

Congress of the United States
Washington, DC 20510

August 11, 2005

The Honorable James Bilbray
Base Realignment and Closure Commission
2521 South Clark Street
Suite 600
Arlington, VA 22202

Dear Commissioner Bilbray:

We would like to direct your attention to recent information about the impact of current and future training limitations at Dyess Air Force Base. This crucial information demonstrates that a flawed and incomplete analysis underlies the Department of Defense (DOD) recommendation to consolidate all B-1 aircraft at Dyess, constituting a substantial deviation from the lawful Base Realignment and Closure (BRAC) selection criteria.

As early as 1997, the Air Force realized that the aerial training ranges available to aircraft at Dyess and Barksdale were inadequate for realistic and effective training. As a result, the Air Force created the Realistic Bomber Training Initiative (RBTI) using Dyess' primary training route (IR-178) and Lancer MOA. However, the RBTI generated significant controversy resulting in a lawsuit after the proposed Final Environmental Impact Statement (FEIS) was published in January 2000. In fact, this issue has been under continuous litigation since then, including a Fifth Circuit Court of Appeals decision on October 12, 2004, which found the FEIS inadequate and set aside the Air Force's Record of Decision for the RBTI.

Moreover, there have been two critical developments since DOD recommended consolidating the B-1 fleet at Dyess. First, on June 29, 2005, the District Court for the Northern District of Texas imposed significant operational limitations on the ability of the Air Force to use the RBTI airspace pending approval of a supplemental EIS. The Court's order prohibits the Air Force from flying aircraft lower than 500 feet in IR-178 and no lower than 12,000 feet when utilizing Lancer MOA.

The real and serious impact of this order should not be minimized and is demonstrated by sworn statements the Air Force submitted to the court in January 2005. The Director of Air Space Operations at Air Combat Command, Major General DeCuir, commented on the effect of these restrictions: *"It is my personal and professional opinion that losing the ability to use IR-178 and the Lancer MOA as currently configured will cause grievous and irreparable harm to Air Force training and the ability of the Air Force to meet its national defense objectives."* He went on to state that *"These changes to the bomber training program, which would be in effect while the Air Force completes the SEIS and the FAA takes action accordingly, do not in my opinion, allow aircrews to fully meet necessary realistic training objectives."*

These court rulings and the order limiting operations were imposed without any consideration of the proposal to substantially increase the number of B-1s at Dyess to 67 aircraft. The environmental impacts from the base's current level of operations alone justified these judicial rulings and the grant of interim relief.

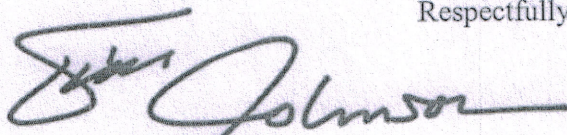
The second important development is the DOD Clearinghouse response (DCN 5321) to issues raised by the RBTI environmental litigation. The response acknowledges the Air Force failed to consider and evaluate the impact of the training range limitations when evaluating Dyess and developing the B-1 consolidation recommendation. According to the Air Force "this litigation was not factored into the MCI score for any Air Force base" because "there was no viable method to consider ongoing litigation in the computation of the MCI score." The Air Force assumed complete access to the RBTI despite the lack of an approved FEIS. They also failed to take into account continuous litigation since 2000, which has subjected the airspace to current restrictions on operational and training access. This evaluation allowed the use of flawed data to inflate military value scores for Dyess for "Proximity to Airspace Supporting Mission" and for "Low Level Routes" under the Current and Future Mission category. These over-inflated military value scores were the principle determining factors in placing Ellsworth Air Force Base on the closure list.

In addition, it appears the Air Force failed to consider and analyze the impact of the proposed consolidation of B-1 aircraft at Dyess on the EIS process and the ongoing litigation. The record does not reveal any analysis and deliberation about the impact of the recommendation on the Air Force's likelihood of success in gaining approval of an EIS. Furthermore, the Air Force failed to notify the court it had proposed to increase the B-1 presence at Dyess while the court was formulating its order, despite the fact that this recommendation would increase utilization of the RBTI by an estimated 35%. The increased scope of operations to be addressed in a Supplemental EIS makes it even more likely the Air Force will face continuing and potentially permanent limitations on its RBTI use. Despite the Air Force's failure to include altitude limitations in the MCI scoring process, these limitations have a real impact on the ability of Dyess to accomplish operational and training objectives, especially if the number of aircraft and the RBTI utilization is substantially increased.

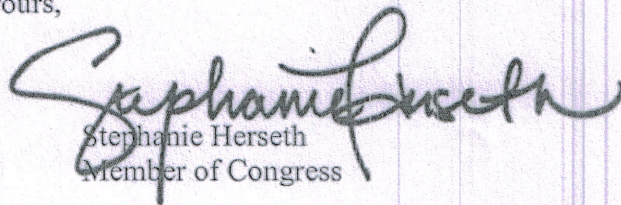
We are confident the BRAC Commission will review these real and existing limitations on Dyess' capabilities and their impact on the ill-conceived recommendation to consolidate all B-1 aircraft. The Air Force's failure to consider the impact of court-imposed restrictions on the RBTI airspace substantially deviates from final selection Criteria One and Criteria Two, and we are certain the Commission will concur with this assessment.

Thank you for your attention to this issue.

Respectfully yours,



Tim Johnson
United States Senator



Stephanie Herseth
Member of Congress