2026-WTE-2099-OE

This document is to voice objection to the reference wind turbine proposal 2026-WTE-2099-OE. These turbines exceed Part 77 height requirements.

This study evaluates a proposed wind farm in Day County near Webster, South Dakota. The nearest airport is Sigurd Anderson Airport (1D7) in Webster. The 134 proposed turbines would be located approximately 6.50 to 14.20 nautical miles (NM) west-southwest, extending clockwise to approximately 10.00 to 15.40 NM northwest of 1D7. The proposed height of these turbines is 699 feet.

The wind farm is expected to affect the GPS approach minimums at Clark County Airport (8D7) and Aberdeen Regional Airport (ABR). It may also influence arrival, departure, and enroute procedures for aircraft operating under visual flight rules.

This area is dotted with many wind turbines of various heights.

- The Crocker Project (148.1 meters)
- Dakota Range 3 (182.6 meters)
- Dakota Range 1 and 2 (150 meters)
- This project (213.06 meters)

This mix of various height turbines is easily able to cause confusion for pilots flying in low weather conditions, not familiar with this area.

A Safety Risk Management Panel (SRMP) must be conducted on this proposal as set out in the Federal Aviation Administration (FAA) Memorandum, dated July 21, 2015, titled Wind Turbine Farms National Guidance.

Items that must be considered are:

- The two hazards identified in the memorandum - **radar malfunction/degradation** (i.e., clutter, jumping targets, anomalous propagation or false weather targets and **radar loss** (an infinite cone of airspace rising above and just beyond the lateral boundaries resulting in loss of primary radar targets as aircraft without operative transponders, transverse the cone of airspace.)
- The effect on approach minimums at Clark County Airport (8D7) as voiced by pilots based and using this airport.
- The effect on approach minimums at Aberdeen Regional Airport (ABR) as voiced by pilots based and using this airport.

Attachment #3

The Wind Turbine Farms National Guidance dated July 21, 2015 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*."

South Dakota and other states are getting a proliferation of wind farms that exceed Part 77 requirements. The FAA needs to rewrite the Federal Aviation Regulations to include these types of farms. Part 77 wind farms prior to July 21, 2015 were grandfathered in with a determination of no risk, but two hazards were identified.

What method will be 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 Visual Flight Rules (VFR) will be affected? On April 27, 2014, an aircraft collided with a wind turbine 10 miles south of the airport in Highmore, SD. 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.

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.