

As the member of the Maine House of Representative for District 92, I represent the area that is at the heart of the section of Western Maine that will be most strongly impacted by the changes proposed by the Massachusetts Air National Guard (ANG) with respect to lower level flights as an element in CONDOR Military Operations Area (MOA).

I attended the public hearing in Farmington and offered oral testimony at that time, and have subsequently reviewed more information, spoken with many constituents, as well as a variety of people with significant experience in environmental impact assessments, military preparedness policy, and mediating broader public policy discussions. Since this is an important issue for my constituents, I have tried to take a considered approach in my review of the situation and my recommendations for a way forward.

Let me summarize my assessment of the situation and a potential remedy. The present plan proposed by the ANG is incomplete and as a result may be ill-conceived. The outcome appears to have been pre-determined and the Environmental Impact Study that was conducted was developed as an "after the fact" solution to placate citizen concerns that had not been anticipated by military planners when making the initial proposal. The only acceptable remedy to this situation is to back up and start the process over in a way that will be transparent and coherent, representing the valid concerns of all parties impacted by the decision including members of the military as well as civilians living in the impacted areas.

It seems to me that there are two primary interests that must be balanced in this decision making process -- first, the legitimate needs to provide adequate training for military pilots that may be called upon to use skills in a time of conflict, with such skill that can only be gained through thorough training. Second, the rights of citizens and businesses in Western Maine to enjoy the quality of life they expect without the disruption, intrusion, noise, and other potential impacts of these low level, high speed flights.

Frankly, I do not believe we have yet obtained the objective evaluation of these two interests that would allow us to make a balanced and considered policy judgment. Therefore, I respectfully request and will do all in my power to see that this decision is put on hold until these two elements can be thoroughly analyzed by professional and independent individuals or organizations, and those conclusions can be brought together as a part of a publicly accessible process to weigh benefits against costs. If we undertake such a process, we will arrive at a conclusion that can be widely supported. Otherwise, the current division and opposition to these low level flights will only intensify with an increasing likelihood of further contentious and time consuming debates in the future.

In short, this should be a classic cost benefit analysis that examines the value of the flights as a training tool, measures that value against a realistic assessment of the environmental impacts, and looks at a range of alternatives for mediating the impacts including -- limits of scheduled exercises; expansion of training areas to include other similar regions, such as the Western Massachusetts mountains, in order to more equitably distribute the potential negative impacts to a wider area by reducing the frequency of the disruption for everyone while still accomplishing the military intent and mission, or; other measures that will meet the military objectives without an outsize impact on the general population.

One discussion with a constituent has stuck in my mind, and I want to close my request for revisiting this process by sharing it. This conversation was with a professional who retired after many years in the environmental remediation business, and he told me about a project he had worked on for the Massachusetts Air National Guard in the remediation and clean-up of jet-fuel contaminated soils at a Massachusetts airbase.

Apparently, for an extended period the standard operating procedure at a Massachusetts Air National Guard facility was to run a fire hose into the jet fuel storage tanks and let loose with the water forcing the unused jet fuel and water out of the tanks and directly onto the ground. As a result, within a few years when environmental testing was performed, there was a growing potential of a hydrocarbon contamination plume that would have reached a larger aquifer and contaminated wells for a significant area. The only solution was a costly clean-up by digging up and disposing of hundreds of thousands of tons of contaminated soils that had to be placed in landfills or otherwise recycled off site. The cost of the clean-up was hundreds of thousands of dollars and perhaps more -- all because of poor planning and a failure to measure the unintended consequences of actions taken within a military command structure not accustomed to transparency and outside scrutiny.

I hope we will not repeat that type of short-sightedness here, but it seems we are on this path unless the decision is reconsidered in a wider and more objective framework. If this project is worth doing, it is worth doing right, because we are talking about the expenditure of significant taxpayer dollars. I urge you to redesign your decision-making process, gather the needed facts and have those facts analyzed by independent and objective sources, and then move that analysis into the public arena where it can be absorbed and discussed by the citizens it will impact. This will produce a better outcome than our current trajectory.

At the end of the process, what we all want is a good decision -- carefully made and based on facts. The vast majority of my constituents want a decision based on reality -- they are not ready to trust whatever the Massachusetts Air National Guard leadership says about the value of the training exercises unconditionally, nor are they

ready to adopt unquestioningly the statements made by environmental, community, and business leaders concerned about potential impacts.

I urge you to step back, take the time, and develop a fact-based approach that can lead to an appropriate decision which can be widely supported. I am ready to assist in that process in whatever way possible. Thank you for your consideration.

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