



November 12, 2021

Major Jeffrey Andrieu
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Dear Ms. Kucharek and Major Andrieu:

On behalf of the PA Wilds Center for Entrepreneurship (PA Wilds Center), I am writing to express our deep concerns about the Maryland National Guard's plans to establish a Low Military Operations Airspace to fly low-level training flights repeatedly over vast parts of the Pennsylvania Wilds (PA Wilds). We request that the ANG complete a full Environmental Impact Statement (EIS), extend the public comment period, and consider other possible locations for their ongoing military training operations due to the prospective risks and negative impacts these drills are likely to cause in our region.

We understand that the Maryland Air National Guard (ANG) recently released its draft Environmental Assessment (EA) on the proposed Low Military Operations Airspace over the Pennsylvania Wilds region and has opened a 45-day public comment period on the drafted document. We also understand that the National Environmental Policy Act (NEPA) specifies that an EA be prepared to provide sufficient analysis and evidence for determining whether to prepare a more robust Environmental Impact Statement (EIS) or a finding of no significant impact (FONSI). Based on the drafted EA, we ask the ANG to complete a full EIS in order to thoroughly review the potential impacts on our region's unique wildlife habitat, quality of life, and local economy.

We believe that the proposal by the Maryland ANG will lead to a variety of detrimental impacts on our region that could be exacerbated by other ANG's also utilizing the same Low MOA airspace. This proposal would allow training units to fly as low as 100 feet above ground level (AGL) for up to 170 days per year. Training is now limited to 8,000 feet above mean sea level (MSL) -- or 6,000-7,000 AGL. Once the new MOA is approved, other ANG's from across the United States would have the ability to also utilize the airspace. This means we could hear and see A-10Cs, F-16s and other military aircraft flying over our homes, cabins, and serene outdoor destinations multiple times per day every other day of the year, if not more frequently. This would impact the quality of life for residents, visitors, livestock and wildlife.

We have major concerns about this proposal and how it could impact decades of work to position this region as a premier outdoor recreation destination and wildlife corridor. The PA Wilds is one of 11 official tourism regions in the Commonwealth. The region is also one of eight state-designated Conservation Landscapes because of its unique natural and heritage assets. Our 13-county region is home to the greatest



concentration of public lands in Pennsylvania. We have 29 state parks, 8 state forests, 50 state game lands and PA's only National Forest, the Allegheny. We have the largest wild elk herd in the Northeast, two designated National Wild & Scenic Rivers, thousands of miles of land and water trails, and some of the darkest night skies in the country.

Thanks to the work of many organizations, businesses and individuals over the past two decades, tourism is a driving economic force in the region -- a \$1.85B industry that makes up 11 percent of the region's economy. This sustainable industry is also helping to make our region's communities – and major employers in them – more competitive by helping to create and sustain the types of amenities that improve rural quality of life and help attract and retain a strong workforce. The Maryland ANG's proposal could have a devastating impact on nature tourism development efforts in the PA Wilds and on the many rural residents who depend on this industry for their livelihoods.

We also have concerns about the safety of not only residents, visitors, and wildlife -- but the operators. Our region is incredibly rural with rolling, mountainous terrain. Many of our communities rely on limited volunteer emergency medical services and small health clinics.

Conservation partners in our network feel that the ANG has not sufficiently explored the likely adverse impacts on birds, wildlife, historic sites and nearby public lands – such as the range of the wild elk herd or nesting eagle sites – which are popular and safeguarded attractions. We share these concerns. In addition, many veterans call our region home. We worry about the impact that loud, low-level military flights flown overhead repeatedly will have on veterans suffering from PTSD.

Lastly, we feel that the ANG has not provided adequate notice to the public to review the highly-technical draft Environmental Assessment -- the 45-day period extends over the Thanksgiving holiday period, a busy time for many families. We are coordinating a sign-on letter requesting the ANG hold public meetings in each of the counties where the flyovers are proposed so residents can have a chance to ask questions and hear from the ANG directly about its plans. We appreciate the ANG considering this request.

As the coordinating nonprofit for the PA Wilds effort, we invest upwards of \$1M a year working with partners to build the PA Wilds as an outdoor recreation destination and lifestyle brand to help revitalize our region's rural communities. Visitors come here to bike, hike, camp, paddle, hunt, fish and see our wildlife. Peace and quiet and access to wild places and public lands are our biggest draws. About half a million people live in the PA Wilds, but we see almost 15 times that – 7.2M - in day trip visitors annually. More than 375 rural businesses and organizations participate in our entrepreneurial ecosystem, The Wilds Cooperative of PA, and tourism is critical for sustaining these small businesses in our rural communities. Major investors in the PA Wilds strategy include the region's county governments, the PA Department of Conservation and Natural Resources, the PA Department of Community and Economic Development, the Appalachian Regional Commission, the U.S. Economic Development Administration, USDA and local and national foundations.

Please know our organization has great respect for our military. The PA Wilds is a patriotic region – so much so that 'patriotism' is called out as a theme in the PA Wilds Design Guide for Community Character Stewardship, an award-winning planning document in use in our region. I come from a family of veterans myself, and worked as a military reporter during my first career as a journalist. I covered National Guard deployments to Iraq and Afghanistan; Coast Guard rescue missions in Alaska; was embedded with an airborne battalion as it prepared to go to Iraq and with C-130 crews delivering relief in Indonesia during the Asian tsunami. I fully appreciate the job our military does, the dangers involved in flying aircraft like the A-10C, and the need for training missions like those being proposed.

The PA Wilds Center respectfully asks the Maryland National Guard to complete a full Environmental Impact Statement to demonstrate its due diligence in researching and identifying potential risks for this low MOA proposal in the PA Wilds region. We also hope that the ANG will consider extending the public comment period into the New Year to provide sufficient time for review and feedback by local stakeholders.



Respectfully,

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Cc:

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Sen. Patrick Toomey
Rep. Fred Keller
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