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MIKE BOST
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AGRICULTURE COMMITTEE
TRANSPORTATION &
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VETERANS' AFFAIRS COMMITTEE

U.S. Army Corps of Engineers
Engineer Inspector General
7701 Telegraph Road
Alexandria VA 22315-3863

Dear Inspector General:

I write today as a Member of Congress and a concerned citizen to officially request a formal Engineer Inspector General investigation into the United States Army Corps of Engineers' (USACE) Environmental Impact Assessment regarding site location for the new National Geospatial-Intelligence Agency (NGA) West Campus.

After extensive review, I am concerned with the accuracy of the overall environmental assessment process in this case, particularly regarding the Army Corps' deeply flawed Final Environmental Impact Statement (FEIS) used to justify placement of the new NGA-West facility in North St Louis rather than adjacent to Scott Air Force Base in St. Clair County, Illinois. The report's factual errors, blatant omissions, and underestimated risks are egregious at best and a threat to national security at worst.

As a sensitive Department of Defense intelligence agency responsible for satellite mapping, NGA performs a critical mission in support of our warfighters. This is why it is especially important that the site location for NGA-West be determined based solely on the merits and with complete confidence in the accuracy of the information at hand. In this case, the FEIS did not provide the informed basis required for such an important national security decision and significant investment of taxpayer dollars.

A thorough investigation of this matter is necessary and must include a review of the following:

- The FEIS's significant errors and complete disregard for geographical accuracy. In the report, St. Clair County, Illinois is confused with St. Clair County, Missouri and St. Clair County, Michigan. The final report also references the Osage River as part of the proposed site, yet there is no Osage River in St. Clair County, Illinois.
- Mission security is crucial for the new National Geospatial-Intelligence Agency West campus, yet the FEIS did not fully address this critical parameter. The FEIS claims to have incorporated security risk analysis into its conclusions, yet there is no mention of standoff distances or antiterrorism/force protection standards for Military Construction as outlined in the Department of Defense Minimum Antiterrorism Standards for New and

Existing Buildings, UFC 4-010-01, Appendix B, issued October 8, 2003 and updated January 22, 2007, or UFC 4-010-02 (9 February 2012), DoD MINIMUM ANTITERRORISM STANDOFF DISTANCES FOR BUILDINGS. Table B-1 Standoff Distances for New and Existing Buildings in UFC 4-010-01, Appendix B chart outlines minimum stand-off distance requirements. The minimum requirements are considered to only provide low or very low applicable levels of protection.

- The FEIS choice of a preferred site in North St. Louis differs greatly from the relocation model utilized for agencies with similarly sensitive national security missions, such as the Defense Intelligence Agency (DIA), National Reconnaissance Office, National Security Agency (NSA), and even the National Geospatial-Intelligence Agency's own NGA East campus. Force protection standards for Military Construction have traditionally compelled agencies with similarly sensitive national security missions to co-locate with existing military installations or in areas without encroachment issues.
- Comparison of the NGA-West FEIS stand-off distances considered acceptable, versus antiterrorism stand-off distances in place at similar agencies such as DIA, NSA, and the NGA East campus at Fort Belvoir.
- Why a full environmental overview of the North St. Louis site was not conducted, along with a thorough comparison of the two sites. It is clear that the North St. Louis and St. Clair County sites were not evaluated on an even playing field, with the St. Clair County site being penalized for being fully transparent by submitting a Phase I and Phase II analysis that North St. Louis has yet to conduct. Therefore, NGA has no means of knowing the true impact of locating at North St. Louis, which could cost millions of dollars in cleanup and delays in construction.
- Why concerns regarding hazardous waste and presumed radioactive contamination at the North St. Louis site were not taken into account in the FEIS. During the Cold War, reports indicate that the U.S. Army conducted classified chemical weapons testing over the adjacent Pruitt-Igoe housing complex. The Army Corps made no mention of likely Pruitt-Igoe contamination in their report; yet for some still unexplained reason, this major portion of the originally-proposed North St. Louis site was dropped from the FEIS.
- Whether possible historic structure impacts were located in a geographically accurate manner. The FEIS does not address Osage Nation concerns that the proposed North St. Louis site would impact their ancient burial grounds.
- Whether an accurate cost assessment of the two sites was made and included in the FEIS. For example, the report claims the cost to acquire and develop the Scott AFB/St. Clair County site is almost 20 percent higher than the North St. Louis site. The final report concedes that the government currently does not know the time or cost necessary to remediate the North St. Louis site and includes only a single sentence of explanation: "The estimate to acquire and develop the St. Clair County Site is almost 20 percent more, which provides a slight advantage to the St. Louis City Site." The assertion is

counterintuitive, as construction costs at St. Clair County are 3% lower than St. Louis City, and union labor rates paint the same picture.

- Whether specific federal regulations were heeded, while other federal regulations were not. The FEIS does not give full weight to the Rural Development Act of 1972, DoD Unified Facilities Anti-Terrorism Criteria, but does emphasize Promise Zones, and Executive Orders 12072, 13963, and 13062.
- Urban and Rural Site Issues. First priority in the location of new offices and other facilities will be given to rural areas, as defined by the U.S. Department of Agriculture. GSA's Customer Guide for Real Property discusses the Rural Development Act and states that agencies must provide a statement for actions going to GSA. If the customer's mission does not require a specific location or specific geographic area, then USACE must give first priority to locating new offices or other facilities in a rural area. If mission or program requires being in an urban area, then USACE must consider the Central Business District (CBD) under E.O. 12072 and then historic properties in the CBD under E.O. 13006. In order to justify why the CBD does not fit the customer's requirements, USACE must at a minimum consider safe and efficient mission performance, nature and function of facility, public convenience, and safe and healthful working conditions for employees.
- Whether workforce benefits to NGA and recruitment were comprehensively addressed and accurately assessed. The FEIS emphasizes a survey of 48 students to justify the appeal of the North St. Louis to millennial professionals. This survey is statistically insignificant and should not have been cited as a reason for choosing North St. Louis.
- Whether or not cost was given full consideration, and if not, what are the actual costs and why was cost not a higher priority.
- Whether a completely new environmental assessment is necessary.

In summary, your investigation will ensure that U.S. Army Corps of Engineers' environmental assessment for the Next NGA-West is accurate and complete, and takes into account mission security, force protection, environmental impact, recruitment, and cost to American taxpayers. Anything less is a disservice to the American people.

Thank you for your time and assistance with this matter. I look forward to your prompt response.

Sincerely,



Mike Bost
Member of Congress