



**DEPARTMENT OF DEFENSE**  
REGIONAL ENVIRONMENTAL COORDINATOR, REGION VIII REGIONAL  
ENVIRONMENTAL AND ENERGY OFFICE- WESTERN US CUSTOM HOUSE  
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DENVER, CO 80202

27 September 2019

Steve Kahl  
Executive Secretary  
Public Service Commission  
600 East Boulevard Avenue  
Department 408  
Bismarck, North Dakota 58505-0480  
ndpsc@nd.gov

Subject: Comment Letter PU-19-290 Section 69-06-08-01 - Energy Conversion Facility Siting Criteria

As the Department of Defense (DOD) Regional Environmental Coordinator (REC) in the area that includes North Dakota, I am responsible for ensuring our State partners are informed of any impacts to military operations that might result from proposed state legislation or regulation. I appreciate the opportunity to share our feedback on the subject rule. Specifically, I am writing to request that safety concerns at Minot Air Force Base (AFB) be considered as you develop revisions to your facility siting criteria. Air Force representatives attended the September 19, 2019 hearing outlining concerns related to the proposed rule. Additional detailed concerns follow:

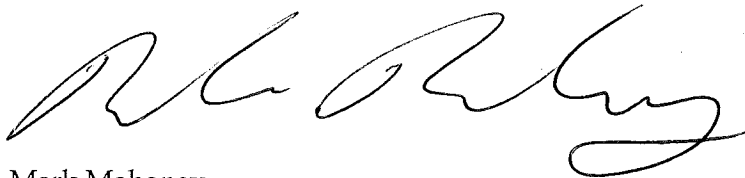
As discussed at the September 19 hearing, the Air Force requests that the final version of the regulation (1) increase the setback from 1,200 feet for wind turbines to a two nautical mile radius from the center of the launch facility and/or launch control facility to the proposed wind tower; (2) provide that proponents of wind tower projects proposed within existing missile fields contact Minot AFB as early in the permitting process as possible in order to identify and remedy any potential adverse impact to missile field operations; (3) provide that all towers erected within missile fields are equipped with collision avoidance lighting that is compatible with the night vision goggles used by AF helicopter pilots (Minot AFB is available to consult on the type of lighting that is compatible with their night vision goggles); and (4) provide that proposed wind towers be staffed for informal review through the Military Aviation and Installation Assurance Siting Clearinghouse to ensure all potentially impacted military missions are identified.

The area within two nautical miles of the ICBM launch facilities and launch control facilities is regularly used by our helicopters to provide overhead security in sensitive locations. Restricting helicopter approach avenues limits the aircraft's turn radius, impacting the ability to provide air-to-ground security response integration and creating hazards for responding forces.

The need to consult directly with Minot AFB remains critical given the sensitive nature of the mission, the emerging technologies and equipment used at our military installations and the hazards posed by the growth of the wind industry. Minot AFB is committed to consulting with the developers as they go through the process of siting and installing these structures.

The State of North Dakota and the Public Service Commission have always supported the mission at Minot AFB and worked closely with the base to accommodate the unique land use and air space concerns that come with maintaining and securing our missile facilities. The DOD remains committed to partnering with the North Dakota Public Service Commission to ensure the safety and security of our missile fields and integrity of our mission. We appreciate the opportunity to provide our concerns in writing and participate in your public hearing. If you have questions or need additional information, please contact Kevin Ward at [kevin.m.ward@usace.army.mil](mailto:kevin.m.ward@usace.army.mil) or at 303.844.0955.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Mahoney', written in a cursive style.

Mark Mahoney  
Department of Defense  
Regional Environmental Coordinator,  
Region 8