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January 13, 2015

Chairman Robert Stein  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

Re: Docket 192B – Towantic Energy, LLC Motion to Reopen and Modify the June 23, 1999 Certificate of Environmental Compatibility and Public Need based on changed conditions pursuant to Connecticut General Statutes Section 4-181a(b) for the construction, maintenance and operation of a 785 MW dual-fuel combined cycle electric generating facility located north of the Prokop Road and Towantic Hill Road intersection in the Town of Oxford, Connecticut.

Dear Chairman Stein:

The Aircraft Owners and Pilots Association (AOPA) is the world's largest aviation organization represents the general aviation interests of pilots and aircraft owners, including 3,709 of our members in the state of Connecticut. On behalf of our membership, AOPA is committed to ensuring the future viability and development of general aviation airports and their facilities as part of a national transportation system. We appreciate the opportunity to submit the following comments to the public record for Docket 192B.

We are strongly opposed to the construction of a power plant within the traffic pattern for the Waterbury-Oxford Airport (OXC). The proposed construction of the Towantic Energy facility represents a risk to aircraft operations at the airport and is not a compatible land use. It is a poor application of public policy to allow the facility to pose a risk to the health, welfare and safety of pilots and passengers conducting normal operations at OXC. The location is directly under the airspace used for the downwind leg of the traffic pattern for Runway 18 and when applicable Runway 36.

Several of the physical plant facilities will penetrate Federal Aviation Administration's (FAA) Horizontal Surface as established under 14 CFR Part 77.19. The FAA considers these obstructions under section 77.17 (a)(5). Based on the approximated 47,987 operations annually they reasonably conclude that the project has the potential to affect at least one aircraft operation daily. That is a substantial adverse effect in the view of the FAA.

Studies by the FAA on the effects of vertical plumes on aviation safety led their Airport Obstruction Standards Committee Working Group to issue a position paper (enclosed) on July 8, 2014 identifying thermal exhaust plumes as incompatible with airports. While the referenced FAA Advisory Circular 150/5190-4, Airport Land Use Compatibility Planning is not yet available; it is AOPA's contention that Siting Council should not reopen this application.

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Thank you for your consideration of our comments. If we can be of further assistance to the Connecticut Siting Council, please contact our staff at 301-695-2200.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Collins". The signature is stylized and written in a cursive-like font.

John L. Collins  
Manager  
Airport Policy

Enclosure

Cc:

James J. Murphy, Jr., Vice Chairman, Connecticut Siting Council  
Dr. Barbara C. Bell, Member, Connecticut Siting Council  
Philip T. Ashton, Member, Connecticut Siting Council  
Daniel P. Lynch, Jr., Member, Connecticut Siting Council  
Michael Caron, Member, Connecticut Siting Council  
Eileen Daily, Member, Connecticut Siting Council  
Dr. Michael Klemens, Member, Connecticut Siting Council  
Robert Hannon, Member, Connecticut Siting Council  
Melanie Bachman, Acting Executive Director, Connecticut Siting Council