



PA WILDS CENTER
FOR ENTREPRENEURSHIP

April 21, 2021

Lt Col Christopher Jesus Mayor
3501 Fetchet Avenue
Joint Base Andrews MD 20762-5157

Dear Lt. Col. Mayor,

On behalf of the PA Wilds Center for Entrepreneurship (PA Wilds Center), I am writing to express our deep concerns about the Maryland National Guard's plans to establish a Low Military Operations Airspace to fly low-level training flights repeatedly over vast parts of the Pennsylvania Wilds (PA Wilds) many days out of the year.

The PA Wilds is one of 11 official tourism regions in the Commonwealth. The region is also one of eight state-designated Conservation Landscapes because of its unique natural and heritage assets. Our 13-county region is home to the greatest concentration of public lands in Pennsylvania. We have 29 state parks, 8 state forests, 50 state game lands and PA's only National Forest, the Allegheny. We have the largest wild elk herd in the Northeast, two designated National Wild & Scenic Rivers, thousands of miles of land and water trails, and some of the darkest night skies in the country.

Our region is also economically distressed and has seen decades of population loss. To help address this, local, state and federal partners from the public and private sectors began working together more than 15 years ago to establish the PA Wilds as an outdoor recreation destination to help diversify rural economies, create jobs, inspire stewardship and improve quality of life. This ground-breaking effort, held up as a model in five national studies in the last two years alone, has involved side-by-side investments in small business development, marketing and branding, recreation infrastructure, community character stewardship, regional planning, and conservation.

Today, thanks to the work of many organizations, businesses and individuals, tourism is a driving economic force in the region -- a \$1.8B industry that makes up 11 percent of the region's economy. This sustainable industry is also helping to make our region's communities -- and major employers in them -- more competitive by helping to create and sustain the types of amenities that improve rural quality of life and help attract and retain a strong workforce.

As the coordinating nonprofit for the PA Wilds effort, we invest upwards of \$1M a year working with partners to build the PA Wilds as an outdoor recreation destination and lifestyle brand to help revitalize our region's rural communities. Go to PAwilds.com, our regional visitor site, and you'll see how the PA Wilds is positioned as an outdoor recreation destination. Visitors come to here to bike, hike, camp, paddle, hunt, fish and see our wildlife. Peace and quiet and access to wild places and public lands are some of our biggest draws. About half a million people live in the PA Wilds, but we see almost 15 times that -- 7.2M - in day trip visitors annually. More than 375 rural businesses and organizations participate in our entrepreneurial ecosystem, The Wilds Cooperative of PA (WildsCoPA.org), helping us to advance this transformative revitalization work for our rural region. Major investors in the PA Wilds strategy include the region's county governments, the PA Department of Conservation and Natural Resources, the PA Department of Community and Economic Development, the Appalachian Regional Commission, the U.S. Economic Development Administration, USDA and local and national foundations.



PA WILDS CENTER
FOR ENTREPRENEURSHIP

I have witnessed military aircraft in training at close range. It was impressive and humbling. But having up to six A-10Cs flying as low as 100 feet above ground over parts of the PA Wilds twice a day, up to 365 days a year – as proposed? This could have a devastating impact on nature tourism development efforts in the PA Wilds, and on the many rural residents who depend on this industry for their livelihoods. Conservation partners in our network have also raised concerns about the impacts to wildlife and ecosystems. We share these concerns. In addition, many veterans call our region home. We worry about the impact that loud, low-level military flights flown overhead repeatedly will have on veterans suffering from PTSD.

Please know our organization has great respect for our military. The PA Wilds is a patriotic region – so much so that ‘patriotism’ is called out as a theme in the *PA Wilds Design Guide for Community Character Stewardship*, an award-winning planning document in use in our region. I come from a family of veterans myself, and worked as a military reporter during my first career as a journalist. I covered National Guard deployments to Iraq and Afghanistan; Coast Guard rescue missions in Alaska; was embedded with an airborne battalion as it prepared to go to Iraq and with C-130 crews delivering relief in Indonesia during the Asian tsunami. I fully appreciate the job our military does, the dangers involved in flying aircraft like the A-10C, and the need for training missions like those being proposed.

But the negative impact of doing this type of training in the PA Wilds is very high. The PA Wilds Center respectfully requests that the Maryland National Guard find other locations, in Maryland or other states, where these trainings can take place. Short of that, we’d ask that all of the attached questions be answered for our communities prior to any decision being made.

For reference we’ve also attached maps showing Pennsylvania’s designated tourism regions and Conservation Landscapes.

Respectfully,

Tataboline Enos, CEO
PA Wilds Center for Entrepreneurship, Inc.
tenos@pawildscenter.org
814-757-9190

Cc:
Senator Robert Casey
Senator Patrick Toomey
Congressman Fred Keller
Congressman Glenn “GT” Thompson
Nicole Faraguna, Director of Policy, PA DCNR
PA Wilds Planning Team



Questions from PA Wilds communities:

Why is the Maryland Air National Guard (MD ANG) making this request?

What is the justification for such a request?

Why can't the MD ANG continue to train where they are currently training?

Is there documentation as to why the MD ANG cannot use another existing, low MOA?

Have the training needs of the MD ANG changed to justify creating a new, low MOA?

What is the process for making a request for a low MOA?

Why can't the MD ANG request a low MOA be created in Maryland?

Why can't the MD ANG use the low MOA at Evers?

Who makes the final decision? The FAA?

If the Environmental Assessment, done by the National Guard Bureau, returns 'a finding of no significant impact,' what happens?

How is a 'less than significant adverse effect' determined and by whom?

Is there an appeal process?

How can a community ensure that there is a full, Environmental Impact Study done?

'Expected usage' is vague language, are there any limiting parameters?

If approved, can any other ANG unit use this airspace?

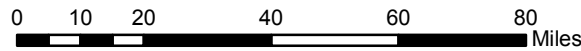
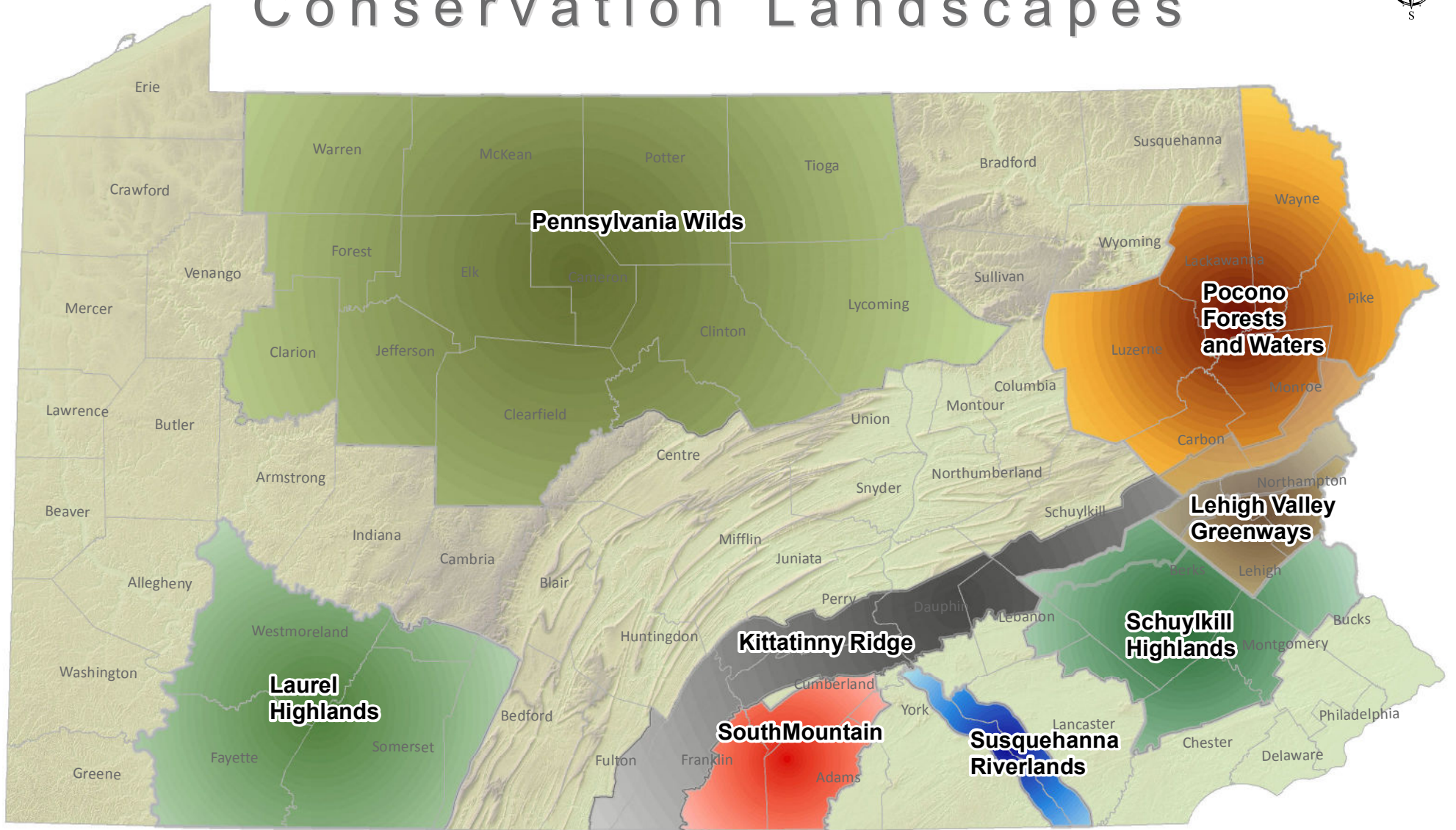
Will there be another EA if usage is more than 170 days?

Who will enforce/police the altitude buffers, the number of days and hours per day, etc.?

Will the local communities have advance notice?

What happens in the case of an accident?

Conservation Landscapes



Updated: January 10, 2019

Conservation Landscapes	DCNR Lead Contacts	Email
Kittatinny Ridge	Kristen Hand	khand@pa.gov
Laurel Highlands	Kathy Frankel & Mike Mumau	kfrankel@pa.gov & mmumau@pa.gov
Lehigh Valley Greenways	Rob Neitz	neitz@pa.gov
Pennsylvania Wilds	Meredith Hill	mehill@pa.gov
Pocono Forests and Waters	Tim Dugan & Christine Dettore	tidugan@pa.gov & cdettore@pa.gov
Schuylkill Highlands	Drew Gilchrist	agilchrist@pa.gov
South Mountain	Mike Eschenmann	meschenman@pa.gov
Susquehanna Riverlands	Lori Yeich	lyeich@pa.gov

