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Remarks Presented at the Hearing on November 14, 2009, Lincoln Auditorium, University of
Maine at Farmington, Farmington, ME 04938

on the

*Draft Environmental Impact Statement—Modification of the Condor 1 and Condor 2 Military
Operations Areas*

104th Fighter Wing, Barnes Air National Guard Base Westfield, MA, Project No. ANG0956737
August 2009

The Air National Guard's (ANG) idea of allowing low-level training flights over our region was a terrible idea when it was first proposed in 1991-92, and it's just as terrible an idea now. The reasons that made it terrible then are the same ones that make it terrible now. Nothing has changed. The current Draft Environmental Impact Statement rolls out the same old assertions of "no significant adverse impact" and "no adverse effect" on peace and quiet, on wildlife, on domestic animals, on outdoor recreation, and on culture. And at the same time it offers nothing to back up these assertions but hocus-pocus with numbers and pitifully inadequate analyses of the social and economic features of western Maine and of the crucial role the region's natural environment plays in its social and economic life.

Just two quick examples:

As has been pointed out repeatedly both in response to the 1992 proposal and to this current one, the EIS obfuscates the issue of noise by averaging out the predicted noise levels. By that sleight of hand, the approximately 117 decibels that an individual experiences during an F-15 overflight at 500 feet above ground level gets averaged out to yield a benign 65 decibels over a twenty-four-hour period.

In the Cultural Resources section, we are reminded on page 3-58 that "[I]n 1775, Benedict Arnold led a force of more than 1,000 men from the Kennebec River to Quebec City to conduct an ultimately unsuccessful attack on British forces in Quebec City. His expedition passed through the rugged terrain of modern Franklin and Somerset County (BPL, 2005)." No conclusions or recommendations having anything to do with the current proposal follow on this bit of common knowledge. And in this same section, no mention is made of cultural resources, such as the University of Maine at Farmington, that might indeed suffer adverse impacts if this ANG proposal were to be implemented.

The list of errors and omissions could go on and on.

In his letter recommending that the 1992 proposal be dropped "without additional expense to American taxpayers," then Governor McKernan wrote: "The State of Maine is unequivocally opposed to the proposed actions related to the CONDOR MOAs and the Great State of Maine MOA described in the DEIS. This proposal represents a serious threat to this State's economic and environmental health, to public safety and to the quality of life enjoyed by Maine citizens."

I urge our state legislature to adopt a resolution expressing a similar sentiment and Governor Baldacci to follow Governor McKernan's lead in his own response to the current proposal.

Let me add here, too, that I am not asking the ANG to revisit this DEIS and "fix" all its shortcomings. No amount of tinkering with this document can correct the incorrect assumption on which this house of cards stands, namely, that the ANG can conduct low-level flights over western Maine without significant adverse impacts on the people of this region. That is a proposition that is untenable on the face of it. So I urge the ANG to withdraw this proposal and put an end to these needlessly protracted and expensive proceedings.

Thank you for your consideration of my views.