

The Opportunity Center of North Franklin County, Inc.

November 12, 2009

Lt Col Mike Milord
NGB Public Affairs
Jefferson Plaza One, Ste 11200
1411 Jefferson Davis Hwy
Arlington, VA 22202

**RE: THE PROPOSED MODIFICATION OF THE CONDOR 1 AND 2 MILITARY
OPERATIONS AREA IN WESTERN MAINE**

Dear Sir:

The Opportunity Center of North Franklin County, Inc. (OC) is a 501 (c) 3 charitable organization dedicated to the recovery of our economically depressed northern portion of Franklin County in the state of Maine through initiation of education and retraining efforts for our citizens. We have been aware of proposed modifications by the Massachusetts Air National Guard (MA ANG) and are concerned about its impacts to our air space and “quality of place” in Franklin County and of the significant detriment to our region’s economic base, now more strongly tied to tourism than any other factor.

The MA ANG is requesting major and significant changes to the scope of the uses of the area known as Condor 1 and Condor 2 by the military (MOA), so much so, that this should be considered a new MOA project and not a modification to an existing undertaking. The OC Board feels that if the Federal Aviation Administration (FAA) even does a cursory review of the Environmental Impact Statement (EIS) submitted by the MA ANG for public review, the reviewers would certainly realize that this EIS does not come close to meeting the criteria to prove there would be no significant impacts to our region. Certainly the FAA would risk their credibility as a professional Federal Review Agency if they were to approve this project given the EIS study is clearly a bad remake of the Environmental Assessment (EA) previously submitted, and direct public concerns have still not been addressed in the EIS, but glossed over with the general statement of “no adverse impact” with no data to support this statement.

Tourism has become a very important component of our economic building blocks since the loss of our manufacturing base over the last few decades. Our lives and often our livelihoods are based upon the quiet of the north woods. Guides, river companies and hiking supply stores depend upon our reputation of a calm quiet ambiance. Inns and resorts promote the peaceful atmosphere in which to enjoy the wildlife and scenery. We do not need any additional negative components to our region’s depressed economy, and we believe that the proposed low level flights may be yet another negative impact to our collective economic success in this region.

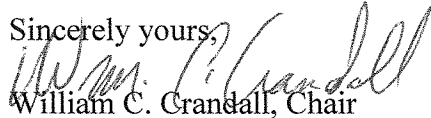
The EIS raises the similar concerns as from earlier requests for modifications to this airspace, and I have attached the copy of the April 1992 “*Comments on Proposed Modifications to Condor I & II MOAs and Creation of a Great State of Maine MOA*” for the record and contend that many of the same reasons that this was denied in the past are the same reasons why this proposal by MA ANG should be denied again. There are many good points made in this summary report that should be included in any EIS that would past the FAA’s review criteria, but I will only highlight a few items

that relate to our region's economy that still hold true or are even more pertinent now almost two decades later.

- Maine's tourism and recreation industries rely on private air travel, especially in our region where lakes and dirt strips are used for landings – fast & low level flights will add undue risks to these individuals, especially given the lack of “controlled” or the “absence of radar.” We question the “wisdom of conducting low level air to air training in uncontrolled airspace.”
- Crashes or Fuel Spills – “What will be the impact of hydrazine in our water system, brooks, rivers or lakes?” “Hydrazine is reactive with water and is classified as a known carcinogen by OSHA and is highly toxic by ingestion, inhalation, and skin absorption.
- “Annoyance Response” to the noise factor of the low flights – people may chose not to vacation or recreate if this response is high enough. “People expect a certain type and quality of environment and experience.”
- “If these special qualities are lost, the remoteness of the region will become a detriment rather than an asset to attracting visitors. Tourism is too significant of a part of our economic base not to have this information presented in an EIS when so much is at stake.
- “Tourists and seasonal visitors with vacation homes... account for the major portion of the local economy and of the local tax base. The quality and condition of the environment is the single most important factor to Maine's tourism industry.”
- Liability to small tourism entities, as to danger to clients when startled by the low flights, while in dangerous situations, such as rock climbing, white water rafting or canoeing, horseback riding, skiing, etc.
- “SILENCE is the premium quality that makes this region special.” However, the people will no longer remain silent to those who want to use us for their own ends without regard to our way of life.

In summary, we believe that the EIS prepared by the Air Guard is neither complete nor entirely accurate nor has it acquired the proper amount of data or economic information to prove their general statements of “no adverse impacts” by their proposed modifications. We strongly request that the FAA deny this inadequately prepared EIS and modification proposal requested by the MA ANG as it has not even attempted to address our earlier concerns of economic impacts to our region.

Sincerely yours,


William C. Grandall, Chair
Board of Directors,
The Opportunity Center
of North Franklin County, Inc.

cc: Honorable Senator Susan Collins, U.S. Senate
Honorable Olympia Snow, U.S. Senate
Honorable Congressman Mike Michaud, U.S. Congress
Honorable Congresswoman Chellie Pingree, U.S. Congress
Kat Beaudoin, AICP Chief of Planning MaineDOT
Lance Harvell, Maine State Representative
Tom Saveillo, Maine State Representative
Walter Gooley, Maine State Senator