Public Comment on Condor MOA Proposal

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1. As a retired Air Force Lt. Colonel, squadron commander, F-15 Instructor Pilot, and Flight Safety Officer, I am appalled at the lack of integrity with which the DEIS was prepared and embarrassed by the lack of quality and content within the DEIS.

2. The DEIS (Draft Environmental Impact Statement) put forth by the ANG is wholly inadequate and fails to prove "No Significant Impact" in numerous areas of concern. The Draft Environmental Impact Statement is merely that, a statement, not a study. Studies contain relevant, quantifiable, and current data. The DEIS does not. It is a pre-foregone conclusion supported by misleading statements and incomplete data. I will support this assertion by giving several examples, and only a sample of the plethora of incongruent facts and conclusions contained in the DEIS. The DEIS does not meet criteria to prove there would be no significant impact in the majority of the areas of concern.
3. I will address the Need Statement, Data deficiencies, and Safety aspects of the DEIS.

Need for Proposed Action Statement

- The entire Needs Statement is based upon a false statement that LOWAT (Low Altitude Awareness Training), Category I is essential and required for combat mission readiness of pilots (page 1-3). This is simply not true. The Need for the Proposed Action is base on the stated need for LOWAT to be conducted at less than 1000 feet AGL (Above Ground Level) to maintain Combat Mission Ready Status (CMR). This is false. As stated in the F-15 training document, AFI11-2F-15V1 Table 4-1 and paragraphs A2.4.18-22, the LOWAT requirements do not affect CMR status. See attachment 1.
- The author of the DEIS states; "This deficiency (lack of LOWAT below 1000 feet) degrades the units ability to provide 24-hour Air Defense Alert." This is only true in the sense that the 104th FW training could be improved, as could their capability if the unit upgraded to F-22s or newer versions of the F-15. The best is not always feasible or realistic. The Massachusetts F-15 Wing has waived this training requirement for the past fifteen years plus. In addition, current conflicts and operations require only medium altitude tactics in a low threat environment. The Cold War was won without this requirement and additional training area.
- The DEIS utilizes a RAND study that indicates a 60nm x 60nm area is required for LOWAT. This study can not be located online, nor are excerpts provided to validate the claim. This claim is mute as Active Duty Air Force, Marines, and Navy utilize much smaller areas to effectively conduct LOWAT training.

Data Deficiency

- The baseline data determining the present area affected compared to the additional area affected under the proposed action is not factual and quite bluntly stated, dishonest and misleading. In addition, the sortie data not current or accurate, being data from 2003.
- The Low altitude airspace known as MTRs (Military Training Routes) is used to calculate the area presently affected. This calculation includes all MTRs under the Condor MOA, both VR and IR. Both are included in the baseline of airspace currently used.
- The IR routes; IR-800, IR-850, IR-851, and IR-852 are not utilized, nor are they even certified for use.
- The DEIS makes a comparison of present and proposed sorties flown but does not mention any sorties flown on IR routes. Reference DEIS page 10, Table ES-1, and page 2-4, table 2-1. Also see attachment 2.
- Pat Welch, Director of National Guard Bureau (NGB) Airspace and Ranges has attempted to cover-up the fact that the IR routes are not used. When giving written comments on the Draft EA he wrote: "Delete the discussion of the currency of the IR route surveys and use. It doesn't add value to the discussion and could lead to demands to remove the routes from charting." "Don't highlight their lack of use!" See attachment 3.
- Therefore routes that are not flown, not current for use, and not needed are included in the calculations of area currently affected.
- The false data discussed above is then utilized in the DEIS to compare alternatives to the proposed action and determine if viable options exist. The use of the false and misleading data allows for the following conclusion on page 2-10;

  "The results of this analysis indicated that expanding existing low altitude airspace at Yankee MOA and Adirondack Airspace Complex would cause encroachment of low altitude airspace into larger areas that are not currently exposed to low altitude overflights, encroach into areas that are not currently military airspace, and cause greater impacts over public land than the Proposed Action.
- The airspace option discussion and comparison in the DEIS Pages 2-9 through 2-15, including table 2-3 are all irrelevant and inconclusive based on the use of the flawed data contained in table 2-3 which includes the unused and non-certified airspace of the IR routes.
- All discussions and conclusions within the DEIS pertaining to airspace utilization increases or decreases are therefore invalid.
- Noise data contained in the DEIS is also irrelevant and inconclusive as it marginalizes the noise effects by averaging the peak noise over a 24 hour period. It also fails to include noise data from other much louder types of aircraft that would be allowed to fly in the proposed airspace.

Safety

The DEIS fails to prove that no significant impact would result with regards to safety.

- Present low level training is conducted within the well-defined confines of the MTRs and is of constant speed and altitude. The MTRs are one-way, have defined entry and exit points, and turnpoints. Fighters using these MTRs maintain their radar in a search or sample mode, allowing the pilot to detect aircraft that may create a

collision potential. The proposed low altitude training would consist of random speed, altitude, and flight paths with aggressive maneuvering and rapid changes in direction. The aircraft radar is typically in a tracking mode, rendering it unusable for search in front of the aircraft. The pilot's visual lookout is highly focused on the area of the aerial target he is intercepting, allowing very little attention to other aircraft that could cause a mid-air collision.

- The type of proposed low altitude training is inherently more demanding and dangerous and is generally conducted in Restricted or Warning Airspace to negate the possiblity of midair collisions with civilian aircraft. Restricted and Warning Airspace does not allow civilian aircraft to use this airspace during military operations; therefore it is exclusive use for military aircraft, effectively making the airspace off limits to civilian aircraft. This proposal maintains the airspace as a MOA and therefore joint use.

- The DEIS fails to address the drastic increase in mishap rates associated with tactical low-level training. Table 3-2 and 4-1 of the DEIS do not contain any relevant mishap data for the proposed tactical operations. The tables only address mishap rates for medium altitude flights and low altitude, not tactical maneuvering. The DEIS has simply extrapolated the current mishap data to determine the projected mishap rate without regard to the additional risk and mishap rates of proposed action.

- Table 4.1 Note reads: "Changes in mishap potential are reported in mishaps per year. These calculations likely overstate effects on mishap potential because they use the maximum changes in utilization figures for each aircraft and airspace, so this methodology provides a conservative assessment of the impacts of the Proposed Action on safety." This statement is misleading and lacks integrity, as no mishap rate data is included for low altitude tactical maneuvering.

- This exclusion of valid low altitude tactical operations mishap rates is irresponsible and potentially dangerous.

- Contrary to the DEIS, there is no FAA radar or communications coverage for vast areas of the proposed low MOA, therefore making separation of military and civilian aircraft next to impossible. The status of the proposed airspace would only be available by calling a 1-800 number or using a website. These means are not typically available with the types of remote flying that is done in Western Maine. In the case that a civilian pilot could determine if the proposed airspace was occupied, that pilot would have no idea as to the planned location, altitude or speed of the military aircraft unlike current operations in which the civilian pilot can determine the route, direction, and altitude of the military aircraft.

- The DEIS states that there would be no significant impact on safety under proposed action. Paragraph 4.1.1 states; "Impacts to airspace management would be considered significant if they:
    - cause an increase in midair collision potential between military and non-participating civilian operations.

- Page 4-2 of the DEIS, titled Effects on VFR traffic, states:

"The Proposed Action would reduce the potential for interference between civilian and military pilots within the MTRs, which cover slightly more than half of the affected airspace." Another example of misleading statements. The MTR would not be flown under the proposed action, and the airspace argument is baseless, reference the findings list under Data Deficiency of this Public Comment.

- Utilizing the logic of the author of the DEIS, it would be safer to cross an unmarked parking lot with random traffic than crossing a single lane one-way street. This type of conclusion is dangerous and irresponsible.

4. Conclusion

In my professional opinion, I find that the DEIS contains significant deficiencies in the fast presented and in the level of analysis provided. Factors that pose a critical threat to public safety have been completely ignored. The DEIS is wholly inadequate and fails to prove that "No Significant Impact" would occur with this proposal, while a cursory view of reality suggests impacts that are quite severe.

The detriment of this proposal to the safety and well being of the people of Western Maine far outweighs any benefit to the Massachusetts Air National Guard. I categorically oppose the proposed expansion of this airspace. An accurate analysis of the facts will validate my concerns.

Attachment 1, page 1

Table 4.1. F-15 Pilot Currencies.

EVENT	To Update Fly:	INEXP	EXP	Affects CMR	To Regain Currency:	NOTES
DEMANDING SORTIE	Sortie	21	30	No	Non-demanding sortie	1, 10
LANDING (Appropriate Cockpit)	Landing	30	45	No	Landing	2
NIGHT LANDING	Day or night Landing	21	30	No	Day landing	
ACBT	ACBT	60	90	Yes	ACBT	3,4,10
LOW A/A	LOW A/A Event	60	90	No	LOW A/A Event	3,4, 6,7,10
AAR	Day or Night AAR	180	180	Yes	Event	3
FORMATION T/O	Event	60	90	No	Event	3,5
FORMATION LANDING	Event	60	90	No	Event	3,5
PRECISION APPROACH	Event (May be acc in the MTC down to mins)	30	45	No	Event (May be acc in the MTC down to mins)	11
INSTRUCTOR	Event (May be acc in MTC)	N/A	60	No	Event (May be acc in MTC)	8
NVG	Event (May be acc in an NVG capable MTC)	120	180	No	Do events listed in 4.6.7. plus academic review (May be acc in an NVG capable MTC)	3, 9
JHMCS	Sortie w/ JHMCS (May be acc in a JHMCS capable MTC)	120	180	No	Sortie w/ JHMCS(May be acc in a JHMCS capable MTC)	3,4

Attachment 1, page 2

NOTES:

1. See **Attachment 2** for demanding/non-demanding sortie definitions. In addition, BAQ pilots will fly in a supervised status (with a SQ supervisor or IP) any time a non-demanding sortie is required.
2. Re-currency supervision level will be SQ supervisor or instructor, in the aircraft or chase, qualified and current in the Event. To regain RCP IP landing currency, FCP must be occupied by a BMC/CMR pilot current and qualified in landing.
3. Supervision will be SQ supervisor or instructor, qualified and current in the event. For NVG currency, supervision will be an NVG current, qualified pilot in aircraft or current, qualified SQ supervisor or instructor.
4. Performance or instruction will update CT ACBT currency. Performance or instruction of LOWAT will update CT LOWAT currency.
5. Flight leaders may update currency from either lead or wing position. Recurrency will be accomplished from wing position. Wingmen may only update currency from wing position.
6. LOW A/A - Event is defined as performing realistic, mission oriented air-to-air operations while in a LOWAT certified low altitude block (at or below 1000 ft AGL over land). Event includes skills necessary to seek out, and engage offensively, an aerial target at low altitude. For the F-15A/ B/C/D, this event also includes low altitude navigation, tactical formation, defensive maneuvering to avoid or negate threats.
7. Currency is required in the pilots low altitude category for operations below 1000 feet. Loss of currency requires pilots to operate above 1000' AGL. Re-currency requires satisfactory performance in the following events: vertical awareness training, hard turns, tactical formation and defensive maneuvering.
8. Instructor pilot currency is 60 days. Non-currency for 61-180 days requires an instructor re-currency flight with an IP; over 180 days requires a Stan/Eval flight check. IP rear cockpit landing currency is 45 days. F-15 FWIC student sorties count as instructor sorties for currency. Performing as an instructor in the MTC on an upgrade will update currency.
9. An NVG academic review is required prior to the recurrency sortie.
10. For IPs, accomplishing or instructing the event from either C/P will update currency.
11. If non-current in precision approaches, increase the pilot weather minimum by one category. If day VFR, the supervision level is a pilot, current and qualified in the event; all other times require an IP IAW AFI 11-202 V3. Currency can be updated in the MTC, and pilots may regain their currency in an MTC on a case-by-case basis with SQ/CC approval.

Attachment 2, page 1

in the region would further decrease airspace use. Annual airspace use below 5,000 feet AGL would decrease to approximately 97-149 hours/year.

Table ES-1. Summary of Current and Proposed Operations (including the BRAC actions) in the Condor MOAs and Underlying MTRs

Airspace	Current Operations (hrs/yr)	Proposed Operations (hrs/yr)	Proposed Operations including BRAC (hrs/yr)
Condor MOA	192-300 (7,000+ ft AGL)	192-300 (79-125 below 5,000 feet AGL; 21-33 below 1,000 feet AGL)	174-276 (79-125 below 5,000 feet AGL; 21-33 below 1,000 feet AGL)
VR 840/1/2	36-52 (500-3,000 ft AGL)	18-24 (500-3,000 ft AGL)	18-24 (500-3,000 ft AGL)
Total	228-352	210-324	192-300

This EIS considered three alternatives to the Proposed Action; however, only the "Lower Condor 1 MOA with Condor 2 MOA Unchanged" alternative was carried forward for detailed consideration. This alternative would lower the flight floor of the Condor 1 MOA from 7,000 MSL to 500 feet AGL. The flight floor of the Condor 2 MOA would remain 7,000 feet MSL and the flight ceiling for the Condor 1 and 2 MOAs would remain at FL 180. This alternative would address the deficiency in LOWAT training opportunities; however, this alternative would restrict lateral defensive tactics due to the insufficient lateral boundaries of the Condor 1 MOA (60 nautical miles (NM) by 40 NM) when compared to the Proposed Action (60 NM by 60 NM). Therefore, the Proposed Action is the only course of action that would fully address the 104 FW's need for low altitude training airspace.

The "Use of Other Airspace" alternative was eliminated from the list of reasonable alternatives because there are no MOAs or Warning Areas within 200 NM of Barnes ANG Base that are available for F-15 LOWAT training and meet 60 NM by 60 NM airspace requirements below from 500 – 1,000 ft AGL.

The "Deployment for LOWAT Training" alternative, which would involve deploying to other bases with access to suitable airspace for LOWAT training, was also eliminated from the list of reasonable alternatives due to the prohibitive cost of this alternative.

Attachment 2, page 2

Table 2-1. Utilization Summary for the Condor 1 and 2 MOAs and VR-840/1/2, FY 2003*

Condor 1 & 2 MOAs				
Aircraft Type	F-15	F-16	KC-135/KC-10	P-3
Sorties/Year	72	324	12	24
Total Hours per Year in the MOAs	30 - 48	135 - 216	9 - 12	18 - 24
Total MOA Usage (All Aircraft)	192 - 300 Hours per Year			
VR-840/1/2 (Low Level Routes)				
Aircraft Type	F-15	F-16	KC-135/KC-10	P-3
Sorties/Year	48	96	0	0
Total Hours per Year in the VR Routes	12 - 20	24 - 32	N/A	N/A
Total Hours in the VR Routes (Low Level) - All Aircraft -	36 - 52 Hours per Year			
Total Airspace Use (MOAs plus Low Level Routes) – All Aircraft				
228 - 352 hours/yr				

*When the EIAP for this action began, A-10s from Barnes and Bradley ANG Bases were flying training missions in the Condor 1 and 2 MOAs, and were included in the baseline operations numbers for the affected airspace. During the course of the Environmental Assessment, the A-10s from Barnes and Bradley ANG Bases relocated out of the Northeast Region and discontinued using the airspace. Therefore, the baseline operations numbers reported in Table 2-1 do not include the A-10s that formerly flew out of Barnes and Bradley ANG Bases. The FY 2003 utilization data for F-15s, F-16s, KC-135s, KC-10s, and P-3s were compared to annual utilization data from the 10-year period from FY 1996-2005, and are

Comment Response Matrix
Comments received on preliminary Draft EA (October 2006)

Comment Number	Location	Commenter	Comment	Response
1	ES-2, line 6	Pat Welch, ANG	The reference of within 200 NM should be from the base, not Condor MOA. Suitable airspace could be within 200 NM of Condor MOA but be useless to the Unit.	Agree, change made
2	ES-2, line 22	Pat Welch, ANG	Change "less-than-optimal" to "insufficient" to strengthen the wording	Agree, change made
3	1-2, line 16	Pat Welch, ANG	CAP in this reference should refer to "Combat Air Patrol" not "Civil Air Patrol"	Agree, change made
4	1-4, line 6	Pat Welch, ANG	Delete "during weather"	Agree, change made
5	1-4, lines 18-20	Pat Welch, ANG	Delete the discussion of the currency of IR Route surveys and use. It doesn't add value to the discussion and could lead to demands to remove the routes from charting. Mission or training requirement changes could increase their importance in a very short period of time. Getting the routes recurrent would only require slow flying them and analysis of new obstructions which could happen very quickly. If they are lost it would require new development, including environmental studies, and could take several years to reestablish them. Don't highlight their lack of use! Simply state that they don't provide sufficient capability for meeting the training requirements.	Agree, change made