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The primary purpose of an environmental impact statement is to serve as an action-forcing device to insure that the policies and goals defined in the document are infused into the ongoing programs and actions of the Federal Government. It shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment. It must include possible conflicts between the proposed action and the objectives of Federal, regional, State, and local or Indian tribal land use plans, policies and controls for the area concerned.

The EIS requirements put the burden of proof on the ANG and its proposal, to demonstrate that it will not have an "undue adverse effect on existing uses, scenic character and natural resources."

This draft is the second attempt, the last being in 1992, to prove no significant impact to western Maine and its communities and environment. You have failed, miserably in all areas of concern.

The ANG's analysis of noise in the proposal states there will be "no significant effect." You claim noise levels would compare to a lawn mower. The data on noise is presented in "average" noise levels over a 24 hour period. This does not address the impact of very loud and sudden noise on humans and wildlife in any realistic manner. The EIS drafted in early 1992 on the same proposal stated that the noise from a plane flying at 500 feet is 102 dB. This draft now states that aircraft noise at the same elevation is 65dB. Nothing in the DEIS covers multiple aircraft at varying speeds and elevations. Nor were effects of turbulence and vibration leading to 'startle reflex' on loggers and boaters from low flying aircraft discussed. Very little was

mentioned on noise sensitive areas, which are areas where noise interferes with normal activities. Such places include residential, health, educational, religious sites, parks, recreational areas, wild life refuges, and historical and cultural sites. There are over 650 critical areas containing outstanding natural features of state significance, with some 350,000 acres of public lands and parks within Condor's bounds. Lands for Maine's Future purchased over 30,000 acres in the proposed area. Private foundations and 100 local lands trusts in Maine have been buying land to protect from development. As an example near Condor's borders, Baxter State Park has placed restrictions or limits on motorized vehicles or craft to insure the peace and quiet of person's experience. The ANG's analysis is incomplete and does not follow the vision communities have for their surroundings and sense of place.

The ANG analysis on wildlife, birds, and livestock in the proposed area indicated a "minor negative effect" but not significant. No mention of livestock and startle effect, or impact on deer in the nearly 200 wintering areas identified in the proposed area. Numerous endangered bird species are widespread throughout the proposed area and trying to alter flight paths to avoid nesting areas is impossible. The Androscoggin River Water shed is a major migratory route for water fowl, passerines, and shorebirds that will be impacted significantly by the proposal as well as the bald and golden eagle, peregrine falcons, osprey. Your analysis and conclusion is based on ground disturbance, not the combined noise with the visual stimulus of a military aircraft approaching. The current risk of a bird-plane strike interaction in the proposed area is low to moderate. No statement was made what that level of risk would be if the flight floor goes from 7,000 feet to 500 feet. At least 3,000 strikes of migratory birds by military aircraft causing an excess of \$75 million in damage every year and yet you define the impact as minor.

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As you did in 1992, you again in 2009 present to the people of Maine an incomplete; half hazard document that fails completely to meet the criteria to prove there is no significant impact from the proposal. Its insanity, as Einstein says, to do the same thing over and over again and expect a different result.

Respectfully submitted

Nancy O'Toole