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Why the Scott AFB Site for the Next NGA West?

The Final Environmental Impact Statement (FEIS) for the Next NGA West Facility presented the preliminary finding of the St. Louis site as the Agency Preferred Alternative.

We strongly disagree.

Recruiting and Job Retention

The FEIS claims the St. Louis Site is superior in NGA job recruitment and retention. Defense agencies such as NGA, recruit new employees from mainly two sources: college graduates and retired military. The Scott AFB site offers a distinct advantage for recruiting military personnel who are exiting the service either through retirement or other honorable discharges. Military personnel exiting the service at Scott AFB with 20 years of service will still likely be in their 40's and will look upon NGA employment favorably. They will know how to work as a team even under stressful conditions. Many have been forward deployed. Many will have advanced degrees in information assurance, cyber defense, finance, and logistics, to name a few. AND, they will likely already have some level of security clearance which will save time.

Security

The FEIS recognizes that the **Scott AFB site is strongly preferred** to the St. Louis site from a security perspective. Security does not only refer to the security of the NGA, but to the security of local residents. We feel this criteria should supersede all others. Doing otherwise puts NGA employees, the warfighters who count on them, and local residents at unnecessary risk.

Environmental

The FEIS did not compare the Scott AFB and St. Louis sites equally. The proposed facility **can** be built on the Scott AFB site without impacting the environmentally sensitive areas discussed in the FEIS. These sensitive portions of the Scott AFB site will likely be avoided and the environmental ranking of the Scott AFB site should be much higher; surpassing the St. Louis site. There is an area larger than 100 acres within the 182 acre site which completely avoids the environmentally sensitive areas (wetlands, streams, and archaeological site).

Key Regulations, Directives and Orders

The FEIS cherry-picked certain components of certain regulations which justified the St. Louis site while others which justify the Scott AFB site were ignored. In fact, per U.S. Army Corps of Engineers and DOD guidance on Land Acquisition, first priority in the location of new offices and other facilities must be given to **rural areas** per the **Rural Development Act of 1972**; and the Scott AFB site is within a rural area. EO 12072 was also misinterpreted as this EO merely requires that **if** an agency has a mission requirement to locate in an urban area, then first consideration should be given to the Central Business District; not that urban areas must be given priority.

Schedule

The FEIS recognizes that the **Scott AFB site is preferred** to the St. Louis site from a schedule perspective. However, the FEIS does not adequately assess the schedule risks and unknown issues associated with the St. Louis site. It is completely unrealistic to believe the St. Louis site could possibly be available for construction in early 2017 due to land acquisition, cultural resources, hazardous waste, etc. If the St. Louis site is selected, there will be construction delays. When this happens, it will result in millions of dollars of taxpayer waste. **Each year of delay at the St. Louis site will easily result in an increase of \$40M to the \$945M construction budget.**

Cost

The FEIS claims the cost to acquire and develop the Scott AFB Site is almost 20 percent more than the St. Louis site and devotes only one sentence of explanation. How can this claim be made when the FEIS admits that the "government currently does not know the time or cost necessary to remediate the St. Louis City Site"? Statistically, construction costs in St. Clair County are 3% less than St. Louis. Furthermore, the Scott AFB site will be available much sooner than the St. Louis site, allowing construction to begin sooner and be constructed at a lesser price. As previously mentioned, **each year of delay at the St. Louis site could easily result in an increase of \$40M to the \$945M construction budget.**