

Congress of the United States

Washington, DC 20510

April 22, 2016

Mr. Robert Cardillo
Director
National Geospatial-Intelligence Agency
7500 GEOINT Drive
Springfield, Virginia 22150

Dear Mr. Cardillo:

We have serious concerns that the National Geospatial-Intelligence Agency's rationale for its Agency Preferred Alternative (APA) rests unintentionally on a series of factual errors and underestimated risks presented in the Army Corps of Engineers' Final Environmental Impact Statement (FEIS). Therefore, we request that you and the Army Corps meet with us in the near term and in a public setting to discuss these concerns and address them prior to issuing a Record of Decision.

The new site for NGA-West should be decided on its merits, and we agree that execution of NGA's mission and the physical security of the site should be the driving factors. We also agree that in a time of tight fiscal constraints, environmental factors and legal issues must also inform the decision, especially those factors which risk driving up costs or delaying construction. The FEIS has a number of significant failures in its analysis, which must be corrected.

Mission

Recruiting and retaining a highly-skilled workforce, now and in the future, is critical for NGA to execute its mission. As we have stated previously, St. Clair County is well positioned to achieve this goal in the fullest. The Intelligence Community as a whole is experiencing difficulty recruiting for positions requiring security clearances regardless of where they are. It is important to stress that Scott Air Force Base sustains its highly-skilled workforce quite easily, whether it be millennials or mid-career professionals. Consider the following:

- Scott Air Force Base has won the Abilene Award multiple times from the Air Force for providing the best military community quality of life in the nation. The 2005 Base Realignment and Closure (BRAC) located the 126th Air Refueling Wing at Scott AFB, and it has had no problems sustaining its workforce for the last eleven years. Most Scott AFB military and civilian personnel choose to remain in the area after their service, and co-location would enhance NGA's ability to recruit these security clearance-holding professionals.
- Further, the Defense Information Systems Agency – Continental United States (DISA CONUS) Field Command, which will soon open its new facility at Scott AFB, has not had any issues recruiting and maintaining its current workforce, to include military, civilians, and contractors.

- Southern Illinois University Edwardsville is the only college or university in the region offering a degree in geography and cartography. The University of Illinois system is also eager to establish a formal partnership to leverage its national leadership in science and engineering graduates. The potential inherent benefits of these partnerships were ignored in the FEIS.
- In attempting to advance the logic that the NGA workforce desires an urban setting, the FEIS relies upon a small, statistically unsound survey of young NGA recruits (in particular the response to one question in which 20 responders preferred St. Louis and 12 preferred Scott AFB). While hard to believe that a conclusion about long-term trends in the future workforce could rest upon such a cursory analysis, the composition of NGA-West undermines this logic entirely as only nine percent of current NGA-West employees live within St. Louis city limits and 91 percent commute from the greater Missouri and Illinois area. We request that NGA conduct a survey of its existing employees on this question and release it publicly. If such a survey was conducted at any point during this process, we request that those results be provided to the Illinois Congressional delegation and publicly released.
- The FEIS stated that the impact of employees' driving distances also played a role. However, the FEIS' analysis failed to factor in prevailing traffic patterns, after which the difference between the two sites shrinks to a mere five minutes. Neither was the availability of better public transportation options discussed.

In short, we are shocked that any fair analysis of Southern Illinois could conclude anything other than the area has a strong, enduring track record of recruiting and maintaining a highly-skilled workforce of all ages, offers a plethora of financial and quality of life advantages for employees, and has a proven track record of supporting national security missions, which is second-to-none.

Security

The physical security of NGA-West's campus and its employees is paramount and critical to enabling NGA to execute its intelligence mission. We also recognize that the FEIS strongly prefers the St. Clair County site on that basis. But we believe the contrast between the sites would be much clearer if the FEIS had conducted a thorough analysis of all the risk factors.

- While the FEIS claims to have incorporated security risks analysis into its conclusions, there is no mention of standoff distances or antiterrorism/force protection standards, which is in stark contrast with the lengthy discussion contained in NGA-East's FEIS prior to the selection of Fort Belvoir. As you are aware, these standoff distances and force protection standards for Military Construction are outlined in UFC 4-010-01, *Department of Defense Minimum Antiterrorism Standards for New and Existing Buildings*, Appendix B (issued October 8, 2003 and updated January 22, 2007). Table B-1 of those standards shows the minimum stand-off distance requirements. The minimum requirements are considered only to provide low or very low applicable levels of protection, however.
- While the FEIS claims that each site met the basic security requirements, an independent analysis by the risk analysis firm *Command Consulting Group* asserts that based on DoD's own minimum standoff distance parameters, due to encroachment and the lack of standoff distance, the North St. Louis site would require a security waiver in order to proceed.

- The overwhelming trend in national security construction since September 11 (and arguably over the last several decades) is a preference for co-location with existing military facilities, due to the additional security benefits of that arrangement, or to locating facilities in areas that do not have encroachment issues. With the NGA's especially sensitive mission supporting military and intelligence communities, it would seem to be especially important to factor in these considerations.

We believe that NGA should conclude its Record of Decision by selecting the strongest security rating from the sites available, and that is clearly St. Clair County.

Environmental Risks and Associated Threats to Cost and Schedule

Any EIS, and especially a final one, should present an accurate assessment of risks posed by environmental contamination or challenges to maintaining a project's cost and schedule. By this definition, the Army Corps of Engineers' FEIS is a miserable failure in this regard by underestimating certain critical risks while claiming ignorance of others. The St. Clair County site risk factors are known and minimal while the North St. Louis site risk factors are claimed to be unknown but are likely higher than the FEIS indicates. We, along with our local elected leadership, have repeatedly attempted to correct these deficiencies in the Corps' study, without success. Given the severe risk the following items pose to the cost and schedule of the project, we urge you to factor these conditions into your final Record of Decision.

- In an effort to provide the NGA with maximum flexibility, St. Clair County submitted nearly twice the amount of land submitted by North St. Louis. If selected, the County's intent was to work with the NGA to tailor the site to avoid any environmentally sensitive areas. The FEIS refused to engage in any modification of St. Clair's initial offer, even as it adjusted the boundaries of the North St. Louis site very late in the process in order to exclude the Pruitt-Igoe complex.
- For years, there have been reports that the Pruitt-Igoe parcel of land may have been the site of military chemical weapons testing in the 1960s. The Corps argues dismissively that it could find no evidence of this. Similarly the FEIS does not contain sufficient analysis of what risk this lack of information may pose to the efficient and timely execution of the project's construction. Given the potential environmental contamination, we urge you to clarify these claims before proceeding to the Record of Decision.
- The proposed St. Clair County site has phase one and phase two analyses of the environmental risks involved with its site already on record. The phase one and phase two analyses confirmed this site's superiority in terms of minimal environmental impact and lack of contamination. It is unclear why North St. Louis chose not to pursue similar transparency. The Corps uses this against St. Clair County by stating repeatedly throughout the FEIS that the North St. Louis site's risk cannot be assessed because there is no level of comparable data available. This is naïve and should be remedied. If costly contamination or environmental issues are found after construction begins, the Corps lack of due diligence will end up being cold comfort to the taxpayers asked to foot the bill later on.
- Similarly, the FEIS understates the risk to schedule involved in taking possession of the North St. Louis parcel of land.

- The FEIS assesses that the St. Clair site is \$25.6 million more expensive on the basis of the area's soil composition relative to North St. Louis. The details of this calculation have not been made public. We would note that the new DISA CONUS facility at Scott AFB is on-time and on-budget. We would further note that the cost of construction in Southern Illinois is at least three percent cheaper than in St. Louis. On that basis, we would urge you to examine closely and skeptically the FEIS' assertions as to cost comparisons between the two sites.
- Finally, the FEIS contains multiple major factual errors in the course of its environmental analysis, including frequent mislabeling of geographic boundaries and waterways. In the FEIS, St. Clair County, Illinois, is confused with both St. Clair County, Missouri, and St. Clair County, Michigan. The FEIS also references the Osage River as being an area of concern, yet the Osage River is not located in St. Clair County, Illinois. It goes on to incorrectly claim that a prehistoric archeological resource is located within the St. Clair County parcel despite the County's repeated attempts to clarify that neither the National Register nor the Illinois State Historical Preservation Office has such a listing.

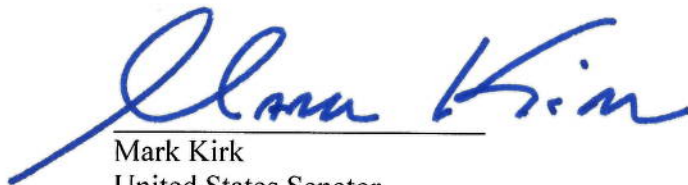
We continue to believe that St. Clair County/Scott Air Force Base is the best possible new home for NGA-West and appreciate the serious manner in which you have engaged with the Illinois and Missouri delegations during the last several years regarding the new facility. We value NGA's decision to continue its presence in the region and, like you, we care deeply about the satisfaction of both today's employees and tomorrow's recruits. We request a meeting with you as soon as possible to discuss the errors in the FEIS and our grave concerns in detail. We know that you share our commitment to ensure that the final Record of Decision is based upon correct information and a fully-formed analysis.

Thank you for your service, time, and consideration. We look forward to further discussion of this important national security decision with you in the very near future.

Sincerely,



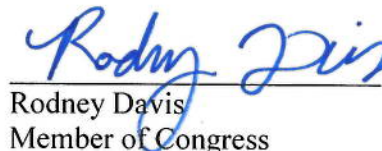
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United States Senator



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