



FOR IMMEDIATE RELEASE

### **Pacific Center for Island Security Submits Scoping Questions and Comments**

Hagåtña, Guam (August 17, 2023) – The Pacific Center for Island Security (PCIS) today submitted its questions and comments on the Missile Defense Agency’s proposed Enhanced Integrated Air and Missile Defense (EIAMD) system. A complete copy of the PCIS submission is attached.

PCIS Chair, Robert Underwood, said that it was important to keep in mind that the scoping process is just the beginning of the process and that Guam residents were operating from an “information deficit” even though the military has information it has not shared.

It is critical that as a community, Guåhan remains aware as the military provides drips and drabs of information about this plan. For example, just last week, the MDA announced that they would be doing missile tests from Guam by late next year. This puts our community in a new category as a place where military experimentation goes on in our homeland. The fact that this kind of information has not been rolled up in one package illustrates the way that we are not being given the whole picture by the Department of Defense.

Robert A. Underwood, PCIS Chair

Underwood reiterated an earlier expressed view that missile defense plans to support military base survivability and resilience in the event of conflict should remain on offshore military platforms and not moved ashore in Guam.

The recently retired head of the Missile Defense Agency described the process of moving upgraded systems from Aegis ships to Guam as “weaponizing” our community. It is not a national security secret that the Navy doesn’t want to man these systems, but that does not mean that putting our community at increased risk should be the alternative. Missile defense of the bases should continue to be executed by military platforms and not moved into our neighborhoods.



August 16, 2023

From: Pacific Center for Island Security  
To: Missile Defense Agency  
RE: EIAMDS Scoping Period Comments

Hâfa Adai,

The Pacific Center for Island Security is a research institute based in Tamuning, Guam that aims to anchor an island and islander perspective amongst geopolitical maneuvering occurring in the Pacific Islands region. We aim to ensure that security for the islands remains paramount, and that island security is different from the security that great powers can gain from islands. Islands are not often the thing to be secured, but rather a tool used by great powers like the United States and China for their strategic interests. We view the EIAMDS in this similar analytical orientation. From our analysis, there is simply too much of an information gap for us to support the proposed EIAMDS. Below are our comments and subsequent questions for the scoping period of the proposed Enhanced Integrated Air & Missile Defense System in Guåhan. We submit our questions and comments below with great concern regarding the potential harmful impacts associated with the establishment of the system and we question the need for the system to be placed in Guåhan from a military perspective.

The people of Guåhan are being asked to provide input on the proposed EIAMDS for the island. The process that is being utilized is a federally required and regulated series of deadlines and issues for consideration. The people of the island are faced with the construction of 20 anti-missile sites which are scattered throughout the island. While most are on existing military property, the impact of these sites on the life of the island will be extensive and far beyond the fence line that we assume divides civilian and military communities.

We are being told that this proposed system will provide 360-degree protection from an incoming missile attack from a variety of sources. We are told that this is necessary due to the dramatically changed geopolitical landscape in this part of the world in the past few years. We are told that the ascendancy of China necessitates this dramatic course of action. The increased presence of China in the island Pacific, potential conflict over Taiwan, the establishment of Chinese bases in the South China Sea and rapid technological advancements of the Chinese military all provide the case for the establishment of this system.

Furthermore, we are told that this comprehensive EIAMDS is designed to include Guåhan because we are part of the U.S. homeland. We are roughly 160,000 American citizens in a U.S. territory. We are told that the need to protect Americans rather than American military bases is the primary motivation. We are told that the fact that Guåhan provides the United States with massive capacity to extend American power and influence is not the main motivation.

The responses of the community are directed towards environmental and historic preservation issues under the requirements of the National Environmental Policy Act (NEPA) and National Historic Preservation Act. Here is the first major disjuncture in this review process. We are being asked to present commentary within the framework of NEPA and NHPA, but the rationale for establishing the EIAMDS is far beyond the scope of why the system is being established in our island community. We are being asked to address the impact of the EIAMDS rather than the reason for its existence.

This disjuncture between the rationale and the process for input is reflected in the rhetorical rationale for establishing the EIAMDS and the forms given to us for input. We are told that we need to establish this as soon as possible and that it may be too late since conflict may be on the horizon. The most recent briefing is being offered by the Missile Defense Advocacy Alliance. It is entitled “Missile Defense of Guam- no time to waste, no time to lose.” It is as if the basic decision has already been made and we are being asked to comment on how to adapt to or mitigate the implementation.

Some will argue that this process is the same as provided to every other American community which may be experiencing a major Department of Defense-induced change in their lives. But the point is that this is not just like every other American community. Our political standing in the American family is insecure and uncertain because we are an unincorporated territory. Perhaps our political insecurity and lack of authority over our own island is comparable to the insecurity which China may be generating.

This is not an idle or ideological point. As an unincorporated territory of the United States, we all know that decisions are made for us. We are not part of the political process that elects national leaders. We have no voting representation in the laws and regulations which are applied to us. Elected leaders are consulted, but that level of consultation is up to the federal government and its agencies to decide. The briefings extended to the Guåhan’s elected leadership on the EIAMD were not extended to the general public.

In Guåhan’s case, this means that we have no meaningful role in deciding whether the threat from China necessitates this action. It means that we have a limited role in deciding whether diplomacy or economic initiatives would be better for us and our island neighborhood. We have bases. The bases are threatened. We will set up a complicated EIAMDS because it protects the bases, and by the way, Americans in the “homeland.”

Even if we could ignore this major disempowered condition associated with unincorporated territorial status, how should we respond to the disruption of our lives and our community which is


being proposed? We have the opportunity to make input even within the confines of the federal processes. We have to ask hard questions. We have to consider uncomfortable realities. We have to protect our community. It is a truism that absent a vigilant Guåhan community, we cannot simply rely on the good will of federal agencies, no matter how well intentioned.

The reality is that we do not have enough information to provide informed input into the process. We do not know the configuration of these proposed 20 sites and how much land will be used. We do not know the related land use and air space restrictions associated with these sites. We do not know how much mobility is expected from these missile batteries. We do not know much training is expected and how often these systems will be tested once they are in our neighborhood.

Without this specific information, we can only register our doubts and concerns and hope that our questions will be answered in a full way. We call for a series of public meetings in which the questions in this document are answered in a full and transparent way.

The relationship between the Department of Defense and the people of Guåhan is personal. There isn't a family in Guahan that doesn't have a military connection. There isn't a family that hasn't had to change their recreational, economic, or agricultural activities because of military decisions. There isn't an endangered species concern that doesn't have a military connection. There isn't a historical preservation issue or disaster than doesn't have military roots. The military is not just our neighbors. They are a major consideration in almost every aspect of our economic, social, and historical life. The people of Guåhan should be given answers and dealt with as the mature self-governing community that they are. This will be a great time for the Department of Defense to demonstrate that they trust the people of Guåhan with full, complete, and honest answers to these questions.

Si Yu'os Ma'åse',

A handwritten signature in black ink, appearing to read "Robert Underwood". The signature is fluid and cursive, with a large initial "R" and "U".

Dr. Robert Underwood  
Chairman  
Pacific Center for Island Security

Claim	Issue/Question	Source
The MDA and Army have conducted extensive siting studies to confirm alternative site selection, optimize system performance, and optimize facility planning and design.		<a href="https://www.federalregister.gov/documents/2023/05/05/2023-09609/notice-of-intent-to-prepare-an-environmental-impact-statement-for-an-enhanced-integrated-air-and">https://www.federalregister.gov/documents/2023/05/05/2023-09609/notice-of-intent-to-prepare-an-environmental-impact-statement-for-an-enhanced-integrated-air-and</a>
	“It is not simple—it is hard, hard work.” Hill said. “We’re running lots of studies right now to see which is best.”	<a href="https://www.airandspaceforces.com/after-long-wait-guams-missile-and-air-defense-is-about-to-get-a-whole-lot-better/">https://www.airandspaceforces.com/after-long-wait-guams-missile-and-air-defense-is-about-to-get-a-whole-lot-better/</a>
	DOT&E have determined that the architecture is not adequate	<a href="https://www.dote.osd.mil/Portals/97/pub/reports/FY2022/other/2022annual_report.pdf?ver=71JCDFcAIC9z_UnuI9BOUQ%3d%3d">https://www.dote.osd.mil/Portals/97/pub/reports/FY2022/other/2022annual_report.pdf?ver=71JCDFcAIC9z_UnuI9BOUQ%3d%3d</a>
	Congressionally mandated independent study of the architecture is not yet completed.	Independent assessment of EIAMDs architecture by Lincoln Labs (MIT) is ongoing.
	So far, the agency has started environmental impact surveys and recently completed a visit focused on determining sites. Nothing is final, but, “we have a very good feel for at least technically and operationally where things should go in order for it to function as a system.”	<a href="https://www.defenseone.com/threats/2022/08/biggest-challenge-building-missile-defense-presence-guam-finding-right-site/375816/">https://www.defenseone.com/threats/2022/08/biggest-challenge-building-missile-defense-presence-guam-finding-right-site/375816/</a>

	Multiple components of the EIAMDs will still be in development when the EIS is scheduled for release. How will the EIS account for the impact of systems that are not fully developed, not field tested, immature or below the threshold of IOC?	<a href="https://breakingdefense.com/2023/08/tying-it-together-army-eyes-evolving-test-plan-new-capabilities-bound-for-guam/">https://breakingdefense.com/2023/08/tying-it-together-army-eyes-evolving-test-plan-new-capabilities-bound-for-guam/</a> <a href="https://www.defensedaily.com/armys-ibcs-test-plan-prepares-for-guam-mission/army/">https://www.defensedaily.com/armys-ibcs-test-plan-prepares-for-guam-mission/army/</a>
"An Enhanced Integrated Air and Missile Defense (EIAMD) system for the defense of Guam"		<a href="https://www.federalregister.gov/documents/2023/05/05/2023-09609/notice-of-intent-to-prepare-an-environmental-impact-statement-for-an-enhanced-integrated-air-and">https://www.federalregister.gov/documents/2023/05/05/2023-09609/notice-of-intent-to-prepare-an-environmental-impact-statement-for-an-enhanced-integrated-air-and</a>
	Is "defense of Guam" defined? What defense of Guam is intended to be accomplished by this action?	
What potential alternatives has the MDA considered?		<a href="https://www.thedrive.com/the-war-zone/41819/decommissioned-navy-cruisers-could-be-the-answer-to-guams-missile-defense-needs">https://www.thedrive.com/the-war-zone/41819/decommissioned-navy-cruisers-could-be-the-answer-to-guams-missile-defense-needs</a>
	Has a system that builds on the existing THAAD/Aegis afloat framework integrate the C2, Radar and additional shooters?	
	What would be the environmental effect of using afloat capabilities to develop an EIAMDs? What is the contrast between the environment effect of this option as opposed to	

	development of dispersed sites in Guam that are connected by mobility?	
	Moving the system off ships has been a stated goal of the Guam EIAMDs	<a href="https://news.usni.org/2021/03/04/davidson-aegis-ashore-on-guam-would-free-up-3-navy-destroyers">https://news.usni.org/2021/03/04/davidson-aegis-ashore-on-guam-would-free-up-3-navy-destroyers</a>
	Freeing up USN vessels afloat has been cited as a major reason to locate an EIAMDs in Guam	<a href="https://news.usni.org/2021/03/04/davidson-aegis-ashore-on-guam-would-free-up-3-navy-destroyers">https://news.usni.org/2021/03/04/davidson-aegis-ashore-on-guam-would-free-up-3-navy-destroyers</a>
	The fact that afloat capabilities have analog (not digital) radars is another reason to move ashore	<a href="https://www.navalnews.com/naval-news/2021/12/mda-discusses-potential-aegis-ashore-options-for-guam/">https://www.navalnews.com/naval-news/2021/12/mda-discusses-potential-aegis-ashore-options-for-guam/</a>
This system will be more distributed than Aegis ashore in Europe		<a href="https://www.navalnews.com/naval-news/2021/12/mda-discusses-potential-aegis-ashore-options-for-guam/">https://www.navalnews.com/naval-news/2021/12/mda-discusses-potential-aegis-ashore-options-for-guam/</a>
	What is the effect of a dispersed and mobile system (to increase "survivability") on a wider environment in both development and stationing, mobility activities and in the event of conflict?	
The EIAMDs has been specifically linked to war fighting from Guam.		<a href="https://news.usni.org/2021/03/04/davidson-aegis-ashore-on-guam-would-free-up-3-navy-destroyers">https://news.usni.org/2021/03/04/davidson-aegis-ashore-on-guam-would-free-up-3-navy-destroyers</a>
	What is the environmental, socio-economic impact of	

	conflict in Guam? (Use classified and unclassified wargames to evaluate)	
	Will the principal reason this system is being put in place (a conflict situation to support conflict operations) be evaluated?	
	Will the effect of conflict be evaluated environmentally to compare the proposed ashore option to an enhanced version of the existing afloat/THAAD hybrid option?	
The head of MDA has described the system being proposed as "weaponizing" a community.		<a href="https://csis-website-prod.s3.amazonaws.com/s3fs-public/event/220523_MDA_2023_Budget.pdf?VersionId=8UXYNINGkSadb19yc8Gg.2TswRa2icWc">https://csis-website-prod.s3.amazonaws.com/s3fs-public/event/220523_MDA_2023_Budget.pdf?VersionId=8UXYNINGkSadb19yc8Gg.2TswRa2icWc</a>
	What measures will be used in the EIS to evaluate the effect of a community being "weaponized"	
Is a Directed Energy Weapon being considered as a part of this action?		<a href="https://missiledefenseadvocacy.org/alert/theory-will-only-take-us-so-far-j-robert-oppenheimer/">https://missiledefenseadvocacy.org/alert/theory-will-only-take-us-so-far-j-robert-oppenheimer/</a>
	If a DEW weapon is planned, how much testing has been done on these weapon systems?	



	What would be the stable source of power for a DEW in Guam?	
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Issue			
NEPA Cumulative Effects			All past effectives are considered accumulative pursuant to Guan's U.S. legal status as an unincorporated territory.
	<b>PFAS</b>	Past/Present	DoD installation CCRs for 2022 have PFAS/PFOS above the new EPA HA levels. GWA did not disclosure PFAS/PFOS in its 2022 CCR, but it is expected that levels will also be above EPA's new HA levels. PFAS/PFOS expected to be higher at wells transferred from U.S. DoD, but PFAS/PFOS migration throughout the Guam freshwater aquifer is anticipated.
	<b>Agent Orange or other dioxins</b>	Past/Present	<a href="https://vaclaimsinsider.com/list-of-agent-orange-exposure-locations/#:~:text=Despite%20previous%20denials%20and%20debates,likely%20exposed%20to%20Agent%20Orange.">https://vaclaimsinsider.com/list-of-agent-orange-exposure-locations/#:~:text=Despite%20previous%20denials%20and%20debates,likely%20exposed%20to%20Agent%20Orange.</a>
			<a href="https://www.pacificislandtimes.com/post/guam-leaders-urged-to-seek-inclusion-of-civilians-in-agent-orange-claims-program">https://www.pacificislandtimes.com/post/guam-leaders-urged-to-seek-inclusion-of-civilians-in-agent-orange-claims-program</a>
	<b>MITT/CJMT/</b>	Past/Present /Future	How many candidate sites are related to and have an impact on existing obligations for these actions?
	<b>USMC Realignment</b>	Past/Present /Future	How many candidate sites have an impact on existing obligations? Has DoD met its obligations pursuant to the USMC realignment to Guam?
	<b>Project Pele (microreactor)</b>	Foreseeable	<a href="https://www.armed-services.senate.gov/imo/media/doc/fy2024_ndaa_bill_report.pdf">https://www.armed-services.senate.gov/imo/media/doc/fy2024_ndaa_bill_report.pdf</a>
			<a href="https://www.militarytimes.com/news/your-military/2022/04/15/pentagon-to-build-nuclear-microreactor-to-power-far-flung-bases/">https://www.militarytimes.com/news/your-military/2022/04/15/pentagon-to-build-nuclear-microreactor-to-power-far-flung-bases/</a>
	<b>IRBM placement in Guam</b>	Foreseeable	<a href="https://www.armed-services.senate.gov/imo/media/doc/fy2024_ndaa_bill_report.pdf">https://www.armed-services.senate.gov/imo/media/doc/fy2024_ndaa_bill_report.pdf</a> ;
			<a href="https://armedservices.house.gov/fy24-ndaa-resources">https://armedservices.house.gov/fy24-ndaa-resources</a>
			<a href="https://www.rand.org/pubs/research_reports/RRA393-3.html">https://www.rand.org/pubs/research_reports/RRA393-3.html</a>

	<b>Conflict in Guam</b>	Foreseeable	This EIAMDs action anticipates conflict in Guam
	<b>Directed Energy Weapon being considered for Guam.</b>	Future?	<a href="https://missiledefenseadvocacy.org/alert/theory-will-only-take-us-so-far-j-robert-oppenheimer/">https://missiledefenseadvocacy.org/alert/theory-will-only-take-us-so-far-j-robert-oppenheimer/</a>
	<b>Power source for DEW?</b>	Future?	

EIAMDs components while mobile		
	What is the environmental impact of transiting system components?	
	What is the environmental impact of transiting system components during potential and actual kinetic conflict?	
	What is the environmental impact of transiting critical support elements of the system (e.g. reload missiles) during potential and actual kinetic conflict?	
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	What is the environmental impact of transiting critical support elements of the system (e.g. reload missiles) during potential and actual kinetic conflict?	
Anticipated HEMP effects		
	Procurement notices for EIAMDs require facilities to mitigate or withstand HEMP. What is the environmental assessment of HEMP action(s) on the non-military sector in Guam?	<a href="https://sam.gov/opp/47cc18fa94c54236a16fd690a3e983b9/view">https://sam.gov/opp/47cc18fa94c54236a16fd690a3e983b9/view</a>
	HEMP weapons are typically detonated by nuclear devices. What is the environmental assessment of HEMP nuclear-detonation action(s) on the non-military sector in Guam?	
Conservation easements and other existing land use agreements between the Government of Guam or other federal agencies and branches of the U.S. military		
	Account for and qualify the environmental value of each and all such existing joint land use	

	agreements based on their size, term and proximity to the proposed sites.	
	Account for and qualify the displaced economic and socio-economic value of each and all such existing joint land use agreements based on their size, term and proximity to the proposed sites.	
	What is the role of REPI and Sentinel Landscapes in past and future processes to securing conservation easements, setbacks etc., in proximity to the proposed sites?	
	Quantify the environmental value of federal habitat designations that are within any area of impact of set-backs, conservation easements, blast radius' or any other prospective limits on development (e.g. areas designated by the USF&WLS or NOAA).	
Baseline for this Action		
	What is the baseline for this Next Generation system?	
	Is the EIS a sum of parts?	

	Is complete architecture, mobility aspects and likelihood of targeting during conflict modeled?	
The 20 Proposed Sites		
	What EIAMDS component is planned for each candidate site?	
	What is the hard physical footprint for each site?	
	Laydown area	
	Perimeter	
	What is the soft footprint for each site?	
	Minimum easement (EMR, blast radius, etc.)	
	Conservation buffers	
	New access requirements to sites?	
	Road	
	Utilities	
	Aviation	
	Will reload munitions (missiles) be situated on the laydown sites for launchers or will they be transported to the site from other locations when reloading is required?	
	What are the ESQDs for each site (1) at steady state and (2)	

	during a conflict/targeting scenario?	
	What are the ESQDs for reload munitions while in transit?	
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	Perimeter	
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	What are the SQDs for reload munitions while in transit?	
Demographic Changes		
	How many personnel (MilPers (by Service) and dependents, ctr) will be involved with this project?	
	What infrastructure (utilities, housing, MWR etc.) is required to accommodate the personnel involved?	
	Who will construct necessary personnel support facilities?	
	Will alien labor be required to support construction activities?	
	If yes, where will the imported workers be housed during their time in Guam?	
Missile Tests in Guam		<a href="https://www.defensenews.com/training-sim/2023/08/09/first-flight-test-for-guam-missile-defense-planned-for-end-of-2024/">https://www.defensenews.com/training-sim/2023/08/09/first-flight-test-for-guam-missile-defense-planned-for-end-of-2024/</a>
	How many different types of missiles will be tested in Guam?	
	How many different missile tests are expected per year over the next 5 years, 10 years, per missile type?	
	Will the EIS treat missile testing in Guam on the same level as other weapons testing areas	<a href="https://www.wsmr.army.mil/">https://www.wsmr.army.mil/</a>

	(e.g. White Sands Missile Range)?	
	If not, please explain differences in the level of evacuation which missile testing in Guam will be treated compared to other missile testing sites.	
	Does the EIS anticipate any evacuations of areas during missile testing in Guam?	
Review of overlapping issues with the Mariana Island Training and Testing area and the CNMI Joint Training EIS		<a href="https://mitt-eis.com/About-the-MITT-Study-Area;">https://mitt-eis.com/About-the-MITT-Study-Area;</a> <a href="https://www.cnmijointmilitarytrainingeis.com/">https://www.cnmijointmilitarytrainingeis.com/</a>
	Airspace	
	Directed Energy Weapons	
	Sonar	