

United States Senate

WASHINGTON, DC 20510

May 25, 2023

Kristi Kucharek, GS-13
Airspace NEPA Program Manager
Air National Guard Readiness Center
3501 Fletcher Avenue
Joint Base Andrews, MD 20762

Major Jeffrey Andrieu
Maryland Air National Guard
175th Wing
Martin State Air National Guard Base
2701 Eastern Boulevard
Middle River, MD 21220

Dear Ms. Kucharek and Major Andrieu:

We write to express our concerns regarding the Maryland Air National Guard's (MD ANG) proposed Duke Low Military Operations Airspace (MOA) over the Pennsylvania Wilds in North Central Pennsylvania and to request a full Environmental Impact Statement (EIS) of the proposed airspace.

The Pennsylvania Wilds is a 13-county region containing the greatest concentration of public lands in Pennsylvania, including 29 state parks, eight state forests, 50 state game lands, two National Wild and Scenic Rivers, thousands of miles of trails, the largest elk herd in the Northeast, and the Allegheny National Forest. Investing in these abundant natural assets through trails, recreation-focused small businesses, and related improvements has drawn tourists from across the country, resulting in \$1.8 billion in annual economic activity from tourism and outdoor recreation. It has also created plentiful recreation opportunities for residents, making the Wilds an even more desirable place to live. The ability to enjoy the serene natural landscape is a cornerstone of the region's identity and way of life, and the promotion of this natural beauty is a critical component of its economic future.

The current Duke MOA permits military aircraft to fly between 8,000 and 17,000 feet above sea level. The MD ANG has proposed a new MOA which would permit aircraft to fly as low as 100 feet above ground level, directly above the Pennsylvania Wilds region. This modification would allow low-level training flights for up to four hours each day, three days per week (170 days annually). Low, loud, and frequent flights could disrupt livelihoods in a region that has built its identity on outdoor recreation and bucolic tranquility. The proposed changes to the use of the airspace over the PA Wilds region may threaten the rich natural resources of the area, damage quality of life in the Wilds, and threaten the vitality of the growing outdoor and tourism economy.

We are joined by many state officials, local leaders, conservation groups, and community members in expressing concerns about the Duke Low MOA, highlighting its potential negative impacts on local economies, public health and safety, wildlife, and outdoor recreation. These citizens and leaders have their communities' best interests at heart. A "Finding of No Significant Impact" trivializes their concerns and does a disservice to the families who call the Wilds home and work to ensure that this region is building toward a brighter future.

We also understand that the U.S. military needs realistic training environments for a variety of mission sets, and Central Pennsylvania is proud to support these training needs. The Air National Guard must remain ready to defend our Nation and its interests from a wide range of threats, including China, Russia, Iran, and North Korea.

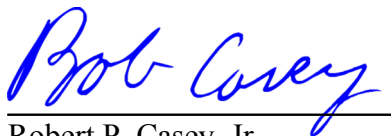
Nonetheless, we question the long-term necessity of the Duke Low MOA given the airframes the MD ANG intends to fly there. The primary justification for the proposed lowering of the MOA's floor is to "accommodate the training requirements for A-10 aircrews," following shifts in the availabilities of other regional training areas.¹ But as you know, Air Force leaders have signaled the need to retire the A-10 airframe for years, due in part to concerns that the plane is vulnerable to modern air defense systems. The current Chief of Staff of the Air Force, General C.Q. Brown, has publicly stated the Air Force's intent to retire all A-10s from service by 2029. Congress supported an initial round of A-10 retirements in the Fiscal Year 2023 National Defense Authorization Act.²

While we do not mean to adjudicate the ongoing debate over the A-10's continued viability, we do observe that the airframe's future is uncertain which further weakens the case for the Duke Low MOA. A major airspace decision with long-term consequences—allowing *all* aircraft to permanently fly as low as 100 feet above ground level—may have negative consequences that outweigh its benefits.

In accordance with National Environmental Policy Act, federal agencies must complete an Environmental Impact Statement when a proposed federal action may "significantly affect the quality of the human environment." Given the abundant natural resources of the Pennsylvania Wilds, the extensive public concern and opposition, and the strategic need to prepare for today's near-peer threats, it is essential that the Air National Guard comprehensively analyze the cumulative effects of the proposed Duke Low MOA and evaluate reasonable alternatives to achieve the department's goals. Accordingly, we urge the Air National Guard to complete a full EIS to ensure the proposal's benefits and drawbacks are thoroughly and transparently assessed.

We appreciate your consideration of this request.

Sincerely,



Robert P. Casey, Jr.
United States Senator



John Fetterman
United States Senator

cc: The Honorable Josh Shapiro, Governor of Pennsylvania

¹ <https://www.175wg.ang.af.mil/Duke-MOA-Low/>

² <https://breakingdefense.com/2023/03/air-force-seeks-more-a-10-cuts-wants-them-all-retired-in-5-6-years/>

Secretary Cindy Adams Dunn, Pennsylvania Department of Conservation & Natural Resources
Captain Ben Hughes, Maryland National Guard's Public Affairs Office
Captain Travis Mueller, Pennsylvania National Guard's Public Affairs Office
Lieutenant Colonel Devin Robinson, Air National Guard's Public Affairs Office