

- The USAF submitted flawed and incomplete analysis with respect to the availability, capability and future access to aerial training routes and MOAs supporting Dyess AFB.
- Inexplicably, the USAF failed to acknowledge in its analysis, scoring and recommendations that Dyess' primary training route (IR-178) and Lancer MOA, together known as the Realistic Bomber Training Initiative (RBTI), are in fact operating subject to a Federal District Court order that has placed limits on its availability and operating conditions. The Air Force has subsequently admitted they did not know how to compute limitations and litigation risk into the MCI score.
- The USAF failed to consider that this training route and MOA have been under continuous litigation since 2000 and are, in fact, vulnerable to future litigation that could further limit USAF operations and training access to Dyess-based B-1s.
- The service also failed to reveal in its recommendations that these key Dyess training assets will remain subject to Court imposed restrictions until the USAF prepares a supplemental Environmental Impact Statement (EIS) and both the court and FAA issue new decisions on whether to retain these airspace training assets.
- Any such decision could result in yet further operational limitations.
- Finally, the USAF failed to consider the cumulative effects from an increase of training requirements resulting from the addition of B-1s coming from Ellsworth and a possible court imposed cap on sortie-operations.
- As a consequence, the final DoD scoring value for Dyess AFB lacks integrity and was based upon flawed scores related to proximity to Airspace Supporting Mission (ASM) and Low Level Routes under the Current and Future Mission category.
- The over-inflation of Dyess' assessed military value in this category – in comparison to Ellsworth AFB - was a principle determining factor in placing Ellsworth on the closure list.
- Importantly, the Air Force failed to inform the court or factor into its BRAC analysis the effect of doubling the number of B-1s at Dyess (to 67) and the impact on the EIS and the probability on continued litigation this will bring.
- We believe that with this omission, DoD substantially deviated from its evaluation of military value criteria.
- Accordingly, this is one more reason the BRAC commission should reject the recommended consolidation of the B-1 fleet at Dyess AFB.

Additional Facts:

- the district court issued an order imposing flying restrictions proposed by the USAF to allow limited use pending the SEIS; thus setting limitations on the Air Force that no aircraft will fly lower than 500 ft. AGL, AP/1B altitude in IR-178, and no lower than 12,000 ft. MSL when utilizing Lancer MOA.
- The Air Force submitted sworn statements to the court in January 2005 stating that the court imposed flying restrictions (listed above) would diminish its training quality.

*“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.”*

*“[T]he 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.”* Major General Kenneth Decuir, Air Combat Command, Director of Air and Space Operations.