



Conservation &
Natural Resources
Advisory Council

May 15, 2023

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RE: Modification of the Duke Military Operations Area Airspace, Draft Final Environmental Assessment

The Conservation & Natural Resources Advisory Council (CNRAC) is a legislatively mandated Pennsylvania Department of Conservation and Natural Resources (DCNR) advisory board. We are charged with reviewing conservation and natural resource policies, laws and programs of the Commonwealth and making appropriate suggestions and recommendations to the Department, the Governor and the General Assembly. CNRAC's duties also include making direct recommendations to Federal executive agencies or legislative bodies whose actions will bear on the Commonwealth's conservation and natural resource responsibilities.

CNRAC is in agreement with the importance of military training operations and the need for our military forces to be prepared. However, we also feel strongly that the MD ANG and NGB need to comply with the requirements of the National Environmental Policy Act and assess to a much greater level the significant environmental impacts the proposal would cause.

After reviewing the Draft Final Environmental Assessment and accompanying documents, CNRAC does not see that the voluminous questions and comments submitted have been adequately addressed. The economic impact of the proposed activity on the natural, historic, cultural and rural nature of the Pennsylvania Wilds must be examined in great detail and consider the more than \$180 million invested in this region.

CNRAC is again requesting more community involvement related to the proposed action. Specifically, we are requesting public meetings be held in the directly impacted counties so impacted community members have the opportunity to discuss the proposed action with the Maryland National Guard. There is a high level of community interest, and we

believe your providing additional information and engaging in discussion with the impacted communities through in-person and virtual meetings will help in the ability to provide their input as envisioned under the National Environmental Policy Act.

CNRAC would again request a deeper analysis of the impact on conservation and natural resources and the region's recognition as an outdoor recreation and tourism destination, along with a more in-depth analysis of Environmental Justice issues. This deeper analysis needs to include minority and low-income populations, as well as this being an area with higher unemployment levels which are part of the investments in the Pennsylvania Wilds as an outdoor tourism destination. It also needs to be based on current information, not 30-year old reports. A deeper analysis and additional mitigation considerations will ensure the cumulative impacts on the region are properly studied and alternatives are evaluated. CNRAC again is requesting an Environmental Impact Statement be prepared for the proposed action.

Sincerely,



Geralyn Umstead-Singer, CNRAC Chair

cc: Governor Josh Shapiro
Cindy Adams Dunn, Secretary, DCNR