Attachment #5

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TO: South Dakota Aeronautics Commission

FROM: Jack Dokken, Office of Aeronautics

DATE: September 17, 2026

SUBJECT: Tall Structures Survey to Other States

The South Dakota Department of Transportation distributed a nationwide survey to state aviation agencies to better understand the challenges posed by tall structures commonly exceeding 499 feet Above Ground Level (AGL). The purpose of the survey was to assess how tall structures are affecting general aviation airports, how states are responding to these impacts, and what regulatory or coordination practices are currently being used across the country. The responses below include the full survey questions and each state's answers.

Question 1: Is your state currently experiencing new or proposed projects involving wind turbines or other tall structures that commonly exceed 499 feet AGL?
GA: There are no wind turbines in Georgia, but there have been 10 new or changing towers studied in the FAA 7460 system that exceed 499' this year. All of them are outside Part 77 airspace for our airports.
MI: Yes.
MN: Yes, almost all new proposed wind farms contain turbines that exceed 499', and Minnesota has and continues to develop large wind farms.
ND: Yes. North Dakota continues to experience development and proposed development involving wind turbines and other tall structures, including structures exceeding 499 feet AGL.
OK: Fewer in 2026 than recent years; still experiencing major growth in wind energy and 5G antenna tower activity.
PA: Received no proposals in 2024, two in 2025, and one in 2026. No objections issued.

Question 2: Do you believe FAA issued "No Hazard" determinations for structures exceeding 499 feet AGL accurately reflect local airspace considerations?
GA: No issues brought to our attention; FAA typically issues "No Hazard" but informs airports procedure minimums may be raised.
MI: Local validation is weak because many airports do not sign up for OEAAA notices. State permitting adds deeper review.
MN: Cannot independently validate FAA determinations; relies on contacting nearby airport managers.
ND: "No Hazard" does not always mean no operational impact.
OK: No. FAA determinations frequently fail to reflect local IFR impacts.
PA: Assumes FAA determinations incorporate local considerations.

Question 3: Is your state comfortable with the current FAA obstruction evaluation outcomes for structures over 499 feet AGL?
GA: No impact to date.
MI: FAA evaluation is only one factor; state conducts its own process.
MN: Believes FAA determinations are adequate so far.
ND: Supports FAA process but believes additional scrutiny is needed for structures exceeding 499 feet AGL.
OK: Sometimes.
PA: No concerns.

Question 4: How often are Safety Risk Management Panels (SRMP) being utilized for tall-structure proposals?
GA: Unaware of any SRMP use.
MI: Uses an Airspace Review Team instead; unsure how SRMP fits.
MN: No SRMP use reported.
ND: SRMPs not routinely used.
OK: Not aware of any SRMP use.
PA: None reported.

Question 5: Are airports or aviation stakeholders expressing concerns about safety, operational impacts, or the SRMP process?
GA: No concerns reported.
MI: No response.
MN: Not aware of any SRMP-related concerns.
ND: Yes concerns about cumulative impacts, ag aviation, EMS operations, and raised IFR minimums even with "No Hazard."
OK: Airports often do not engage; difficult to gather stakeholder feedback.
PA: None reported.

Question 6: Has your agency taken any legislative, regulatory, advisory, or zoning-related action in response to tall-structure development near airports?
GA: State requires local governments to enact zoning protecting Part 77 surfaces.
MI: Strong zoning and tall-structure permitting statutes.
MN: Requires airport safety zoning and, in some areas, state permits for tall structures based on AGL and distance criteria.
ND: Relies on coordination rather than statewide restrictions.
OK: Has a statewide tall-structure permitting process.
PA: No tall-structure-related code provisions.

Question 7: Has your agency been working with Congressional staff for tall-structure issues?
GA: No tall-structure laws; only reviews FAA 7460 cases.
MI: Only when inquiries occur.
MN: No.
ND: Supports federal discussion but no major initiative yet.
OK: Yes—engaging delegation on military airspace protection and tower-marking requirements.
PA: No.

Question 8: Are you working with FAA ATC facilities, regional offices, FSDOs, or local zoning authorities regarding tall-structure impacts?

GA: No.
MI: Works with local authorities; not FAA facilities.
MN: No.
ND: Yes, as appropriate.
OK: Limited involvement via APPPA.
PA: No.

Question 9: Please provide any additional concerns, examples, case studies, or lessons learned related to wind turbines, cell towers, or other tall structures near airports.
GA: New Georgia law requires local governments to adopt airport-protective zoning tied to eligibility for transportation funding.
MI: No response.
MN: Zoning/permitting framework works well; wind farms affect minimum sector altitudes but have not required raising decision heights.
ND: Detailed case study of a 315-ft tower at 9Y1 Killdeer "No Hazard" but major IFR minima increases; project stopped locally.
OK: Growing RPZ incompatibility concerns.
PA: Few towers over 499 ft; none to report.