



Save Ontario Shores, Inc.



PO Box 216, Lyndonville, NY 14098  
www.SaveOntarioShores.com  
info@SaveOntarioShores.com

July 6, 2017

The Honorable Andrew M. Cuomo  
Governor of New York State  
NYS State Capitol Building  
Albany, NY 12224

Dear Governor Cuomo:

Save Ontario Shores (SOS) has voiced concerns that the Lighthouse Wind proposal by Apex Clean Energy to construct up to seventy 620+ foot tall industrial wind turbines in close proximity to the Niagara Falls Air Reserve Station (NFARS) could endanger the encroachment-free zone which the base currently enjoys. The loss of this status could place NFARS at risk when the next Base Realignment and Closure process (BRAC) is convened.

NFARS has been targeted for closure by two previous BRAC's. The BRAC process has not been kind to New York State, which has seen the closure of seven military installations. We cannot risk NFARS being the eighth base to be added to that list. Recently, two events have highlighted the changing debate regarding the placement of wind turbines near military installations. Military officials are publically raising serious concerns about the negative impacts these structures could have on military readiness and effectiveness.

U.S. Army officials at Fort Drum recently expressed concerns with an Apex proposal for a wind turbine project near the base in a published article in *Watertown Daily Times*. According to Julie A. Halpin, Fort Drum spokeswoman, "The project would have an impact on radar as it increases clutter on the scope." She also expressed concerns that, "wind turbines in the area could negatively affect instrument approaches for aircraft and negatively impact its air traffic control services."

Coming on the heels of that statement, Department of the Navy Deputy Assistant Secretary James B. Balocki communicated the Navy's concerns to Senator John Cornyn regarding a proposed wind turbine project near the Naval Air Station Kingsville and Naval Air Station Corpus Christi (letter attached).

This letter clearly states numerous issues and concerns the Navy has with the presence of wind turbines near these two installations. The impact study the Navy conducted stated the following:

“The general conclusion of the study confirmed that primary radar detection may be significantly degraded in airspace immediately above wind farms and in some cases in areas beyond the windfarm. When flying in such areas of degraded primary radar coverage, there is increased risk to Navy pilots from civilian aircraft operating without active transponders.”

It appears that the military is now speaking out when it determines that wind energy projects may interfere with and erode operational effectiveness.

SOS is asking that you lend your voice to this issue through the Article 10 process. Article 10 regulations require an application to construct an electrical generation facility to include detailed information about potential impacts on transportation facilities including airports and military installations (16 NYCRR Section 1101.25 (e)). The Article 10 Siting Board may request either an “informal” or “formal” review by the Department of Defense (DOD), (32 Code of Federal Regulations, Sections 211.6 and 211.7) for projects located near military installations.

Based on the concerns military officials are now openly expressing and the possible negative impacts the Apex project could have on NFARS in the next BRAC process, SOS has a request: please convey to the Article 10 Siting Board your desire for it to call for a formal DOD review of the Apex proposal.

It is clear that officials in other states, faced with similar proposals, are moving to protect their military installations before the next BRAC begins.

New York State now has fair warning that the issue of wind turbines near military installations could degrade military operations. Any base entering the next BRAC with such circumstances caused by a wind energy project could find itself slated for closure. The risks to NFARS and the entire Western New York region are just too high to take this risk.

Please, Governor, use the power and influence of your office to call for a formal DOD review of the Apex project.

Sincerely,

A handwritten signature in cursive script that reads "Pamela Atwater".

Pamela Atwater  
President  
Save Ontario Shores, Inc.