



421 Aviation Way
Frederick, Maryland 21701

T. 301-695-2000
F. 301-695-2375

www.aopa.org

March 20, 2009

Ms. Donna O'Neill
Federal Aviation Administration
Air Traffic Airspace Branch, ASW-520
2601 Meacham Blvd.
Fort Worth, TX 76137-0520

RE: Aeronautical Study No. 2009-WTE-332-OE

Dear Ms. O'Neill:

The Aircraft Owners and Pilots Association (AOPA), represents the general aviation interests of more than 416,000 members nationwide. On behalf of our membership, AOPA is committed to ensuring the future viability and development of general aviation airports and the national airspace system.

AOPA has reviewed the Federal Aviation Administration's Notice of Presumed Hazard for aeronautical study number 2009-WTE-332-OE and submits the following concerns relating to the proposed 130 offshore wind turbines that would encompass nearly 35 square miles of Nantucket Sound. AOPA is opposed to the proposed location and height of the wind turbines due to the negative impact on both visual flight rules (VFR) operations as well as the impacts on air traffic radar systems that serve flight operations into Barnstable Municipal (HYA), Martha's Vineyard (MVY) and Nantucket Memorial Airport (ACK).

The FAA's obstruction evaluation and *Impact Study of 130 Wind Turbines in Nantucket Sound* both address the impacts of the proposed wind turbines on primary and secondary radar coverage and the greater potential for shadowing, line-of-sight shielding or clutter at altitudes below 1000 feet. However, the FAA does not address the area of significant concern to AOPA which is the high volume of low-altitude VFR flights between HYA, ACK and MVY due to low ceilings and marginal visibility – particularly in busy summer months. In talking with operators who routinely use these busy VFR routes, we know that the majority of VFR traffic operates at altitudes below 1,500 feet over the Nantucket Sound. Based on the radar impacts associated with the proposed project, Cape Approach would be unable to provide consistent air traffic control "flight following" services for operations below 1000 feet over great portions of Nantucket Sound.

Allowing nearly 130 wind turbines to be located in a busy VFR corridor would likely lead to a situation similar to the accidents that occurred as a result of the collisions with Fullerton radio tower back in December of 2004 and prior to that in January of 1970.

We strongly recommend the FAA evaluate and consider the impacts of the proposed wind turbine project on low-altitude VFR operations over the Nantucket Sound prior to issuing a final determination. In light of the VFR impacts and the well documented radar interference, we urge the FAA to issue a final determination of hazard on this wind turbine project in Nantucket Sound.

Sincerely,

Heidi J. Williams
Senior Director, Airports