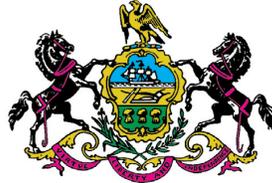


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ATTACHMENT

Issues of Concern associated with the Duke low-MOA proposed by
the Maryland Air National Guard

1. According to the Pennsylvania Department of Conservation and Natural Resources, the proposed Duke low-MOA will cover more than 1.4 million acres in the Commonwealth. To say that the Environment Assessment associated with the USAF's Environment Impact Analysis Process had a Finding Of No Significant Impact is ignoring the fact that this region has invested millions of dollars in it's brand as a natural conservation preserve.
2. While the requirements for proceeding to an Environmental Impact Study (EIS) include significantly affecting the quality of the human environment (Title 7 / Subtitle B / Chapter IV / Subchapter F / §650.7), I do not believe that the Draft Final EA was thorough enough to assess cumulative impacts on the region, effectively engage the public, and fully evaluate alternative locations. This level of analysis and engagement requires a full EIS. The creation of a low-level training area over the Pennsylvania Wilds region may have been found to have individually insignificant environmental impacts, but certainly will have cumulatively significant environmental, economic, and health impacts.
3. Pennsylvania Wilds natural conservation region (to include national wild and scenic rivers, multiple parks and trails/drives) creates a \$1.7 billion-dollar tourist business (www.pawildscenter.org/programs-and-services/business-assistance/). Much of the tourism occurs on the weekends which coincides with much of the Air National Guard's training. Millions of people across Pennsylvania and beyond seek out the natural beauty of the Wilds to recreate, hunt, fish, and relax...and collectively spend over \$1.7B each year in the process. This certainly exacerbates the interaction between AF ANG training and the public looking to enjoy the natural beauty of the Wilds. This unique and dynamic economy has not been fully assessed by the Final along with the impacts of the proposed action on outdoor recreation and tourism industries that have thrived in recent decades.
4. The branding of the Pennsylvania Wilds includes more than 1,600 miles of hiking trails (pawilds.com/activity/trails/) where tourists expect to find serenity and encounters with nature.

5. Furthermore, in terms of noise, the A-10s are forecast to be retired by 2029. This means that these fighter aircraft could easily be replaced by either F-16s, F-35s or some other similar weapon system which could easily create a larger noise pollution impact. An updated noise analysis should be completed to address this anticipated usage within the Duke Low MOA.
6. The Federal Aviation Administration (FAA) has noted that excessive aircraft noise can adversely impact wildlife and visitors' intended use of "parks, recreational areas (including areas with wilderness characteristics), wildlife refuges, and cultural and historical sites where a quiet setting is a generally recognized feature or attribute." The federal standard for parks is to recommend flying no lower than 2,000 feet AGL. While the Pennsylvania Wilds is not a national park, it is equivalent in size and unique beauty, and offers natural and cultural resources for the enjoyment, education and inspiration of current and future generations. The 1,000' AGL for night flying and 100' AGL for day flying restrictions are well below and certainly much more impactful than the federal parks standard.
7. Pennsylvania Wilds has some of the darkest skies found in the United States of America and Cherry Springs State Park is an internationally renowned dark sky designation. While light pollution may seem insignificant associated with the flying community, to the researcher and astronomer, even a miniscule amount of light can be cause for missed observations and/or misinterpreted data, not to mention how much is missed by the everyday "stargazer" enjoying the nighttime in the Wilds.
www.keystoneedge.com/2022/01/18/experience-the-magic-of-the-east-coasts-darkest-skies/#:~:test=The%20PA%20Wilds%20is%20home%20to%20a%20region,for%20night%20viewing%20is%20Cherry%20Springs%20State%20Park.)
8. An emergency response issue has not been fully addressed. Flight at this level is infinitely more vulnerable to accidents due to increased air traffic, proximity to the ground and the terrain masking techniques that the aircraft will be using. Case in point includes two Army helicopters that collided in Alaska (www.aol.com/news/2-us-army-helicopters-crash-095952443.html). No matter what the NTSB determines as the cause of the accident, the fact remains that there are many more accidents in the low altitude environment than at higher altitudes. In fact, just a month prior to this accident, two Army medical evacuation helicopters crashed during routine nighttime training exercises.
9. Should this new MOA become a reality, I am also concerned with who will be scheduling the airspace associated with Duke low-MOA. Almost all of the airspace is above Pennsylvania (a slight portion is in southern NY). Because multiple organizations will be using this airspace (while the 175th will be the primary user), it makes more sense to have the scheduling function in Pennsylvania.

10. The Bernhard Greiser study in the late 2000s concluded that aircraft noise clearly and significantly impairs health.^[14] For example, a day-time average sound pressure level of 60 decibels increasing coronary heart disease by 61% in men and 80% in women. As another indicator, a night-time average sound pressure level of 55 decibels increased the risk of heart attacks by 66% in men and 139% in women. Statistically significant health effects did however start as early as from an average sound pressure level of 40 decibels.^[14] I am not saying that the turbo-fan engines on the A-10s immediately affect the health of tourists, residents, etc. But, people go to the Pennsylvania Wilds for rest and relaxation. They go to airshows to watch aircraft.

11. With the number of established low-level routes in Pennsylvania, Maryland, Virginia and West Virginia, I'm not convinced that another 1.4 million acres of pristine parks and recreational areas need to be used for this airspace purpose.