

To: Major Stephen R. Lippert
ANG, NGB/A7AM, Program Manager
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

From: Ann K. Williams
PO Box 149
Center Lovell, ME 04016

Re: DEIS Condor I&II

August 27, 2009

Dear Major Lippert,

I am very concerned by the changes suggested to the Condor I & II MOA, particularly as they do not reflect fairly the restraints and guidelines placed upon such actions by NEPA.

Specifically:

- 1) The Notice of Intent was sent to the Sunday Telegram, in Portland, on June 21, 2009. This is NOT a paper which is normally read by the citizens in the affected area. This reflects poor research.
- 2) The Notice of the Public Hearing was dated August 19, 2009 (from your office). This does not give adequate time, per NEPA, to respond. Moreover, Sept. 2 is too close to Labor Day Weekend, with its many activities related to tourism, to assure a good turn-out by the citizens of the area.
- 3) The significance of the proposed action (i.e. enlarging the area over which LOWAT exercises will be employed to over 2,500,000 acres) will be far greater than the ANG acknowledges. LOWAT exercises will occur over the entire areas listed here: Grafton Notch State Park, Rangeley Lake State Park, Mt. Blue State Park, the Bigelow Preserve, the Connecticut Lakes Natural Area (Coos County, NH), Carrabassett Valley, Alder Stream Property, two properties of the Penobscot Nation, and a large portion of the northern extremities of the Appalachian Trail.
 - a. These areas are world-renowned for their pristine quiet. They attract people who cherish these things. These people rely on the support of small businesses that depend on this tourism, in a state where economic stress is already a fact of life. To introduce LOWAT exercises here would have a significant negative impact on the economy of the region.
 - b. This is an area rich in corridors necessary for the survival of wildlife, which migrate over large areas in search of food and breeding grounds.
 - c. It is an area of bird migration; wildlife scientists are voicing increasing concern about the reduction of numbers of songbirds due to reduction and contamination of habitat.
- 4) The three stated ANG alternatives do not reflect careful consideration of the reality of the situation. At a time when the US has acknowledged an over-

- dependence on foreign oil, with resulting dramatic increases in fuel costs, one alternative not mentioned would be to cease such over-flights and rely on the use of simulators for training the ANG pilots. Your alternatives ALL consistently refer to flights which will use enormous quantities of fuel. “Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.” (*A Citizen’s Guide to NEPA* #1502.13)
- 5) Other than combining the areas of Condor I & II and stratifying the over-flights across the entire area to those between 500 ft. above ground level to 1,000 ft. above ground level, and those above 1,000 ft. above ground level, and the inclusion of sign-off’s by 10 resource areas that there would little or no significant impact on those areas (which is highly questionable), this DEIS seems little changed from the original EA submitted in 2007. It does not warrant the expense to taxpayers.
 - 6) A prior request to expand the MOA (under the McKernan administration in 1992 [sic!]) was denied: there was no reference to this in the DEIS, therefore there was not FULL DISCLOSURE.

Given these concerns, I respectfully request that you review the DEIS before going further.

Sincerely,

Ann K. Williams