

Excerpts from State of Maine Comments on

have heard from citizens present at scoping meetings accounts of incidents where lives were endangered by turbulence and vibration from low flying aircraft. Most such incidents occurred to persons boating on Maine lakes when watercraft were upset or nearly capsized by turbulence. These incidents already happen with alarming frequency and the potential for harm to persons on the ground can only be expected to increase.

Expansion into the Great State of Maine MOA and the lowered flight floor in the Condor MOAs will pose a far more widespread risk. Of particular concern is the safety of loggers working in the Maine woods. The turbulence and vibration caused by low flying aircraft presents danger to a logger about to fell a tree at the time of overflight. Logging is a major economic activity in the region under

2. Noise is not addressed in the Draft EIS as an issue of public health or safety. What is the impact of such loud noises on persons with hearing devices, pace makers, and other mechanical aids? The Draft EIS does acknowledge primarily emotional effects (distracting and annoying, sudden loud noises can interrupt thoughts, etc.) rather than physical effects, but does not address long term effects or the effect of repeated and unpredictable loud and disruptive occurrences.

The sudden noise created by a plane approaching at high speed only a few feet overhead has been known to startle people and animals, resulting in temporary chaos and potentially life threatening circumstances. There are documented cases of people who have driven off the road, been thrown from horses and overtipped canoes when startled by overflights.

Proposed Modifications to Condor I and II MOAs

B. Turbulence and Vibration:

The DOD and Consultants involved in the preparation of the Draft EIS

April, 1992

EXHIBIT 3

It is the sudden shattering roar of a plane going at very high speed at low altitude that destroys the tranquility of a wilderness experience, not the casual observance of a plane floating along the horizon.

The EIS acknowledges that "noise is one of the more important concerns associated with low-level flights of military aircraft" (page 4-3) but fails to adequately address people's responses to aircraft noise in parks or other natural settings.

The EIS addresses the "annoyance" factor only briefly in its discussion of human response to noise. The data from these models measures a human response that is fundamentally different and cannot be applied to the "annoyance" response of aircraft overflights in park settings because of the different tolerances and expectations that people bring to parks.

The National Park Service, in their preliminary work to measure the effects of aircraft overflights on parks and wilderness areas, has found that the use of averaged noise levels is irrelevant to measuring impacts of noise in park and wilderness settings. Averages do not adequately reflect the noise impact from individual overflight events, which the

(Page 2)

A. NOISE Impacts:

The criteria used to assess impact is incorrect. In addition to safety issues, noise, not frequency of sitings is of greatest concern. The way noise is assessed is equally irrelevant.

The draft EIS inappropriately emphasizes the frequency or likelihood of siting aircraft rather than the noise factor as the significant criteria. It is NOISE, not frequency of sitings, that holds the greatest impact.

destinations to which people voluntarily come because they 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.

Although the EIS acknowledges adverse impacts are likely, saying "it is difficult to assess whether or not this (i.e., the overflights) will affect...recreational experience or quality of life. (page 4-41) and that "the greatest potential for adverse impact would be the disruption of tourism in scenic areas" (page 4-44), the EIS does not address this potential. Despite the difficulty of quantifying recreational experience, this assessment must be made. Tourism, the quality of the recreational resources, and the quality of the recreational experience are simply too significant in these areas of Maine to be subjected to adverse affects by aircraft noise or any other aspect of overflights.

(Page 6)

The EIS asserts that sensitive land areas such as those listed for Maine in Appendix F are not significantly affected by the proposed airspace modifications unless they experience noise levels greater than Ldmnr65 (page 4-41). The arbitrary designation of Ldmnr65 as the cut-off point needs to be examined carefully. In general, an Ldn value of 65 decibels, which we believe to be similar to Ldmnr65, is the noise level at which residential land use compatibility becomes questionable for structures with average or below average acoustic insulation. It is also the level above which the military must monetarily compensate residential dwellers. To assert that this is also the level by which to measure the significance of noise impacts on sensitive land use areas is wholly inappropriate and, like most of the noise analysis in the EIS, has no bearing on park, recreational, or wilderness environments. If natural sounds and quiet are the critical values of park and wilderness areas, there is little doubt that military overflights will have adverse effects on such areas.

EXHIBIT 3

(Page 12)

(Page 17)