

Meadow Lake Airport Association

13625 Judge Orr Road, Meadow Lake Airport (KFLY), Peyton, CO 80831-6051

Date: May 13, 2025

To: El Paso County Planning and Community Development Department

Subj: **Wind Powered Generator**

File: COM2510

Ref: (a) C.R.S. 43-10-113 "Safe Operating Area Around Airports"
(b) Meadow Lake Airport Layout Plan (2019)

The Meadow Lake Airport Association is absolutely opposed to this application as submitted. If approved and constructed as described, directly in line with the Meadow Lake's primary runway, the result will result in aircraft accidents and probable fatalities.

At issue is the appropriate application of C.R.S. 43-10-113. It states: "(2) *Government entities with zoning and building permit authority shall adopt and enforce, at a minimum, rules and regulations to protect the land areas defined in 14 CFR part 77.*" Part 77 is the "Airport Airspace Analysis" contained in the FAA approved "Airport Layout Plan" (ALP). Any vertical construction, especially around an airport, requires an Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) by the FAA. A check of the FAA OE/AAA website on May 7th, shows that the two proposed wind turbines are numbers 1059 and 1060 of 2095 wind turbine projects in Colorado. A Final Determination and Statement of No Objection has not yet been issued by the FAA for these projects. An analysis performed by Armstrong Consultants, MLAA/KFLY Engineer of Record, indicates that both structures will penetrate the airport's Part 77 approach slopes.

The FAA Obstruction Evaluation study will review the proposed location, elevation of the site, and height of proposed structures, and compare that to the published part 77 airspace surfaces for the airport. What it does not consider is the performance of aircraft using our runways and airspace. We believe that is why the Colorado statute provides the caveat "*at a minimum*".

The obvious concern is for approaches to Runway 15 from the north, directly overflying the proposed wind turbine sites. The published "minimum approach altitude" for the instrument approach passes over the top of the wind turbines at approximately 100 feet and does not allow any margin for wind, turbulence, instrument error, pilot skill or other deviations.

Of greater significance are departures from Runway 33 in line with and over the Ferguson property. Meadow Lake is built to an Airport Design Group of B-1, the smallest of FAA design standards. At sea level, a similar airport would have a primary runway 3,000 feet long. As altitude (elevation) increases, aircraft performance decreases. Therefore, in accordance with FAA standards, Meadow Lake (at approximately 7,000 feet elevation) has a primary runway that is 6,000 feet long. On a typical 90 degree day in the summer, a "density altitude" effect of 10,000 feet or greater will result in even further performance degradation. With the uphill slope of the runway and rising terrain, some aircraft have barely been able to climb after takeoff. In fact,

several aircraft have actually had to land in Mr. Ferguson's pasture due to lack of climb performance. Fortunately, the wind turbines were not on the property during those events and no significant damage or injuries occurred.

The published traffic pattern for powered aircraft at Meadow Lake is to the east side of the airport. We can not support construction of tall structures in line with the runways or interfering with normal traffic flow. This would create significant hazards to flight crews and the public. However, the Meadow Lake Airport Association does not believe that the provisions of the 1969 Avigation Easement preclude Mr. Ferguson from constructing the wind turbines along the western boundary of his property (with proper FAA analysis).

Respectfully,

A handwritten signature in blue ink, appearing to read "David E. Elliott", with a large, stylized initial "D" and "E".

David E. Elliott
President, MLAA Board of Directors



WIND TURBINE EXHIBIT



MEADOW LAKE AIRPORT
(FLY)

