WHITE MOUNTAINS RADIO USERS' STATEMENT of CONCERNS

Regarding Signal Interference Caused by Wind Turbines/Wind Farms
Upon Public and Private Emergency Radio Communications & Radar Signals

May 27, 2026

TO: Apache County Planning and Zoning Commission
Apache County Board of Supervisors
Apache County IT Dept., County Sheriff's Dept., Apache Co. Emergency Mgmt. & Preparedness
US Representative Eli Crane, AZ District 2
Other local/regional Law Enforcement and Emergency Services Agencies

EXECUTIVE SUMMARY

- A **County Moratorium** is clearly justified by state law (ARS 11-833 attached) based on law enforcement and emergency services communications that will be compromised by multiple wind turbine (WT) interference to two-way radio, cell towers, microwave and other radio frequency (RF) signals.

- Such **communications interferences are well known** by the US Government, RF telecommunications companies, and also the wind energy industry.

- **FCC Regulations and involvement** are explained, but ***CORRECT WIND FARM LOCATION SITING IS CLEARLY THE RESPONSIBILITY OF THE LOCAL JURISDICTION THAT ISSUES LAND DEVELOPMENT PERMITTING.***

- US AZ District 2 **Representative Eli Crane** is quite concerned about this issue here in Apache County. His detailed February 2026 letters to the heads of the Federal Communications Commission (FCC) and the US Dept. of Transportation are provided here.

- **Draft 8 Renewable Energy Ordinance** (Section 804 "FCC Compliance") language is reviewed with constructive criticism and recommendations.

- The **locations** currently proposed by Lava Run and Black Ridge wind projects in Apache Co., and others in Navajo Co., are **graphically shown** in relation to **Greens Peak and TV Knoll summits** which are critical for RF communications of several government/emergency agencies, as well as citizen users.

- **Known user groups**, including **law enforcement/emergency services agencies** and FCC-licensed citizen groups are identified and explained.

- The County must **require two key types of studies** be done to prevent WT-caused RF interference, and to protect emergency communications capabilities:

    - An independent EXISTING BASELINE TECHNICAL STUDY including ALL government and user groups to establish the current levels of communications in use now.

- An Ordinance requirement for wind developers to provide an independent, RF professionally-prepared, cumulative COMMUNICATIONS IMPACTS ANALYSIS, disclosing all predicted wind farm(s) interferences upon the known BASELINE situation of existing capabilities, at the developer's expense, and provided to both Apache Co. and concerned user groups before a CUP is approved.

- **A Moratorium** postponing P&Z CUP application acceptance for wind projects will provide the County time for:
  - Placing correct requirements into the renewable ordinance revision; and
  - Commencing with the BASELINE STUDY needed to clarify existing RF communications in use now.

INTRODUCTION

Wind Turbines (WTs) and wind farms tend to obstruct, distort, or reflect: UHF-VHF two-way radio, aviation navigation and tracking radar, and Doppler weather radars, microwave, shortwave, fixed telemetry, AM/FM radio, cell phones and cell towers, digital TV, satellite and Wi-Fi Networks. This problem is well-known in the RF Communications industry, and also in the wind energy development industry. It interferes with governmental and private emergency services radio, broadcast radio and terrestrial television, meteorological radar, and some internet and satellite networks. Fixed transmitters and receiver stations are typically affected more than mobile units, although mobiles are also impacted (Docs. **1 through 14**), especially when they depend on fixed repeaters to relay their signals. The inability of UHF telemetry systems to operate through obstructed paths is one feature that creates a significant potential for incompatibility with WTs (Docs. **2 & 11**). Tall WTs that stand in the direct line-of-sight between signals from fixed transmitters to receivers (and repeaters) are the most direct problem, although other locations can also be troublesome, making correct wind farm location siting a very important consideration (Docs. **1, 3, 4** -pgs. 38-39, **9, 10, 11**).

Each single WT emits a small amount of radio interference that can radiate out in all directions, but is minor enough to be compliant with FCC regulations. HOWEVER, the potential for hundreds of WTs in S. Navajo and S. Apache Counties combined, risks a cumulative interference that can exceed the signal tolerance limit for receivers/repeaters across the White Mtns., including those frequencies used by law enforcement.

KEY FCC REGULATIONS

- **Part 15 Regulations** (signals from "Unintended Radiators"): Wind turbines must comply with FCC Part 15 rules, which state that electrical equipment must not cause or radiate harmful interference and must accept any interference received.
- **Protection of Microwave Links**: Wind developers must analyze potential impacts on existing microwave communication links, which are often used by utilities, telecommunications (telcom) companies, and public safety agencies. The FCC maintains a database of these links, and developers often use this data to avoid siting turbines in the Fresnel Zone (line-of-sight) of these links.
- **Interference Resolution**: If an operating wind farm causes harmful interference to licensed services, the FCC Enforcement Bureau may intervene to investigate and require mitigation.
- **Local Ordinance Control**: While the FCC regulates the radio frequency spectrum, **local jurisdictions** manage wind turbine siting and the potential for electromagnetic interference via local ordinances.

FCC's INVOLVEMENT at Different Stages of Wind Development and Operations

While the Federal Communications Commission has statutory responsibilities for protecting radio-frequency (RF) spectrum, public safety communications, and coordinates with the Federal Aviation Administration, US Dept. of Defense, National Telecommunications and Information Administration, and Natl. Weather Service, they have no legal jurisdiction over wind turbines. **It is the local governmental planning-zoning authority that is responsible for permitting specific wind turbine site locations** (Apache and Navajo Counties in this case, regardless of land ownership). However, the FCC does vigorously regulate and protect approved cell phone towers, radio transmitters-receivers-repeaters, microwave towers, and other communications facilities-equipment, which they license.

The FCC generally stays inactive during the local permitting-stages of wind turbine/wind farm development. Their policy is to wait until AFTER the wind energy facility has been built, to see if they receive any complaints filed from public safety entities, radio or cell users about communications interferences. Only then does the FCC's Enforcement Bureau investigate the source of that reported interference. The Bureau works with Federal, State, and local public safety agencies to resolve harmful interference to public safety communications and critical infrastructure communication systems. They work closely with commercial wireless carriers and other licensees to investigate claims of harmful interference (Doc. **12** – FCC Interference Resolution). If the Enforcement Bureau field agents determine that the interference is caused by wind turbines, then they require remediation by the turbine owner/operator to restore communications back to the level of service that existed before the wind turbines were built. -(This is WHY an EXISTING BASELINE STUDY of the current RF communications situation across the White Mountains is NEEDED BEFORE any wind turbines are approved for construction, to establish what that the existing pre-construction level is or was.)

Proper maintenance of turbine nacelle insulation can minimize electrical interference from the generator system. In the event of confirmed interference, the FCC suggests further mitigation measures that may be tried to eliminate or reduce the turbine-caused interference, such as:

1. Redirecting the transmitter's-receiver's antenna;
2. Relocating the transmitter's-receiver's antenna;
3. Upgrading the RF equipment used by the public and government agencies;
4. Possibly directing the local permitting government to require the turbine owner/CUP or building permit-holder to relocate or remove the offending wind turbine(s).

In the case of so many repeaters, translators, and other RF electronics located in southern Apache County on the summits of Greens Peak, and TV Knoll (directly north of US Hwy.60 at mile marker 368 across from Cerro Montosa = see Images 1 & 4 below), which have been built and continuously operated there for many decades, these mitigation measures are not feasible, for the following reasons:

1. Most antennas there are already **omni-directional**, for a good reason, and "redirecting" them makes no sense.
2. Greens Peak was chosen as a **strategic location** ideal for such RF uses. And all that fixed equipment cannot just be picked up and moved some 15 to 20+ miles away to another hilltop.
3. Upgrading RF equipment on Greens Peak would take **considerable time, at considerable expense** to the owners/users, with no guarantee it will fully solve the problem. Most citizen users of mobile and hand-held two-way radios cannot afford to purchase new, upgraded equipment. Many private owners of fixed antennas also would be impacted. **Many government agencies would have trouble budgeting to finance upgraded equipment quickly enough to ensure continuous RF**

communications for law enforcement and emergency services essential to public safety at all times.

4. Relocating or removing the offending turbines is an action the wind energy owner will fight strongly due to the cost and difficulty to get new FAA, US Fish and Wildlife Service, and other government approvals for new turbine locations after their permit and lease agreements have been approved specifically for the exact original turbine locations. Just turning a turbine off permanently does not entirely eliminate its ability to continue interfering with RF signals while still standing.

Prevention of RF interference by project denial, or by proper original site location, of wind farms is the key to success, rather than mitigations after the fact. **Preconstruction studies with mapping and modeling** has become the normal way to avoid inappropriate siting of turbines, using FCC microwave path and other RF data to properly site turbines (Docs. **1 ,3, 4, 5, 9, 10, 11).**

ESSENTIAL LAW ENFORCEMENT and GOVERNMENT EMERGENCY SERVICES USERS

Both the **Apache** and Navajo **County Sheriffs' Depts**. as well as the Apache-Sitgreaves Natl. Forests field personnel, rely heavily upon repeaters sited on Greens Peak summit for daily radio service, especially given the long distances some must travel to do their jobs, often in remote areas where cell phone service is lacking. **EMS dispatchers** for various county, state and federal agencies in both counties regularly use government repeaters on Greens Peak. Numerous other State and Federal department-agency personnel, and utility companies also rely upon Greens Pk. towers/electronics for their 2-way radio communications:

- FEDERAL: US Forest Service, US Bureau of Land Management, US Dept. of Homeland Security, US Border Patrol, US Fish and Wildlife Service, NOAA-US Weather Service, possibly others;
- STATE: AZ Dept. Public Safety, AZ Game & Fish Dept., AZ Dept. of Transportation, AZ Dept. of Emergency and Military Affairs, AZ Dept. of Fire & Forestry Management;
- COUNTY: Apache Co. Sheriff's Dept., Apache Co. Emergency Mgmt. & Preparedness, occasionally Navajo Co. Sheriff's Dept.
- MUNICIPAL: Round Valley Police & Fire-Medical Depts.(EMS), Vernon Fire Dist., Greer Fire Dist.
- ELECTRIC UTILITY COMPANIES: Salt River Project (SRP), Tucson Electric Power (TEP), Navopache Electric Cooperative (NEC)

Both the Round Valley (Springerville + Eagar) Police and Fire-Medical Departments now use dispatching services located in the Show Low-Pinetop-Lakeside area – which places the Black Ridge and Lava Run Wind projects (and others proposed?) in the near-path between dispatching services and Greens Peak. And communications towers/translators, plus cell/microwave towers, erected on the summits of Cerro Montosa-TV Knoll (see Image 4 below) are used by FM and AM public radio stations broadcasting from the Show Low-Pinetop-Lakeside transmitters (and some from Flagstaff and Snowflake) to listeners in Vernon, Concho, Springerville, Eagar, St. Johns, Nutrioso, Alpine, and into western New Mexico. Wind turbines are planned on the Cerro Montosa-TV Knoll summits, and on all near-sides surrounding them (see Image 4), which could interfere with those cell phones and public-private radio broadcasts, also important for local information to citizens during times of emergency events like large wildfires.

Round Valley and St. Johns Ambulance Services rely heavily upon the cell phone tower on Greens Peak, and on several other cell phone towers along US Hwy. 60 (like the one just east of Vernon), to communicate with Summit Regional Medical Center while transporting critical patients to that hospital. All citizens and

government agencies rely equally upon the cell towers on Greens Peak, TV Knoll, and other cell towers in the vicinities of Round Valley, Vernon, Concho, St. Johns.

Moreover, utility companies critical for maintaining power for civilization, hospitals, water and sanitation, and public health, like NEC, SRP, TEP, and AZ Public Service Co. (APS) also use radio communication equipment-repeaters located on Greens Peak, and/or microwave towers on TV Knoll.

Due to our vast unobstructed airspace, rugged terrain, and sparse population, very low-altitude and high-speed military aviation training missions frequently occur over the Apache National Forest, across southern Apache County over the Springerville Volcanic Field grasslands, and sometimes at Springerville Municipal Airport. Various fighter jets, special ops aircraft, transports, and helicopters train here from Luke Air Force Base (AFB), Davis-Monthan AFB, Kirtland and Holloman AFBs, as well as Morris Air National Guard Base. Some fly as low as 200 feet above ground level (AGL) for terrain masking exercises, and others do night-vision exercises, both providing critical radar training for combat missions. Their military navigation, tracking and tactical radars could be at stake if the 2-3 proposed, and possibly more, wind farms move into this area.

The FAA and DoD should not be clearing each wind farm individually for aviation safety, but rather should be considering the cumulative effect of several wind farms proposed within so close a proximity to each other and near established military training routes. Civilian pilots are warned by the FAA to avoid flying over wind farms at any altitude due to the distortion of their onboard tracking radar signals by WTs (Docs. **8, 14**).

All of the many communications listed above qualify as authorized uses by the FCC, which means they must be maintained at existing levels of use.

Having clear, direct line-of-sight signals, without tall obstructions that reflect or distort radio and/or radar waves, is critical, and is well-known by wind industry consultants (Docs. **2, 3, 5, 10, 11**) that WTs block or interfere with those signals (Docs. **1 - 14**). Standard mitigation is *avoidance* by locating WTs out of the radio users' "near-field effect", &/or line of sight (called the "Fresnel Zone") to each other and/or to repeaters (Docs. **3, 4, 6, 9, 10 ,11**). Other expensive mitigation measures after construction might be of help, but correct original siting of multiple WT clusters is the best option.

Yet, correct WT siting alone may not be enough to eliminate impacts or reduce them to an acceptable level of interference (Docs. **1, 2, 3, 10, 11**). Each additional wind farm placed west of Hwy. 180/191 anywhere in Apache Co., when cumulatively added to the wind farms already located NW of Greens Peak in Navajo Co., can cumulatively increase radio interference for White Mtns. & N. Arizona regional users, thus reducing critical daily and/or emergency communications abilities.

CITIZEN USERS' CONCERNS

Here in southern Apache Co., as well as in Navajo County and across ALL White Mtns. communities, and the NE portion of this state south of Interstate-40 extending to Sanders and even Flagstaff, we have a large number of FCC-licensed civilian amateur radio users. We are some of them, as FCC-licensed Amateur Radio ("HAM") operators and GMRS (General Mobile Radio Service) users. FCC records now show over 1,000+ HAM operators plus another some 500+ GMRS radio users in Apache and Navajo Counties, and these

numbers keep growing quarterly. On the Greens Peak summit there are at least 12 private HAM & GMRS repeaters within 4 distinct radio buildings, and ALL have been used in the past for urgent emergency communications, including our 2 largest AZ forest-wildfires in recent history (2002 Rodeo-Chediski evacuations and 2011 Wallow direct and indirect suppression), as well as the Greer Fire just last summer of 2025. These are fixed sites which cannot be easily moved.

Nine citizen radio associations whose members and users depend upon all these Greens Peak repeaters/electronics include:

- Greens Peak Users Association,
- Eastern AZ Amateur Radio Society (EAARS),
- AZ Repeater Assoc. (ARA),
- Kachina Amateur Radio Club,
- Rim Country Amateur Radio Club (RCARC),
- The Cactus Inter-tie System,
- White Mountains Volunteer Community Radio System,
- Southwest Community Radio System (SWCRS), and the
- American Radio Relay League (ARRL).

These are organized groups promoting expansion of HAM and GMRS users and capabilities across portions of AZ to ensure communications during widespread outages of cell phone and internet services. Nearly all use omni-directional antennas to operate with signals across all of NE and Central AZ. Most repeaters are privately-owned, and are under special use permits from the US Forest Service and licensed by the FCC. They are very expensive to operate and maintain once approved. Millions of dollars are invested in all the equipment, labor, licenses and permits associated with these many operators and users. Regional fixed repeaters are linked to many other fixed repeaters on other mountaintops or ridgelines, such that local two-way radio users can use Greens Peak as the primary means to connect with multiple other repeaters to talk with radio users hundreds of miles away. Several organized networks (called "Nets") of these citizen users connect weekly (some daily) to test the equipment ensuring emergency communications are possible in case all cell phones, landlines, internet, and Wi-Fi connections should go down. Leaders' names and contact info for these organizations are available on request to verify statements here, and for requested study coordination.

Some Greens Peak repeater owners are currently in the process of upgrading their equipment with more highly-sensitive receivers, to receive very weak signals sent by many area users of mobile and hand-held radios. The presence of WTs in southern Apache Co. will risk desensitizing repeater performance on Greens Pk., especially for citizens/officials in smaller communities and remote areas.

Properly working aircraft tracking radar and Doppler weather radar signals are also important for reporting critical safety information, and are altered by WTs in the immediate vicinity, capable of causing tragic results (Docs. **8, 1, 7, 9, 10**). According to US Dept. of Energy's Wind Turbine Radar Interference Mitigation Strategy Working Group: "… issues include turbine blades that rotate 360-degrees, spin to induce Doppler bin detections, and produce turbulent air with varying amounts of water vapor. **Wind turbine-radar interference issues are complex, and a full resolution may be difficult to achieve."** … "Replacing the National Airspace System and weather radar fleet with radars that are more robust to wind turbines is a **long-term** solution to wind turbine-radar interference." -(Doc. **13** - page 19). Therefore, the timeline to

accomplish the objectives of their 2016 strategy was extended to 2035 based on the technology available and tested to date (Doc. **13** - Exec. Summary). So, in other words, don't expect clear technology solutions anytime soon. In the meantime, public and aviation safety are still at risk while poorly-located wind farms continue to operate and new ones are built. That does not have to be the case in Apache County, with better studies done to determine proper siting before permit issuance.

The Flagstaff NOAA Weather Radio transmitter (FCC Call Sign KXI-23, transmits on frequency of 162.525 MHz) fixed on Greens Peak also broadcasts round-the-clock daily local weather existing conditions and forecasts, used by USFS firefighters/other field employees, as well as outdoor recreationists, hunters, loggers, ranchers, resident gardeners, and travelers passing through.

These communications also qualify as authorized uses by the FCC, which means they must be maintained at existing levels of use.

All of these concerns are serious enough that **Arizona Congressman Eli Crane, House of Representatives for AZ District 2 in Washington DC**, has written to the Heads of FCC and the Dept. of Transportation/FAA about it (See his letters dated February 13, 2026 , attached to the end of this paper).

Prevention of these problems is essential before a wind facility is built, as once a wind farm is constructed, it's difficult to remedy the situation satisfactorily without removing the offending turbines to a better site location. Even standing still, turbines are capable of causing reflective/mirror interference, especially in the near-field zone. (Docs. **1, 3**, **10, 11**.)

RECOMMENDATIONS for 2026 APACHE COUNTY PLANNING & ZONING ORDINANCE UPDATE:

- **IMMEDIATELY ENACT a COUNTY MORATORIUM AGAINST the PLANNING-ZONING DEPT. ACCEPTING ANY CONDITIONAL USE PERMIT (CUP) APPLICATIONS for WIND PROJECTS FROM ANY COMPANY, UNTIL AFTER** a VERY **THOROUGH BASE-LINE STUDY** has been done by an independent 3rd-party consulting firm, of all communications currently in use across the white mountains: (types of users, numbers of users, current levels of signal transmission/reception, frequencies, band-widths, signal strengths, distances reached, repeaters needed, etc.). This is needed for compliance with Arizona Revised Statute **ARS 11-833** (see attached) for protection of essential emergency services and law enforcement. EXISTING RF CAPABILITIES MUST BE ESTABLISHED FIRST, IN ORDER TO DETERMINE LEVELS OF USE THAT MUST BE RESTORED AFTER TURBINE CONSTRUCTION, IF INTERFERENCES SHOULD RESULT. ALL agencies and private radio organizations, including the local Greens Peak Users Association, and American Radio Relay League (ARRL) State Section Manager for Amateur Radio Emergency Services, and communications equipment owners licensed/permitted for special uses on the summit of Greens Peak and Cerro Montosa-TV Knoll should be consulted in this study.

- **KEEP the text from existing 2021 Ordinance old Section 439.E. text as required compliance with FCC Regulations:**

  439.E. – "Renewable Energy Generation projects shall comply with applicable Federal Communications Commission (FCC) requirements, including those applicable to microwave communication links in the vicinity. Renewable Energy Generation facilities shall minimize and mitigate

telecommunication interference (electromagnetic fields and communication interference generated by the project). No interference with public communication systems shall be allowed."

REVIEW of NEW ORDINANCE DRAFT VERSION 8 TEXT (5-20-26 full section text provided below, verbatim in Times New Roman font, and selected text highlighted here in light gray):

Draft 8
Article 8 Renewable Energy

Section 804. General Development Standards (439)

FAA and FCC Compliance

Communications Interference; Compliance; Investigation; Remediation; Waivers. The Applicant/Operator shall design, construct, operate, and maintain the Renewable Energy Facility in compliance with all applicable Federal Communications Commission (FCC) rules and regulations (including prohibitions on harmful interference, as defined by the FCC) and any other applicable federal or state authorizations, licenses, or permits governing RF, microwave, broadcast, public safety, and telecommunications systems. Prior to construction, the Applicant shall submit a pre-construction RF/microwave interference study prepared and sealed/signed by a qualified communications engineer and shall provide and maintain a local point-of-contact (name, 24/7 phone, and email) authorized to receive and act on interference complaints. Upon receipt of a written complaint, the CUP holder shall initiate an investigation within ten (10) business days and provide the complainant and the County a written status update. If interference is verified, the CUP holder shall, at its sole cost, implement corrective action sufficient to eliminate the verified interference and restore service to pre-project conditions, including as necessary operational curtailment or cessation, repair or replacement of affected equipment, filtering/shielding, and re-aiming or relocation of antennas or communications equipment, within thirty (30) calendar days of verification **unless the Community Development Director grants a written extension for good cause.** The County may require independent testing and/or engineering analysis by a qualified third party to confirm the presence, source, and resolution of interference; all reasonable costs shall be paid by the Applicant/Operator. Any person or entity may waive application of this subsection as to a specific receiver, facility, or parcel by executing a written waiver identifying the affected location and scope of waiver and recording the waiver with the County Recorder to provide notice to successors.

_____*END of DRAFT 8 DIRECT QUOTE*_____

SPECIFIC PROBLEMS IDENTIFIED WITH THIS PROPOSED ORDINANCE LANGUAGE:

- *"…Prior to construction, the Applicant shall submit a pre-construction RF/microwave interference study prepared and sealed/signed by a qualified communications engineer…"*

This text is a good improvement. It is required by state and local permitting agencies in other states -(see pgs 38-39 of Doc. **4** by US Dept. Of Energy,+ Docs. **10 & 11**). Yet, the methodology and results of such studies should further be subject to review by the Senior RF Engineer who is Vice-President of the Greens Peak Users Association, representing multiple entities that could be impacted, to ensure their technical

issues have also been considered and modeled in that developer-commissioned study. THE COUNTY ALSO NEEDS to COMMISSION an INDEPENDENT EXISTING BASELINE STUDY of ALL COMMUNICATIONS CAPABILITIES and USES OCCURING NOW, BEFORE ANY WIND FACILITIES ARE PERMITTED TO BE BUILT WHERE THEY ARE PROPOSED NEAR GREENS PEAK. If a baseline study is not required to be done before approval of the wind farm's Conditional Use Permit to PROVE the level of RF capabilities present before the project starts, then there is no way for radio users to pursue reception restoration back to that level after post-construction problems become apparent, as required by the FCC.

- *"…and [the Applicant] shall provide and maintain a local point-of-contact (name, 24/7 phone, and email) authorized to receive and act on interference complaints.*

The appropriate means for citizen radio users, public safety agencies, and telcom companies/others to report interference complaints is NOT through the wind developer or permit-holder, but rather to report issues directly to the FCC's website established for this purpose. Otherwise, the FCC will not be aware of the problems that RF users are experiencing, and appropriate resolution of the issues is not documented or guaranteed. It is up to the FCC, not the CUP permit-holder, to determine if interference is occurring and from what source. By making this a requirement in the new Ordinance Article 8, the County is placing responsibility upon themselves and the developer for liability claims and possible FCC violation penalties.

- *"Upon receipt of a written complaint, the CUP holder shall initiate an investigation within ten (10) business days and provide the complainant and the County a written status update."*

The CUP-holder has no expertise to conduct an investigation, as that is the job of the FCC Enforcement Bureau (Doc. **12**). The CUP-holder will be required to implement mitigations or remediations as specified by the FCC. The CUP-holder's responsibility to the County should be to keep them advised of the situational status.

- "*…re-aiming or relocation of antennas or communications equipment…"*

It is NOT within the authority of the County or the wind energy facility owner/operator/permit-holder to use this as a mitigation option, because all such communications equipment belong to private/government owners under license with the FCC. All antennas & RF equipment on Greens Peak CANNOT be relocated, as this summit was intentionally selected as a strategic location for the entire White Mtns. area. Many Millions of $$ worth of equipment are mounted there, under Special Use Permits from the US Forest Service. Nobody can simply pick up this mountain and move all that equipment to a "better" location to suit poorly-sited wind turbines causing communications interference after turbine construction. Many of those fixed antennas are already omni-directional, so "re-aiming" them is not an option.

- *"The County may require independent testing and/or engineering analysis by a qualified third party to confirm the presence, source, and resolution of interference; all reasonable costs shall be paid by the Applicant/Operator."*

This is good language we agree with. It is required by state and local permitting agencies in other states. - (see pgs 38-39 of Doc. **4** by US Dept. Of Energy).

- "*… Any person or entity may waive application of this subsection as to a specific receiver, facility, or parcel by executing a written waiver identifying the affected location and scope of waiver and recording the waiver with the County Recorder to provide notice to successors."*

If Apache County permits this as an Ordinance provision, then the County is inviting liability for vital communications needed by critical emergency services to be impacted when needed most at times of public distress. No individual citizen as a private landowner has the right to permit construction of a structure that jeopardizes overall public safety, and the County has no right to permit this either. In fact, doing so likely violates the County's legal responsibilities under state law to provide for the public health, safety and welfare.

- **Therefore, the revised ordinance must require wind project developers to provide a Communications Impact Analysis, or its equivalent, to demonstrate that pathways between communicating 2-way radio/radar towers are unobstructed prior to approval of wind project CUP operational permit, including potential adverse impacts possible after construction. This is required by state and local permitting agencies in other states. -(**see pgs 38-39 of Doc. **4** by USDOE, + see Doc. **11** as one example**).**

- **For this Analysis, REQUIRE COORDINATION WITH: Local HAM/GMRS licensed leadership, repeater owners via the Greens Peak Users Assoc., and US Weather Service, National Telecommunications And Information Administration (NTIA), utilities, other federal & state agencies and county, all owners & users to establish the baseline of existing radio signal transmission/reception capabilities in the proposed project area vicinity before county CUP permit is approved. IT SHOULD INCLUDE THE CUMULATIVE EFFECTS of ALL EXISTING and POTENTIALLY PROPOSED WIND PROJECTS KNOWN.**

- ***If done correctly, a thorough EXISTING BASELINE STUDY will be very useful to help evaluate all proposed wind projects and their projected COMMUNICATIONS IMPACT ANALYSIS results.***

- **DO - Keep wind turbines and wind farms well away from the area between Greens Peak, TV Knoll, and the majority of our radio user locations who are dependent upon these repeaters, which is key to maintaining these communication networks as fully functional.**

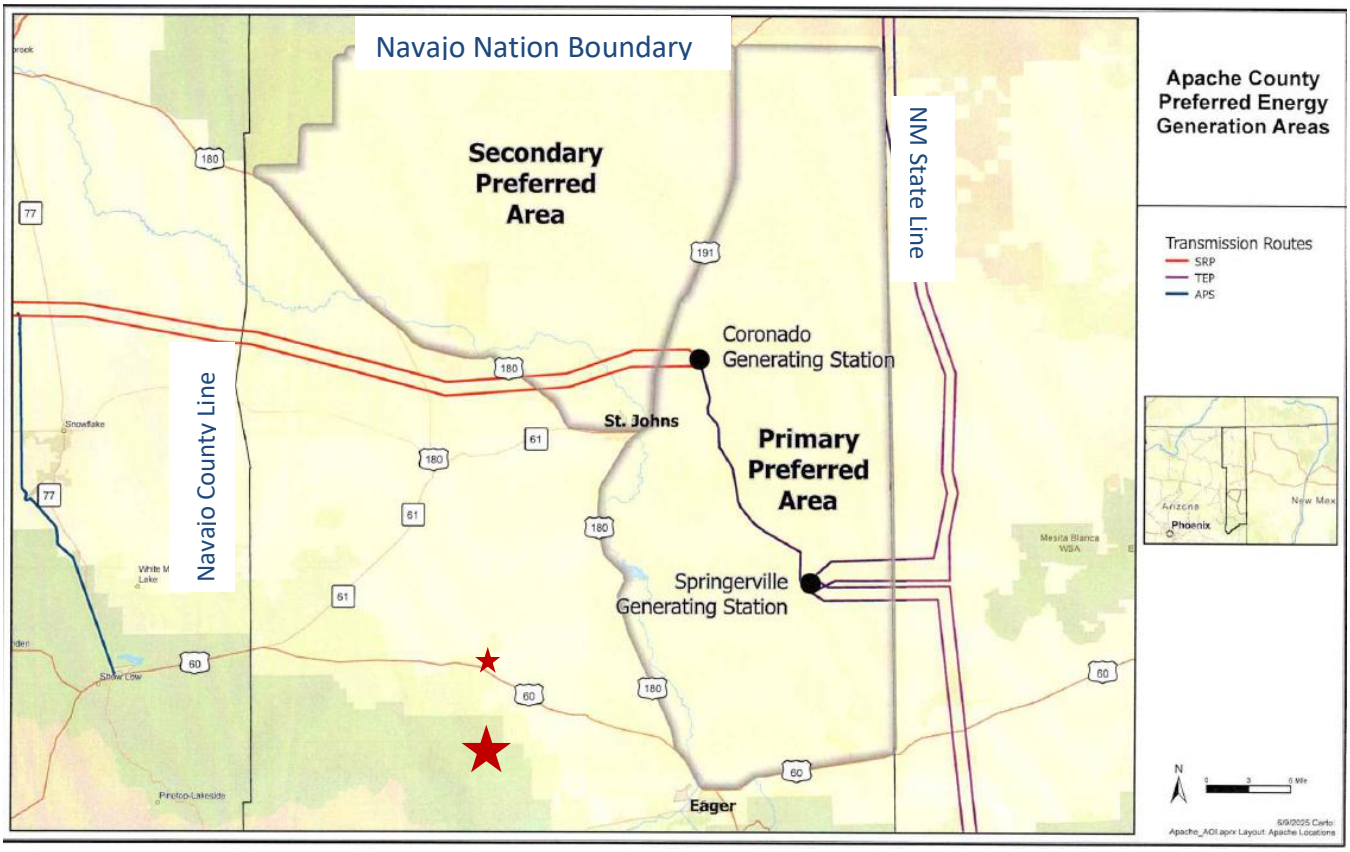
- **DO – Adopt the County's proposed "Preferred Areas" into the Comprehensive Plan.**

- **DO - Locate wind turbines and wind farms in the Preferred Area which can be a solution for most users, as that area is less populated (especially the "Primary" Preferred Area), and is away from the Greens Peak Fresnel Zone.** See Apache County's proposed "Preferred Area" map **Image 1** on following pages.

- **DO - Require wind project owners/operators to cooperate with the FCC and local RF users throughout the life of the wind project whenever signal interference is reported.**

- **DO PLEASE CONSIDER - The wisdom of placing a turbine height limit capped at 500 feet total height in the Ordinance. As WTs keep increasing in total heights, this issue will continue to intensify.** (For example, another large wind farm near Seligman in Coconino Co. is now proposed with 850-ft. turbines.) But, such a height limit will NOT prevent all WF communications interference.

IMAGE 1: Apache County Proposed Preferred Area(s)

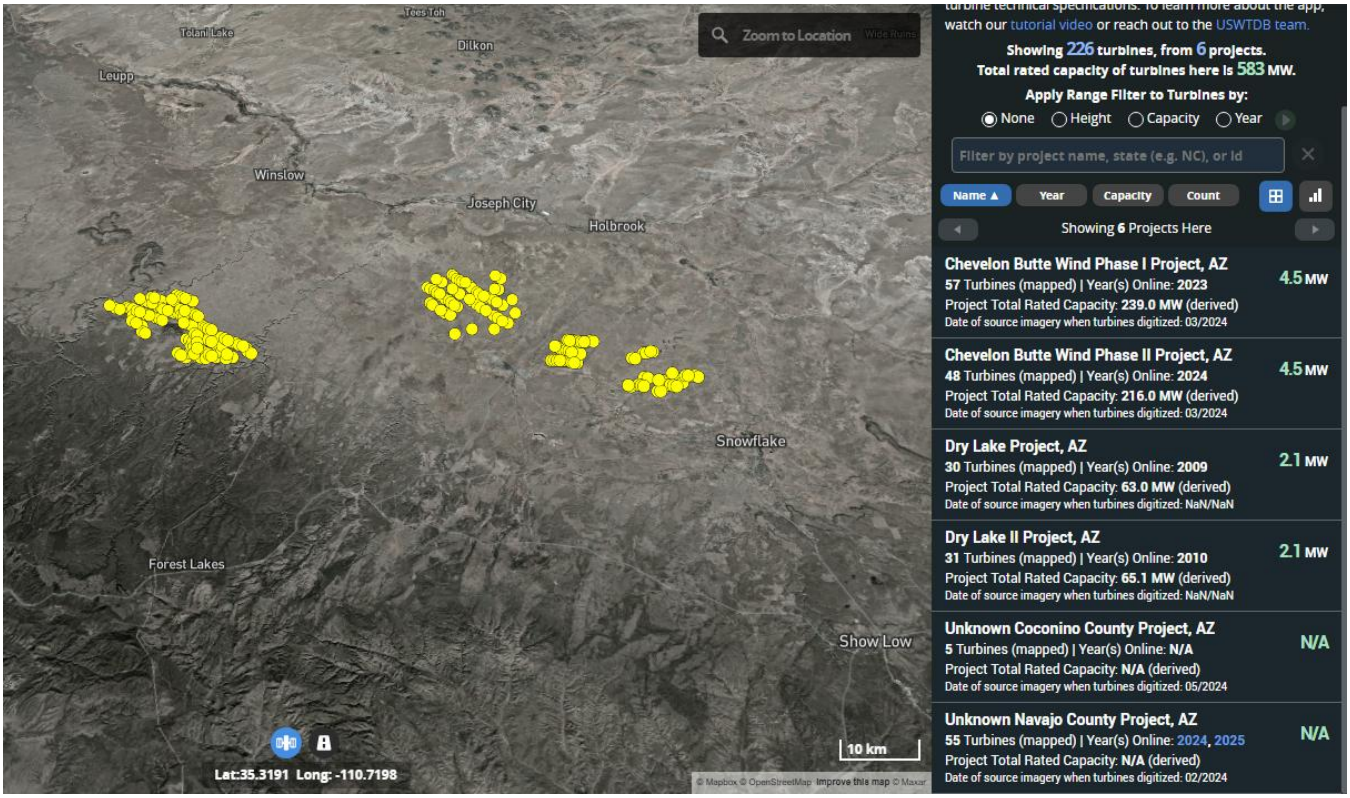


[Map Source: Apache County GIS, for 2025-26 proposal to add to County Comprehensive Plan.
Large red star = Greens Peak, Small red star = TV Knoll, added by this paper's authors]

CURRENT WIND PROJECT SITUATON IN-NEAR THE WHITE MOUNTAINS

Six (6) existing wind farms are currently operating in Navajo & Coconino Counties, with a total of 226 turbines installed thus far between Flagstaff and Greens Peak (see Image 2 below), with more under construction and/or proposed. The average total height of those 226 turbines ranges from 412 ft. in the Dry Lake project to 745 ft. in the "Chevelon Butte" project. Because these are all at a rough average 6,200 ft. elevation above sea level, some turbine heights could possibly interfere with communications, but need to be studied carefully to know for sure. "West Camp-1" construction has recently completed and is now in full operation, and the "West Camp-2" Development Agreement was just approved on 4/28/26 by Navajo County, thus *another* 144 wind turbines (600-774 feet tall) will soon be added somewhere in this same field of view shown below in Image 2.

IMAGE 2: Six wind farms exist now in Navajo and Coconino Counties between Flagstaff and Greens Peak, (with 4+ more proposed or approved to begin construction):



[2025 Map Source: USGS Wind Turbine Data Base Website. "Unknown" project in Navajo Co. includes West Camp-1.]

Additionally, in Apache County, three (3) proposed wind farms near Greens Peak are known at this time (see roughly-drawn Image 3 below):

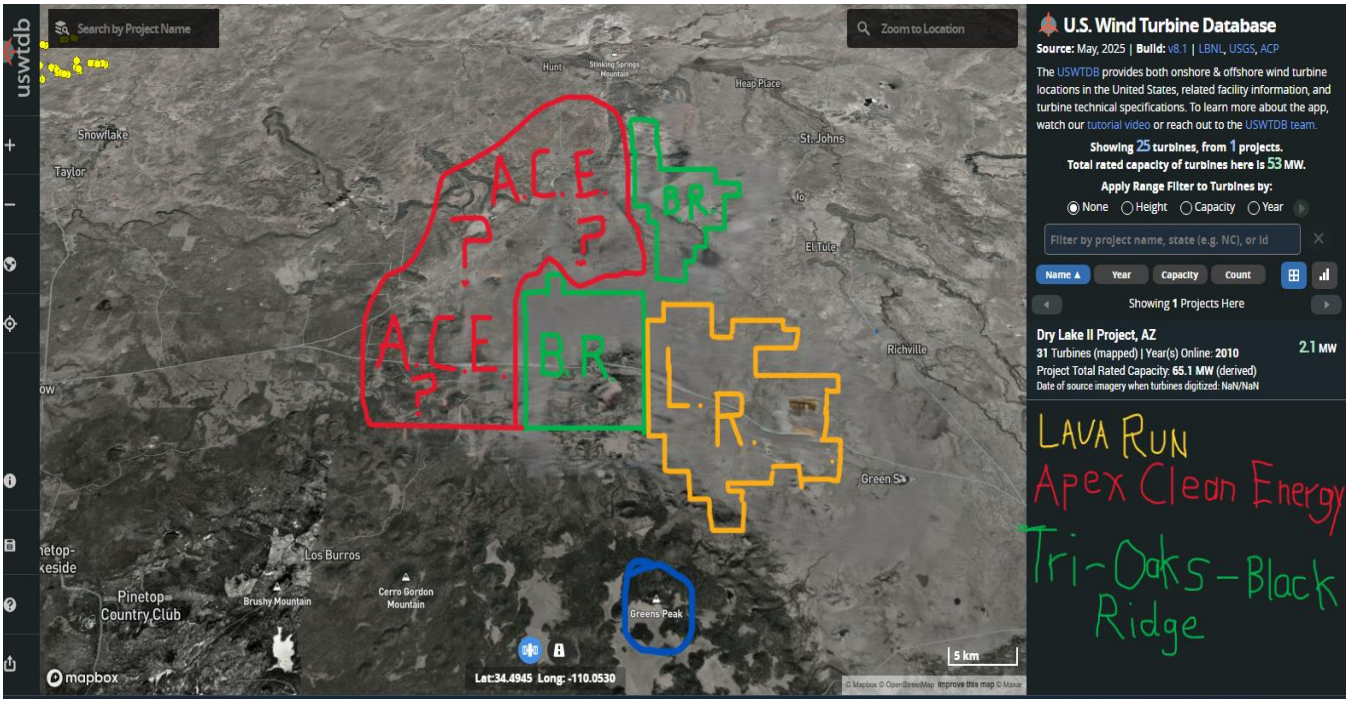
- "Lava Run" Wind project (proposed by CG ApacheCountyWind,LLC of Repsol Renewables) along both sides of US Hwy. 60 between **Springerville** and Greens Peak Hideaway Subdivision, plans to install a total of 112 wind turbines in two phases across nearly 55,000 acres (all on State Trust Lands), at a total turbine height of 654 ft., at average elevation of 7,000' above sea level. **Adding 654 ft. atop this ground elevation could very likely obstruct RF signals from the ground to Greens Peak, such as dispatchers in St. Johns.** Project boundary mapped here in yellow is a rough approximation of the company's public map.

- "Black Ridge" Wind project (proposed by Triple Oaks Power) planned from **Vernon** to **Concho** just southwest of **St. Johns** (on a mix of State Trust and private lands), proposes 146 WTs (130 now in Phase-1, with more possible in a later phase), many straddling US Hwy 60. Total turbine height supplied to the FAA is 780 ft. tall. Concho sits at approx. 5,952 ft. above sea level. Vernon sits at average 6,943 ft. above sea level. **Adding 780 ft. atop these ground elevations could very likely obstruct RF signals from the ground to Greens Peak, such as dispatchers in St. Johns, or the Vernon**

fire station. The Black Ridge boundary mapped here in green is a rough approximation of the company's map posted on their project website.

- Apex Clean Energy (no known project name yet) has been recently soliciting private landowners in and around the community of **Vernon** to lease to them participating private properties to install wind turbines. If they can gain enough cooperators in that community, they likely will link the turbines into a wind farm. Turbine size or number is unknown. Vernon sits at approx. 6,943 above sea level. Boundary mapped here in red is a very rough guestimation.

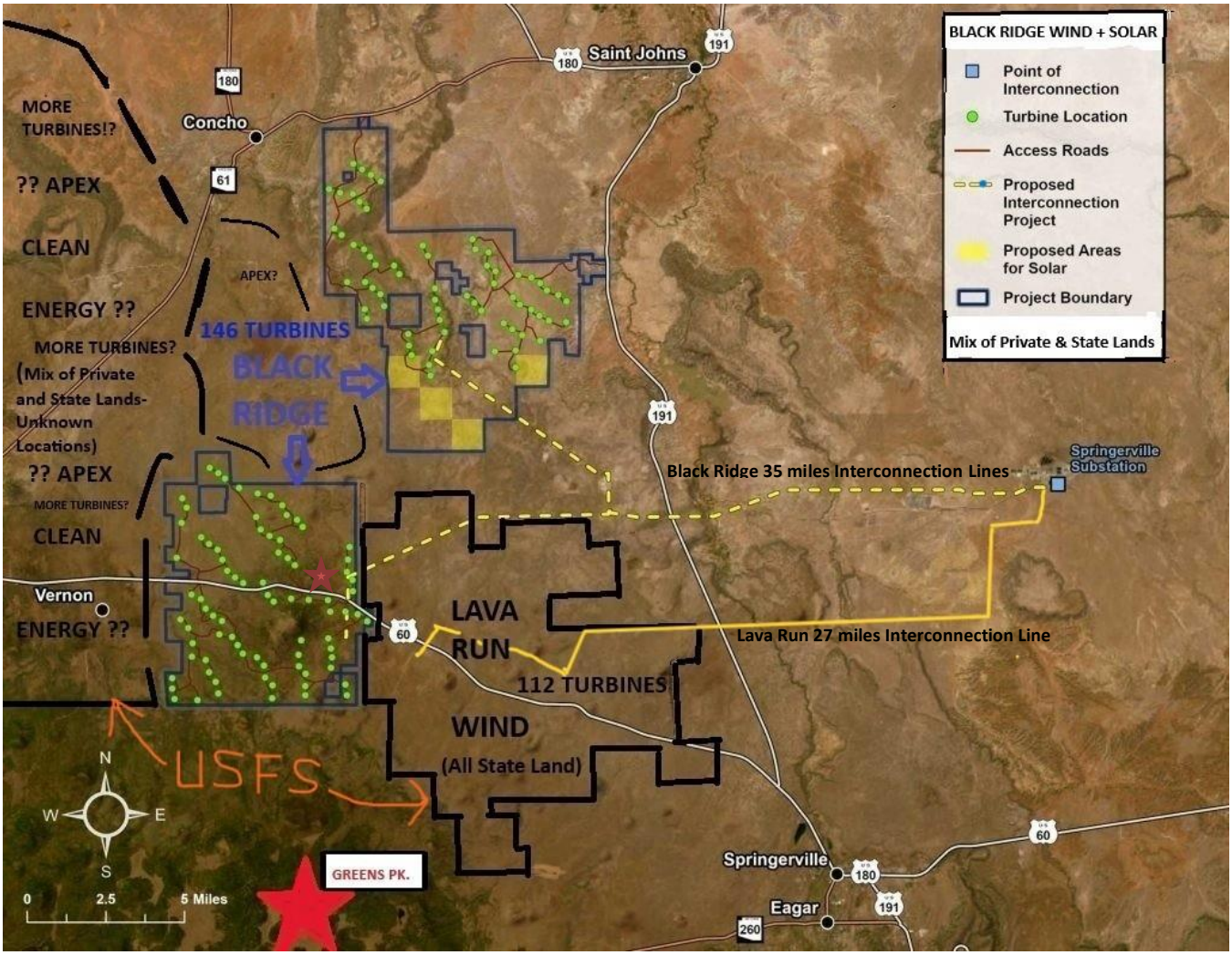
IMAGE 3: Dry Lake II windfarm near Snowflake (in upper left corner), with open area shown in Apache County where 3 more are approximately proposed to the north, northeast, and northwest of Greens Peak near between Springerville, Vernon, Concho, and St. Johns:



[Map Source: USGS Wind Turbine Data Base website, with Lava Run (L.R.), Black Ridge (B.R.), and Apex Clean Energy (ACE) roughly hand-drawn in for perspective. Notice Greens Peak circled in blue.]

(continued next page)

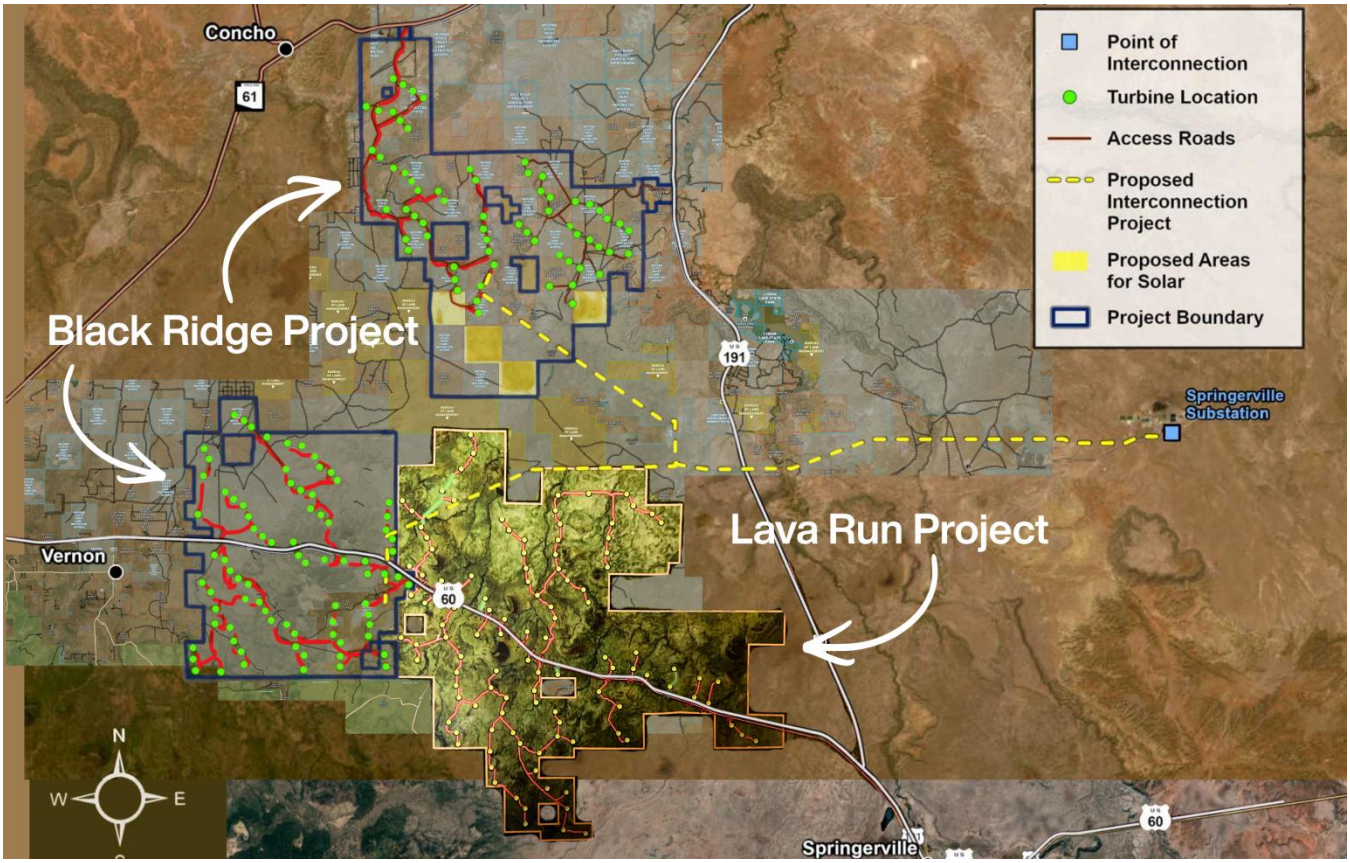
IMAGE 4: Closeups of Black Ridge (146 total Wind Turbines proposed) + Lava Run (112 total WTs proposed) = See proximity to Greens Peak and TV Knoll



[Map Sources: Black Ridge project website Map by Triple Oak Power, with hand-drawn additions to show close proximities of Lava Run, Greens Peak and US Forest Service (Apache-Sitgreaves NFs) boundary.] **Large red star** indicates Greens Peak location, while **small red star** shows "TV Knoll" location.

(continued next page)

IMAGE 5: Closeups of Black Ridge (146 total Wind Turbines proposed)
+ Lava Run (112 total WTs proposed)



[Map Sources: Black Ridge project website Map by Triple Oak Power, and Lava Run open house Map by Repsol, (graphically merged into one image at same scale.)]

US Representive Eli Crane's letters to the FCC & US Dept. of Transportation are replicated on the following pages. Therein, he expresses many of the same concerns that we've outlined here. BELOW are two strong excerpts from his US DOT letter (bold emphasis added here, and See **Doc. 11**):

"I applaud the updated federal policies governing wind turbine setbacks near highways and railroads. These policies restore safety recommendations previously overruled by the prior administration after it was discovered that dozens of wind energy projects had been approved, despite **engineering warnings that wind turbines can interfere with the radio-frequency spectrum that is used for critical safety communications.** The Department's recent technical review found that 'wind farm deployment could potentially obstruct radio communication links and/or degrade radio RF signal reception by means of lowering signal-to-noise ratio through several mechanisms and factors such as diffraction, scattering, wind farm density, distance, speed, etc.' **In response to these findings, USDOT now recommends a minimum 1.2-mile setback for wind turbines constructed near major highways and rail corridors.**

Radio-frequency interference: **Turbines placed within the 1.2-mile buffer may obstruct or degrade radio communications essential for highway safety, emergency response, and transportation operations.** Based on the project maps publicly shared by Repsol, **at least 41 turbines in the proposed Lava Run Wind Project appear to be located within 1.2 miles of the shoulder of U.S. Highway 60, placing them inside the newly recommended federal safety buffer."**

ELI CRANE
2ND DISTRICT, ARIZONA

COMMITTEE ON
OVERSIGHT AND
GOVERNMENT REFORM

COMMITTEE ON
HOMELAND SECURITY

Congress of the United States
House of Representatives
Washington, DC 20515–0302

OFFICE LOCATIONS
307 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225–3361

122 NORTH CORTEZ STREET
SUITE 211
PRESCOTT, AZ 86301
(928) 286–5338

February 13, 2026

The Honorable Brendan Carr Chair
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Dear Chair Carr,

I write to request information and raise significant concerns regarding the potential aviation-signal, radar, and emergency-communications interference associated with the proposed Lava Run Wind Project in Apache County, Arizona. Given the FCC's statutory responsibilities over radio-frequency spectrum, public-safety communications, and aviation-related signal integrity, I respectfully request that the Commission review the project's potential impacts and clarify the extent of its oversight.

Properly functioning aircraft-tracking radar and Doppler weather radar are essential for aviation safety, emergency response, and severe weather reporting. Wind turbines located in close proximity to radar systems can distort or obscure radar returns, creating false targets, signal clutter, or degraded detection capability. Military aviation training missions occur periodically over the Apache National Forest and at the Springerville Municipal Airport, raising additional concerns about interference with military navigation radar.

Given the number of wind farms proposed in this region, the FCC and FAA should not evaluate each project in isolation. The cumulative effect of multiple wind farms clustered within a limited geographic area may exceed acceptable interference thresholds. Southern Apache and Navajo Counties are now facing the prospect of hundreds of turbines from multiple wind projects. When combined, these installations pose a significant risk of cumulative interference to:

1. Law-enforcement radio frequencies
2. Emergency-services communications
3. Aviation navigation and radar systems
4. Public-safety repeaters
5. Amateur radio and GMRS networks

Turbine siting alone may not be sufficient to mitigate these impacts. Each additional wind farm west of US-180/191, when added to existing and proposed projects near Greens Peak, increases the likelihood of regional RF degradation. Additionally, the western boundary of the Lava Run Wind Project lies approximately five miles northeast of Greens Peak, a critical communications hub at 10,134 feet elevation. Greens Peak hosts:

1. Federal, state, county, and municipal emergency-services repeaters
2. Law-enforcement radio infrastructure
3. Natural-resource agency communications
4. More than 12 private HAM and GMRS repeaters
5. Equipment used during major wildfire emergencies and regional disasters

FCC records show 1,000+ licensed amateur radio operators and approximately 500 GMRS users across the White Mountains. These networks have repeatedly provided essential emergency communications during wildfire events and outages when cellular, landline, and internet systems failed.

Any turbine-induced interference affecting Greens Peak repeaters would pose a serious threat to public safety, emergency response, and daily law-enforcement operations across northeastern Arizona.

In light of these concerns, I respectfully request that the FCC:

1. Evaluate the potential RF interference posed by the Lava Run Wind Project to aviation radar, weather radar, and military navigation systems.
2. Assess cumulative interference impacts from all existing and proposed wind farms in southern Apache and Navajo Counties.
3. Review potential impacts to emergency-services communications, including law-enforcement, EMS, and natural-resource agency repeaters on Greens Peak.
4. Determine whether additional FCC review, mitigation requirements, or interagency coordination with FAA, NTIA, and DOD are warranted.
5. Clarify whether the FCC will require a cumulative-impact analysis rather than project-by-project approvals.

Given the critical importance of aviation safety and emergency communications, we believe these issues merit immediate and thorough review.

Thank you for your attention to this matter. I look forward to your response.

Sincerely,

Eli Crane
Member of Congress

(continued on next page)

ELI CRANE
2ND DISTRICT, ARIZONA

COMMITTEE ON
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(928) 286–5338

February 13, 2026

The Honorable Sean Duffy
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Duffy,

I write to request information and raise concerns regarding the proposed Lava Run Wind Project located in Apache County near Springerville AZ. I am specifically concerned about the placement of wind turbines near major transportation corridors and the project's potential conflict with the new federal safety recommendations announced by the Department of Transportation on July 29, 2025.[1]

I applaud the updated federal policies governing wind turbine setbacks near highways and railroads. These policies restore safety recommendations previously overruled by the prior administration after it was discovered that dozens of wind energy projects had been approved, despite engineering warnings that wind turbines can interfere with the radio-frequency spectrum that is used for critical safety communications. The Department's recent technical review found that "wind farm deployment could potentially obstruct radio communication links and/or degrade radio RF signal reception by means of lowering signal-to-noise ratio through several mechanisms and factors such as diffraction, scattering, wind farm density, distance, speed, etc." In response to these findings, USDOT now recommends a minimum 1.2-mile setback for wind turbines constructed near major highways and rail corridors.

Based on the project maps publicly shared by Repsol, at least 41 turbines in the proposed Lava Run Wind Project appear to be located within 1.2 miles of the shoulder of U.S. Highway 60, placing them inside the newly recommended federal safety buffer. Additionally, turbines are planned on both sides of U.S. 60, and Repsol intends to use this federal highway as the primary access route for construction and long-term operations.

This raises several significant concerns:

1. Radio-frequency interference: Turbines placed within the 1.2-mile buffer may obstruct or degrade radio communications essential for highway safety, emergency response, and transportation operations.
2. Pavement damage: Transporting turbine components, cranes, concrete, and other heavy equipment will impose substantial wear on U.S. 60, creating costly repair needs for a highway that serves as the region's main commercial corridor.
3. Traffic disruption: Oversized trailers carrying turbine blades and tower sections require extra-wide turning radii and slow-moving convoys, which will cause extended interruptions to normal traffic flow.
4. Emergency response delays: Of greatest concern is that ambulances transporting patients to medical facilities in Show Low, the region's largest town, could face life-threatening delays due to construction congestion or blocked lanes.

---

[1] President Trump's Transportation Secretary Sean P. Duffy: Biden-Buttigieg Ignored the Dangers of Wind Turbines Near Railroads & Highways, Put Climate Religion Ahead of Safety | US Department of Transportation

Given these issues, I respectfully request clarification on the following:

1. Has the Department of Transportation conducted an updated safety assessment of the Lava Run turbine locations in light of the July 29, 2025, policy announcement?
2. Do any of the proposed turbine sites violate the new 1.2-mile setback recommendation, and if so, what corrective actions will be required?
3. Will DOT require modifications to turbine placement, height, or construction access routes to ensure compliance with federal safety guidance, or terminate approval of this project due to violations?
4. How will DOT coordinate with the Federal Aviation Administration and state transportation agencies to ensure that highway safety, emergency response, and critical communications are not compromised?

My intent is to ensure that any project proceeds in a manner fully consistent with federal safety standards and does not endanger the traveling public or emergency responders.

Thank you for your attention to this matter. I appreciate any information you can provide and look forward to your response.

Sincerely,

Eli Crane
Member of Congress

_____END of Representative Crane's 2 Letters_____

By using the Triple Oak's company map of Black Ridge (see Image 4), we count at l*east 27 more turbines proposed within 1.2 miles of US Hwy. 60*, precisely where multiple cell phone towers, microwave, and radio broadcast towers are located along the US 60 corrridor. (See Doc. **11** and US Secretary Duffy's DOT recommendations document cited by Rep. Crane's second letter.)

(continued on next page)

ARS 11-833 - Standards for enactment of moratorium; land development; limi...
https://www.azleg.gov/ars/11/00833.htm

11-833. Standards for enactment of moratorium; land development; limitations; definitions

A. A county shall not adopt a moratorium on construction or land development unless it first:

1. Provides notice to the public published once in a newspaper of general circulation in the community at least thirty days before a final public hearing to be held to consider the adoption of the moratorium.

2. Makes written findings justifying the need for the moratorium in the manner provided for in this section.

3. Holds a public hearing on the adoption of the moratorium and the findings that support the moratorium.

B. For urban land or land subject to potential urbanization, a moratorium may be justified by demonstration of a need to prevent a shortage of essential public facilities that would otherwise occur during the effective period of the moratorium. This demonstration shall be based on reasonably available information and shall include at least the following findings:

1. A showing of the extent of need beyond the estimated capacity of existing essential public facilities expected to result from new land development, including identification of any essential public facilities currently operating beyond capacity and the portion of this capacity already committed to development, or in the case of water resources, a showing that, in an active management area as defined in section 45-402, an assured water supply cannot be provided, or outside an active management area, a sufficient water supply cannot be provided, to the new land development, including identification of current water resources and the portion already committed to development.

2. That the moratorium is reasonably limited to those areas of the county where a shortage of essential public facilities would otherwise occur and on property that has not received development approvals based on the sufficiency of existing essential public facilities.

3.That the housing and economic development needs of the area affected have been accommodated as much as possible in any program for allocating any remaining essential public facility capacity.

C. A moratorium not based on a shortage of essential public facilities under subsection B of this section may be justified only by a demonstration of compelling need for other public facilities, including police and fire facilities. This demonstration shall be based on reasonably available information and shall include at least the following findings:

1. For urban land or land subject to potential urbanization:

(a) That application of existing development ordinances or regulations and other applicable law is inadequate to prevent irrevocable public harm from development in affected geographical areas.

(b) That the moratorium is sufficiently limited to ensure that a needed supply of affected housing types and the supply of commercial and industrial facilities within or in proximity to the county are not unreasonably restricted by the adoption of the moratorium.

(c) The reasons that alternative methods of achieving the objectives of the moratorium are unsatisfactory.

(d) That the county has determined that the public harm that would be caused by failure to impose a moratorium outweighs the adverse effects on other affected local governments, including shifts in demand for housing or economic development, public facilities and services and buildable lands and the overall impact of the moratorium on population distribution.

(e) That the city or town proposing the moratorium has developed a work plan and time schedule for achieving the objectives of the moratorium.

2. For rural land:

(a) That application of existing development ordinances or regulations and other applicable law is inadequate to prevent irrevocable public harm from development in affected geographical areas.

(b) The reasons that alternative methods of achieving the objectives of the moratorium are unsatisfactory.

(c) That the moratorium is sufficiently limited to ensure that lots or parcels outside the affected geographical areas are not unreasonably restricted by the adoption of the moratorium.

(d) That the county proposing the moratorium has developed a work plan and time schedule for achieving the objectives of the moratorium.

D. Any moratorium adopted pursuant to this section does not affect any express provision in a development agreement entered into pursuant to section 9-500.05 or as defined in section 11-1101 governing the rate, timing and sequencing of development, nor does it affect rights acquired pursuant to a protected development right granted according to chapter 9 of this title or title 9, chapter 11. Any moratorium adopted pursuant to this section shall provide a procedure pursuant to which an individual landowner may apply for a waiver of the moratorium's applicability to its property by claiming rights obtained pursuant to a development agreement, a protected development right or any vested right or by providing the public facilities that are the subject of the moratorium at the landowner's cost.

E. A moratorium adopted under subsection C, paragraph 1 of this section shall not remain in effect for more than one hundred twenty days, but such a moratorium may be extended for additional periods of time of up to one hundred twenty days if the county adopting the moratorium holds a public hearing on the proposed extension and adopts written findings that:

1. Verify the problem requiring the need for the moratorium to be extended.

2. Demonstrate that reasonable progress is being made to alleviate the problem resulting in the moratorium.

3. Set a specific duration for the renewal of the moratorium.

F. A county considering an extension of a moratorium shall provide notice to the general public published once in a newspaper of general circulation in the community at least thirty days before a final hearing is held to consider an extension of a moratorium.

G. This section does not prevent a city or town from complying with any state or federal law, regulation or order issued in writing by a legally authorized governmental entity.

H. A landowner aggrieved by a county's adoption of a moratorium pursuant to this section, at any time within thirty days after the moratorium has been adopted, may file a complaint for a trial de novo in the superior court on the facts and the law regarding the moratorium. All matters presented to the superior court pursuant to this section have preference on the court calendar on the same basis as condemnation matters. The court may award reasonable attorney fees incurred in the appeal and trial pursuant to this section to the prevailing party.

I. For the purposes of this section:

1. "Compelling need" means a clear and imminent danger to the health and safety of the public.

2. "Essential public facilities" means water, sewer and street improvements and water resources to the extent that these improvements and water resources are provided by the county or private utility.

3. "Moratorium on construction or land development" means engaging in a pattern or practice of delaying or stopping issuance of permits, authorizations or approvals necessary for the subdivision and partitioning of, or construction on, any land. It does not include denial or delay of permits or authorizations because they are inconsistent with applicable statutes, rules, zoning or other ordinances.

4. "Rural land" means all property in the unincorporated area of a county or in the incorporated area of the city or town with a population of two thousand nine hundred or less persons.

5. "Urban land or land subject to potential urbanization" means all property in the incorporated area of a city or town with a population of more than two thousand nine hundred persons.

6. "Vested right" means a right to develop property established by the expenditure of substantial sums of money pursuant to a permit or approval granted by the city, town or county.

END of Arizona Revised Statute 11-833

(continues next page)

DOCUMENTS CITED: (Digital Versions provided in a separate Appendix Folder or flash-drive upon request)

1 "Impact Analysis Of Wind Farms On Telecommunication Services", by I. Angulo, D. de la Vega, I. Cascón, J. Cañizo, Y. Wu., D. Guerra, P. Angueira, 12/29/13, publ. by Science Direct Journal, Elsevier Ltd., - Renewable and Sustainable Energy Reviews 32 (2014) pgs. 84-89.
https://doi.org/10.1016/j.rser.2013.12.055

2 "Radio Link Coordination With Wind Farms", by Joint Radio Company, Coventry, UK, 2019
https://www.jrc.co.uk/what-we-do/wind-farms

3 "Identifying And Avoiding Radio Frequency Interference For Wind Turbine Facilities" – White Paper by Lester E. Polisky of Comsearch, 2005 Andrew Corporation, Bulletin TP-100321-EN (03/05)
https://www.avw.co.nz/images/andrew/docs/TP-100321-EN.pdf

4 "Land-Based Wind Energy Siting: A Foundational and Technical Resource", US Dept. of Energy, Office of Energy Efficiency & Renewable Energy, August 2021. (see pgs.38-39)
https://docs.nrel.gov/docs/fy21osti/78591.pdf

5 "RF Studies For Wind Farm Impacts On Communication Networks" Information & Communication Technologies , by Titan ICT, 2025 website:
https://titanict.com.au/rf-studies-for-wind-farm-impacts-on-communication-networks/

6 Google AI Search/Overview of how wind turbines can interfere with radio communications signals, systems affected, mitigation strategies, and literature search.
(Paper doc. only, no hyperlink possible.)

7 "Wind Farm Interference Shows Up On Doppler Radar", by Marc Kavinsky, Senior Meteorologist of the National Weather Service (Wisconsin), https://www.weather.gov/mkx/windfarm

8 "FAA Aeronautical Information Manual – Publication On Air Traffic Control Systems – Section 5. Surveillance Systems, 4-5-1. Radar, b. Limitations (g) Wind Turbines, &
Figure 4-5-2 = 'Wind Turbine Farm Area of Potential Interference'" ,
https://www.faa.gov/air_traffic/publications/atpubs/aim_html/chap4_section_5.html

9 "The Impacts of Terrestrial Wind Turbine's Operation on Telecommunication Services", by Ukashatu Abubakar, Saad Mekhilef, Hazlie Mokhlis, Mehdi Seyedmahmoudian, Alex Stojcevski and Muhyaddin Rawa, Copyright: © 2022 by the authors. Licensee MDPI, Basel, Switzerland. Publ. 12/28/2022, by *Energies* ***2023****, 16,* 371. https://doi.org/10.3390/en16010371;
https://www.mdpi.com/journal/energies

10 "Technical Information and Guidelines on the Assessment of the Potential Impact of Wind Turbines on Radiocommunication, Radar, and Seismoacustic Systems", by the Radio Advisory Board of Canada (RABC) Canadian Wind Energy Association (CanWEA). Publ. April 2007.
https://docs.wind-watch.org/rabc-canwea-technicalinformationguidelinesrepotentialimpactofwindturbines_2.pdf

11 "Assessment of Wind Farm Interference Impact on ITC Communications in 220 MHz Frequency Band" – Research Technical Report, Doc. Rev. 1.3, by Meteorcomm LLC, 07/29/2025. For US Dept. of Transportation: https://www.transportation.gov/sites/dot.gov/files/2025-08/Wind%20Farm%20Interference%20Impact%20on%20ITC%20Communications%20in%20220%20MHz%20%281%29.pdf

12 FCC Website: "Interference Resolution" – Federal Communications Commission Enforcement Web Page https://www.fcc.gov/enforcement/areas/interference-resolution

13 "Federal Interagency Wind Turbine Radar Interference Mitigation Strategy", by US DOE Office of Energy Efficiency & Renewable Energy, August 2023. https://www.energy.gov/sites/default/files/2023-08/federal-interagency-wind-turbine-radar-interference-mitigation-strategy_082023.pdf

14 "The Winds of Change - Wind Turbines And Their Effects On The National Airspace System", FAA Safety Briefing Magazine – Nov/Dec. 2023 Issue, article by Michael Rauchle of the FAA. https://medium.com/faa/the-winds-of-change-b49520f350ed

Other Related Articles:

- "WindEnergy-TheFactsWebsite-Electromagnetic-Interferences" https://www.wind-energy-the-facts.org/electromagnetic-interferences/
- "How Wind Turbines Fake Rain"_byPagerPower_2020 https://www.pagerpower.com/news/how-wind-turbines-fake-rain/
- Good for our enemies: Wind turbines scramble the Air Force radars, and provide cover for jets « JoNova 2023

We the undersigned submit this STATEMENT of CONCERNS to Apache County Officials (Planning & Zoning, and Board of Supervisors, + others) to express our determination to protect our existing White Mountains radio communications capabilities under FCC regulations.

SIGNATURES of WHITE MTNS. LICENSED RADIO USERS/OPERATORS:

NEATLY PRINTED NAME + *SIGNATURE* / Nearest Town / FCC RADIO CALL SIGN/s

(SIGNATURES NOT INCLUDED IN THIS ELECTRONIC DOCUMENT, ORIGINALS BEING COLLECTED and TO BE SUBMITTED in the NEAR FUTURE as an ATTACHMENT of SUPPORTING CITIZEN INVOLVEMENT)

(Signatures continued on MANY following pages)