



DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT SECRETARY OF THE ARMY
INSTALLATIONS, ENERGY AND ENVIRONMENT
REGIONAL ENVIRONMENTAL AND ENERGY OFFICE-SOUTHERN
101 MARIETTA STREET, NW, SUITE 3120
ATLANTA, GA 30303-2711

2 June 2011

Lloyd E. Griffin, III, Chairman
Pasquotank County Board of Commissioners
206 E. Main St.
Elizabeth City, NC 27907

Dear Mr. Griffin,

Thank you for the opportunity to comment on the subject application. We understand that this application is to request a conditional use permit CUP-11-01 by David C. Shadle, Atlantic Wind, LLC, to construct and operate a Large Wind Energy Facility on multiple properties within Perquimans County.

Per Ike Skelton National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2011, Public Law 111-383, section 358, it is the objective of the Department of Defense to ensure the robust development of renewable energy, while minimizing or mitigating any adverse impacts on military operations and readiness. This includes evaluating renewable energy projects to determine the level of risk of adverse impact on military operations and readiness that would arise from the project and the extent of mitigation that may be needed to address such risk.

A preliminary assessment by the Navy's Forces Surveillance Support Center (FSSC) indicates that large-scale wind energy projects may adversely affect their operations. FSSC operates and maintains the unique Relocatable Over the Horizon Radar (ROTHR) at the Naval Support Activity, Northwest Annex located in Currituck County, NC, as well as neighboring City of Chesapeake in Virginia. The ROTHR is the only wide area surveillance network available to U.S. Southern Command's Joint Interagency Task Force (JIATF) South for detection and monitoring of air and maritime traffic of illegal drugs into the United States from the Caribbean, as well as the South and Central America areas. The ROTHR network has provided over 85% of the total tracking of all trafficking events over the past five years and supports the counter-drug activities of Federal, State, local and foreign law enforcement agencies.¹

The concern with the proposed wind farm is that the large cross-section of the rotating blades of wind turbines will impart a Doppler shift on the radar signal returning from down range, and re-radiate the signal to the radar receiver. The Doppler shifted signal will appear as a target in the radar return, thus confusing the tracking system as well as masking true targets and causing a significant degradation on the operational capabilities of the radar and the overall mission. This has been documented in a preliminary modeling study by the Naval Research Laboratory initiated in 2010.

As a follow up to the preliminary modeling study, FSSC has initiated a comprehensive hazard assessment that is expected to quantify the level of risk of adverse impact to ROTHR, and to identify possible options to mitigate those risks. This study is projected to be completed by early July, 2011, and will be immediately forwarded to the DoD Energy Siting Clearinghouse per ref (a) for their analysis. At this time, a copy of the study will also be forwarded to the applicant and the County no later than July 15, 2011, for review and discussion on potential options to mitigate any identified risks. We respectfully request that the County Commission consider deferring action on Conditional Use Permit

¹ See 10 United States Code (USC), section 124 – The Department of Defense shall serve as the single lead agency of the Federal Government for the detection and monitoring of aerial and maritime transit of illegal drugs into the United States.

No. CUP-11-01 until information from the comprehensive assessment can be provided to the applicant and the County.

In the interim, we would like to like to invite the applicant and the County to visit the ROTH and provide a brief on the mission of the ROTH. The purpose would be to maintain an open line of communications, and provide more detailed information on why the DoD is concerned with the proposed wind farm development.

We very much appreciate your time and consideration in this matter. Our points of contact for further coordination are David Blalock at 404-460-3132 and Marshall Williams at 404-360-3136.



Susan P. Gibson
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CC:

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