



Clinton County Town Hall

Duke Military Operations Airspace (MOA)

2023 Proposal to Create a Low Altitude MOA
Submitted by the Maryland Air National Guard
175 Wing

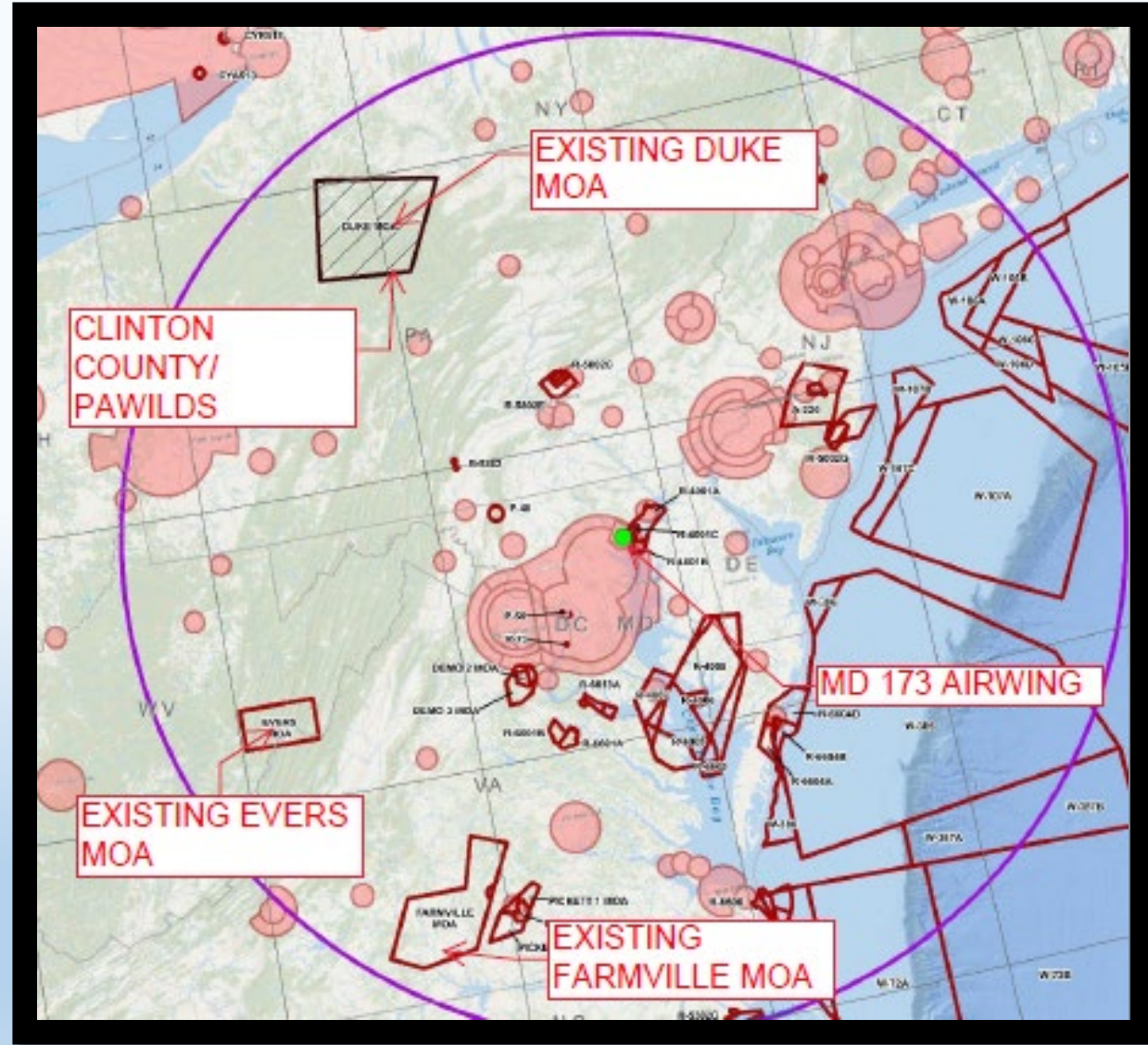
Support an Informed Public

- The purpose of this Town Hall Zoom Presentation is to provide a brief overview of the Duke Low Altitude MOA, which is being proposed by the Maryland Air National Guard 175th Wing.
- Provide the Citizens that could be impacted by the Duke Low Altitude MOA additional resources to further review the change in airspace being proposed by the Maryland Air National Guard.
- Encourage Citizens to submit their concerns or support by completing a web page form located on the Clinton County Web Page:
 - [Clinton County, PA | Home \(clintoncountypa.gov\)](https://www.clintoncountypa.gov/)
 - Click the Yellow Button pertaining to the Duke MOA.



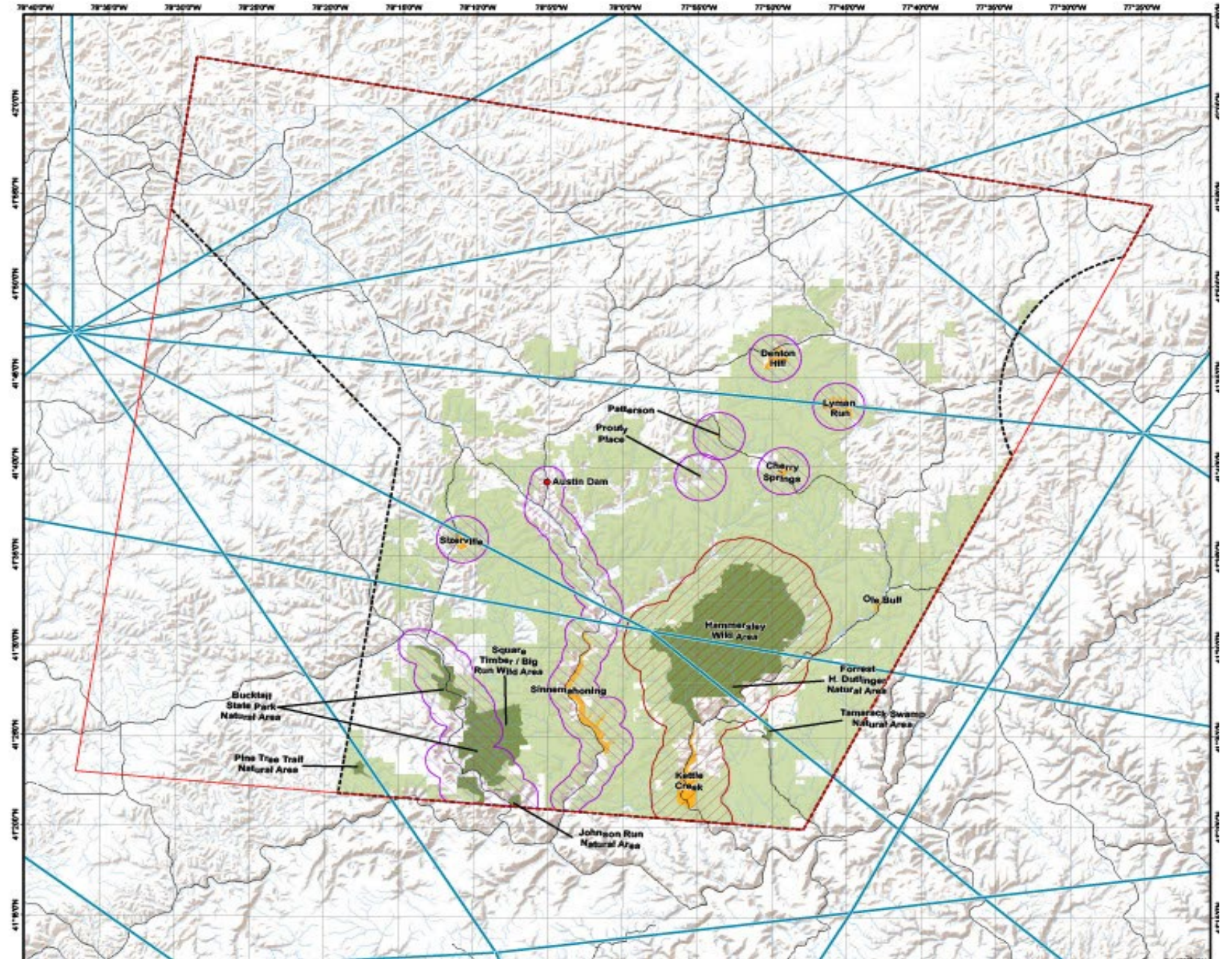
What is the Duke MOA?

- The Duke MOA is an existing Military Operation Airspace (MOA) utilized to train military forces to avoid comingling with commercial air space, where military aircraft can perform air combat maneuvers that are separate from instrument flight.
- Its current operational altitude is 8,000 ft MSL to 17,000 ft MSL.
- The Duke MOA covers 1.4 Million Acres of land in North Central PA.
- The U.S. Navy controls the airspace adjacent to the Atlantic Ocean, leaving little inland airspace for training. The map to the right depicts the few inland MOA's on the United States East Coast



Proposed Duke Low Altitude MOA

Visit the County Website
for a better map
www.clintoncountypa.gov



Low Altitude MOA Proposed Mitigation Areas

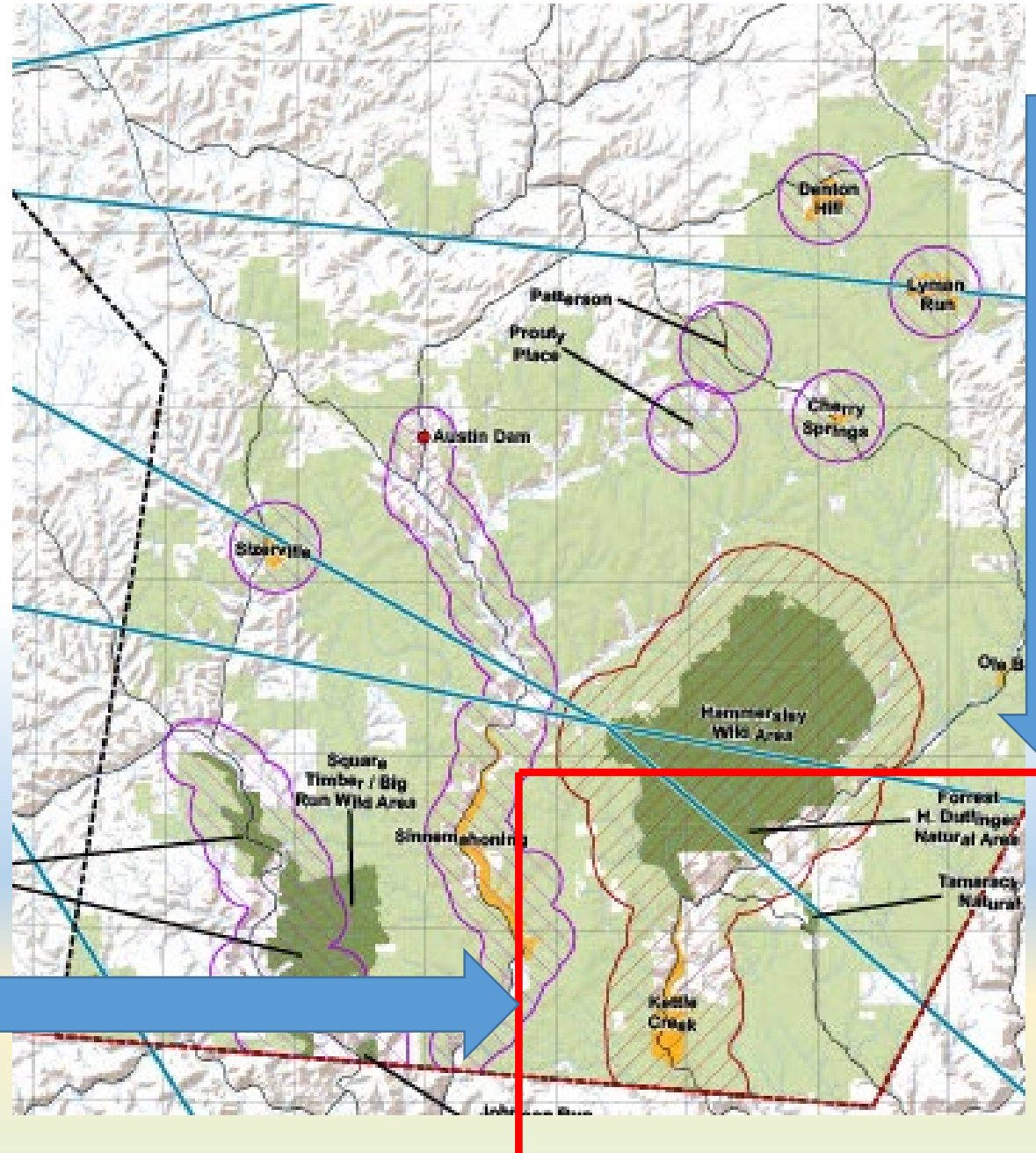
Map Area hatched in RED including Kettle Creek State Park and Hammersley Wild Area have proposed flight altitudes of 1,000 feet Above Ground Level to avoid impacts to wildlife and tourism.

Areas hatched in purple such as State Parks, Austin Dam, Sinnemahoning Creek, Bucktail Park, Pine Tree Trail Natural Area, Stormville, Cherry Springs State Park, Patterson State Park, etc. have proposed flight altitudes of 500 feet Above Ground Level to avoid impacts to “sensitive” areas.

Night Operations will not occur below 1,000 feet Above Ground Level.

The remaining areas of the MOA can be utilized for low level training runs.

NORTH WEST CORNER OF CLINTON COUNTY PA



A-10C Thunderbolt – flying at low altitude. Military Retirement of the A-10C is currently ongoing and reported to be complete by 2029.



F-16 Fighting Falcon – the assumed replacement of the A-10C by 2029. It is reported to be a few decibels louder than the A-10C



National Environmental Policy Act (NEPA)

Environmental Assessment VS Environmental Impact Statement

- In accordance to the National Environmental Policy Act (NEPA), all federal agencies must make a good faith effort to look at potential environmental consequences of a proposal before making a decision.
- In 2021, an Environmental Assessment (EA), which is a simplified desktop study, was prepared and received approximately 1,000 pages of comments outlining concerns from citizens, local and state agencies about the negative impacts to the Pennsylvania Wilds, in particular the impacts on wildlife, tourism and public safety.
- In March of 2023, the original EA was revised and resubmitted by the MD ANG with minimal concessions to the concerns outlined in the first draft response to the original MOA.
- If there is a **significant impact affecting the quality of human environment**, a more detailed Environmental Impact Statement (EIS) is required. **The EIS is a more comprehensive study for policy makers to make decisions.** An EIS has NOT been completed.
- The EA is currently indicating Finding of No Significant Impact (FONSI) for the proposed Low Altitude MOA.

PROPOSED FINAL ACTION AND MITIGATION EFFORTS

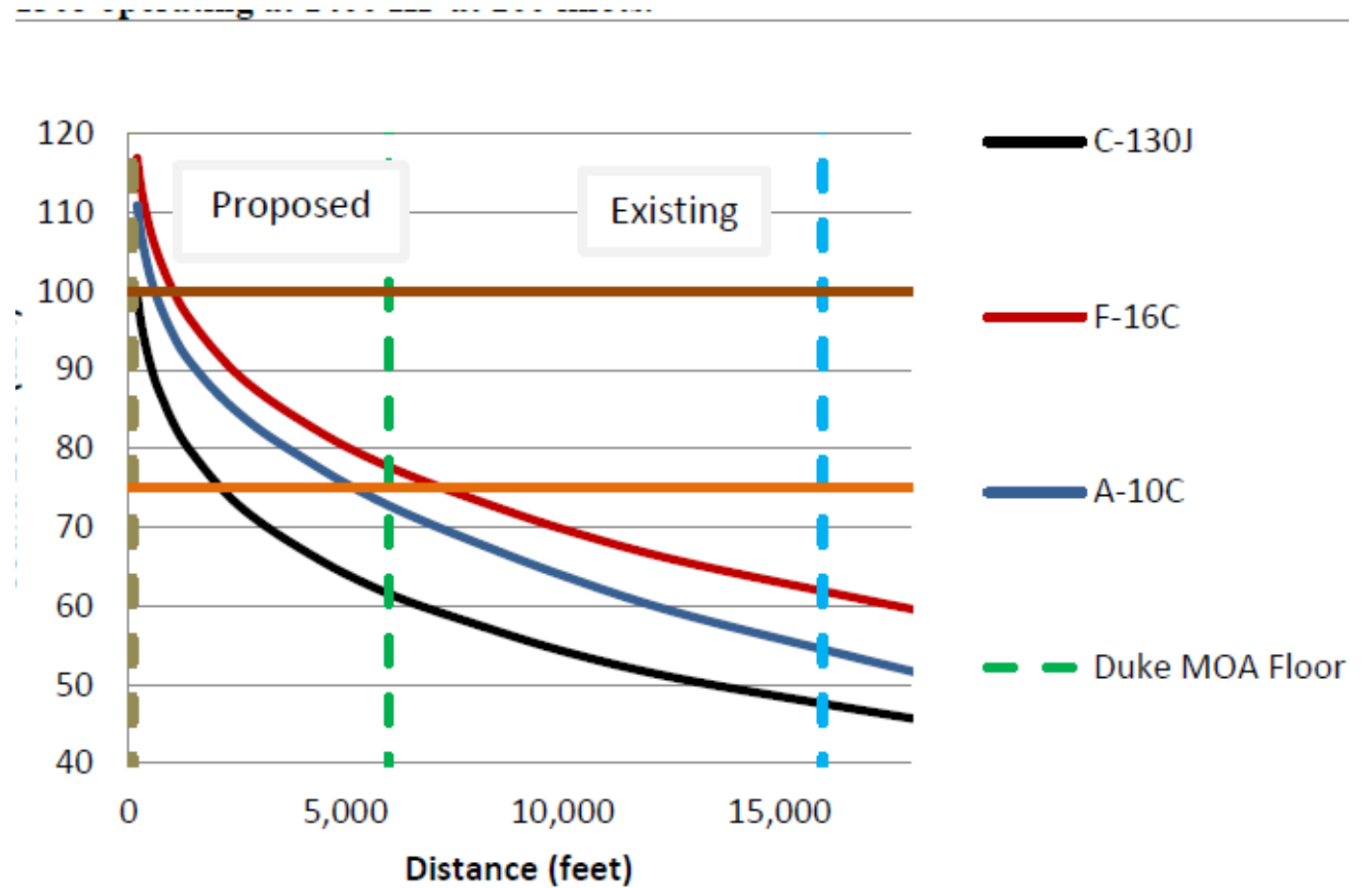
1. The vertical limits would be defined as 100 ft above ground level (AGL) to 7,999 ft MSL.
2. The Duke Low MOA may be activated separately from the Duke MOA or concurrently as needed to facilitate low-level training requirements.
3. Activation times would be intermittent by Notice to Air Missions (NOTAM).
4. Expected usage would be two hours per day, twice per day, one hour at a time, with no more than six total aircraft, approximately 170 days per year.
5. Weekend operations would be limited mostly to Saturdays; Sundays would be non-typical.
6. The Maryland ANG is a federal entity that would not typically, outside of wartime, fly on federal holidays.
7. Nighttime operations (defined as sunset until 10:00 p.m.) at low altitude would be limited to above 1,000 ft AGL.
8. A surface to 6,000 ft MSL exclusion area would avoid Wellsboro Airport Class E airspace within the eastern side of the Duke Low MOA. No supersonic operations, release of chaff and flares, ordnance deployment, weapons firing, infrastructure changes or ground disturbance would be conducted in the Duke Low MOA.
9. A 1,000 ft AGL floor would be implemented over sensitive areas of concern in the southern portions of the Duke Low MOA, specifically over the Hammersley Wild Area, Forrest H. Dutlinger Natural Area and the Kettle Creek State Park.
10. A 1,000 ft overflight buffer and a 0.5 nautical mile (NM) lateral buffer around Bald and Golden Eagle nests would be incorporated per Air Force direction.
11. A 500 ft AGL floor would be implemented over sensitive areas of concern in the remaining portions of the Duke Low MOA, such as over the State Parks, Sinnemahoning Creek and the historical Austin Dam ruins.
12. A 500 ft overflight buffer would be maintained over obstacles such as radio towers, windmills and oil drilling rigs per Air Force Manual (AFMAN 11-202v3).

Major Concerns Not Fully Addressed in the Environmental Assessment

- 1. Noise** – Impacts Quality of Life. Low level flights produce noise levels of 110 to 120 decibels according to the following chart. Sudden onset of noise is not addressed in the EA.
- 2. Wildlife** – Sudden onset of noise and vibration can impact predatory birds, startle mammals and impact spawning of aquatic wildlife.
- 3. Tourism and Recreation** – the Pennsylvania Wilds, DCNR, the PA Game Commission, PA Fish and Boat have collectively worked for decades establishing eco-tourism, hunting and fishing below the Duke MOA generating \$1.68 billion dollars in 2021.
- 4. Public Safety** – the EA does not address public safety or training of emergency services.
- 5. Public Outreach** – the Maryland ANG has not responded to County requests to attend public meetings to personally outline the proposal.

Noise and Frequency

- Section 3.2 of the Environmental Assessment.
- According to the table referenced from the Duke Low MOA, one (1) low level flight will create sounds ranging from 110 to 115 decibels. F-16's are even louder.
- This noise level is consistent with hearing damage from a rock concert or screaming directly into an ear.
- The EA does not evaluate sudden onset of noise. Only a 24 hour average.
- According to Table 2-2 of the Environmental Assessment, the frequency of A-10 flights will increase from 100 annual flights, to 300 annual flights.
- The EA seems to indicate the flights will be louder and more frequent.



ce: DAF 2021 and DNWG 2009.

: L_{max} is the maximum sound level during the overflight.

Noise Measurement

Sound is measured in terms of decibels.

The Environmental Assessment measures an average change in sound in terms of dBA DNL, which is a complicated weighting method of measuring sound for overall Day to Night sound levels, and doesn't account for sudden onset of sound from low altitude flyovers.

The EA indicates that a single (one aircraft) at low level overflight between 100 and 500 feet will range from 100 to 120 decibels.

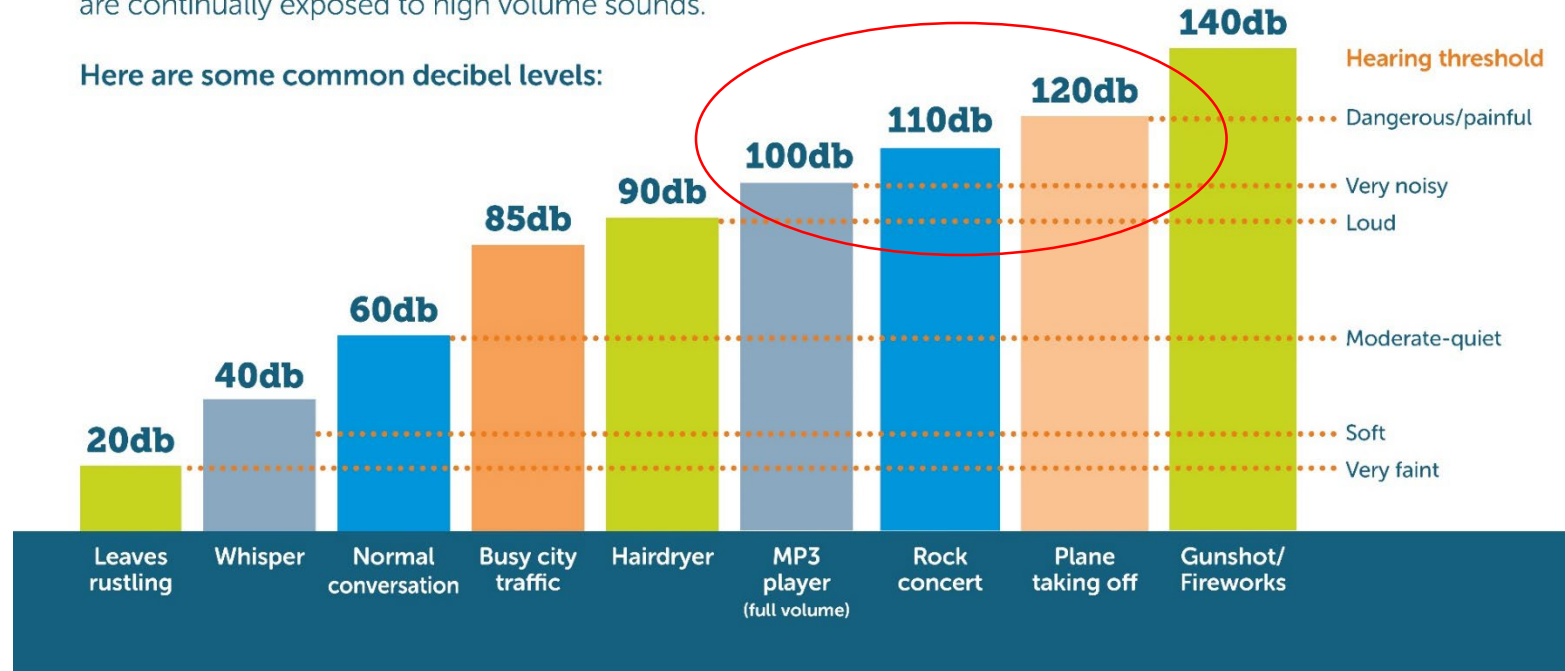
The chart to the right indicates noise levels that are "Very Noisy to Dangerous or Painful".

Examples are a Rock Concert or a Plane Taking Off.

How loud is too loud?

Government research suggests the safe exposure limit is **85 decibels** for **eight hours a day**. Your hearing could be at risk of damage if you are continually exposed to high volume sounds.

Here are some common decibel levels:



Impacts on Wildlife and the Environment

Section 3.4.2.2 of the EA

Bald Eagles are protected under the Bald and Golden Eagle Protection Act. Known nests are to be avoided by limiting flyovers to 1,000 feet above ground and provide 0.5 NM buffer zones. The report indicates that there are only 7 Bald Eagle Nests in the entire PA Wilds.

All other species are indicated in the EA to be of no concern to low level flights.

There are 29 Threatened and Endangered Mammal and Bird Species in the Duke MOA.

PGC indicates they simply don't know how the low level flights will affect the elk herds of PA. The EA indicates its not a concern due to the short span of low flights, but does provide evidence of panic stampeding at flights below 500 feet for similar species like caribou and prong horn sheep.

Vibrations can disturb spawning beds of fish. There is no mention of this in the EA in Section 3.4.4.3.

Tourism and Recreation

Section 3.7.2

1. Appears to minimize concerns raised by the County and PA Wilds.
2. Indicate that there is a lack of published studies on impacts from MOAs on local economies. The study admits that there will be impacts, but they should be insignificant due to the size of the MOA.
3. According to the EA, hunting will not be affected because the low level flights will take place outside of prime hunting hours and avoid some weekends during the hunting seasons.
4. Indicates the MOA area is low income and declining in population, essentially as an argument to transition to low level flights.
5. EA appears to indicate that some of the PA Wilds and DCNR Tourism income is really padded with costs associated with traveling to the PA Wilds and not spent in the PA Wilds.

Public Safety

Section 3.6 addresses Human Health and Safety

1. Historically very low airborne mishaps with military aircraft. Pilots go through exhaustive pre-flight reviews and low level flight training.
2. The EA offers no opportunity to provide local first responders and Departments of Emergency Services information or training on how to respond to a major or minor mishap.
3. Immediately upon notification of air ambulances being dispatched to the MOA, the military air traffic controllers will contact the pilots and have them evacuate the area.

Public Outreach

Section 5 Management Actions and Special Procedures

No response to date from the Maryland ANG on providing additional in person discussion on the use of the proposed Duke Low Altitude MOA, despite several requests. The EA offers the following:

1. Questions and concerns regarding 175 WG training operations can be presented to the Eastern Area Defense Sector at <https://www.eads.ang.af.mil/Contact-Us/>. This Office will be able to address concerns regarding 175 WG operations.
2. Military safety officers would continue to utilize the MACA educational and outreach program to conduct public awareness and outreach.
3. No direct interaction with any entity located under the Duke MOA.

Energy Infrastructure and Leidy Natural Gas Storage Facility

- There is no mention in the Environmental Assessment of the extensive Natural Gas Energy Infrastructure below the MOA.
- The Leidy Natural Gas Storage Facility takes Federal Energy Regulatory Commission (FERC) pipelines from across the United States and stores excess gas until demand reaches and annual peak for release of the stored gas.
- The operators of the pipelines have indicated that they use remote sound detection devices, impacted by loud noises, to alert operations of pressure relief valve malfunctions. Low level aircraft noise may inadvertently cause a Pressure Relief Valve alarm, which could shut down the pipeline, affecting the fuel source to major customers, such as power plants.
- A false alarm could also trigger a 911 emergency services response.

WHY BE CONCERNED? THE PA WILDS IS A HUB OF ECO-TOURISM IN THE EASTERN UNITED STATES

Principles of Ecotourism - Provided by the International Ecotourism Society (<https://ecotourism.org/>)

Ecotourism is about uniting conservation, communities, and sustainable travel. This means that those who implement, participate in and market ecotourism activities should adopt the following ecotourism principles:

- 1. Minimize physical, social, behavioral, and psychological impacts.**
- 2. Build environmental and cultural awareness and respect.**
- 3. Provide positive experiences for both visitors and hosts.**
- 4. Provide direct financial benefits for conservation.**
- 5. Generate financial benefits for both local people and private industry.**
- 6. Deliver memorable interpretative experiences to visitors that help raise sensitivity to host countries' political, environmental, and social climates.**
- 7. Design, construct and operate low-impact facilities.**
- 8. Recognize the rights and spiritual beliefs of the Indigenous People in your community and work in partnership with them to create empowerment.**

Get Involved!

Express your concerns and request a full
Environmental Impact Study (EIS)

How can we reach a compromise with MD
Air National Guard?

RESPONSES DUE BY MAY 17, 2023

Complete the short survey located here for
inclusion in the County's response:



[Learn more about the Duke low MOA | Clinton County, PA \(clintoncountypa.gov\)](https://clintoncountypa.gov)

References

Maryland Air National Guard 175 Wing, Draft Final Environmental Site Assessment for Modification of Duke Military Operations Area. Prepared by Tetra Tech, Inc. March 2023.