

ASN 2026-WTE-651-OE

This document is to voice objection to the reference wind turbine proposal 2026-WTE-651-OE.

These turbines exceed Part 77 height requirements.

They are proposed approximately 13 miles southwest of the airport in Milbank, South Dakota, near the Crown Ridge Wind Farm.

The issues with this proposal are:

- Crown Ridge has turbines that meet Part 77 requirements. The idea of putting 650' turbines next to 499' turbines is creating a safety issue, especially when encroaching into Visual Flight Rules (VFR) airspace. Has a Safety Risk Management Panel (SRMP) been held to address putting 499' and 650' turbines in close proximity to each other?
- What method was used to determine the level of traffic in this area that would be below whatever radar source will be used to determine if a significant volume of VFR will be affected? On April 27, 2014, an aircraft collided with a wind turbine 10 miles south of the airport in Highmore, South Dakota. Four people were killed. The National Transportation Board noted radar data for the accident flight was not available. One aircraft, in this case, turned out to be significant traffic. Not every aircraft will show up on radar if below the radar line of sight.
- On July 21, 2015 Wind Turbine Farms National Guidance was issued by the Director, Operations-Headquarters, AJT-2. In the second paragraph it states: "as additional wind farm development is proposed, consideration of risk to the **local** site with its unique complexities, airspace, and operations must be evaluated by a **local** SRMP." If it is decided to continue with this project, I would expect that the flight schools in Watertown and Brookings, South Dakota be asked to participate. In addition, the air ambulances that use helicopters are contacted, and the local agriculture pilots.
- I would request, when conducting the local SRMP, an emphasis be placed on getting local users, including air ambulance (fixed and rotor wing), ag-pilots and area flight schools. If controllers are used from Minneapolis Center (ZMP), they would not be experienced, since ZMP is 176 miles away.

South Dakota, and other states are getting a proliferation of wind farms that exceed Part 77 requirements. The Federal Aviation Administration needs to rewrite the FAR to include these types of farms. The Part 77 farms prior to July 21, 2015 were grandfathered in with a determination of No Risk. However, two hazards were identified. The one I feel applies in this instance is Radar Loss in the infinite cone of airspace rising above and just beyond the lateral boundaries of a wind farm resulting in loss of primary radar targets as aircraft, without operative transponders, transverse the cone of airspace.

Therefore, an SRMP definitely needs to be conducted to ensure the same level of safety as the current regulations attempt to provide, and not just somebody's best guess.

Thank you,

Bob Huggins