

APPENDIX A: Comparison of Environmental Impact Statements issued by the Massachusetts Air National Guard in 1992 and 2009

Final Environmental Impact Statement (EIS), July 1992.

Aircraft Conversion at the 103 Fighter Group, Bradley International Airport, Connecticut, and the 104 Fighter Group, Barnes Municipal Airport, Massachusetts, and Changes in Utilization of Military Training Airspace.

- **Condor MOAs**- the Condor 1 and 2 Military Operations Areas (MOAs) are located primarily over the state of Maine with a small portion extending over New Hampshire. The proposed modification is to lower the floor of Condor 1 from 7,000 feet mean sea level (MSL) to 300 feet above ground level (AGL). (ES-2) The MOA has the potential to be divided into Condor 1 Low (below 10,000 feet MSL down to 300 feet AGL) and Condor 1 High (10,000 MSL and above)¹
- **Greater State of Maine MOA**- the ANG propose to establish the Great State of Maine MOA over northwestern Maine. The proposed MOA would have a floor of 100 feet AGL and a ceiling of 5,500 feet MSL.²

Draft of Environmental Impact Statement (DEIS), August 2009.

Modification of the Condor 1 and Condor 2 Military Operations Area,

- Combine the Condor 1 and 2 MOAs, divide the combined MOA into Condor Low MOA and Condor High MOA, and lower the flight floor of the proposed Condor Low MOA from 7,000 feet MSL (between approximately 2,800 feet to 6,300 feet above ground level) to 500 feet AGL. Condor Low MOA would extend from 500 feet AGL up to, but not including, 7,000 feet MSL. Condor High MOA would extend from 7,000 feet MSL up to but not including 18,000 feet MSL.³

Air Quality:

- **EIS, 1992.** Projected emissions of criteria pollutants and ozone precursors associated with the proposed changes in utilization of military training airspace reflect a wide range of total annual contributions and modeled concentration exposures. The proposed Greater State of Maine would constitute new indirect sources of air pollutants through the localization of training sorties. Increases in carbon monoxide, sulfur dioxide and particulate matter (at 10 microns) from the Condor 1 and 2 MOAs.⁴
- **DEIS, 2009.** Minor negative effects due to low altitude emissions but no significant impacts. A total of 65 tons per year of criteria pollutants dispersed into the atmosphere. Section 3-24 states the emission estimates were generated using data over a wide area and range of altitudes. Not a fair modeling for the given proposal.⁵
-

Hazardous Materials:

- **EIS, 1992.** There is a small increase in the potential for the release of hazardous materials as a result of the proposed airspace action. The increase in low-altitude flight training associated with some proposals could increase the risk of accidents that might release hydrazine and jet fuel. Other hazardous materials that could be present at a crash site include 20- millimeter practice ammunition and the small explosive charges used to dispense chaff and flares.⁶
- **DEIS, 2009.** No mention of any risk in the release of hazardous materials.

Air Space Management and Safety:

- **EIS, 1992.** The military airspace proposals involve varying degrees of interaction among military users of the airspace and civilian airports, seaplane bases, general aviation activities and some federal airways. (ES- 3) There are minimal increases in safety risks associated with the conversion of F-16s. The F-16 has a higher statistical mishap rate than an A-10. It is more vulnerable to mechanical failure and damage to bird-strikes than the A-10. The establishment of new MOAs would require coordination to resolve interactions between military and civil air traffic. Bird- Aircraft strikes could increase in those training areas as a result of the higher speed of the F-16.⁷
In volume 1, Table 2.5-2, under Condor MOA and Great State of Maine MOA states possible interaction with traffic patterns at local airports and sea plane bases. Table 2.6-2, Airspace Management for Condor and Great State of Maine MOA states coordinate with FAA for resolution of interactions with other airways. Avoid existing airport traffic patterns.
- **DEIS, 2009.** No adverse impact, minor increase in probability of Class B mishap. There are seven civilian airport in the proposed area and fly under the Visual flight Rules. A minor negative impacts on accessibility of the MOAs under Instrument flight Rules (IFR)⁸

Noise:

- **EIS, 1992.** The airspace proposals would result in slight increases in noise levels in the vicinity of the MTRs, MOAs, and weapon ranges.⁹ The proposed airspace actions could result in some increased startle effects on raptors know to nest in the vicinities of the affected MOAs and MTRs. These impacts can be reduced through avoidance of known nest areas.¹⁰
- **DEIS 2009,** The proposed action would have no significant effect on noise. The noise levels will remain below the FAA significance-threshold of 65 dB, and the more conservative 55 dB threshold established by the EPA.¹¹

Social-economics and Land Use:

- **EIS, 1992** It is possible that the tourist industry in some locals could be adversely affected. This would occur in areas where tourist visitation are based on out of door, primitive or wilderness type experiences. The effects of the airspace proposals are most likely to be felt as a result of new or additional flight activity at lower altitudes over recreational and wilderness areas. These overflight effects would be most noticeable in wilderness areas where the noise would be more unexpected and intrusive.¹²
- **DEIS, 2009** The proposed action would not produce any significant noise, health, or safety impacts. It would have no significant effect on the tourism industry; nor would it pose any significant adverse health or safety risk to children.¹³

Final Environmental Impact Statement, volume IVb**Appendix F, Details on Special Use Airspace, Lowering the floor of Condor 1 MOA¹⁴**

(See figure 2.3.-2 for map of area)

Introduction

The Condor MOAs are located in the states of Maine and New Hampshire. They include Condor 1 and Condor 2. The altitudes are from 7,000 feet above MSL up to, but not including, 18,000 feet. This proposal recommends lowering the floor of Condor 1 from 7,000 feet to 300 feet AGL.

Altitude

The area has the potential to be divided into Condor 1 High (10,000 feet and above) and Condor 1 Low (below 10,000 feet MSL to 300 feet AGL)

Operating hours

The operating hours for the Condor MOAs would be sunrise to sunset seven days a week.

Primary Using Aircraft

The types of aircraft using the Condor 1 MOAs include F-16s, F-15s, A-4s and F-18s

Scheduling Agency

The scheduling agency for the Condor MOAs would remain the Northeast Air Defense Sector.

FAA Comments on Condor 1 MOA

The Boston Air Route Traffic Control Center (ARTCC) concurs with the proposal to lower the floor of Condor 1 to 300 feet AGL with the following stipulations.

1. **Flight Restrictions:** Users must avoid the temporary flight restrictions around the USAF OTHB radar site at Moscow, Maine at and below 5,500 MSL.

NOTE: the OTHB site is in Condor 2 but the 5 NM radius restriction infringes on Condor 1. The area of temporary flight restrictions is scheduled to become a published restricted area, R-3901.

2. **Simultaneous Use with Yankee:** The combination of Condor and Yankee MOA utilizes 130 NM of airspace from east to west. Simultaneous scheduling would require excessive rerouting/vectoring of IFR aircraft; therefore, we require non-simultaneous use.
3. **Separation from MTR** Separation from existing IR/VR Routes within the proposed MOA will be necessary by military coordinated scheduling or by the MARSA concept.
4. **Condor 2:** The proposal does not address Condor 2. Since its base is now 7,000 feet MSL the combined Condor 1 and 2 would have a stepped up/down base altitude making Condor 2 impractical for the users and complicated for ATC.

We therefore recommend that Condor 2 be cancelled.

Final Environmental Impact Statement, volume IVb

Appendix F, Details on Special Use Airspace, Establish a New Great State of Maine MOA¹⁵

(See figure 2.3.-3 for proposed area, FAA modified version, see figure 2.3-4 for map of area)

Introduction

The proposed MOA is located entirely in the state of Maine,

Altitude

The floor of the airspace should be 100 feet AGL and the ceiling 5,500 feet MSL.

Operating Hours

The operating hours for the Great State of Maine MOA would normally be from sunrise to sunset five days a week. (Other times by NOTAM)(Notices to airmen)

Primary Using Aircraft

The types of aircraft using the Great State of Maine MOA include F-16, F-15, A-4, CF-18, and B-52)

Scheduling Agency

The scheduling agency would be the Northeast Air Defense Sector (NEADS)

FAA Comments on Great State of Maine MOA

The Boston ARTCC concurs with the Great State of Maine proposal with the following modifications

1. **Lateral Boundaries:** In order to protect the approach and departure procedures to/from Greenville, Maine Municipal Airport and Seaplane Base on the south and Loring Terminal airspace to the east, we require the MOA to be described in Figure 2.3-4 (see attached map)

2. **Vertical Boundaries** The Minimum Instrument Altitude (MIA) in the area is 6,000 MSL. In order to facilitate ATC clearances in/out of the MOA, we request the MOA altitude be raised from 6,000 to 5,500 MSL.
3. **Separation From MTR** Separation from existing IR/VR Routes within the proposed MOA will be necessary by military coordinated scheduling or by the MARSAs concept.

References

1. Environmental Impact Statement, 1992, Volume I, Executive Summary, page 2
2. Environmental Impact Statement, 1992, Volume I, Executive Summary, page 3
3. Draft Environmental Impact Statement, 2009, Executive Summary, page 1
4. Environmental Impact Statement, 1992, Volume I, Section 2- page 39.
5. Draft Environmental Impact Statement, 2009, Section 6.0 Summary of Findings
6. Environmental Impact Statement, 1992, Volume I, Section 2, page 41
7. Environmental Impact Statement, 1992, Volume I, Section 2, page 39
8. Draft Environmental Impact Statement, 2009, Section 5, Cumulative Impacts
9. Environmental Impact Statement, 1992, Volume I, Executive Summary page 3
10. Environmental Impact Statement, 1992, Volume I, Section 2, Biological Resources, page 41
11. Draft Environmental Impact Statement, 2009, Section 5, Cumulative Impacts, Table 5-1
12. Environmental Impact Statement, 1992, Volume I, Section 2, page 40
13. Draft Environmental Impact Statement, 2009, Section 5, Cumulative Impacts, Table 5-1
14. Environmental Impact Statement, 1992, Volume IVb, Appendix F
15. Environmental Impact Statement, 1992, Volume IVb, Appendix F