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January 31, 2012

Todd Cornett
Oregon Department of Energy
625 Marion St. NE
Salem, OR 97301

RE: Troutdale Energy Center Project

Dear Mr. Cornett:

The Aircraft Owners and Pilots Association represents the general aviation interests of over 400,000 members, more than two-thirds of the nation's pilots, including over 6,300 in the state of Oregon. On behalf of our membership, AOPA is committed to ensuring the continuing viability and development of general aviation airports and their facilities as part of a cohesive and vital national transportation system.

It has come to our attention that Troutdale Energy Center, LLC filed a Notice of Intent (NOI) with the Oregon Department of Energy for construction of a natural gas-fired power generation facility immediately adjacent to the Troutdale Airport. While we fully understand the community's need for adequate power generation capabilities, we were disappointed that the potential impacts of the power facility on aviation activities at the Troutdale Airport are not addressed anywhere in the NOI dated November 22, 2011.

It is imperative that the Oregon Department of Energy evaluates the potential impacts of this project on aviation activities as it considers this NOI. This includes, but is not limited to (1.) the height of the facility's structures and their proximity to the airport; (2.) the potential adverse visibility impacts from the facility's saturated exhaust; (3.) the thermal plumes from the facility's exhaust stacks and associated turbulence; and (4.) potential airport restrictions that could arise from security issues affecting power generation facilities.

1. Under Federal Aviation Regulation 49CFR Part 77 (Objects Affecting Navigable Airspace), the Federal Aviation Administration (FAA) has established standards for determining obstructions affecting airports and airspace. Part 77 also outlines the process for aeronautical studies of obstructions to air navigation or navigational facilities to determine the effect on the safe and efficient use of navigable airspace, air navigation facilities or equipment.

At a minimum the NOI should address how the project will comply with 49CFR Part 77, as well as any local land use regulations that may implement Part 77 obstruction requirements on and in vicinity of the Troutdale Airport. Failure to do so could have a significant impact on the Troutdale Airport's safety and utility.

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2. The NOI notes that the power facility's exhaust will be saturated with water (100% relative humidity), and warmer than the air entering the facility. This is of significant concern, since as this moist exhaust air cools, it is likely to create fog and low cloud conditions in vicinity of the airport. This in turn could result in visibility conditions that could impact the airport's Visual Flight Rules (VFR) traffic patterns, and make the airport unusable. The NOI should address the proposed facility's impact on visual flight conditions on and around the Troutdale Airport.
3. Additionally, we have concerns about the thermal plumes emitted from the facility's exhaust stacks, and the associated turbulence from them. The two most critical phases of flight are takeoff and landing. During these operations, the immediate areas surrounding airports should be free of hazards, including facilities that create unstable air masses and turbulence. Because of this proposed project's proximity to the Troutdale Airport, thermal plumes could have a negative impact on aviation operations, particularly during critical takeoff and landing phases. To that end, the NOI should address the potential impact of the project's thermal plumes on aviation operations.
4. Lastly, we have concerns about how security measures that have been required of power generation facilities in the past could have unintended negative impacts on the Troutdale Airport. In the past, the FAA has at times imposed "no-fly" zones around some power generating facilities in response to security issues. Were such a "no-fly" zone ever implemented at the proposed site, given this project's proximity to the Troutdale Airport operations could be severely restricted or prohibited. The NOI should address how potential power plant security measures will impact aviation activities.

In summary, we are disappointed that the current NOI does not address the potential impacts the proposed project could have on the Troutdale Airport and surrounding aviation activities. However, we appreciate your consideration of our views on the critical issues outlined above. We look forward to analysis of these issues in future project plans.

Again, thank you. If we can be of further assistance, please contact me at 301-695-2094.

Very Truly Yours,



David Ulane
Northwest Regional Manager