THE UNDER SECRETARY OF DEFENSE
3010 DEFENSE PENTAGON
WASHINGTON, DC 20301-3010

ACQUISITION,
TECHNOLOGY
AND LOGISTICS

AUG 0 7 2013

Mr. Neil Kornze
Principal Deputy Director,
Bureau of Land Management
Department of the Interior
1849 C Street
Washington, DC 20240

Dear Mr. Kornze:

The Department of Defense (DoD) officially objects to a portion of the preferred alternative route identified in the Sun Zia Southwest Transmission Project Final Environmental Impact Statement (FEIS), released on June 14, 2013. Given the importance of the Defense interests at stake, we request your support to resolve this objection before you sign the Sun Zia Record of Decision and associated Right of Way agreement. Once again, we also ask you to thoroughly examine the DoD Preferred Route, as identified in our March 19, 2013, letter to Deputy Secretary Hayes (see attached map).

Our objection is based on our belief that the FEIS has not adequately analyzed the significant risks to national security should an above-ground transmission line be constructed across the White Sands Missile Range (WSMR) Northern Extension Area (NEA) in New Mexico, and the discovery of substantial new information relevant to the feasibility of burying a segment of the transmission line. Further, we believe that the FEIS did not analyze all reasonable alternatives, as required under the National Environmental Policy Act.

In our March 19, 2013 letter, Under Secretary Frank Kendall stated that without four specific mitigations, the route proposed in the FEIS would result in an unacceptable risk to national security. If a bulk power transmission line is constructed along the selected route, it would preclude our capability to fully test the Joint Integrated Air and Missile Defense Architecture and other weapon systems under realistic threat environments at WSMR. This testing is absolutely necessary and it should be clearly understood that no other location exists in the United States where it is possible to conduct flight tests with the footprint requirements these weapon systems present. Critical to fully testing joint military weapons are the preservation of the restricted airspace (from the surface to unlimited) on the range area on WSMR, and the permanently-designated and specially-allocated restricted airspace in the northern extension area.

A Technical Working Group (TWG) was formed to evaluate issues raised by the Applicant's proposal and make recommendations to resolve these issues. The TWG completed its analysis of the technical and economic issues and briefed your staff and the Applicant on July 11, 2013. The TWG included electrical power engineering experts from the Department of Energy. A copy of the TWG report is attached.

We are committed to continuing to work with you, and with the New Mexico State Director and his staff, to resolve our serious objection prior to BLM issuing the Sun Zia Record of Decision and a Right of Way permit to the Applicant.

Sincerely,

John Conger
Acting Deputy Under Secretary of Defense
(Installations & Environment)

Attachment:
Technical Working Group Report