

Testimony

Renewable Energy Projects: Anthracite Ridge Wind Farm Project

Senate Democratic Policy Committee

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Department of Military and Veterans Affairs

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Deputy Adjutant General - Army

Chairwoman Muth and Committee members, thank you for the opportunity to share the concerns of the Pennsylvania Army National Guard (PAARNG) about the Anthracite Ridge wind development project. I am Brigadier General Laura McHugh, the Department of Military and Veterans Affairs' (DMVA) Deputy Adjutant General for the PAARNG; I have with me today Mr. Marc Ferraro, DMVA's Executive Deputy Secretary, and LTC Timothy Zerbe, Pennsylvania Army National Guard State Army Aviation Officer.

The Department of Military and Veterans Affairs is committed to clean energy and reducing carbon emissions. DMVA has invested heavily in the past four years in renewable energy projects. We have incorporated green technology in numerous facilities at Fort Indiantown Gap (FTIG) and throughout the Commonwealth, including operating a solar farm at the installation that generates more than 5MW of power. There is an extensive federal approval process for such a project that has been ongoing for the last few years. Unfortunately, this proposed project impacts safe operations at the installation.

In December 2019, the United States Department of Defense (DoD) Clearinghouse notified the Pennsylvania Army National Guard that based on their preliminary review of the Clean Air Generation, LLC and Anthracite Ridge LLC project; DoD had determined the project would have an adverse impact on military operations and readiness. Specifically, it outlined the adverse impact to Army helicopter and fixed-wing training missions at Fort Indiantown Gap. The DoD Clearinghouse requested a mission compatibility evaluation of the proposed Anthracite Ridge energy project in Schuylkill County. Per Title 10 U.S. Code § 183a (c)(6), if a proposed energy project is known to be inside a military training route or in a radar surveillance line-of-sight that the DoD owns or operates in, then the developer must file for a mission compatibility evaluation. As a result, and under Army policy, the Pennsylvania Army National Guard established a Mitigation Response Team (MRT) to respond to the evaluation.

The MRT initially met in good faith with the project developers six times between December 2019- December 2020. There were also additional meetings in 2021 to attempt to agree on a mitigation plan. These meetings, however, have failed to identify adequate mitigation methods or corrective measures. All proposed mitigation measures reduced safety margins and mission capability for aviation operations or required the sustained application of taxpayer resources (both State and Federal) to overcome. DMVA remained concerned that the developers'

recommendations would have compromised the safety of our aircrews and accepted the inherent dangers of operating flights in the proximity of wind turbines.

Throughout the process, Anthracite Ridge Wind has not illustrated mitigation measures that are acceptable under Section 183a(d)(2)(B), Section 183a(c)(5) of Title 10, United States Code, and 49 USC §44718. The recommendations do not alleviate aircrew safety concerns and would cause severe impacts to training, readiness, and national security.

Anthracite Ridge Wind and the MRT discussed three mitigation efforts. First, the developer and the MRT discussed moving flight training to another location. This move is impossible due to useable aircraft fuel on board, which concerns time-distance to conduct training. Property acquisition has not been obtained within a distance that supports cost-effective training with limited time available. No community support has been obtained to fly at or below 200 feet above ground level in theoretical property to be acquired.

Second, the developer and the MRT discussed moving training into other sections within the Northern Training Area (NTA). The amount of training and aircraft flying within the NTA does not allow safe flight. Fort Indiantown Gap has 9 to 12 aircraft flying at any given time. The complexity of tasks being performed complicates space within the Northern Training Area. Northern Training Area- A, which shares space with Restricted Area 5802, is already scheduled by ground shooters such as field artillery and U.S. Air Force or Air National Guard fixed-wing aircraft or jets. This area can only accommodate one type of user at a time and is already scheduled by ground shooters and jets 77% of the calendar year, leaving a small window of time available for helicopter training.

Finally, the developer and the MRT discussed alternative approaches and departures to Landing Zones near template wind turbines. The alternatives discussed are not a sufficient mitigation measure as suggested approaches and departures do not account for variable and shifting wind conditions, effects of moon illumination angle that impact required flight under Night Vision Goggles, and escape routes for failed approaches or potential aircraft emergencies that require variable maneuver space to maintain the safety of the aircraft and aircrew. No mitigation efforts discussed have been agreed upon that does not significantly impact training, readiness, national security, and the safety of aircrews.

Fort Indiantown Gap hosts the largest National Guard U.S. Army Rotary Wing aviation program in the United States. It supports the second busiest aviation training location to Fort

Rucker, AL, where the U.S. Army Aviation proponent school is located. The placement of wind turbines within FITG's NTA in Schuylkill County would reduce usable rotor-wing maneuver airspace in a critical location utilized to perform required, low-level, tactical training for U.S. Army aircraft and would render the airspace unusable, resulting in a detrimental impact on the readiness of the U.S. Army Aviation community and national security.

Over 2,500 military personnel receive aviation training annually at FTIG. An inability to train critical tasks associated with training and readiness would create a severe gap for the United States Military and our allied partners. Permitting this project to move forward will reduce the value of FTIG to the U.S. Army and create a reason to transition aviation training to another state that supports aviation operations. The reduction of aviation programs will have a devastating impact on local union jobs, reduce our active guardsman force structure and impact our ability to respond with aviation assets in times of emergency in support of the Commonwealth. The Pennsylvania Army National Guard provides nearly \$1.4 billion a year in economic impact to the Commonwealth of Pennsylvania, and more than 48% of this total is generated from Fort Indiantown Gap.

Army rotary-wing aircraft must conduct tactical, low-level flights to maintain proficiency and readiness. The placement of wind turbines in the heart of the NTA and training space would create an unsafe environment. A required stand-off distance for RW flight is three (3) kilometers (or 9,800 feet) of lateral distance, making this area of proposed wind turbine installation unusable. Anthracite Ridge Wind recommended adjusting maneuver corridors and approaches to landing zones, which is insufficient when considering the required maneuver space to conduct low-level tactical training and enabling aircrews to respond to emergencies. Anthracite Ridge Wind recommendations suggest amending approaches and departures to landing zones near template wind turbines. This option does not consider variable and shifting wind conditions, effects of illumination that impact required flight under night vision goggles, and escape routes for failed approaches or potential aircraft emergencies that require variable maneuver space to maintain the safety of the aircraft and aircrew.

All of Anthracite Ridge Wind's recommendations require the National Guard to compromise the safety of the aircrews and accept dangerously close flights in the proximity of wind turbines in an unacceptable manner. Installation of wind turbines will require Muir Army Airfield (AAF) to increase minimum weather criteria, including cloud ceiling and visibility

requirements, to ensure obstacle avoidance and safe operation. Increasing Muir AAF weather minimums to ensure the safety of aircrew will have a detrimental impact on rotary-wing training, resulting in reduced days available to train due to inclement weather.

In addition to the safety of our aircrews and disruption to aviation training, there will be a significant disruption in our ability to conduct ground maneuver training at Fort Indiantown Gap if the developer erects wind turbines. The number of ground maneuver fires, rotary and fixed-wing aircraft, including Air Force/Air National Guard aircraft and UAS, that utilize the NTA, including Restricted Areas, does not allow for multi-use of the airspace. Eliminating training to remain compliant with safety procedures and restrictions would result in no training for two of the three categories of users: ground maneuver fires, rotary wing (RW), or fixed-wing (FW). Per U.S. Army Aviation Aircrew Training Manuals (ATM), maneuver space is required for RW training. Seven tasks within the ATM require tactical low-level evasive maneuvers to gain proficiency in these tasks and be considered a unit ready for mobilization. Anthracite Ridge Wind's proposed wind turbine location will reduce useable RW maneuver space in a critical location, making that land and airspace unusable for RW training. An inability to train critical tasks associated with unit readiness and mobilization would negatively impact national security. Units will not be trained or prepared to meet the demands of missions overseas and within the continental U.S.

The Pennsylvania Army National Guard followed all of the federal procedures and guidelines required in federal law to mitigate the construction of this proposed energy project. As required by the Governor and the DoD Clearinghouse, the MRT evaluated the impacts. All proposed remedies the Anthracite wind turbine project would pose to the national aviation training mission located at FTIG, but the safety risks aircrews are too high. The PAARNG has requested a determination of adverse impact due to safety concerns for our aircrews and the detrimental impacts on military readiness and national security. The final determination for this decision does not rest with DMVA or anyone at the state level. The Undersecretary of Defense will review our recommendations and consider the full impact of our input before rendering a recommendation to the Federal Aviation Administration, who will make the final decision.

Fort Indiantown Gap has always operated with the utmost concern for and cooperation with the local community. The Pennsylvania National Guard strives to assure flight-friendly

procedures and restricted flight maneuvers over designated areas to ensure continued community support while balancing precious training time with our traditional guardsmen.

Thank you for allowing us to share our concerns today, and we look forward to answering any of your questions.