 East College Drive,  
Cheyenne, Wyoming, before Lt. Col. Shad Kidd, Hearing  
Officer, presiding.

1 P R O C E E D I N G S

2 (Public hearing proceedings commenced

3 6:00 p.m., August 4, 2022.)

4 (Project presentation.)

5 LT. COL. KIDD: Thank you for your

6 attention during the formal presentation part of the

7 hearing.

8 So the next part of the hearing, after we take a

9 break, is going to be opportunity for the public to provide

10 comments. If you want to give your comment and haven't

11 signed up yet, you just do so at the table outside.

12 Before we get to the break, we do want to give an

13 opportunity, if any members of the public have any

14 questions, just clarifying questions that would be helpful

15 for everybody to understand the project better. If you

16 have any clarifying questions, now would be your

17 opportunity. So if you have any you can just come up and

18 go to one of the mics and state your name and then ask the

19 question. If not, then we'll just go to a 15-minute break.

20 I don't see any questions, so we're going to be

21 on break for 15 minutes. After that we'll do the public

22 comment portion.

23 (Public hearing proceedings recessed

24 6:45 p.m. to 6:59 p.m.)

25 LT. COL. KIDD: We've now reached the third

1 part of this hearing, which is your opportunity to provide  
2 the Air Force with your comments on the draft EIS by making  
3 statements for the record. The court reporter's recording  
4 everything stated during this portion of the hearing.

5           The public hearings and comment period are part  
6 of the environmental impact analysis process. This comment  
7 process gives you, the public, the opportunity to provide  
8 the Air Force with your concerns about the draft EIS and  
9 information on your community relevant to the analysis.  
10 These comments will be part of the official project record,  
11 and substantive comments will be addressed in the final  
12 EIS. This will ensure that the Air Force decision maker  
13 benefits from your local knowledge and is aware of your  
14 concerns about the environmental analysis.

15           Throughout the comment process, I ask that you  
16 keep in mind this is not an arena for debate, nor is this  
17 hearing designed as a question-and-answer session. Rather,  
18 this hearing is the venue the Air Force uses to gather your  
19 concerns and any additional data or recommended changes you  
20 may have, whether they are oral or written comment process  
21 regarding the environmental analysis and the environmental  
22 impacts identified under the proposed action and  
23 alternatives. We ask that you focus your comments on  
24 issues related to the GBSD proposal and the draft EIS.

25           So only one person has signed up to make public

1 comments. So what we'll do is we'll give him the  
2 opportunity to make his comment, and after that we'll  
3 go into a recess. And then if anybody wants to make  
4 a comment, then you can just sign up at the table  
5 outside, and they will let me know somebody wants to make  
6 comments, and we would call the hearing back to order and  
7 allow them to make their comments. And we'll be here until  
8 8:30 one way or the other.

9                   So with that, we'll move forward to  
10 Mr. Dan Meyer.

11                   MR. MEYER: Thank you. Thank you.

12                   My name is Dan Meyer. My question is a two-part  
13 question. And Matt helped answer some of those. But the  
14 local workforce, making sure they have a fair shot at the  
15 work, and does the Air Force and the prime contractor have  
16 a plan in place to make sure that local established  
17 registered apprenticeship programs that are already in  
18 place are going to be able to get utilized as needed on  
19 this project. That's my comment. Thank you.

20                   LT. COL. KIDD: Thank you, sir.

21                   All right. With that, we'll go ahead and we'll  
22 go into recess, but we will remain here and -- at least  
23 some of us will be here to accept any public comments until  
24 8:30.

25   (Public comment proceedings recessed)

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7:02 p.m. to 8:30 p.m.)

LT. COL. KIDD: We're adjourned.

(Public hearing proceedings concluded  
8:30 p.m., August 4, 2022.)



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C E R T I F I C A T E

I, KATHY J. KENDRICK, a Registered Professional Reporter, do hereby certify that I reported by machine shorthand the foregoing proceedings contained herein, constituting a full, true and correct transcript.

Dated this 5th day of August, 2022.

  
KATHY J. KENDRICK  
Registered Professional Reporter



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EIS PUBLIC HEARING

F.E. WARREN AIR FORCE BASE

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Draft EIS for the Ground Based  
Strategic Deterrent (GBSD) Deployment and  
Minuteman III Decommissioning and Disposal  
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TRANSCRIPT OF VIRTUAL PUBLIC HEARING PROCEEDINGS

PURSUANT TO NOTICE duly given to all parties  
in interest, this matter convened for Public hearing on  
Tuesday, the 8th day of August, 2022, at the hour of  
5:30 p.m. CDT, before Lt. Col. Shad Kidd, Hearing Officer,  
presiding.

1 P R O C E E D I N G S

2 (Virtual public hearing proceedings  
3 commenced 5:30 p.m., CDT, August 8, 2022.)  
4 (Project presentation.)

5 LT. COL. KIDD: And now I'm going to take a  
6 break until 6:30 Central Daylight Time. At that point, at  
7 6:30, is when the public will have opportunities to provide  
8 their comments. If you haven't signed up to comment and  
9 you would like to do so, then please do so using the email  
10 method that was shown earlier.

11 We'll break until 6:30.

12 (Virtual public hearing proceedings  
13 recessed 6:17 p.m. CDT to 6:30 p.m. CDT.)

14 LT. COL. KIDD: We have now reached the  
15 second part of this hearing, which is your opportunity to  
16 provide the Air Force with your comments on the draft EIS  
17 by making statements for the record. A court reporter is  
18 recording everything stated during this portion of the  
19 hearing. We are recording the hearing.

20 The public hearings and comment period are part  
21 of the environmental impact analysis process. This comment  
22 process gives you, the public, the opportunity to provide  
23 the Air Force with your concerns about the draft EIS and  
24 information on your community relevant to the analysis.  
25 These comments will be part of the official project record

1 and substantive comments will be addressed in the final  
2 EIS. This will ensure that the Air Force decision maker  
3 benefits from your local knowledge and is aware of your  
4 concerns about the environmental analysis.

5           Throughout the comment process, I ask that you  
6 keep in mind that this is not an arena for debate, nor is  
7 this hearing designed as a question-and-answer session.  
8 Rather, this hearing is the venue the Air Force uses to  
9 gather your concerns and any additional data or recommended  
10 changes you may have, whether they are through the oral or  
11 written comment process regarding the environmental  
12 analysis and the environmental impacts identified under the  
13 proposed action and alternatives. We ask that you focus  
14 your comments on the issues related to the Ground Based  
15 Strategic Deterrent proposal and the draft environmental  
16 impact statement.

17           In order to move through the testimony  
18 efficiently, I ask that you observe the following ground  
19 rules. Members of the public are going to be called in the  
20 order in which they have signed up to speak. I will  
21 announce your name. At that point you'll be unmuted or  
22 allowed the opportunity to unmute yourself, and then you  
23 will be able to give your comment.

24           Please speak clearly and slowly. And if you  
25 don't know how to unmute your phones, you'll be sent

1 something that says you can unmute and then take whatever  
2 steps it says to unmute.

3 Please speak clearly and slowly. State your full  
4 name and spell it out so we can record it correctly. If  
5 you are representing someone or some group other than  
6 yourself, please let us know. We need this information to  
7 make sure that the court reporter gets an accurate record.  
8 Please do not provide any personal information in your  
9 comments that you do not want to see published in the final  
10 EIS.

11 All right. So we're going to move to the public  
12 comment session now. And the first person who has signed  
13 up to make a comment -- well, and before we get to that.  
14 We have the slide up there that just gives information  
15 about whether -- if you want to make a comment, how you  
16 would do it. If you haven't previously signed up to  
17 indicate you want to make a comment. You would just follow  
18 the instructions on the slide to just sign up, if you  
19 choose to do so during the next couple of hours.

20 So we'll move to the first person who has signed  
21 up to make a comment, and that is Catherine Kreuter. And  
22 so we'll give her a minute to unmute, and then she can make  
23 her comment.

24 MS. KREUTER: Okay. Got it. Thank you.

25 My name is Catherine, C-a-t-h-e-r-i-n-e, Kreuter,

1 K-r-e-u-t-e-r. I am a member of the Utah Campaign to  
2 Abolish Nuclear Weapons. And I'm a member of the Catholic  
3 church, and with great respect for Pope Francis, who has  
4 asked us to -- actually, I like his words very much. He  
5 says spending on nuclear weapons squanders the wealth of  
6 nations and would be far better invested in education and  
7 the health and the fight against extreme poverty.

8 I am -- I guess I have to respond as if I were  
9 taking this whole thing seriously. There's -- it's really  
10 hard to do for me. It sounds like billions and billions of  
11 dollars going toward destruction, machines that destruct,  
12 destruct property and people, people and property.

13 And in our local UCAN organization, we've studied  
14 some writing by Bruce Blair, a former Minuteman launch  
15 control officer, and Frank von Hippel, former white house  
16 advisor on nuclear security, and we were impressed by their  
17 belief that we don't really need a land-based part of the  
18 triad. We can go to a diad -- I guess that's to planes and  
19 submarines -- in their opinion actually keep us safe  
20 adequately. And so the whole idea of everything that  
21 you've planned for here is -- actually, some experts  
22 believe it's unnecessary. And that is what we believe in  
23 the organization UCAN.

24 I know -- when I thought about what to say here,  
25 I just thought immediately of Pope Francis and his words,

1 and also former president and military leader Dwight  
2 Eisenhower. He had warnings for us, which seemed very  
3 pertinent, that every gun that is made, every warship  
4 launched, every rocket fired signifies, in the final sense,  
5 of threats from those who hunger and are not fed, those who  
6 are cold and not clothed. Yet he was concerned that --  
7 that there was a great danger in allowing the military  
8 industrial conflicts to take control of the U.S. And it  
9 does sound like you will be taking control of a lot of  
10 resources, certainly a lot of power. I don't know how that  
11 will affect the country, but --

12           So I think -- I think this is enough said,  
13 really. I am strongly opposed to spending money to upgrade  
14 a system which ought to just be dismantled, that would  
15 certainly -- it's certainly disrespectful of the United  
16 Nations' recent ban on nuclear weapons, rendering them  
17 illegal. Illegal means that other countries can sue  
18 manufacturers involved in -- in this work that is being  
19 proposed by Northrop Grumman and the Air Force.

20           So out of respect for the many, many, many  
21 millions of us who think very differently on these matters,  
22 I do appreciate this EIS. It's very, very important. And  
23 I would look forward to reading the report when you send it  
24 to me. Thank you for the time.

25           LT. COL. KIDD: Thank you, ma'am.

1           All right. So she was the only person who has  
2 signed up to comment so far, and so we will keep the  
3 comment opportunity open until 8:30 p.m. Central Daylight  
4 Time. But what we're going to do is we're going to recess  
5 the hearing, but we'll leave this slide up with the  
6 explanation on how to register to make a comment, if you  
7 want to, throughout -- up until 8:30 Central Daylight Time.

8           So at this point we're going to go into recess,  
9 but if anybody wants to make additional comments, just  
10 follow the instructions on the slide.

11                           (Virtual public hearing proceedings  
12                           recessed 6:39 p.m. CDT to 8:30 p.m. CDT.)

13           LT. COL. KIDD: Thank you for attending.  
14 This concludes the virtual environmental impact survey  
15 hearing for 8 August 2022.

16                           (Virtual hearing proceedings concluded  
17                           8:30 p.m. CDT, August 8, 2022.)

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C E R T I F I C A T E

I, KATHY J. KENDRICK, a Registered Professional Reporter, do hereby certify that I reported by machine shorthand the foregoing proceedings contained herein, constituting a full, true and correct transcript.

Dated this 10th day of August, 2022.

  
KATHY J. KENDRICK  
Registered Professional Reporter



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EIS PUBLIC HEARING

F.E. WARREN AIR FORCE BASE

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Draft EIS for the Ground Based  
Strategic Deterrent (GBSD) Deployment and  
Minuteman III Decommissioning and Disposal  
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TRANSCRIPT OF VIRTUAL PUBLIC HEARING PROCEEDINGS

PURSUANT TO NOTICE duly given to all parties  
in interest, this matter convened for Public hearing on  
Tuesday, the 9th day of August, 2022, at the hour of  
5:30 p.m. MDT, before Lt. Col. Shad Kidd, Hearing Officer,  
presiding.

1 P R O C E E D I N G S

2 (Virtual public hearing proceedings  
3 commenced 5:30 p.m. MDT, August 9, 2022.)  
4 (Project presentation.)

5 LT. COL. KIDD: All right. We are about to  
6 go on a break, and after the break will be the public's  
7 opportunity to provide the comments. And the way that you  
8 do so is by signing up as explained on the slide there.  
9 And so if you want to make a comment, but haven't signed up  
10 yet, you can do so over this break.

11 So we'll go ahead and be on break until 6:30  
12 Mountain Daylight Time.

13 (Virtual public hearing proceedings  
14 recessed 6:17 p.m. MDT to 6:30 p.m. MDT)

15 LT. COL. KIDD: We have now reached the  
16 third [sic] part of this hearing, which is your opportunity  
17 to provide the Air Force with your comments on the draft  
18 EIS by making statements for the record. A court reporter  
19 is recording everything stated during this portion of this  
20 hearing.

21 The public hearings and comment period are part  
22 of the environmental impact analysis process. This comment  
23 process gives you, the public, the opportunity to provide  
24 the Air Force with your concerns about the draft EIS and  
25 information on your community relevant to the analysis.

1 These comments will be part of the official record and  
2 substantive comments will be addressed in the final EIS.  
3 This will ensure that the Air Force decision maker benefits  
4 from your local knowledge and is aware of your concerns  
5 about the environmental analysis.

6           Throughout the public comment process, I ask that  
7 you keep in mind that this is not an arena for debate, nor  
8 is this hearing designed as a question-and-answer session.  
9 Rather, this hearing is the venue the Air Force uses to  
10 gather your concerns and any additional data or recommended  
11 changes you may have, whether they are through the oral or  
12 written comment process regarding the environmental  
13 analysis and the environmental impacts identified under the  
14 proposed action and alternatives. We ask that you focus  
15 your comments on the issues related to this GBSD proposal  
16 and the draft EIS.

17           In order to move through the testimony  
18 efficiently, I ask you to observe the following ground  
19 rules. I will announce your name, and I will also announce  
20 who will follow the speaker that's going to speak right  
21 now. And then once your name has been announced, just go  
22 ahead and unmute yourself and make your comment.

23           Please speak clearly and slowly. State your full  
24 name and spell it out so we can record it correctly. If  
25 you are representing someone or some group other than

1 yourself, please let us know. We need this information to  
2 make sure that the court reporter gets an accurate record.  
3 Please do not provide any personal information in your  
4 comments that you would not want to see published in the  
5 final EIS.

6 So the first speaker that we have is Mr. Bruce  
7 Spencer. And then after him the next speaker will be Mark  
8 Page.

9 So Mr. Spencer, you can go ahead and make your  
10 comment.

11 MR. SPENCER: Thank you very much. My  
12 family has some recreational property in the Monarch,  
13 Montana area. And studying the EIS, the maps that were  
14 provided, I was unable to determine exact location of the  
15 proposed 300-foot communications towers in the area. I did  
16 send an email to the address that was listed earlier, and  
17 got back that indicated folks from the real estate area  
18 will be getting me some specific maps.

19 But I also noticed in the EIS that the  
20 description regarding the 300-foot communications towers  
21 didn't describe any noise they might make, any, I don't  
22 know, microwave transmissions or transmissions at all that  
23 may be adverse. It just doesn't contain a lot of  
24 information about the 300-foot communications towers.  
25 so I would urge more information and analysis on that,

1 if another analysis hasn't already been done. Thank  
2 you.

3 LT. COL. KIDD: Thank you, sir. All right.  
4 Mark Page is going to be speaking next, and then after him  
5 John Prehn will be speaking.

6 MR. JAMES: Your Honor, it looks like  
7 Mr. Page was with us during the presentation, is no longer  
8 part of the up Zoom webinar. So it looks like we'll want  
9 to get ahead and move on to Speaker Number 3.

10 LT. COL. KIDD: Okay. Yeah, if you'd let  
11 me know if Mr. Page signs back in at any point.

12 So Mr. Prehn, I apologize if I'm pronouncing your  
13 name incorrectly.

14 MR. PREHN: Hello. Can you hear me?

15 LT. COL. KIDD: Yes, sir.

16 MR. PREHN: You can. Okay.

17 Let me just say that your historical -- oh, my  
18 name is John Prehn, J-o-h-n P-r-e-h-n, and I'm with the  
19 Utah Campaign to Abolish Nuclear Weapons, or UCAN. And my  
20 name is J-o-h-n P-r-e-h-n, John Prehn.

21 Let me just say that your historical introduction  
22 was an insult to our intelligence. It's propaganda like  
23 from the '50s. And the rest of the EIS was rose-colored  
24 glasses, right? You're going to -- if -- the environmental  
25 impacts would be tiny, and we got them all taken care of.

1 So that was also very insulting.

2 But let me start out with my comment. We  
3 understand that nothing will stop you from building this  
4 project, no matter what. So this hearing is really in bad  
5 faith. It's a joke.

6 The major, huge environmental impact of this  
7 project, which wasn't mentioned, is that these billions and  
8 billions, hundreds of billions dollars, will not be used by  
9 our country to avert the oncoming climate catastrophe. You  
10 are building a doomsday machine. Its detonation will  
11 destroy the possibility of human life in the northern  
12 hemisphere at the minimum. Is that your intention? That's  
13 a pretty big environmental impact.

14 But let's ask what its intended use is. And I  
15 think its intended use is just building it and raking in  
16 the billions of profit. But it could be claimed to be  
17 deterring the Russians and Chinese by posing a threat. But  
18 we know that doesn't work. In the Ukraine, they -- Putin  
19 was not deterred from attacking the country, and is not  
20 being deterred, even with all of our nuclear weapons in  
21 Europe.

22 The other thing you didn't mention was the  
23 missile field as a sponge to attract nuclear weapons from  
24 Russia and China, and thereby obliterating most of the  
25 United States. That doesn't seem like a good intention

1 either.

2           So the last intention must be to detonate the  
3 doomsday machine on Russia and China. And that's going to  
4 have a big environmental downside.

5           So this is my main point, just building this  
6 project, which we don't really need at all for our  
7 security, has severe environmental consequences. All the  
8 billions of dollars spent on it will not be spent to avert  
9 our oncoming global climate catastrophe, which is -- is a  
10 huge threat to us all.

11           So thank you for letting me speak my piece.

12                   LT. COL. KIDD: Thank you, sir.

13           All right. So Mr. Prehn was the last speaker  
14 who had signed up. So we will keep this open until  
15 8:30 p.m. Mountain Daylight Time. And if people want to  
16 sign up, they would just go through the process there  
17 that's on the screen. If they want to make a public  
18 comment, we would reopen the hearing and allow them to make  
19 their public comment. But for now we are going to go into  
20 recess.

21                   (Virtual public hearing proceedings  
22                   recessed 6:38 p.m. MDT to 8:30 p.m. MDT.)

23           LT. COL. KIDD: All right. I'm informed no  
24 one else signed up to make any more comments, and Mr. Page  
25 never signed back in. So this concludes the hearing.



1 Thank you.

2 (Virtual public hearing proceedings  
3 concluded 8:30 p.m. MDT, August 9, 2022.)

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C E R T I F I C A T E

I, KATHY J. KENDRICK, a Registered Professional Reporter, do hereby certify that I reported by machine shorthand the foregoing proceedings contained herein, constituting a full, true and correct transcript.

Dated this 10th day of August, 2022.

  
KATHY J. KENDRICK  
Registered Professional Reporter

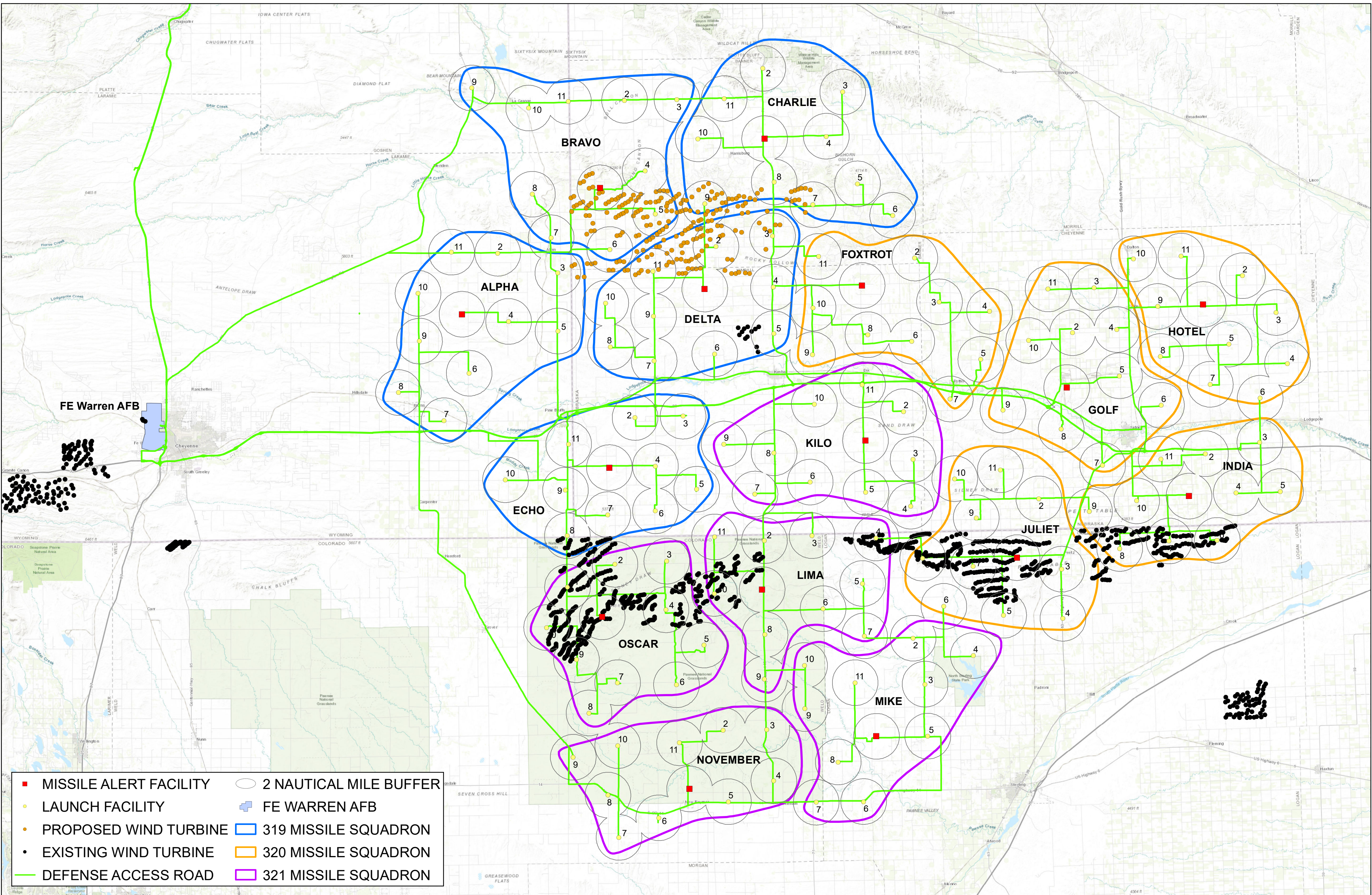


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## **PART 3: WIND ENERGY AND OIL AND GAS DEVELOPMENT MAPS**

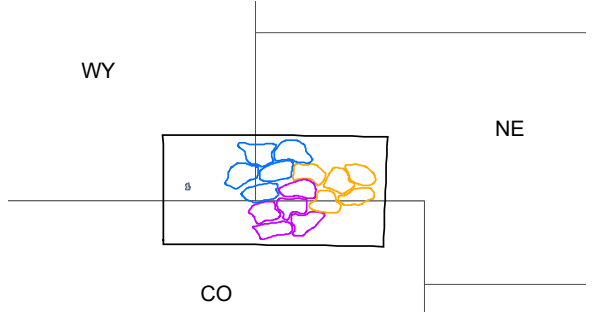
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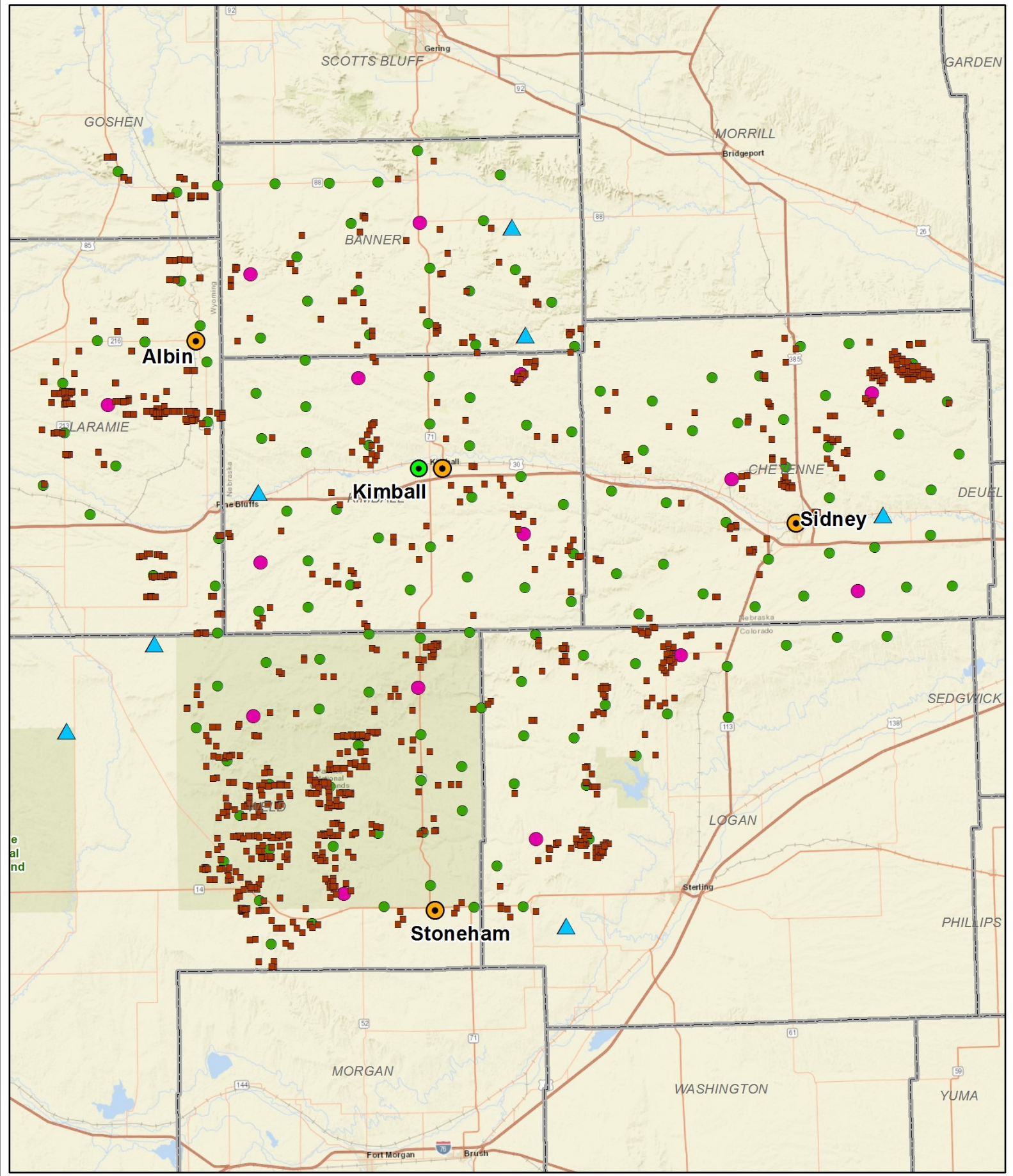


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 90 CIVIL ENGINEER SQUADRON  
 FE WARREN AFB, WYOMING  
 (307) 773-5286 DSN: 481-5286

WIND POWER GENERATION TURBINES, DEFENSE ACCESS ROADS, & COMMERCIAL POWER DISTRIBUTION SYSTEM

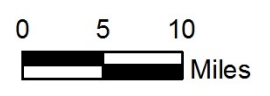






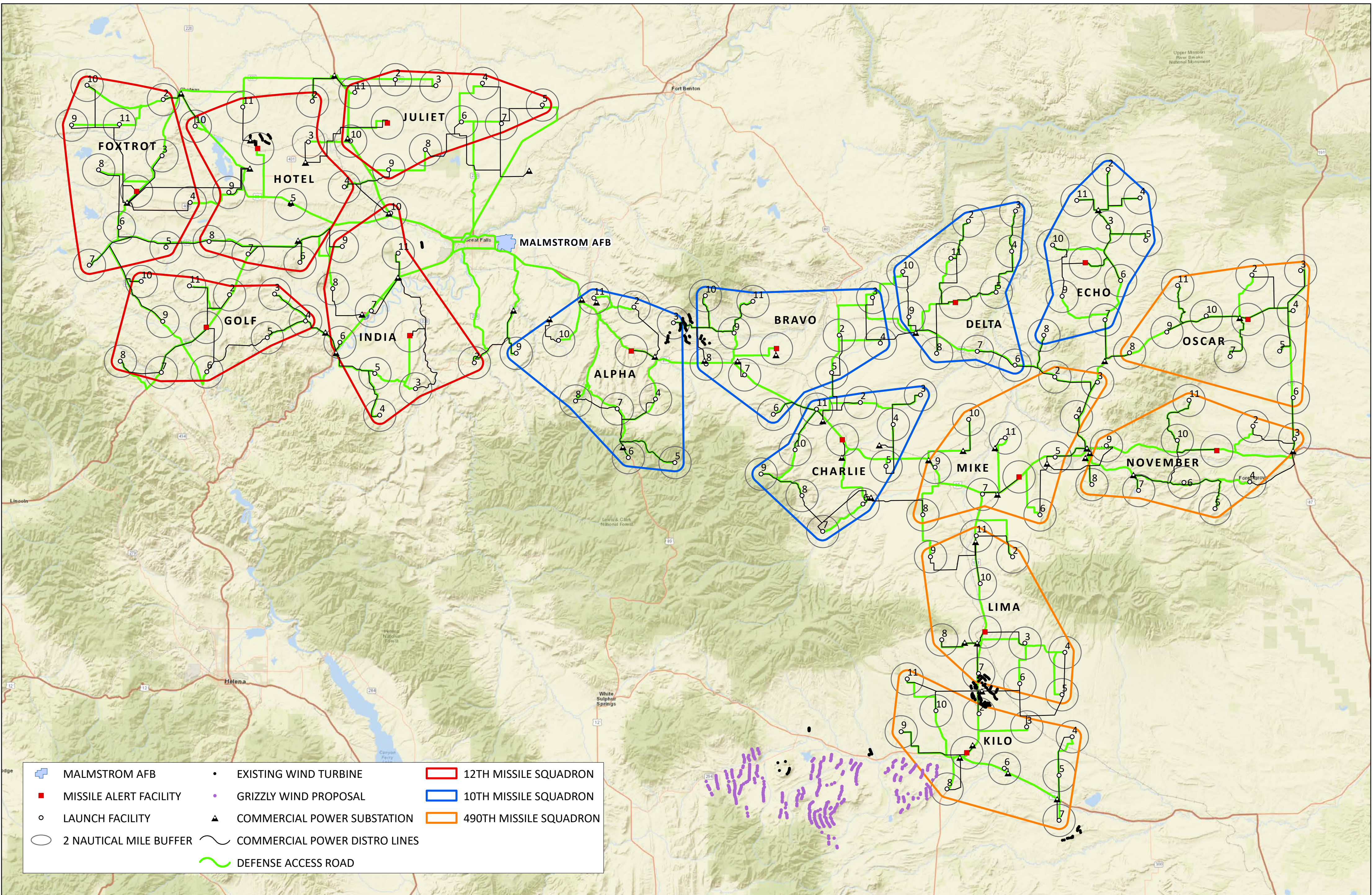
**LEGEND**

- Launch Facility (LF)
- Missile Alert Facility (MAF)
- ▲ Proposed Communication Towers
- Active Oil and Gas Wells within 2NM of LF/MAF
- Workforce Hub
- Laydown Area
- County Boundary



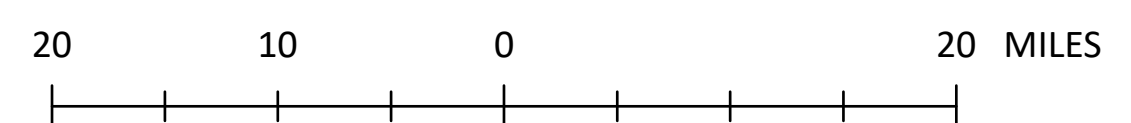
Sources: AFCEC 2019; COGCC 2021; ESRI World StreetMap 2021; HIFLD 2021; WOGCC 2021





**MALMSTROM AFB MISSILE FIELD**

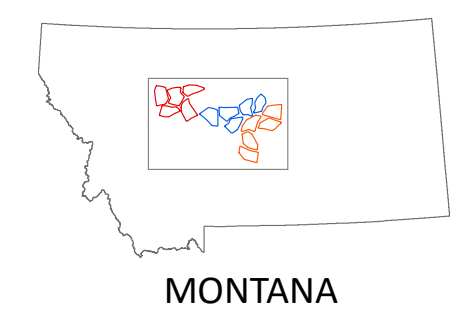
WIND POWER GENERATION TURBINES, DEFENSE ACCESS ROADS, & COMMERCIAL POWER DISTRIBUTION SYSTEM



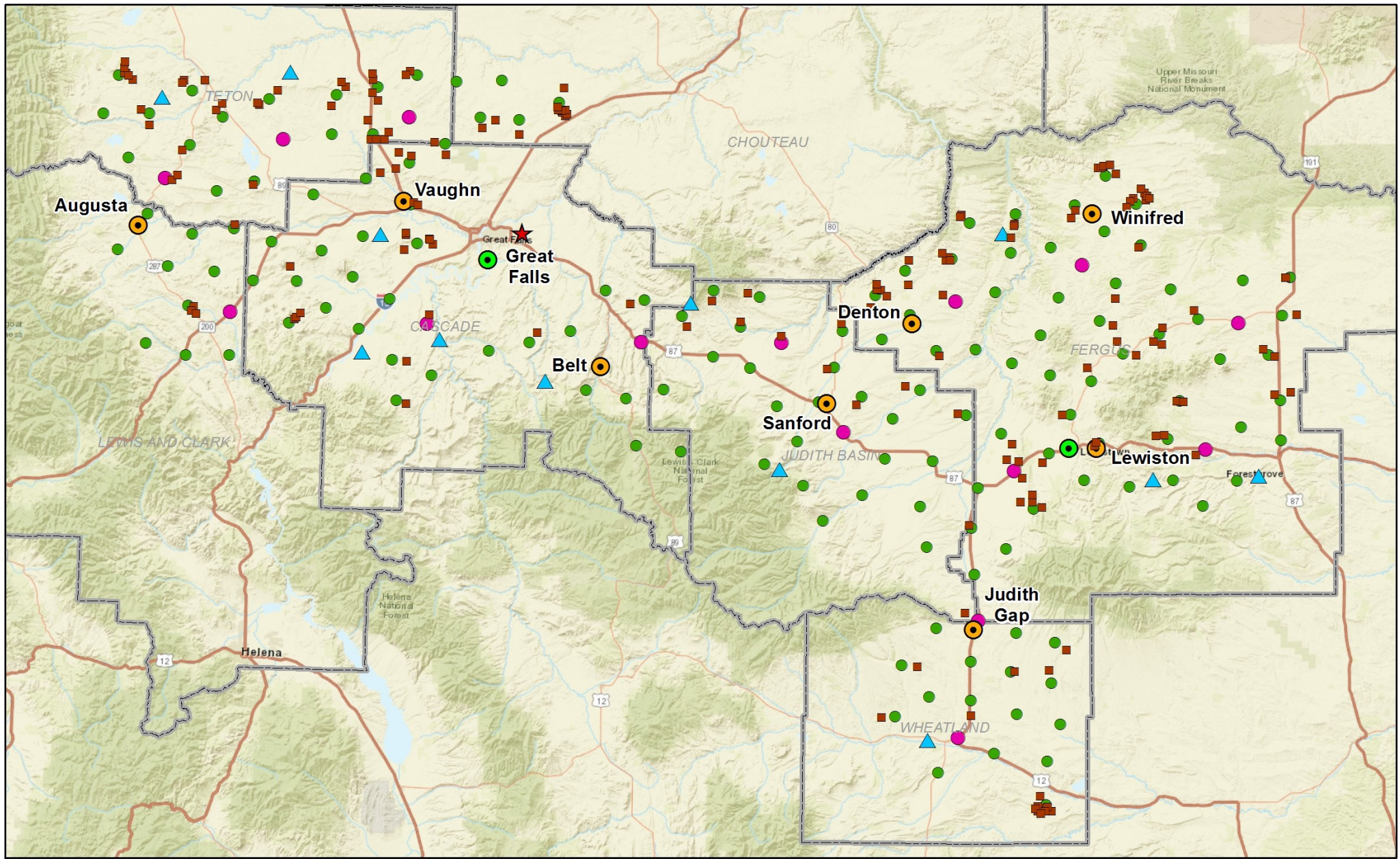
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 341 CIVIL ENGINEER SQUADRON  
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 341CES.GeoBase@us.af.mil

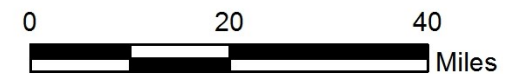






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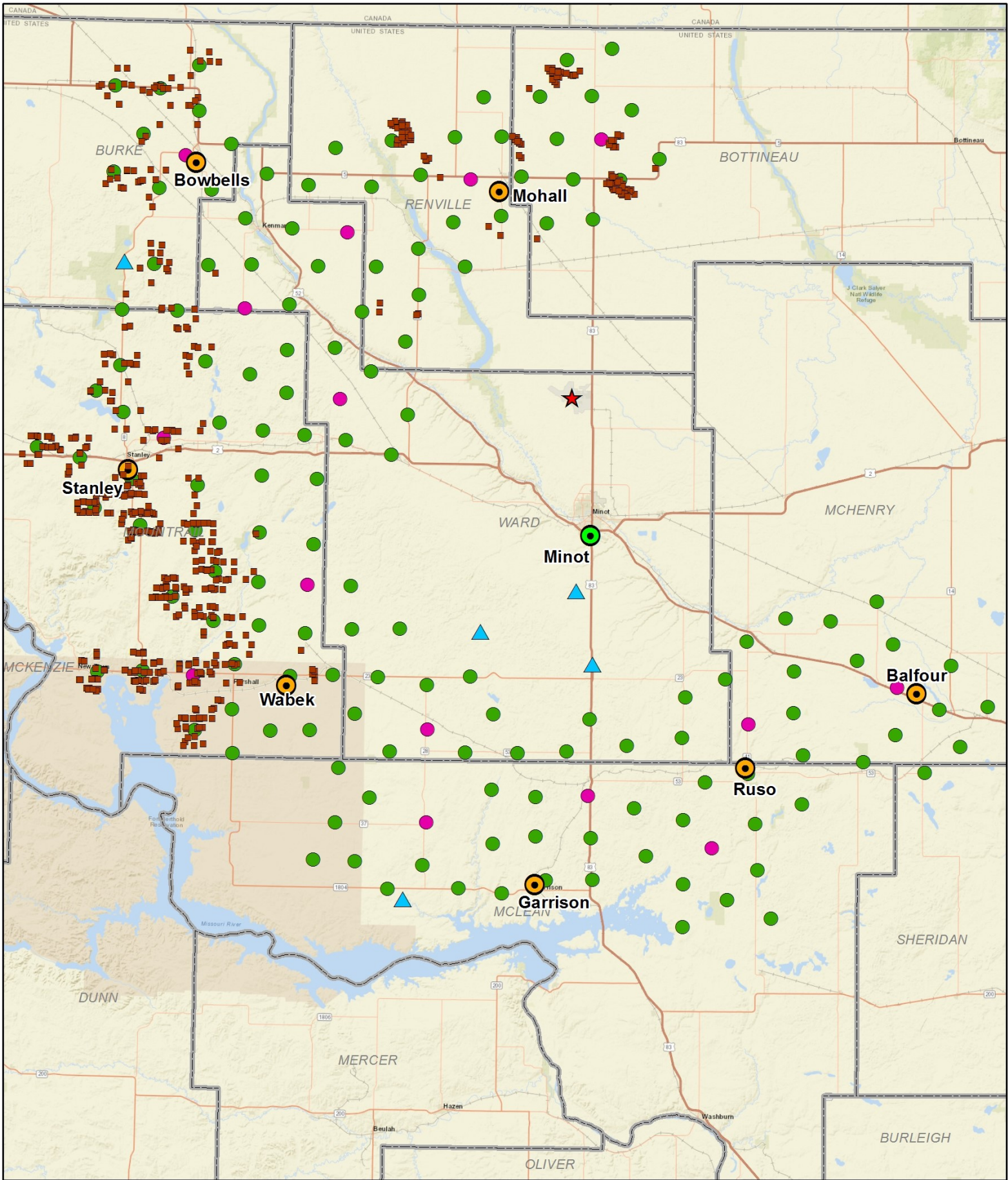
- ★ Malmstrom AFB
- Launch Facility (LF)
- Missile Alert Facility (MAF)
- County Boundary
- ▲ Proposed Communication Towers
- Workforce Hub
- Laydown Area
- Active Oil and Gas Wells within 2NM of LF/MAF



Sources: AFCEC 2019; ESRI World StreetMap 2021; MTDNRC 2021

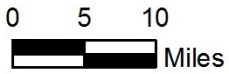






**LEGEND**

- ★ Minot AFB
- Launch Facility (LF)
- Missile Alert Facility (MAF)
- County Boundary
- Active Oil and Gas Wells within 2 NM of LF/MAF
- ▲ Proposed Communication Towers
- Workforce Hub
- Laydown Area



Sources: AFCEC 2019; ESRI World StreetMap 2021; NDDMR 2021