



ENERGY,
INSTALLATIONS
AND ENVIRONMENT

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

3400 DEFENSE PENTAGON
WASHINGTON, DC 20301-3400

December 11, 2015

MEMORANDUM FOR: MITIGATION OVERSIGHT COMMITTEE MEMBERS

FROM: Michael A. Aimone, P.E., Executive Director, DoD Siting Clearinghouse

Aimone
11 Dec 2015

SUBJECT: Procedures Memo #7: Concept of Operations (ConOps): Risk of Adverse Impact on Military Operations and Readiness Area (RAIMORA)

You staffs are directed to follow the procedures identified in the attached ConOps to submit your candidate RAIMORA maps, by energy resource type, to the DoD Siting Clearinghouse for review and approval. The maps are necessary to inform developers, State, Indian tribal and local governments, non-governmental organizations, and landholders of areas where renewable energy development may adversely impact military operations and readiness.

If you have any questions relating to use of these procedures, please contact Mr. Bill Van Houten at william.j.vanhouten.civ@mail.mil or 703-571-9068.

Attachment:
As Stated

CONCEPT OF OPERATIONS

Risk of Adverse Impact on Military Operations and Readiness Area (RAIMORA)

I. Need for a RAIMORA: National Defense Authorization Act for FY 2011, Section 358

Section 358(d)(2)(B) of the Ike Skelton National Defense Authorization Act for Fiscal Year 2011 requires that the Secretary of Defense “identify geographic areas selected as proposed locations for projects filed, or which may be filed in the future, with the Secretary of Transportation pursuant to section 44718 of title 49, United States Code, where such projects could have an adverse impact on military operations and readiness...” The identification of “geographic areas” is interpreted as the production and publication of maps by the Department of Defense (DoD) for the purpose of conducting early outreach efforts to parties interested in development of projects. This Concept of Operations (CONOPS) document provides guidance for the identification and publication of these maps.

II. Definition of a RAIMORA

Risk of Adverse Impact on Military Operations and Readiness Area (RAIMORA): A designated geospatial area into which the introduction of structures associated with projects filed, or which may be filed in the future, pursuant to 49 U.S.C. 44718 could have an adverse impact to onshore military operations and readiness. If the proposed RAIMORA is for impacts from energy generation, it should be designated for a specific type of energy (e.g., wind or solar power). Section 211.3 of title 32, Code of Federal Regulations, provides that an adverse impact is “any adverse impact upon military operations and readiness, including flight operations research, development, testing, and evaluation and training, that is demonstrable and is likely to impair or degrade the ability of the armed forces to perform their warfighting missions.”

III. Purpose of a RAIMORA

The RAIMORA will inform persons or entities who may file an action for review with the Secretary of Transportation pursuant to 49 U.S.C. 44718, and other interested parties, that development in these designated areas could adversely impact military operations and readiness activities. Such parties include a State, Indian tribal, or local official, a landowner, a developer of a project, and members of the general public. Developers and others are invited to work with DoD to identify feasible and affordable solutions to compatibility challenges in these areas.

IV. Process for RAIMORA Nomination, Recommendation, and Establishment

The process that results in publication of a RAIMORA is separated into Nomination, Recommendation, and Establishment elements. This process is illustrated in Figure 1.

CONCEPT OF OPERATIONS

Risk of Adverse Impact on Military Operations and Readiness Area (RAIMORA)

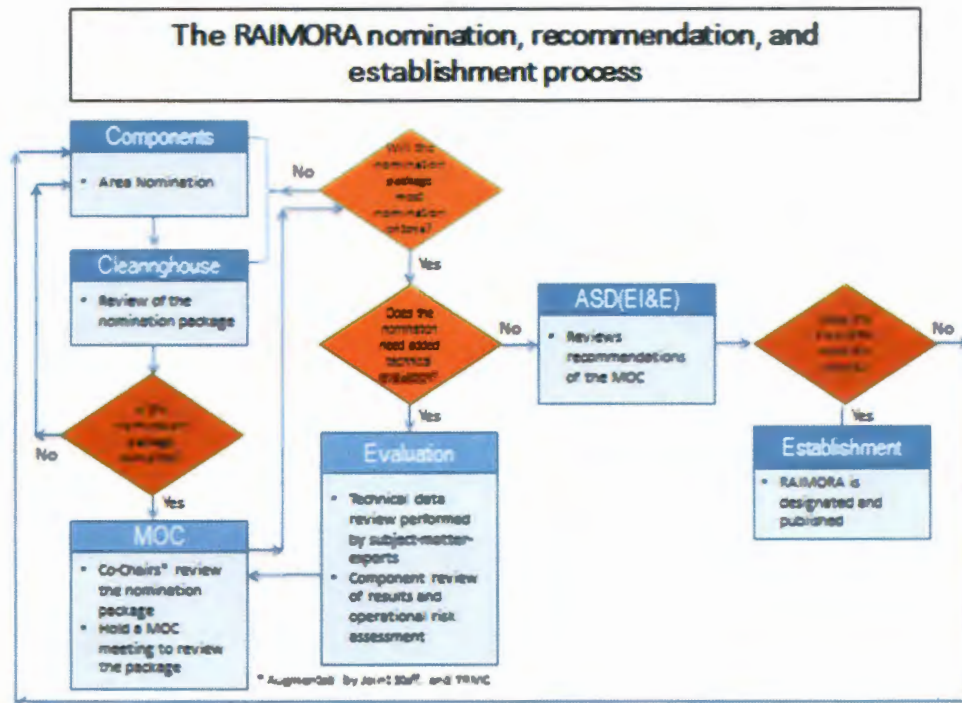


Figure 1: The RAIMORA nomination, recommendation and establishment process

1. Nomination: A RAIMORA nomination is made by a DoD Component.¹ A template is provided in Appendix A to ensure that a consistent approach is used to provide a nomination to the DoD Siting Clearinghouse (Clearinghouse). Nominations should be for areas where:
 - a. Current or future developments in a defined geospatial area could have an adverse impact on military operations and readiness; or
 - b. The cumulative impacts of multiple current or future developments in a defined geospatial area could have an adverse impact on military operations and readiness.
2. Recommendation by Clearinghouse and Mitigation Oversight Committee (MOC):
 - a. The Clearinghouse staff will review a RAIMORA nomination package to:
 - i. Assess documentation for completeness and validate the information provided.
 - ii. Resolve issues with the nominating DoD Component's documentation.
 - iii. Engage other DoD Components to ascertain additional adverse impacts to those identified by the nominating DoD Component, including areas of impact in the vicinity of the proposed RAIMORA.
 - iv. Develop a recommendation for presentation to the MOC that includes:

¹ The Office of the Secretary of Defense, the Military Departments, the Chairman of the Joint Chiefs of Staff and the Joint Staff, the Defense Agencies, the DoD Field Activities, and all other organizational entities in the Department of Defense.

CONCEPT OF OPERATIONS
Risk of Adverse Impact on Military Operations and Readiness Area
(RAIMORA)

- a. the methodology employed to validate the documentation provided by the nominating Component;
 - b. any additional data employed to determine the size/shape of the area and potential for adverse impact; and
 - c. the decision factors leading to the recommendation.
- b. Within thirty (30) days of the MOC's receipt of a Clearinghouse recommendation for a RAIMORA, the MOC will make a determination on whether to concur with the RAIMORA nomination.
- i. If the MOC concurs with the nomination, the Clearinghouse will prepare the package for approval by the Assistant Secretary of Defense for Energy, Installations, and Environment (ASD(EI&E)).
 - ii. If the MOC determines that the stated mission risks are not adequately supported, Clearinghouse staff will work with the nominating DoD Component to provide additional information, potentially to include new technical evaluation by independent experts as detailed in Section V.
 - iii. If the nomination will clearly not substantiate a RAIMORA designation, the MOC will recommend that the nomination not be approved by the ASD(EI&E).
3. Establishment:
- a. Following a recommendation by the MOC, the ASD(EI&E) will consider nomination packages for RAIMORA establishment, in coordination with the Board of Directors co-chairs. If a RAIMORA designation is not approved, the nomination will be referred to the MOC for further action or termination of the proposal. If the ASD(EI&E) approves the recommendation and establishes the RAIMORA, the Clearinghouse will publish the results.
 - b. Following approval by the ASD(EI&E), the Clearinghouse will publish the RAIMORA on the Clearinghouse website (www.acq.osd.mil/dodsc).
 - c. The RAIMORA maps should include an effective date (approval by ASD(EI&E)) and a note that DoD should be contacted for any updates.
 - d. In developing RAIMORAs, the Department of the Air Force shall include NORAD mission concerns in its maps but will not separately identify these concerns.

V. Technical Validation and Evaluation

In the event that the MOC determines that further study and technical evaluation is necessary, the following procedures will apply:

- a. The MOC will determine whether the data and methodology supports the concerns introduced in the RAIMORA nomination. DoD may fund and use external independent investigators recognized for their subject-matter expertise to conduct a

CONCEPT OF OPERATIONS

Risk of Adverse Impact on Military Operations and Readiness Area (RAIMORA)

technical evaluation of the proposed RAIMORA. Use of independent investigators will promote information credibility and provide peer reviewed verification of the proposed RAIMORA borders and potential impacts to military operations and readiness identified in the nomination package.

- b. Once the technical evaluation is complete, the Clearinghouse staff will provide the results to the nominating DoD Component.
- c. The MOC will review the results of the DoD Component review and will make a recommendation to the ASD(EI&E) on RAIMORA conformance with the nomination criteria in Section IV.
- d. If the RAIMORA nomination is unfavorably recommended to the ASD(EI&E), the DoD Component may revise or conduct additional analyses to the proposal in accordance with MOC recommendations or terminate the nomination.

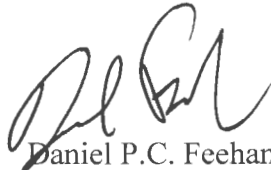
VI. Offshore Energy and DoD Mission Compatibility Assessments for Use with the Department of Interior's Bureau of Ocean Energy Management (BOEM) or the FAA

DoD conducts mission compatibility assessments to inform BOEM's offshore oil and gas and renewable energy lease sale processes on the Outer Continental Shelf (OCS). The Department's OCS mission compatibility assessment process pre-dates the statutory requirement for designation of RAIMORAs and the DoD assessments are coordinated by the Office of the Assistant Secretary of Defense (Readiness). However, the DoD OCS mission compatibility assessments are similar in nature to RAIMORA designations.

The major difference between the DoD assessments for the BOEM lease sale processes and the RAIMORA process is in the use of the DoD mission compatibility assessments. RAIMORA assessments are designed primarily to inform industry of potential military mission risks, primarily on land but also including the offshore jurisdiction of FAA, where 49 U.S.C. 44718 applies. In contrast, DoD's offshore mission compatibility assessments are provided to BOEM to support the Department of Interior's planning and designation of lease sale areas on the OCS.

CONCEPT OF OPERATIONS
Risk of Adverse Impact on Military Operations and Readiness Area
(RAIMORA)

It should be noted that the assessments produced for BOEM leasing purposes can also be used for assessments involving the projects under the Federal Aviation Administration's Obstruction Evaluation (OE/AAA) process as contained in 49 U.S.C. 44718 (within the confines of FAA's authority out to the territorial sea boundary at 12 nautical miles from land).



Daniel P.C. Feehan
Performing the Duties of the
Assistant Secretary of Defense
(Readiness)



John Conger
Performing the Duties of the
Assistant Secretary of Defense
(Energy, Installations, and Environment)

OCT 29 2015



David W. Duma
Principal Deputy Director
Operational Test and Evaluation

OCT 08 2015

CONCEPT OF OPERATIONS

Risk of Adverse Impact on Military Operations and Readiness Area (RAIMORA)

Appendix A: RAIMORA Nomination Template

Security: Classified information should be referred to as "Classified supporting information is available on request" as required by applicable DoD information security policies and guidance.

- 1) DoD mission capabilities potentially affected:
 - a. Testing
 - b. Training
 - c. Operations
- 2) A proposed RAIMORA map showing the details listed below. Separate RAIMORA maps shall be provided for different development siting technologies (e.g., RAIMORA-Wind, RAIMORA-Solar/PV, RAIMORA-Solar/Tower, RAIMORA-Transmission).
 - a. DoD installations and ranges
 - b. Special Use Airspace and Military Training Routes
 - c. Operating Areas
 - d. Other geographical areas as appropriate
 - e. Other details as appropriate
- 3) DoD activity description:
 - a. Instrumentation or test capabilities
 - b. Operations scenarios (e.g. resource locations, geographic features, separation distances, mission expectations, altitude/aptitude, etc.). Future operations scenarios should reference DoD planning information
 - c. Major technical characteristics of activity
 - d. Unique features of activity
- 4) Characterization of potential siting interactions:
 - a. Physical obstruction
 - b. Safety and Security interference
 - c. Electro-Magnetic Interference
 - i. Radar
 - ii. Telemetry
 - iii. Communications
 - iv. Environmental
 - v. Test Instrumentation
 - d. Visual
 - e. Acoustic
 - f. Seismic
 - g. Cumulative impact of multiple, or additional, developments in the same geographical area if possible to determine.
- 5) Expected mission impact, which may be theoretical or may be calibrated to activity risk factors. Supporting analysis data and case studies should be provided when available.
- 6) Expected consequences of mission impact: supporting information and data documenting the magnitude of the impact from potential development siting upon mission capabilities at one or more sites should be provided if available.

CONCEPT OF OPERATIONS

Risk of Adverse Impact on Military Operations and Readiness Area (RAIMORA)

- 7) Identification of potential issues and concerns with a RAIMORA designation by DoD.
- 8) Submission of the nomination to the Clearinghouse to initiate review process.