

Air National Guard DEIS:	Rebuttal by “Western Maine Matters”
<p style="text-align: center;">Safety:</p> <p>“No significant effect on safety.”</p> <ul style="list-style-type: none"> • ‘Minor increase’ in probability of Class B <u>mishaps</u> (those which result in a permanent partial disability; costs between \$200K and \$1M) 	<p>Even a ‘Minor increase’ is unacceptable.</p> <ul style="list-style-type: none"> • F-15’s are being phased out of the regular Air Force because of safety issues incurred by the aging fleet. Older fighters (F-15A through F-15D) are being relegated to domestic flights. (<i>LA Times 1-9-09</i>)
<p style="text-align: center;">Noise:</p> <p>“No significant impact on noise.”</p> <ul style="list-style-type: none"> • ‘Minor adverse effects outside existing Military Training Routes.’ • “Proposed Action would introduce visual and audible elements that <i>could</i> be perceived as being out of character with cultural properties in a quiet setting.” (DEIS 4-38) • Instantaneous maximum noise level on the surface for an F-15 flying at 500 ft. above ground level is 115.7 dB. • Graphs and tables included in DEIS text and textbook sections in Appendix regarding ‘Noise’ are overly long and complicated. 	<ul style="list-style-type: none"> • ‘Noise’ is defined by unwanted sound. Effects could be major; this is ignored by the ANG. • PROFOUND increases in noise levels produced by planes other than F-15’s and F-16’s that could realistically conduct sorties in this area (e.g. unspecified ‘visiting’ units flying F-18, F-22 and other craft). • If a 10dB increase in noise corresponds to a 100% increase in <i>perceived</i> loudness, and a baseline noise level of 55 dB threshold is set by EPA to protect public health and welfare, then this is VERY VERY loud (600% louder), double the 55 dB threshold. • “Environmental Impact Statements shall be written in plain language and may use appropriate graphics so that decision makers and the public can readily understand them.” (<i>NEPA Environmental Impact Statement, Sec. 1502.8</i>)
<p style="text-align: center;">Air Quality:</p> <p>“No significant impact on air quality.” It would actually have ‘positive cumulative effects’.</p>	<p><u>Cumulative effects</u> of effluents from jet fuel particulate matter (on air quality, on surface and ground water) are not adequately addressed, and not ‘positive’.</p>

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<p style="text-align: center;">Biological Resources:</p> <p>“...No significant impact on biological resources.” <i>(only limited to noise, bird strikes, and the use of chaff and flares associated with military sorties)</i>. Wildlife would ultimately ‘habituate’ and suffer no long-term effects.</p>	<ul style="list-style-type: none"> • There has been a huge investment by the state of Maine for over 20 years in the reestablishment of the peregrine falcon population. Peregrines are established in Oxford County and in the C Pond bluff area in NW Oxford County (which was the 2nd area to be reestablished in Maine, and therefore of historic significance). This community of peregrines was observed to be adversely affected by at least one low overflight [as was the Maine Wildlife Biologist who was tracking this population] <i>(personal communication, MIF&W)</i>. • Whitetail deer population is the most fragile it has ever been, because wintering yards have been especially hard hit. Panic induced by low-flying military aircraft will further reduce herd size. <i>(personal communication, MIF&W)</i>. • Canada lynx is on the Federal Endangered Species list, but not on Maine’s. Canada lynx (from 200-500 individuals in ME) are known to react adversely to loud unexpected noise. Since they are already reproducing at reduced levels, the noise impact is negative and significant. • Wild and domestic animals and birds will never ‘habituate’ to this low-overflight noise.
<p style="text-align: center;">Land Use:</p> <p>FAA Order 1050.1E, Appendix A, Section 6.2g: “...land uses and values are only applicable to the extent that they are relevant to the value, significance, and enjoyment of the</p>	<p>In the affected area, there are:</p> <ul style="list-style-type: none"> • 80,000 people. • 144 miles of the Appalachian National Scenic Trail • 1,260 acres of the White Mountain

lands in question...”

[National Forest](#)

- 3,860 acres of the [Lake Umbagog National Wildlife Refuge](#)
- [Bigelow Preserve Public Reserved Lands](#)
- [Grafton Notch State Park](#)
- [Mount Blue State Park](#)
- [Rangeley Lake State Park](#)
- Six [Wildlife Management Areas](#)
- [Connecticut Lakes Natural Area](#) - run by the fish and game of NH, covering over 14,000 acres
- [High Peaks Region](#) - the State of Maine has designated 59,790 acres of land protected, the remaining 46,344 acres left is being proposed for protection ([click for map .jpg](#))
- Numerous areas protected by local and state Land Trusts
- [Androscoggin River Canoe Trail](#)
- [Northern Forest Canoe Trail](#)
- Penobscot Nation Tribal Lands
- Ski areas reporting approximately one million ‘skier visit days’ in 2008-‘09

The above reflect value, significance, and enjoyment of the lands in question

- There is also a fragile economy that depends heavily on tourism. “The Maine Lakes & Mountains region remains an important Maine destination in terms of the number of trips it receives and the unique ‘lakes and mountains’ outdoors experience that it provides. The most important marketing challenge is to leverage its position by increasing the number of Maine visitors who spend at least some time in the region and especially on touring trips.”

(Prepared for Maine Office of Tourism by Longwoods International, 2003 Travel Year, new pamphlet not public)

- [Property values](#) have been shown to

	<p>plummet in areas that have been impacted by military aircraft. A July 2007, internal Air Force document confirmed that real estate prices of homes located within the minimum <u>65 dB</u>, sound contours of military flight airport showed a significant negative impact (on resale value) due to the presence of high aircraft noise.</p> <ul style="list-style-type: none"> • The Condor I & II area modifications would result in a negative impact (including, but not limited to, noise, property values and area economy) by F-15, F-16, and the probability of more modern and much noisier fighter jets flying at 500 ft. above ground level. 500 ft. is less than half the height of the Empire State Building (1,250 feet).
<p>Alternatives:</p> <p>NEPA requires alternatives to proposed action. The ANG has indeed followed the rules and provided alternatives as required.</p>	<p>The proposed alternatives ALL consistently refer to <u>flights</u> that will use enormous quantities of fuel. At a time when the United States acknowledges 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 <u>simulators</u> for training the ANG pilots. <i>A Citizen's Guide to NEPA</i> states: <u>“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.”</u> (#1502.13) In a noteworthy article in the website <u>Air Force Military News</u> (www.af.mil/news/story.asp?id=123172892) on 10-15-09, Air Mobility Command (AMC) writes “the use of flight simulators as an Air Force Smart Operation for the 21st Century (AFSO 21) effort is helping significantly reduce costs, maximize training</p>

	<p>and make more aircraft available for operational missions. Through AFSO 21, initiatives provide a ‘dedicated effort to maximize value and minimize waste in operation’...It is ten times cheaper to train in a simulator than to fly the aircraft. And it’s just like flying the real thing...The use of simulators, in lieu of airplanes, results in safer flight training, large flying hour cost reductions for the Department of Defense, saves fuel and increases the service life of AMC aircraft.”</p>
<p style="text-align: center;"><u>Timing of LOWAT</u></p> <p>Lieutenant General Harry M Wyatt, Director of the Air National Guard, reassures Gov. Baldacci (September 10, 2009) that “currently, F-15’s typical (sic!) fly low level routes in winter months during the day” which will continue.</p>	<p>Research shows that ski resorts host approximately one million ‘skier visits’ in Western Maine in winter months. Skiing is not the only outdoor activity in Western Maine during the winter. Moreover, in winter, without the leaves on the trees, and with the noise bouncing off the snow pack, sound is enhanced.</p>
<p style="text-align: center;"><u>Omission and Conclusion</u></p> <p>“The EIS will also have a list of who prepared the document and their qualifications.” (p.18, <i>A Citizen’s Guide to the NEPA</i>)</p>	<p>Notably, this is not included. ‘Western Maine Matters’ submits that this omission is the last in a series of skewed facts, specious arguments, and poor research contained in this DEIS that, if allowed to go forward, endangers the citizens, domestic animals and wildlife, and environmental quality of over 2.5 million acres in Western Maine.</p>