



14 December 2012

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The Honourable Randy Hope  
Mayor, Chatham-Kent  
315 King St W, PO Box 640  
Chatham, ON  
N7M 5K8

Dear Mayor Hope:

I have reviewed the report [http://www.chatham-kent.ca/SiteCollectionDocuments/media\\_centre/Airport%20Study%20Report%20December%204%202012.pdf](http://www.chatham-kent.ca/SiteCollectionDocuments/media_centre/Airport%20Study%20Report%20December%204%202012.pdf) regarding the plan to erect more wind turbines in the vicinity of the Chatham Kent airport and also a news report <http://www.chathamdailynews.ca/2012/12/04/study-finds-no-issue-with-wind-turbines-near-airport> that included quotes from you and others. I also note that the airport manager had no comment, which I view as a red flag on whether or not the plan is in the best interest, in particular safety, of the people who use the airport.

The purpose of this letter, on behalf of tens of thousands of pilots, is to ask that you not permit certain turbines to be erected until you know for sure, from Transport Canada and Nav Canada, that the assumptions made by the consultants will in fact be approved. Alternatively, if you do not wish to amend the aggressive construction schedule, you should demand that the wind farm developer relocate any turbines that result in additional restrictions to the instrument approaches and other procedures at the airport, as determined by Transport Canada and Nav Canada.

My comments are divided into four areas; the certification status of the airport, the impact on the instrument approaches, glider operations and Visual Flight Rules (VFR) operations.

Airport's certification status: I note that several turbines fall within the airport zoning protection, I could find no mention in the report of what impact, if any, this encroachment has on the status of the airport zoning protection or certification status of the airport. The airport zoning protection is there for safety reasons. Permitting a number of wind turbines to encroach this area, especially to the great extent that they will, may have significant consequences on the airport. Transport Canada should be approached about their position in this matter.

Instrument approaches: I am neither a designer of approaches nor a certification authority so I cannot comment on whether or not the recommended redesign of the instrument approaches and changes to the airport infrastructure will fully mitigate the encroachment by the turbines. However, I note that there are many statements in the report that include "should". There are so many elements of the solution that are subject to final design and approval that it is uncertain whether or not in the end the airport will or will not be subject to restrictions that impact on the usefulness of the airport. It appears that the project schedule is such that the full impact will not

be known until well down the turbine installation process. So, it is entirely possible that it may come to light well into the wind turbine and runway construction process that the hoped for minimum descent altitudes will not be possible. There appears to be no contingency for this. Therefore, there is a significant risk that the airport will be negatively impacted, with no possibility for mitigation, such as relocating a turbine. The solution for this issue is to introduce into the agreement a guarantee that the hoped for minimums will be achieved or else the wind farm project will be modified accordingly, including relocating turbines. This may become an issue, for example, if an LPV approach is achieved for one of the runways and not for the opposite end and/or the minimums for one approach are much higher than hoped for, consequently requiring a circling approach at relatively high altitude. In my opinion, the airport's usefulness is at significant risk from not having a guarantee in place.

Glider operations: The report goes into some detail about the impact on glider operations on the ground at the airport but it in no way addresses the risk to airborne operations. Additional obstacles, especially so many of them in total and so close to the airport, reduce the options for off-airport landings. In addition, no one has performed a definitive study of the turbulence impact of wind turbines on small aircraft. Everyone appears to be making an assumption that small aircraft will not be affected in the event that they pass behind a turbine that is in operation, such as a glider conducting an off-airport landing. I am not aware of anyone involved in the glider operation being consulted on this and other issues.

VFR operations: As I have experienced with other developments near airports, there has been some study of the impact on IFR operations in this study but little or none for VFR, which is by far the majority of operations at the airport. Transport Canada's Obstacle Limitation Surface has been established for a reason, and that is to provide a safety margin around airports where aircraft operate at low altitudes. When this surface is breached, it is logical to conclude that safety is negatively impacted. In some cases, this can be mitigated by restricting circuits to one side of the airport. In the Chatham case, where the additional turbines will essentially surround the airport, it is not possible to mitigate this risk of collision. While it can be argued that circuits should be kept close enough to the airport to avoid all turbines, there are circumstances where this may not be possible. An additional issue is the marking and lighting of turbines, which is different from all other obstacles. While they are required to be lit, not all elements in a farm are required to be lit. Also, while other obstacles are required to be marked for daytime if they are not lit appropriately, turbines are not required to be appropriately marked. The consequence of these two unique standards is that in certain weather and lighting conditions, such as snow squalls and winter cloud cover causing white out conditions, a combination of no daytime lighting and no conspicuous marking resulting in white turbines on a white background, combined with locating turbines close to airports, logically increases the potential for collisions. To date, Transport Canada has remained silent on this issue, most likely due to political factors. It may require an unfortunate accident to demonstrate my concern. With so many wind farms in development near airports, it is logical to conclude that it is only a matter of time until a collision occurs. I am making you aware that there is a liability for the municipality if you permit turbines to be installed so close to the airport.

I ask that you consider very carefully the decision you are making to accept the consultant's report at face value, as appears to be the case in the news report. While physical improvements to the airport are welcome, they most likely will come at a price, in terms of safety, and render the airport less usable in the event that the assumptions made by the consultants are not acceptable to the certification authorities. I urge you to not accept the plan until it is known for sure that the mitigation measures are acceptable to everyone involved.

Yours truly,



Kevin Psutka  
President and CEO

Cc: Mr. John Norton - Municipality of Chatham-Kent  
The Honourable Denis Lebel, PC, MP - Minister of Transport, Infrastructures and Communities  
The Honourable Jim Bradley - Minister of the Environment, Ontario  
Mr. Bernard Schropp - GENIVAR  
Mr. Keith Knudsen - BowArk Energy Ltd.  
Mr. Charles Cormier - Aeronautical Information Consultant  
Mr. Bob Boughner - Chatham Daily News