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STATEMENT OF
HUGH J. WESSINGER, ASSOCIATE DIRECTOR
COMMUNITY AND ECONOMIC DEVELOPMENT DIVISION

BEFORE THE
HOUSE COMMITTEE ON INTERIOR AND INSULAR AFFAIRS, 145E 01905
SUBCOMMITTEE ON PUBLIC LANDS AND NATIONAL PARKS

ON
[THE DRAFT ENVIRONMENTAL IMPACT
STATEMENT FOR THE MX MISSILE SYSTEM]



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MR. CHAIRMAN AND MEMBERS OF THE SUBCOMMITTEE:

WE ARE HERE TODAY AT YOUR REQUEST TO PROVIDE INFORMATION
ON SELECTED ASPECTS OF THE AIR FORCE'S DRAFT ENVIRONMENTAL
IMPACT STATEMENT (EIS) FOR THE MX MISSILE SYSTEM.

THE DRAFT EIS WAS PREPARED TO AID IN MAKING THE MAJOR
DECISIONS RELATED TO SELECTING THE MX DEPLOYMENT AREA OR
AREAS AND THE APPROXIMATE LOCATIONS OF THE OPERATING BASES.
THE AIR FORCE FILED THE DRAFT EIS ON DECEMBER 31, 1980,
FOR REVIEW AND COMMENT AND IS ALLOWING 120 DAYS FOR INPUT
BEFORE IT BEGINS PREPARING THE FINAL EIS. THE COST OF
PREPARING THE DRAFT EIS IS \$20 MILLION. OUR REVIEW
RECOGNIZED THAT A DRAFT EIS IS ISSUED TO GAIN INFORMATION
TO BE CONSIDERED, WHERE APPROPRIATE, IN PREPARING THE FINAL
EIS. IT IS IN THIS CONTEXT THAT WE OFFER OUR OBSERVATIONS
CONCERNING THE DRAFT EIS.

WE BELIEVE SEVERAL FACTORS DIMINISH THE CREDIBILITY
OF THE DRAFT EIS. WE FOUND WEAKNESSES IN THE AIR FORCE'S
SYSTEM OF INTERNAL CONTROLS FOR DATA USED IN THE EIS; THE

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DRAFT ITSELF IS VOLUMINOUS AND DIFFICULT TO REVIEW; THE DESCRIPTION OF THE OPERATIONAL CONCEPT AND RESOURCE REQUIREMENTS IS INCOMPLETE, IN SOME INSTANCES; AND FINALLY, THE DRAFT CONTAINS SEVERAL QUESTIONABLE ASSUMPTIONS.

OUR REVIEW WAS LIMITED TO EVALUATING DATA THAT RELATES TO THE PROPOSED ACTION--FULL DEPLOYMENT OF THE MX MISSILE SYSTEM IN NEVADA AND UTAH, WITH THE FIRST OPERATING BASE AT COYOTE SPRING VALLEY, NEVADA, AND THE SECOND OPERATING BASE AT MILFORD, UTAH. BECAUSE OF THE LIMITED TIME, WE DID NOT EVALUATE THE OTHER ALTERNATIVES TO THIS PROPOSED ACTION AS DISCUSSED IN THE DRAFT EIS.

OUR REVIEW FOCUSED ON THREE ASPECTS OF THE DRAFT EIS:

- (1) THE ADEQUACY OF THE DESCRIPTION OF THE PROPOSED ACTION.
- (2) THE ACCURACY OF ESTIMATES OF RESOURCE REQUIREMENTS FOR CONSTRUCTION AND OPERATIONS.
- (3) THE REASONABLENESS OF IMPACT ASSESSMENTS AND MITIGATING MEASURES.

OUR REVIEW WAS MADE AT THE BALLISTIC MISSILE OFFICE, AT THE OFFICE OF THE AIR FORCE REGIONAL CIVIL ENGINEER FOR MX, AND AT THE CONTRACTOR RESPONSIBLE FOR PREPARING THE DRAFT EIS. WE DISCUSSED OUR OBSERVATIONS WITH COGNIZANT AIR FORCE AND BUREAU OF LAND MANAGEMENT OFFICIALS. WE DID NOT, HOWEVER, OBTAIN OFFICIAL WRITTEN COMMENTS.

WE ALSO COORDINATED OUR WORK WITH THE OFFICE OF TECHNOLOGY ASSESSMENT, THE CONGRESSIONAL RESEARCH SERVICE, AND THE CONGRESSIONAL BUDGET OFFICE.

ALTHOUGH WE WERE NOT ASKED TO ASSESS THE OVERALL ADEQUACY OF THE DRAFT EIS, WE WOULD LIKE TO POINT OUT THAT SUCH AN

ASSESSMENT IS BEING PERFORMED BY THE DEFENSE SCIENCE BOARD. THE UNDERSECRETARY OF DEFENSE FOR RESEARCH AND ENGINEERING HAS ASKED THE BOARD TO DETERMINE WHETHER THE DRAFT EIS IS COMPREHENSIVE ENOUGH TO ENABLE DECISIONMAKERS TO ADEQUATELY WEIGH ENVIRONMENTAL AND SOCIAL CONSEQUENCES IN CHOOSING AMONG THE SPECIFIED ALTERNATIVES FOR MX SITING. THE BOARD'S REPORT IS TO BE SUBMITTED NOT LATER THAN MAY 1, 1981--THE LAST DAY OF THE PUBLIC COMMENT PERIOD.

CONDITIONS THAT DIMINISH THE CREDIBILITY OF THE DRAFT EIS

OVERALL, WE BELIEVE THE CREDIBILITY OF THE DRAFT EIS IS DIMINISHED FOR SEVERAL REASONS. FIRST, THE AIR FORCE DID NOT IMPLEMENT AN ADEQUATE SYSTEM OF INTERNAL CONTROLS TO ENSURE THAT THE DATA IN THE DRAFT EIS WAS REASONABLY ACCURATE, COMPLETE, AND SUPPORTABLE. SPECIFICALLY, WE NOTED THE FOLLOWING INTERNAL CONTROL WEAKNESSES:

- THERE WAS LIMITED EVIDENCE OF AIR FORCE REVIEW AND APPROVAL OF DATA.
- THERE WERE FRAGMENTED DATA SOURCES CAUSED BY A LACK OF CENTRALIZED ACCOUNTABILITY.
- THERE WAS NO SYSTEM FOR MAINTAINING THE SUPPORTING DATA THAT IDENTIFIED THE METHODOLOGIES AND ASSUMPTIONS USED IN ESTIMATING REQUIREMENTS.

SECOND, THE DRAFT EIS IS VOLUMINOUS AND DIFFICULT TO REVIEW AND UNDERSTAND. FOR EXAMPLE, IT CONTAINS A SUMMARY, FIVE CHAPTERS, AND NINE SEPARATE VOLUMES--MORE THAN 1,900 PAGES IN ALL. IN ADDITION, 33 ENVIRONMENTAL TECHNICAL REPORTS SUPPORT THE DRAFT EIS. THE DRAFT EIS IS LONGER THAN THE 300 PAGES PRESCRIBED BY FEDERAL REGULATIONS FOR PROPOSALS OF UNUSUAL

SCOPE OR COMPLEXITY, BUT SUCH LENGTH MAY BE WARRANTED CONSIDERING THE MAGNITUDE OF THE MX PROGRAM.

THE AIR FORCE MAINTAINS THAT THE GENERAL PUBLIC CAN ADEQUATELY UNDERSTAND THE DRAFT EIS AND ASSOCIATED IMPACTS SOLELY BY READING THE DRAFT EIS WITHOUT REFERRING TO THE TECHNICAL REPORTS. WE FIND THIS POSITION QUESTIONABLE BECAUSE THE TECHNICAL REPORTS CONTAIN ESSENTIAL DATA NOT INCLUDED IN THE DRAFT EIS. FOR EXAMPLE, THE ESTIMATED REQUIRED AMOUNT OF WATER FOR THE OPERATIONAL PHASE OF THE MX PROGRAM IS NOT IDENTIFIED IN THE DRAFT EIS BUT MUST BE SEARCHED OUT IN THE TECHNICAL REPORTS. FINDING SPECIFIC DATA IN THE TECHNICAL REPORTS TO CLARIFY DATA IN THE DRAFT EIS IS DIFFICULT BECAUSE THERE IS NO CROSS-REFERENCING IN CERTAIN INSTANCES.

THE DIFFICULTIES WE ENCOUNTERED IN EVALUATING THE DRAFT EIS WERE ALSO EXPERIENCED BY OFFICIALS OF THE BUREAU OF LAND MANAGEMENT, THE OFFICE OF ECONOMIC ADJUSTMENT, AND THE OFFICE OF TECHNOLOGY ASSESSMENT. IN COMMENTING ON THE DRAFT EIS, THE BUREAU STATED THAT THE GREATEST PROBLEM WITH THE DRAFT EIS ANALYSES OF THE SOCIOECONOMIC IMPACTS IS THAT THEY FAIL TO LAY OUT THE ANALYTICAL METHODOLOGIES USED AND THE VARIOUS UNDERLYING ASSUMPTIONS AND DATA SOURCES. THE BUREAU CONCLUDED THAT IT WAS NOT POSSIBLE TO INDEPENDENTLY CONFIRM OR CHALLENGE THE ANALYSES THAT HAVE BEEN MADE.

THIRD, THE DESCRIPTION OF THE OPERATIONAL CONCEPT AND RESOURCE REQUIREMENTS IS INCOMPLETE AND MISLEADING. FOR EXAMPLE, THE ACTUAL NUMBER OF MX MISSILES AND SHELTERS IS NOT YET FIRM. AS DISCUSSED IN A RECENT GAO REPORT (MASAD-81-1, FEB. 17, 1981),

THE MX BASELINE SYSTEM, COMPRISED OF 200 MISSILES AND 4,600 SHELTERS, IS DESIGNED TO PROVIDE THE NECESSARY SURVIVABILITY ASSUMING THE LIMITS ON THE NUMBER OF SOVIET REENTRY VEHICLES IMPOSED BY THE UNRATIFIED SALT II TREATY. HOWEVER, CURRENT STRATEGIC AIR COMMAND PROJECTIONS INDICATE THAT--EVEN WITHIN THE LIMITS OF THE UNRATIFIED SALT II TREATY--A GREATER NUMBER OF MISSILES AND SHELTERS MAY BE REQUIRED TO PROVIDE THE NECESSARY SURVIVABILITY. WITHOUT AN ARMS LIMITATION AGREEMENT, THE SURVIVABILITY OF MX WILL DEPEND ON EITHER SOVIET RESTRAINT OR EXPANSION OF THE MX SYSTEM AND/OR DEPLOYMENT OF A BALLISTIC MISSILE DEFENSE. EXPANDING THE MX COULD INVOLVE EITHER ADDING SHELTERS WITHIN THE EXISTING CLUSTERS OR ADDING MORE MISSILES AND CLUSTERS WITH THE POTENTIAL FOR EXPANDING THE DEPLOYMENT AREA. WE CONCLUDED THAT IT IS NOT POSSIBLE TO ACCURATELY PREDICT THE ULTIMATE SIZE OF THE DEPLOYMENT AREA OR THE NUMBER OF MISSILES AND SHELTERS. ANY EXPANSION OF THE FORCE WOULD INCREASE ENVIRONMENTAL IMPACTS.

THE AIR FORCE ACKNOWLEDGED IN THE DRAFT EIS THAT THE SYSTEM IS BEING DESIGNED TO ACCOMMODATE ADDITIONAL SHELTERS WITHIN EXISTING AREAS, BUT THE DRAFT EIS DID NOT DISCUSS THE POSSIBILITY OF ADDING CLUSTERS, INCREASING THE SIZE OF THE DEPLOYMENT AREA, OR DEPLOYING A BALLISTIC MISSILE DEFENSE SYSTEM. THE AIR FORCE PROVIDED NO ASSESSMENT IN THE DRAFT EIS OF IMPACTS ASSOCIATED WITH EXPANSION; IT STATED THAT A SUPPLEMENTAL EIS WOULD BE ISSUED IF ADDITIONAL SHELTERS ARE REQUIRED. THAT ANALYSIS MAY BE ACADEMIC, HOWEVER, IF THE MX DEPLOYMENT AREA HAS ALREADY BEEN SELECTED.

FINALLY, WE BELIEVE THE DRAFT EIS CONTAINS SEVERAL QUESTIONABLE ASSUMPTIONS FOR SELECTING ALTERNATIVE OPERATING

BASE LOCATIONS, DETERMINING RESOURCE AVAILABILITY, ASSESSING IMPACTS, AND SUGGESTING MITIGATING MEASURES TO DEAL WITH THE IMPACTS. FOR EXAMPLE, THE AIR FORCE STATES THAT WILDERNESS STUDY AREAS ARE NOT TO BE CONSIDERED FOR POTENTIAL MX DEPLOYMENT. IT SEEMS INCONSISTENT, THEREFORE, THAT THE AIR FORCE WOULD INCLUDE COYOTE SPRING VALLEY AS ONE OF THE SUITABLE LOCATIONS FOR AN OPERATING BASE BECAUSE PARTS OF THE VALLEY ARE INCLUDED IN THREE CURRENT WILDERNESS STUDY AREAS. IN COMMENTING ON THE DRAFT EIS, THE BUREAU STATED THAT SITING AT COYOTE SPRING VALLEY CLEARLY VIOLATES DEPARTMENT OF THE INTERIOR POLICIES AND THE FEDERAL LAND POLICY AND MANAGEMENT ACT.

ANOTHER EXAMPLE OF QUESTIONABLE STATEMENTS IN THE DRAFT EIS IS THE AIR FORCE'S CONTENTION THAT SUFFICIENT LAND, WATER, AND ELECTRICITY CAN BE OBTAINED TO MEET THE NEEDS OF THE MX PROGRAM. IN THREE PRIOR GAO REPORTS ON THE MX (PSAD 79-40; PSAD 80-29; AND MASAD 81-1), WE HAVE CONSISTENTLY REPORTED THAT THE TIMELY AVAILABILITY OF RESOURCES IS UNCERTAIN. WATER, IN PARTICULAR, IS A PROBLEM. THE AIR FORCE STATES IN THE DRAFT EIS THAT THE OPERATING BASE REQUIREMENTS AT COYOTE SPRING VALLEY ARE BELIEVED TO EXCEED RECHARGE CAPACITY, THAT IS, THE WATER WITHDRAWN WOULD EXCEED NORMAL REPLENISHMENT. AS A RESULT, AGRICULTURAL USERS MAY BE AFFECTED. IMPORTING OF WATER IS A PROPOSED MITIGATING MEASURE, BUT A SOURCE IS NOT ASSURED.

FOR COYOTE SPRING VALLEY, THE AIR FORCE IS PROPOSING TO PURCHASE THE UNUSED PORTION OF THE CLARK COUNTY, NEVADA, COLORADO RIVER BASIN ALLOTMENT. THE BUREAU, IN COMMENTING ON THE DRAFT EIS, STATED THAT SUCH USE MAY CONFLICT WITH THE MEXICAN WATER TREATY. THAT TREATY REQUIRES THE UNITED

STATES TO DELIVER A CERTAIN AMOUNT AND QUALITY OF WATER TO MEXICO FROM THE COLORADO RIVER BASIN, AND, ACCORDING TO THE BUREAU, THE COLORADO RIVER FLOW IS USUALLY OVERCOMMITTED.

FOR MILFORD, THE AIR FORCE WILL HAVE TO OBTAIN WATER RIGHTS FROM EXISTING AGRICULTURAL USERS SINCE THE UTAH STATE WATER ENGINEER WILL NOT APPROVE FURTHER APPROPRIATION. THE AIR FORCE, HOWEVER, ACKNOWLEDGES IN THE DRAFT EIS THAT THE POTENTIAL EXISTS FOR A DECREASE IN THE WATER TABLE, IF EXISTING WATER RIGHTS ARE OBTAINED. AS A MITIGATING MEASURE, THE AIR FORCE PROPOSES IMPORTING WATER, WITH THE COLORADO RIVER BEING THE ONLY SUGGESTED SOURCE.

THE AIR FORCE PROPOSALS FOR OBTAINING WATER AT COYOTE SPRING VALLEY AND AT MILFORD REQUIRE APPROVAL BY THE STATES INVOLVED, BUT NO EVIDENCE IS PRESENTED IN THE DRAFT EIS INDICATING THAT NEVADA AND UTAH SUPPORT THE AIR FORCE PROPOSALS.

A FINAL EXAMPLE OF QUESTIONABLE ASSUMPTIONS, BUT OF CRITICAL IMPORTANCE, CONCERNS THE DEVELOPMENT OF ESTIMATES OF REQUIRED CONSTRUCTION MANPOWER AND MATERIALS. THESE ESTIMATES WERE DEVELOPED ON THE BASIS OF A PRELIMINARY CONSTRUCTION PLAN. THE AIR FORCE AND THE ARMY CORPS OF ENGINEERS, WHICH IS RESPONSIBLE FOR ACTUAL CONSTRUCTION, ARE STILL DISCUSSING THE DETAILS OF A FINAL PLAN. WITHOUT A REASONABLY FIRM CONSTRUCTION PLAN, THE RELIABILITY OF THE ESTIMATES FOR REQUIRED CONSTRUCTION MANPOWER AND MATERIALS AND THE ASSOCIATED ASSESSMENTS OF ENVIRONMENTAL AND SOCIOECONOMIC IMPACTS IS QUESTIONABLE.

AN EXAMPLE OF CHANGES THAT HAVE OCCURRED WITHOUT A FIRM CONSTRUCTION PLAN IS THE REVISED ESTIMATE OF REQUIRED

CONSTRUCTION WORKERS. THE REVISED NUMBERS, IN CERTAIN YEARS, ARE SUBSTANTIALLY GREATER THAN THE NUMBERS USED IN THE DRAFT EIS TO ASSESS IMPACT. FOR INSTANCE, IN 1985, THE REVISED NUMBER OF CONSTRUCTION WORKERS IS ABOUT 18,000, AND THE ORIGINAL ESTIMATED AMOUNT IN THE DRAFT EIS IS ABOUT 11,000. THE ORIGINAL ESTIMATE IS BASED ON A CONSTRUCTION PLAN DEVELOPED BY THE EIS CONTRACTOR. THE REVISED ESTIMATE IS BASED ON A CONSTRUCTION PLAN DEVELOPED BY ANOTHER BALLISTIC MISSILE OFFICE CONTRACTOR. HOWEVER, THIS LATER ESTIMATE WAS COMPLETED TOO LATE TO BE USED FOR THE DRAFT EIS IMPACT ASSESSMENTS BUT IS CONSIDERED TO BE THE MOST ACCURATE ESTIMATE AVAILABLE. OTHER CHANGES MAY OCCUR BECAUSE OF VARIANCES BETWEEN THE INITIAL CONSTRUCTION PLAN USED FOR THE DRAFT EIS AND A DRAFT PLAN PROPOSED BY THE CORPS. THESE PLANS HAVE TWO VERY DIFFERENT ASSUMPTIONS:

--THE AIR FORCE'S DRAFT EIS ASSUMES 18 CONSTRUCTION CAMPS; THE CORPS ASSUMES 8 CAMPS.

--THE AIR FORCE'S DRAFT EIS ASSUMES AUSTERE CONSTRUCTION CAMPS FOR WORKERS WITHOUT FAMILIES; THE CORPS ASSUMES CAMPS HAVING A FULL RANGE OF FACILITIES AND SERVICES FOR CONSTRUCTION WORKERS WITH FAMILIES.

WE BELIEVE THE CONDITIONS PREVIOUSLY DISCUSSED CAN BE ATTRIBUTED TO AT LEAST TWO FACTORS.

FIRST, THE AIR FORCE WAS FACED WITH THE DIFFICULT TASK OF PREPARING A DRAFT EIS BASED ON VARIOUS PRESUMPTIONS THAT HAVE CHANGED AS THE PROGRAM HAS EVOLVED. FOR INSTANCE, REDIRECTIONS RELATIVE TO BASING CONCEPT DESIGN AND DEPLOYMENT AREA ALTERNATIVES WERE PARTIALLY RESPONSIBLE FOR ABOUT A 7-MONTH DELAY IN ISSUING THE DRAFT EIS. IN ADDITION TO THE REDIRECTIONS ALREADY MADE, SEVERAL CRITICAL DECISIONS MUST

STILL BE MADE WHICH COULD INFLUENCE THE IMPACTS OF MX DEPLOYMENT. IN PARTICULAR, THE SECRETARY OF DEFENSE IS RECONSIDERING THE MX BASING CONCEPT AND SELECTED ALTERNATIVES, WITH A DECISION NOT EXPECTED UNTIL JUNE 1981.

SECOND, THE DRAFT EIS WAS PREPARED UNDER VERY TIGHT TIME LIMITS THAT WERE NECESSARY TO ATTAIN INITIAL DEPLOYMENT IN JULY 1986. IN SEPTEMBER 1979, WHEN THE PRESIDENT SELECTED THE MX CONCEPT OF BASING AND APPROVED INITIATING FULL-SCALE DEVELOPMENT, THE AIR FORCE EXPECTED TO ISSUE THE DRAFT EIS IN MAY 1980--ALLOWING ONLY 8 MONTHS TO PREPARE THE DRAFT EIS. HOWEVER, AS PREVIOUSLY NOTED, THIS TARGET DATE WAS NOT MET BECAUSE THE DRAFT EIS WAS ISSUED DECEMBER 31, 1980, WHICH LENGTHENED THE PERIOD FOR PREPARING THE DRAFT EIS FOR A PROGRAM AS LARGE AS MX TO 15 MONTHS.

THE PROBLEMS CAUSED BY TIGHT TIME FRAMES IN PREPARING AND PROCESSING THE DRAFT EIS MAY, IN FACT, BE CONTINUED AS A RESULT OF THE RELATIVELY SHORT TIME FRAMES SET FOR PREPARING THE FINAL EIS. THE AIR FORCE CURRENTLY PLANS FOR 45 DAYS TO REVIEW, EVALUATE, AND INCORPORATE COMMENTS FROM THE CLOSE OF THE COMMENT PERIOD FOR THE DRAFT EIS UNTIL THE FINAL EIS IS ISSUED. THE BUREAU, WHICH ROUTINELY DEALS WITH PREPARING EISs, HAS SAID THAT THIS ESTIMATE IS VERY OPTIMISTIC. IT SUGGESTED A PERIOD OF 6 MONTHS. THE AIR FORCE HAS AGREED THAT ITS 45-DAY ESTIMATE IS OPTIMISTIC, BUT HAS STATED THAT ADDITIONAL TIME IS NOT AVAILABLE IF IT IS TO MEET THE CRITICAL MILESTONE OF DEPLOYING THE SYSTEM IN 1986.

THIS RAISES AN OBVIOUS QUESTION: CAN THE AIR FORCE PRODUCE A FINAL EIS OF SUFFICIENT RELIABILITY WITHIN A 45-DAY TIME FRAME TO ENABLE DECISIONMAKERS TO MAKE AN INFORMED DECISION

ON THIS HIGHLY CONTROVERSIAL AND POLITICALLY SENSITIVE ISSUE
OF MX DEPLOYMENT?

MR. CHAIRMAN, THIS CONCLUDES MY STATEMENT. WE WILL
BE HAPPY TO RESPOND TO YOUR QUESTIONS.