### **APPENDIX A**

# Preconstruction Wind Turbine Noise Analysis

# **Pre-Construction Wind Turbine Noise Analysis**

for the proposed

# **Philip Wind Project**

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Prepared for:

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### 1. Introduction

This report describes a pre-construction noise analysis conducted by Hankard Environmental for the proposed Philip Wind Farm (Project, Facility). The Project will produce up to 300 megawatts (MW) of electrical power using up to 95 wind turbine generators, which will be located in Haakon County, South Dakota. Figure 1-1 shows the general location of the Project, which is situated about 15 miles north of Philip, South Dakota.

The noise analysis was conducted at the request of the Project proponent, Philip Wind Partners, LLC, for the purpose of demonstrating that the Project has been designed to meet the noise level limits historically applied to wind turbine projects by the South Dakota Public Utilities Commission (PUC). Described herein are the applicable noise limits, the Project and its environs, the methods and data used to predict noise levels, and the results of the noise level predictions demonstrating compliance with noise limits typically applied to wind projects in South Dakota.



Figure 1-1. General Location of the Philip Wind Farm

### 2. Applicable Noise Standards

There are no noise-related federal, county, or local regulations that apply to the Project.

At the state level, South Dakota Administrative Rule 20:10:22:33.02 requires that an application for an Energy Facility Permit include "Anticipated noise levels during construction and operation." The noise levels reported herein are those expected during operation. Construction noise levels will be typical of those produced by standard construction equipment.

The South Dakota PUC does not have any specific noise limit that applies to wind turbine projects. In lieu of this, Hankard Environmental reviewed the South Dakota PUC's Wind Energy Siting Dockets to determine what noise limits have been applied to recent projects. Out of 11 dockets we reviewed from 2017 to 2021, eight had county limits of 45 dBA at non-participating residences and three had local limits of 50 dBA.

This range of 45 to 50 dBA is consistent with the limits that are typically applied to wind turbine projects nationally. To be conservative, this Project has been designed to meet the more stringent 45 dBA limit.

### 3. **Project Description**

The Project consists of up to 95 wind turbines generating up to 300 MW of electric power. Associated facilities include gravel access roads and underground cabling to collect and transmit the power to the Project substation and its two step-up transformers. The locations of the 95 wind turbine sites under consideration are shown in Figure 3-1. The Project is located entirely in Haakon County. The proposed turbine models under consideration are the Vestas V163-4.5 and the General Electric (GE) Sierra 3.4-140, both with a hub height of 98 meters. The GE turbines used will be fitted with noise-reducing blades, known as Low Noise Trailing Edge (LNTE) blades, and the Vestas turbines will be modeled with and without noise-reducing blades, termed Serrated Trailing Edge (STE) by Vestas. Also shown in Figure 3-1 is the location of the substation, approximately 2,900 meters (9,515 feet) from the nearest residence. The substation will include up to two 140 megavolt ampere (MVA) primary step-up transformers.



Figure 3-1. Philip Wind Project Layout (L027)

### 4. Noise Modeling Method

Noise levels from the proposed Project were predicted using the modeling method set forth in International Organization for Standardization (ISO) Standard 9613-2:1996 - *Attenuation of Sound During Propagation Outdoors*. The method was implemented using the SoundPLAN v8.2 acoustical modeling program. Figure 4-1 shows a representative three-dimensional view of the SoundPLAN model of the Project.

The ISO 9613-2:1996 method requires input data and the setting of certain parameters, including the locations of the noise sources and receivers, noise emission factors including frequency characteristics, terrain and ground type, and atmospheric propagation conditions. In general, the ISO method assumes optimal acoustic propagation in all directions, specifically that a "well-developed, moderate ground-based temperature inversion" is present or, equivalently, that all receptors are downwind of all noise sources at all times. The specific ISO 9613-2:1996 settings and input data used in this analysis are described below.



Figure 4-1. Three-Dimensional View of the SoundPLAN Noise Model

#### **Noise Sources**

In the SoundPLAN model, each of the wind turbines was represented as an acoustical point source located at its hub height. No directivity was applied to any noise source thus assuming maximum acoustic output in all directions. All turbines were assumed to be operating in normal mode (versus noise-reduced mode). The acoustic model includes two 140 MVA step-up transformers located at the Project's electrical substation. The locations of each turbine and the substation are shown in Figure 3-1 (layout L027). The geographic coordinates and ground elevation of each turbine and step-up transformer are listed in Appendix A.

Table 4-1 lists, for the wind turbine models under consideration and the step-up transformers, the height above the ground at which each source was located in the acoustic model, and each source's noise emission level (sound power level) expressed both in octave bands levels<sup>1</sup> and the overall level. All of the noise emission levels are expressed in terms of A-weighted decibels (dBA). The noise emission levels for the turbines were provided by the manufacturers and were determined according to International Electrotechnical Commission Standard 61400-11. Wind turbine noise emissions increase with increasing wind speeds up to approximately 10 m/s at hub-height. Noise levels do not increase when hub-height wind speeds exceed 10 m/s because the turbines reach a maximum rotational speed, and the sound emission of a turbine is directly proportional to its rotational speed. This analysis used the octave band noise levels reported by the manufacturer for a wind speed of 10 m/s at hub height.

The Project includes a substation containing two step-up transformers which are the only significant noise-producing components of the substation. The analysis assumed the simultaneous operation of both step-up transformers at their maximum rating (140 MVA), including the operation of cooling fans. The sound power levels of the step-up transformers are listed in Table 4-1 and were estimated using the methodology published in the Edison Electric Institute, "Electric Power Plant Environmental Noise Guide," 2<sup>nd</sup> Edition, BBN, 1984. The step-up transformers were modeled as point sources located three meters (10 feet) above the ground, with no barriers or directivity reductions.

| _                              | Source          | Octave Band Sound Power Level (dBA) |          |           |           |           |             | Overall     |             |             |                |
|--------------------------------|-----------------|-------------------------------------|----------|-----------|-----------|-----------|-------------|-------------|-------------|-------------|----------------|
| Source                         | Height -<br>(m) | 31.5<br>Hz                          | 63<br>Hz | 125<br>Hz | 250<br>Hz | 500<br>Hz | 1,000<br>Hz | 2,000<br>Hz | 4,000<br>Hz | 8,000<br>Hz | Level<br>(dBA) |
| GE Sierra<br>3.4-140           | 98              | 78.8                                | 88.2     | 92.5      | 96.1      | 99.2      | 102.2       | 101.6       | 93.6        | 74.0        | 106.8          |
| Vestas<br>V163-4.5<br>Standard | 98              | 71.2                                | 85.8     | 96.1      | 102.1     | 104.2     | 102.6       | 96.9        | 88.3        | 76.8        | 108.4          |
| Vestas<br>V163-4.5<br>STE      | 98              | 74.0                                | 86.5     | 95.4      | 100.3     | 101.9     | 100.1       | 94.7        | 86.8        | 76.6        | 106.3          |
| 140 MVA<br>Transformer         | 3               | 57.4                                | 76.6     | 88.7      | 91.2      | 96.6      | 93.8        | 90.0        | 84.8        | 75.7        | 100.2          |

| Table 4-1. | Source | Sound | Power | Levels |
|------------|--------|-------|-------|--------|
|------------|--------|-------|-------|--------|

<sup>1</sup> Nine standard frequency octave bands, as defined by the American National Standards Institute (ANSI) Standard S1.11: Specification for Octave-Band and Fractional-Octave-Band Analog and Digital Filters.

#### **Noise Level Metric**

The noise levels predicted using this method are in the form of the energy equivalent average noise level  $(L_{eq})$  over a one-hour period of maximum acoustic emissions from the turbines.

#### Receptors

In the model, prediction points were located at each of the 37 residences identified in the vicinity of the Project, all in Haakon County. Of these 37 residences, 24 are non-participating in the Project and 13 are participating. The geographic locations and participation status of the receptors were obtained from the Project and Hankard Environmental reviewed the receptors for accuracy using aerial photography. Each receptor's height was set to 4 meters (13 feet) above the ground in the acoustic model.

#### **Atmospheric Conditions**

The air temperature, relative humidity, and atmospheric pressure were set to conditions of 10°C, 70%, and 1 atmosphere, respectively. These values represent the lowest amount of atmospheric absorption of sound available in the ISO 9613-2:1996 method and result in the highest levels of sound reaching the receptors.

#### **Terrain and Ground Effect**

The ground elevations in the Project area were established by importing data from the National Elevation Dataset (USGS National Map) for the state of South Dakota at a resolution of 1 arcsecond (30 meters). The acoustical effect of the ground was modeled using the ISO 9613-2:1996 General Method. All reductions due to terrain acting as a barrier were removed from the analysis resulting in a more conservative model and higher predicted noise levels. The ground absorption factors for the ground near the source, near the receiver, and in between can range from 0.0 to 1.0 and represent the proportion of sound that is absorbed or reflected when sound waves interact with the ground. A value of 0.0 represents completely reflective ground material such as pavement, and results in a higher level of sound reaching a receptor. A value of 1.0 represents highly absorptive material such as thick grass or fresh snow, and results in a lower level of sound reaching a receptor. For this noise analysis, the most conservative ground factor, 0.0 (completely reflective), has been assumed. Actual ground conditions could at times be 0.0 when the ground is completely frozen but would generally be closer to 0.5 when the ground is covered with crops or new snow, or when the ground is bare and unfrozen.

#### Model Validation

This noise level prediction method employed on this Project is consistent with the requirements of ANSI/ACP-111-11<sup>2</sup>. This method has been validated by Hankard Environmental and other acoustic professionals by comparing predicted noise levels to those measured at operating wind farms. The results show that this modeling approach consistently over-predicts the measured noise level. That is, actual noise level emissions from the Project, if measured, are expected to be less than those reported herein.

<sup>&</sup>lt;sup>2</sup> Wind Turbine Sound Modeling, ANSI/American Clean Power (ACP) Standard 111-1-2022

### 5. Predicted Noise Levels

Noise levels were predicted for the full, continuous, and normal operation of the proposed Facility at the 24 non-participating and 13 participating residences located near the Project. Table 5-1 lists the non-participating residences with the highest predicted noise levels. The full list of predicted noise levels at each receptor is provided in Appendix B. The highest predicted noise level at a non-participating residence 44.7 dBA, which is less than the 45 dBA noise level goal. Predicted noise levels at all participating residences are less than 48 dBA. To provide a visual demonstration of compliance, the predicted noise levels are shown in the form of noise level contours for the loudest turbine model (Vestas V163-4.5 with standard blades) in Figures 5-1 to 5-3. Contours for all other turbine models would be smaller than those shown in these Figures. For example, areas between the turbines or the substation and the 45 dBA contour have a predicted noise level above 45 dBA. No non-participating residences are located within the 45 dBA contours.

|          |                             | Overall Leq (dBA)      |                       |
|----------|-----------------------------|------------------------|-----------------------|
| Receptor | Vestas V163-4.5<br>Standard | Vestas V163-4.5<br>STE | GE Sierra 3.4-<br>140 |
| R-011    | 44.7                        | 42.8                   | 41.0                  |
| R-012    | 44.0                        | 42.1                   | 40.2                  |
| R-248    | 41.3                        | 39.3                   | 37.6                  |
| R-027    | 39.9                        | 38.1                   | 36.0                  |
| R-008    | 39.2                        | 37.5                   | 35.2                  |
| R-033    | 37.0                        | 35.3                   | 32.9                  |
| R-004    | 36.0                        | 34.3                   | 31.8                  |
| R-028    | 36.0                        | 34.4                   | 31.9                  |
| R-007    | 35.3                        | 33.7                   | 31.1                  |
| R-006    | 34.8                        | 33.3                   | 30.7                  |
| R-005    | 34.7                        | 33.2                   | 30.5                  |
| R-001    | 34.3                        | 32.7                   | 30.2                  |
| R-269    | 33.9                        | 32.2                   | 29.7                  |
| R-017    | 33.0                        | 31.6                   | 29.0                  |
| R-029    | 32.4                        | 31.0                   | 28.4                  |
| R-018    | 30.9                        | 29.6                   | 27.1                  |
| R-024    | 30.9                        | 29.6                   | 27.1                  |
| R-179    | 30.8                        | 29.5                   | 27.0                  |
| R-030    | 29.1                        | 28.0                   | 25.6                  |
| R-022    | 29.0                        | 27.4                   | 24.9                  |
| R-163    | 28.4                        | 27.1                   | 24.7                  |
| R-020    | 26.3                        | 25.2                   | 22.9                  |
| R-019    | 25.9                        | 24.9                   | 22.7                  |
| R-021    | 24.2                        | 23.1                   | 21.0                  |

Table 5-1. Highest Predicted Noise Levels at Non-Participating Residences



Figure 5-1. Predicted Noise Level Contours - North Area



Figure 5-2. Predicted Noise Level Contours – Southwest Area



Figure 5-3. Predicted Noise Level Contours – Southeast Area

### 6. Conclusions

Noise levels were predicted for the full, continuous, and normal operation of turbines operating at all 95 potential sites in the proposed Facility. Noise levels were predicted at the 24 non-participating and 13 participating residences located nearest to the Project in Haakon County, South Dakota. The highest predicted noise level at a non-participating residence is 44.7 dBA, which is less than the 45 dBA Project noise level goal.

Predicted noise levels at all participating residences are 48 dBA or less for the loudest turbine model under consideration, the Vestas V163-4.5 with standard blades.

The noise level prediction method employed for this analysis is consistent with ACP-111-1 (2022) and has been validated by Hankard Environmental and other acoustic professionals by comparing predicted noise levels to those measured at operating wind farms. The results show that the modeling approach employed here consistently overpredicts measured noise levels. That is, actual noise level emissions from this Project, if measured, are expected to be less than those reported herein.

Furthermore, the noise levels reported herein are the very highest turbine noise levels expected, as they represent the case where all turbines are operating fully. A majority of the time turbine noise levels will be lower than those reported herein, when the turbines are not producing full acoustic output due to low winds, and/or atmospheric conditions not being as conducive to sound propagation as assumed by the acoustic model (e.g., an unstable atmosphere or receptors located crosswind to the nearest turbines). Additionally, during very windy periods, the noise of the wind blowing through vegetation would be louder than that from the turbines and could in many cases render noise from the turbines inaudible.

The results described herein are valid for the receptor locations analyzed, the turbine and substation layout described above, the wind turbine sound power levels provided by the manufacturer, and the mode of turbine operation. If the Project makes any significant changes, including turbine layout, turbine type, or operational mode, this noise analysis should be updated accordingly.

# APPENDIX A Noise Source Locations – Layout L027

|             | UT          | Ground Elevation |         |
|-------------|-------------|------------------|---------|
| Source Name | Easting (m) | Northing (m)     | (m asl) |
| 1           | 278952      | 4916433          | 760     |
| 2           | 279061      | 4916934          | 760     |
| 3           | 279805      | 4917016          | 759     |
| 4           | 277420      | 4919622          | 765     |
| 5           | 277289      | 4919089          | 770     |
| 6           | 279070      | 4914794          | 752     |
| 7           | 278715      | 4914302          | 758     |
| 8           | 278327      | 4912593          | 760     |
| 9           | 278246      | 4913554          | 760     |
| 10          | 278033      | 4913193          | 767     |
| 11          | 279306      | 4912429          | 759     |
| 12          | 277360      | 4911513          | 790     |
| 13          | 277996      | 4911820          | 770     |
| 14          | 279201      | 4911601          | 760     |
| 15          | 277133      | 4910805          | 790     |
| 16          | 278759      | 4910603          | 770     |
| 17          | 279249      | 4910862          | 770     |
| 18          | 278114      | 4909769          | 783     |
| 19          | 277974      | 4909233          | 790     |
| 20          | 279041      | 4908888          | 780     |
| 21          | 276093      | 4908512          | 799     |
| 22          | 277917      | 4908477          | 785     |
| 23          | 276259      | 4907924          | 800     |
| 24          | 277844      | 4907429          | 790     |
| 25          | 278298      | 4907714          | 790     |
| 26          | 279020      | 4907926          | 780     |
| 28          | 284381      | 4909787          | 768     |
| 29          | 283040      | 4910336          | 764     |
| 30          | 283754      | 4910385          | 770     |
| 31          | 283130      | 4909607          | 770     |
| 32          | 284150      | 4909434          | 770     |
| 33          | 282670      | 4909299          | 777     |
| 34          | 281138      | 4907457          | 778     |
| 35          | 281644      | 4907959          | 780     |

|             | UT          | Ground Elevation |         |
|-------------|-------------|------------------|---------|
| Source Name | Easting (m) | Northing (m)     | (m asl) |
| 36          | 282071      | 4908389          | 780     |
| 37          | 283511      | 4907242          | 780     |
| 38          | 278366      | 4918775          | 763     |
| 39          | 277237      | 4918509          | 780     |
| 40          | 278350      | 4918094          | 770     |
| 41          | 277653      | 4917680          | 770     |
| 42          | 277246      | 4917312          | 773     |
| 44          | 269752      | 4905320          | 802     |
| 45          | 270224      | 4905591          | 797     |
| 46          | 270367      | 4902964          | 830     |
| 47          | 270807      | 4903284          | 830     |
| 48          | 293256      | 4904508          | 770     |
| 49          | 272066      | 4902259          | 808     |
| 50          | 273165      | 4902059          | 801     |
| 51          | 273707      | 4902285          | 806     |
| 52          | 273282      | 4902972          | 830     |
| 53          | 273665      | 4903462          | 821     |
| 54          | 274060      | 4903901          | 810     |
| 55          | 274130      | 4904440          | 810     |
| 56          | 275244      | 4904218          | 810     |
| 57          | 275736      | 4904482          | 810     |
| 58          | 276240      | 4904723          | 811     |
| 59          | 275509      | 4907005          | 797     |
| 60          | 276535      | 4905895          | 810     |
| 62          | 276738      | 4907006          | 800     |
| 67          | 282605      | 4906387          | 791     |
| 68          | 282522      | 4905776          | 800     |
| 69          | 282500      | 4905135          | 818     |
| 73          | 285103      | 4905552          | 781     |
| 74          | 285208      | 4905963          | 776     |
| 75          | 287752      | 4906292          | 773     |
| 76          | 287611      | 4905697          | 777     |
| 77          | 288334      | 4906566          | 780     |
| 78          | 289233      | 4906553          | 780     |

| <b>•</b> • •             | UT          | Ground Elevation |         |  |
|--------------------------|-------------|------------------|---------|--|
| Source Name              | Easting (m) | Northing (m)     | (m asl) |  |
| 79                       | 290126      | 4906526          | 775     |  |
| 80                       | 289977      | 4905535          | 776     |  |
| 81                       | 290624      | 4905716          | 780     |  |
| 82                       | 290436      | 4904736          | 770     |  |
| 83                       | 291391      | 4904825          | 771     |  |
| 84                       | 291829      | 4905342          | 770     |  |
| 85                       | 290654      | 4904054          | 768     |  |
| 86                       | 291461      | 4904026          | 760     |  |
| 87                       | 292435      | 4903763          | 770     |  |
| 88                       | 292871      | 4904139          | 772     |  |
| 89                       | 276512      | 4910638          | 790     |  |
| 90                       | 276549      | 4910032          | 790     |  |
| 91                       | 276300      | 4909052          | 797     |  |
| 92                       | 265823      | 4902187          | 840     |  |
| 93                       | 266312      | 4902468          | 847     |  |
| 94                       | 267201      | 4902486          | 840     |  |
| 95                       | 269696      | 4900614          | 799     |  |
| 96                       | 277227      | 4903847          | 790     |  |
| 97                       | 277159      | 4903324          | 790     |  |
| 98                       | 277182      | 4902818          | 780     |  |
| 101                      | 274565      | 4906231          | 794     |  |
| 102                      | 279742      | 4918306          | 764     |  |
| 103                      | 279764      | 4917587          | 763     |  |
| 104                      | 281602      | 4906781          | 783     |  |
| 105                      | 285175      | 4906596          | 770     |  |
| 106                      | 286440      | 4903181          | 775     |  |
| 108                      | 276287      | 4909619          | 796     |  |
| Substation Transformer 1 | 276491      | 4909841          | 791     |  |
| Substation Transformer 2 | 276480      | 4909841          | 791     |  |

# **APPENDIX B Receptor Locations and Predicted Noise Levels**

|          |               |         |          |                      | Overall Predicted Noise Level |                         |                      |  |
|----------|---------------|---------|----------|----------------------|-------------------------------|-------------------------|----------------------|--|
|          | Participation | UIN     | 1411     | Ground               | (L <sub>eq</sub> , dBA)       |                         |                      |  |
| Receiver | Status        | Easting | Northing | Elevation<br>(m asl) | Vestas<br>V163-4 5            | Vestas V163-<br>4 5 STF | GE Sierra<br>3 4-140 |  |
|          |               | (m)     | (m)      | ( 401)               | Standard                      | 7.001                   | J.7-14V              |  |
| R-001    | NP            | 287469  | 4901219  | 750                  | 34.3                          | 32.7                    | 30.2                 |  |
| R-002    | Р             | 286782  | 4902300  | 764                  | 40.1                          | 38.2                    | 36.6                 |  |
| R-003    | Р             | 287014  | 4903916  | 786                  | 41.5                          | 39.6                    | 37.9                 |  |
| R-004    | NP            | 291512  | 4908428  | 762                  | 36.0                          | 34.3                    | 31.8                 |  |
| R-005    | NP            | 288146  | 4910178  | 730                  | 34.7                          | 33.2                    | 30.5                 |  |
| R-006    | NP            | 288048  | 4910140  | 730                  | 34.8                          | 33.3                    | 30.7                 |  |
| R-007    | NP            | 287905  | 4909939  | 740                  | 35.3                          | 33.7                    | 31.1                 |  |
| R-008    | NP            | 285815  | 4910305  | 760                  | 39.2                          | 37.5                    | 35.2                 |  |
| R-009    | Р             | 284772  | 4908591  | 760                  | 43.1                          | 41.2                    | 39.3                 |  |
| R-010    | Р             | 282281  | 4906984  | 786                  | 47.5                          | 45.6                    | 44.3                 |  |
| R-011    | NP            | 280731  | 4908411  | 770                  | 44.7                          | 42.8                    | 41.0                 |  |
| R-012    | NP            | 280173  | 4907190  | 771                  | 44.0                          | 42.1                    | 40.2                 |  |
| R-013    | Р             | 280769  | 4912366  | 743                  | 41.1                          | 39.3                    | 37.0                 |  |
| R-015    | Р             | 274442  | 4907683  | 784                  | 42.2                          | 40.4                    | 38.3                 |  |
| R-016    | Р             | 271191  | 4905981  | 802                  | 40.8                          | 38.9                    | 37.1                 |  |
| R-017    | NP            | 271201  | 4910294  | 770                  | 33.0                          | 31.6                    | 29.0                 |  |
| R-018    | NP            | 269445  | 4910181  | 775                  | 30.9                          | 29.6                    | 27.1                 |  |
| R-019    | NP            | 265381  | 4910695  | 760                  | 25.9                          | 24.9                    | 22.7                 |  |
| R-020    | NP            | 263992  | 4908366  | 780                  | 26.3                          | 25.2                    | 22.9                 |  |
| R-021    | NP            | 262186  | 4908316  | 790                  | 24.2                          | 23.1                    | 21.0                 |  |
| R-022    | NP            | 262691  | 4901258  | 840                  | 29.0                          | 27.4                    | 24.9                 |  |
| R-024    | NP            | 269542  | 4910270  | 771                  | 30.9                          | 29.6                    | 27.1                 |  |
| R-026    | Р             | 271214  | 4905926  | 802                  | 40.8                          | 39.0                    | 37.1                 |  |
| R-027    | NP            | 271847  | 4900917  | 801                  | 39.9                          | 38.1                    | 36.0                 |  |
| R-028    | NP            | 273270  | 4899777  | 790                  | 36.0                          | 34.4                    | 31.9                 |  |
| R-029    | NP            | 277443  | 4899168  | 760                  | 32.4                          | 31.0                    | 28.4                 |  |
| R-030    | NP            | 269907  | 4913405  | 770                  | 29.1                          | 28.0                    | 25.6                 |  |
| R-033    | NP            | 280511  | 4920074  | 750                  | 37.0                          | 35.3                    | 32.9                 |  |
| R-070    | Р             | 284707  | 4908337  | 760                  | 42.6                          | 40.7                    | 38.7                 |  |
| R-086    | Р             | 279791  | 4915476  | 750                  | 43.5                          | 41.6                    | 39.8                 |  |
| R-091    | Р             | 272350  | 4912433  | 750                  | 33.2                          | 31.9                    | 29.3                 |  |
| R-149    | Р             | 271023  | 4905998  | 799                  | 41.8                          | 39.9                    | 38.2                 |  |
| R-163    | NP            | 264713  | 4907225  | 790                  | 28.4                          | 27.1                    | 24.7                 |  |
| R-170    | Р             | 269428  | 4899770  | 788                  | 40.3                          | 38.4                    | 37.0                 |  |
| R-179    | NP            | 280207  | 4899231  | 750                  | 30.8                          | 29.5                    | 27.0                 |  |
| R-248    | NP            | 276690  | 4920342  | 762                  | 41.3                          | 39.3                    | 37.6                 |  |
| R-269    | NP            | 275468  | 4921275  | 753                  | 33.9                          | 32.2                    | 29.7                 |  |