

HOWARD D. (DAVE) BELOTE

OPENING STATEMENT AND WRITTEN TESTIMONY

Good morning, Chairwoman Muth, senators, and attendees. I'm Dave Belote, Managing Partner and CEO of DARE Strategies; along with my colleague, Ed Chupein, I've been advising Doral Energy on mission compatibility issues regarding their Anthracite Ridge Wind project and helicopter training conducted by the Pennsylvania Army National Guard at and around Fort Indiantown Gap. I bring a broad perspective and more than a decade of experience in this unique area, combining multiple command tours, senior Pentagon staff assignments, and wind and solar development. Most pertinent to this issue, I'm a retired Air Force colonel and F-16 pilot who served as the expeditionary air support operations group commander and air liaison officer to the commanding general of Multinational Corps-Iraq in Baghdad; in that role, I directed all country-wide close air support during the Battle of Fallujah in 2004 and the first Iraqi elections in 2005. I later served as the commander of Nellis Air Force Base and the 2.9-million-acre Nevada Test and Training Range, overseeing roughly 10 percent of the Department of Defense's land holdings. During that tour, I negotiated the compatible siting of a concentrated solar power tower in close proximity to sensitive test and training programs – and was subsequently recruited by the then-Deputy Under Secretary of Defense for Installations and Environment to develop DoD-level renewable energy siting policy. Responding to direction in section 358 of the 2011 National Defense Authorization Act, I founded and served as first executive director of the Military Aviation and Installation Assurance Siting Clearinghouse. To fulfill Federal law, I developed the mission compatibility evaluation process and put that process into Title 32 Code of Federal Regulations Part 211. I coordinated the first set of Clearinghouse reviews and concluded the first-ever Memorandum of Understanding between DoD and a wind developer, protecting flight paths and radar approaches for flight trainees while simultaneously promoting utility-scale renewable energy development. Since leaving the Pentagon in 2012, I've worked as a wind and solar developer and consultant. I've negotiated 21 similar memoranda for developers and facilitated the permitting of 36 projects comprising 9.4 gigawatts of wind power while protecting critical military capabilities.

As I describe the mission compatibility evaluation process and the mitigation negotiations that take place within it, let me emphasize I'm testifying as a private citizen – I am not trying to state DoD positions on siting. That said, I am testifying from firsthand knowledge, as the process still works fundamentally as I designed it. The 2011 law emphasized a balance between robust renewable energy development and military readiness; at the direction of Pentagon attorneys, I made sure to acknowledge landowner's rights in the Federal Rule. The 2011 law also consciously removed decision authority from local commanders and their entire Service chain of command. The law's author, a staff attorney for the Senate Armed Services Committee, explained to me that installation commanders far too frequently blocked energy proposals without adequate understanding or explanation – and Congress agreed, reserving the authority to object to an energy project to a principal deputy under secretary of defense or higher. While I knew from personal experience that installation commanders typically lack the tools, expertise, or resources to analyze renewable energy projects – my own initial response to development in Nevada was hesitant at best, and I relied on sophisticated assistance from the Massachusetts Institute of Technology's Lincoln Laboratory to identify a suitable site for the Crescent Dunes solar project – I made sure to keep commanders and local staffs integral to the process. Under my leadership, the original Mitigation Response Teams, MRTs for short, were chaired by the affected base commanders, with subject matter expertise and analytical support provided by Pentagon and Major Command agencies; to this day, the Services designate MRT leads, supported by Service staffs and functional agencies in the Office of the Secretary of Defense.

For the most part, Clearinghouse reviews and associated MRT discussions have been fruitful and productive. Through the end of 2020, the Clearinghouse had received 35,109 aeronautical study requests from the Federal Aviation Administration for review, including 5413 wind projects. The Clearinghouse website has published 43 mitigation agreements, allowing any interested party to see in-depth and successful collaboration between military aviators and the wind industry. However, that success depends on transparent and free-flowing communication within the MRT and a willingness to accept analytical support from appropriate Pentagon experts – and as my colleague Ed Chupein will describe, we’ve never had that level of discourse with the Gap or the Department of Military and Veterans Affairs. I’m accustomed to having commanders and airspace managers acknowledge the rights of the landowners over whom they fly, outline their unit training requirements, propose and discuss possible mitigation solutions, and provide detailed rationales for their concerns. We haven’t enjoyed that type of collaboration in Pennsylvania; instead, we’ve seen letters to local authorities with demonstrably false assertions about turbine lighting – the FAA approved night-vision-compatible lighting almost 3 years ago in Advisory Circular 150/5345-43J – and we’ve seen an apparent unwillingness to let the Pentagon supply the analytical support gleaned from more than 11 years of Clearinghouse experience. As of November 23, 2021, acting Deputy Assistant Secretary of the Army for Energy and Sustainability Christine Ploschke told us the Army Secretariat had not completed its review of the Anthracite Ridge project – which clearly indicates the Gap’s objections are premature.

I recognize and acknowledge that we could add numerous layers to this argument about Federal vs. state roles of the National Guard, prerogatives of a Governor and Cabinet, and decades or centuries of reluctance of front-line commanders to reach back to higher headquarters for guidance—but there’s far too much economic and climate benefit to this project to complicate the discussion. Having designed the Clearinghouse process to bring all pertinent voices to the table, from local commanders to subject matter experts to senior Department of Defense decision makers, I ask all parties to complete the mission compatibility evaluation process and mitigation discussions as outlined in 10 USC §183a and 32 CFR Part 211. Thank you for your attention and interest in this matter – after my colleague’s remarks, I look forward to your questions.