November 1, 2016

Mr. Louis Alexander
Acting Commissioner
NYS Department of Environmental Conservation
625 Broadway
Albany, New York 12233

Dear Mr. Alexander:

A recent article in the Buffalo News was entitled "Air Force officer debunks claim that wind turbines endanger Niagara Falls base".

In actuality, the article and the statements by base officials support the point Save Ontario Shores, Inc. (SOS) and others have been making in regards to the proposed Apex industrial wind turbine project and the future viability of the base.

Col. Joseph Janik, operations group commander of the 914th Airlift Wing, when asked if the new mission at NFARS involving higher flying KC-135 tankers made the Apex projects impact on base operations a "nonissue", gave a very qualified and limited response, saying; "At this time, with the new mission, yes."

In speaking about the current mission of the 107th Air Attack Wing of the New York Air National Guard, which operates "Remotely Piloted Aircraft" (RPA's or drones), launched and recovered from other bases but controlled and operated from Niagara, the Colonel stated "the drones themselves are not expected to be housed at Niagara Falls."

When addressing the position NFARS needs to be in when the next Base Realignment and Closure Commission (BRAC) is convened, everything is about having a critical mass of missions that will be valuable to the military in meeting its objectives in the future. As threats change, so do the objectives and strategies the military must design. The mission of any single base is never static. The history of NFARS includes fighters, refueling and airlift missions. To say that the Apex proposal is not a threat to NFARS "at this time, with this new mission", is hardly reassuring, given the changing priorities and missions the United States military faces. If these structures are an encroachment on low altitude missions, NFARS could be excluded from being assigned new low altitude missions in the future, especially when we know that RPA's will play a bigger and bigger role in the force structure of all military branches. This inability to accommodate new missions reliant on RPA's could be a huge negative for the base going into the next BRAC.

The Colonel's statement that "the drones are not expected to be housed at Niagara" is interesting from a number of standpoints. First, the decision to award up to seven "Landing and Recovery Element" (LRE) missions has yet to be made by the DOD. In fact, one of the major priorities coming out of the "Future Missions Study" conducted by Niagara County was to secure an LRE mission at NFARS. This would result in the RPA's actually being hangered at the base. These low flying craft are very likely to be impacted by 70 industrial wind turbines over 600 feet tall. Securing the LRE mission, or being able to accommodate them in the future, could be critical to NFARS surviving the next BRAC. Knowing these structures can impact low altitude flight operations and radars and allowing them to be sited within the Military Operating Area (MOA) of the base could be sacrificing a critical future mission for NFARS. This type of encroachment could lead to NFARS not being able to be retrofitted to accommodate new missions in the future. All of these factors could lead to NFARS being listed for closure, for the third time, by the next BRAC.

SOS finds it very interesting that Apex is using a lobbying firm, Cassidy & Associates, which is representing both sides of this issue. Where it is retained by Apex to site wind turbines next to a military base, it argues that they have no impact on base operations. Where Cassidy & Associates has been retained to protect a military base from encroachment, as is the case with Ft. Campbell in Maryland, Cassidy lobbyist Barry Rhoades is quoted as arguing:

"You only get so many maneuver acres. You don't get them back ever again, no matter where it is."

What's good for Ft. Campbell should be good for NFARS. Encroachment is encroachment and right now NFARS could be forfeiting its "encroachment free" card just as we enter a critical phase in securing an LRE mission and head into the next BRAC. Is this community really willing to risk the future of one of its largest employers for an out of state company intent on defacing our lakeshore, disrupting the environment and killing huge numbers of birds?

Sincerely,

Pam Atwater

Pam Atwater, President
Save Ontario Shores, Inc.