



DEPARTMENT OF THE NAVY
COMMANDER
NAVY REGION, MID-ATLANTIC
1510 GILBERT ST.
NORFOLK, VA 23511-2737

IN REPLY REFER TO:
5090
EVN40/00/RE340
MAY 31 2012

ORIGINAL

RECEIVED
JUN - 4 2012

CONNECTICUT
SITING COUNCIL

Ms. Melanie Bachman
Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Dear Ms. Bachman:

SUBJECT: CONNECTICUT WIND SITING REGULATIONS

On behalf of Commander, Navy Region Mid-Atlantic, who serves as Department of Defense (DoD) Regional Environmental Coordinator for Standard Federal Region I, which includes the State of Connecticut, I am writing to you concerning the Notice to Intent to Adopt Regulations for the Siting of Wind Projects. The regulations are currently before the Connecticut Siting Council and are open for public comment. We appreciate the opportunity to comment on these regulations and to discuss how effective planning can support the state's alternative energy goals and DoD missions.

DoD firmly supports alternative energy development and applauds Connecticut for taking the initiative in this area. We are concerned; however, that the subject legislation may permit the siting of wind energy projects in areas that may impact the DoD mission in Connecticut. For a partial appreciation of the potential of the potential adverse impact of such projects, and the difficulty in predicting impact without a case-by-case analysis, please see Report to Congressional Defense Committees, The Effect of Windmill Farms on Military Readiness, 2006, at <http://www.defenselink.mil/pubs/pdfs/WindFarmReport.pdf>.

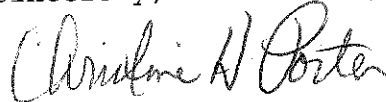
The Ike Skelton National Defense Authorization Act ("NDAA") for Fiscal Year 2011 (Public Law 111-383, section 358) maintains that it is the objective of the DoD to ensure the robust development of renewable energy, while minimizing or mitigating any adverse impacts on military operations and readiness. To meet this objective, the NDAA directs that the DoD create a review process to evaluate such projects when they are in their developmental and permit approval stages. This includes evaluating renewable energy projects to determine the level of risk of adverse impact, if any, on military operations and readiness that would arise from the project and the extent of mitigation that may be needed to address such risk. In order for us to meet that requirement, timely awareness and notification to the DoD Siting Clearinghouse of these projects is critical.

5090
EVN40/00/RE340
MAY 31 2012

As you are no doubt aware, Connecticut hosts many DoD installations, ranging from small support centers to the nation's first submarine base, Naval Submarine Base New London. Each installation has a unique national defense mission, with unique land use compatibility challenges. If not appropriately sited, wind turbines can be a challenge, potentially interfering with DoD air, sea, communications, radar or training missions. Proactive planning efforts, such as proposed in these regulations, can help the state accomplish its energy goals and sustain the DoD mission, if adequately coordinated amongst the stakeholders. To further both objectives, we offer the attached enclosure for your consideration.

In closing, we believe that early notification as contemplated by our request would help realize our shared goals of maximizing alternative energy development in Connecticut while minimizing adverse impact to DoD operational readiness. We welcome the opportunity to work with the Connecticut Wind Siting Council, and our surrounding communities on any matter that may affect DoD installations. If you have any questions, my point of contact for this matter is Lieutenant Commander Amanda Myers, who can be reached by telephone at (757) 322-2812, or by email at amanda.myers@navy.mil.

Sincerely,



CHRISTINE H. PORTER
Director for Regional
Environmental Coordination
By direction of the Commander

Enclosure

Copy to: U.S. Army REC, Region I (Mr. Mulhy)
USAF REC, Region I (Mr. Glass)

DEPARTMENT OF DEFENSE COMMENTS TO CONNECTICUT WIND SITING
REGULATIONS

Sec 16-50j-12:

(NEW) (e) Department of Defense Notification. For all applications submitted for projects regulated by Article 7, Renewable Energy Facilities, each application shall be accompanied by proof of service of copies of the application on the Executive Director, Department of Defense Siting

Clearinghouse, Office of the Deputy Under Secretary of Defense (Installations and Environment), Room 5C646, 3400 Defense Pentagon, Washington, DC 20301-3400, and to the Department of Defense Regional Environmental Coordinator at Commander, Navy Region Mid-Atlantic (N45), 1510 Gilbert Street, Norfolk, VA 23511-2737.

Comment: Early notification of renewable projects within the State of Connecticut allows the Department of Defense to coordinate the siting of wind towers with the proponent of the project, which allows for early mitigation.

Enclosure (1)