



OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

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WASHINGTON, DC 20301-3500

SUSTAINMENT

September 27, 2019

Mr. 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"

Dear Mr. Kahl:

The Military Aviation and Installation Assurance Siting Clearinghouse is responsible for reviewing all energy projects filed with the Federal Aviation Administration for potential adverse impact on Department of Defense missions. North Dakota is home to many missions vital to the national security of the United States. Many of those missions can be severely degraded or impaired by incompatible energy project development.

As your commission reviews PU-19-290 Section 69-06-08-01, "Energy Conversion Facility Siting Criteria," I request that you consider measures to protect military missions in North Dakota, including impacts to ballistic missile silos and launch facilities, low level military airspace, weather radars and air traffic control radar, that may be significantly impaired or degraded by wind farms in close proximity to those facilities.

There are many ways that North Dakota can support national security and enhance protections for military missions in North Dakota, complementary to the reviews conducted by my office. As one example, I recommend that your commission include the following as a new set of selection criteria under subsection 5 in the existing rule:


"5. Selection criteria. . . .

e. The impact upon military operations and readiness in relation to United States Department of Defense installations, facilities, and activities within North Dakota and adjacent states, including but not limited to notices, objections, or concerns expressed by the Department of Defense Military Aviation and Installation Assurance Siting Clearinghouse during or after a formal or informal review pursuant to its Mission Compatibility Evaluation Process.

(1) For any proposed facility that requires review by the Federal Aviation Administration pursuant to its Obstruction Evaluation / Airport Airspace Analysis program, the applicant must submit a Determination of No Hazard from the Federal Aviation Administration, and documentation from the Military Aviation and Installation Assurance Siting Clearinghouse that resolves any potential adverse impact on military operations and readiness as identified by the Clearinghouse pursuant to the Mission Compatibility Evaluation Process and any mitigation measures agreed to by the applicant.

I would welcome the opportunity to discuss approaches with you at your convenience. Thank you for the opportunity to provide my concerns and to participate in your public process. I can be reached at (703) 693-6707 or ronald.e.tickle4.civ@mail.mil.

Sincerely,



Ronald E. Tickle
Executive Director
Military Aviation and Installation Assurance
Siting Clearinghouse

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NDARNG