



## Pennsylvania Chapter

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Attention: Duke Low MOA Environmental Assessment

Dear Mr. Ortiz:

The Pennsylvania Chapter of The Wildlife Society (PA TWS) Executive Board wishes to express its concern over the proposed Duke Low Military Operations Area (MOA) in Northcentral Pennsylvania. The proposed Duke Low MOA comprises 1,727 square nautical miles (over 1.4 million acres) of area in the counties of Cameron, Clinton, Elk, McKean, Potter, and Tioga. This area holds some of the State's richest and most diverse forest and natural resources, and is home to numerous species of wildlife, with some being Federal and State Threatened and Endangered. Approving the proposed Duke Low MOA without properly evaluating and assessing the potential impacts could cause irreversible damage to sensitive wildlife populations, the local ecosystem, and the local economy.

Two species unique to the proposed Duke Low MOA area include the Pennsylvania population of northern goshawks and Pennsylvania elk. Northern goshawks have undergone precipitous declines and were recently listed as PA Endangered. Unprecedented low flight activities occurring in occupied territories is likely to adversely affect this species through repeated aerial disturbance. Loud, short-duration bursts of sound during courtship, incubation, and brood rearing could lead to nest abandonment or reduced chick survival. The Pennsylvania Game Commission has already mandated avoidance measures from February 15 through August 15 for all planned projects within 1,000 meters of known northern goshawk territories. This is directly relevant to the Duke Low MOA proposal, including avoiding repeated, low-elevation aerial flyovers and activities that produce extremely loud noises. In addition, the impacts of loud and low flying aircraft may also impact the resting and ruminating behavior, habitat use & distribution, and calf survival of the local elk population. Pennsylvania elk are limited in range to only northcentral counties, directly overlapping the area proposed for the Duke Low MOA.

Research has shown that unmanned aircraft systems can and do disrupt behavior and health of some wildlife species. Therefore, more research is needed to understand how larger, louder, faster, and lower-flying military aircraft will impact wildlife in the proposed Low MOA. In addition to potential disruptions to terrestrial wildlife feeding, breeding, and migratory behavior, proposed flight patterns would greatly increase the likelihood of aircraft strikes with birds and bats. According to the Federal Aviation Administration's *Wildlife Strikes to Civil Aircraft in the United States, 1990-2020*, "...about 42 percent of bird strikes with transport aircraft occurred when the aircraft was at 0 feet AGL, 71 percent occurred at 500 feet or less AGL, and 92 percent occurred at or below 3,500 feet AGL." Considering most of this reporting is directly associated with airport environments where commercial aircraft are moving slower, it can be assumed that military aircraft moving at much greater speeds, and at altitudes of 100 feet above ground level (AGL) would pose an increased potential for bird/aircraft collisions.

It is the PA TWS Board's position that there simply is not enough research to adequately assess impacts to wildlife in the proposed Low MOA. Existing peer-reviewed research relating to wildlife impacts from military jet overflights is not only sparse, but what exists was conducted in other ecosystems very dissimilar to Northcentral Pennsylvania and not relevant to our faunal assemblages. Furthermore, flights at 100 feet above ground level (AGL) are a significant departure from the existing Duke MOA where flights are restricted to no lower than 8,000 feet above mean sea level (MSL). Significant research has not been conducted in areas with flight zones as low as 100 ft AGL and the impacts could be magnitudes greater than we currently comprehend. The proposed Low MOA encompasses a large area important not only breeding northern goshawks (Pennsylvania Endangered) and elk, but also breeding bats such as the Indiana bat and Northern long-eared bat (both listed under the Endangered Species Act), and a myriad of both migratory birds (including large birds of prey) and bat species highly susceptible to strikes at this height and higher.

In summary, while we respect and support the need for military readiness, including the need for low-level flight training for our Air National Guard, we would be remiss to support these activities without adequate research. We encourage more applied research related to the impacts of low altitude flights on Pennsylvania's wildlife resources prior to final approval of this MOA. Therefore, PA TWS supports that the "No Action" alternative detailed in the Environmental Assessment be instituted, or that a full EIS be conducted by the National Guard Bureau to address the lack of foundational knowledge needed to conclude that impacts to the wildlife resource will be less than significant. We thank you for time in considering this important matter.

Sincerely,



Craig Hicks, President