



FOR IMMEDIATE RELEASE

**PCIS Comments on the MDA's Proposed Enhanced Air and
Missile Defense System for Guam**

Hagåtña, GUAM. January 7, 2025 -- The Pacific Center for Island Security (PCIS) today submitted a response to the Missile Defense Agency's (MDA) Draft Environment Impact Assessment (DEIS) on the proposed Enhanced Integrated Air and Missile Defense System (EIAMDS) for Guam.

The MDA's proposal for an EIAMDS in Guam is overstated in its effectiveness and understated in the real and potential damaging repercussions to the Guam community. While the anticipated threat of conflict may ebb and flow due to diplomatic as well as military policies, the damaging repercussions to Guam will be manifest on the island for decades.

PCIS Chair Robert Underwood

The Missile Defense Agency's (MDA) Proposed Action expects that the civilian community will continue to absorb significant impacts, many of which the DEIS itself cannot quantify. In exchange, the systems offered by the Proposed Action would provide no significant increase in the island's defense and would likely result in exposure of the civilian community to greater insecurity. The EIAMDS system has been described by the MDA as "reducing adversary incentives to conduct small-scale, coercive attacks." On the other hand, it is clear that the U.S. Department of Defense is planning for a much larger conflict; one that assumes that Guam will not be available that that alternative operating locations across the region will be needed. This indicates that even DoD planners do not anticipate the EIAMDS will "defend the entirety of Guam."

PCIS noted that there remained significant questions about the ability of the system to function as proposed. The U.S. Department of Defense's Directorate of Testing and Evaluation (DOT&E) has for the past two years found that the architecture for the system to not be sufficient. At the direction of the U.S. Congress, the FY 2025 National Defense Authorization Act requires regular reporting on the status of the EIAMDS developments. This legal requirement follows the Senate Armed Services Committee applying the acronym IAMDOG (Integrated Air Missile Defense of Guam) to the system.

A Congressionally directed study about the EIAMDS and the impact of the project on housing in Guam was completed in mid-2024 but was not referenced in the MDAs DEIS, nor was it made available for the public to use as a basis to respond to the DEIS.

The continued classification of the Lincoln Lans report to the Secretary of Defense on this very system—and its impact on the Guam housing market—is a public disservice. An unclassified version of this report was requested by the Guam Legislature, but we are now at the public comment deadline and neither the DEIS nor the public have had the benefit of reviewing it.

PCIS Chair Underwood

Following are highlights from the PCIS Comments (attached)

The MDA’s foundational assumption is not correct.

The DEIS asserts that the proposed EIAMDS is to “defend the entirety of Guam.” This foundational claim is not supported by

- the MDA’s own description of the system
- the technical limitations of an untested system to counter yet-to-be developed threats
- the limitations of current technology to assure complete missile defeat
- the explicit recognition that Guam will not be available for military operations in a major regional conflict (i.e. on-going U.S. divert airfield and ports development in the region)

Importantly, an existing level of anti-missile defeat infrastructure is in place today. In addition to the THAAD battery located in Guam since 2013, the U.S. Navy operates Aegis vessels off Guam that currently provide a level of layered defense, using many of the same missile systems, sensors and command and control that are proposed to be placed in Guam. The reasons that the military is proposing to move the missile defeat capabilities onto Guam are complex. However, “weaponizing” Guam (a term used by the former head of the MDA) will not result in a significant level of increased defensive capabilities or “deterrence.”

The proposal for “weaponizing” Guam does not include basic civilian security infrastructure.

The MDA’s proposal for an EIAMDS is to respond to long- medium- and short- range precision weapons expected to target Guam in conflict. The DEIS, however, does not address how the impact of the EIAMDS would impact the community in a conflict situation.

That Guam would be targeted by precision weapons (hundreds, if not thousands in coordinated attacks) is understood. The expectation that Guam will be targeted and taken out of the fight for periods of time is being planned for. What is not planned for in the MDA’s proposal is shelters and food security for the civilian community. The absence of civilian shelters being included in the proposal contradicts the MDA’s claim that Proposed Action is to “defend the entirety of Guam.”

The MDA and the U.S. Army are not planning for housing their personnel, contractors, or foreign construction workers.

The Proposed Action acknowledge the housing problem in Guam without providing a directed solution. Housing construction is a long lead process. By not directly addressing the housing requirement as a function of the operational plan, the proposal adds to existing and cumulative socioeconomic impacts that are directly related to the U.S. military's failure to properly plan for its activities in Guam.

The Proposed Action needs to fully account for the socioeconomic impact of the housing requirements of military personnel, civilian support workers, contractors and foreign workers. This accounting should be (1) in relation to the EIAMDS activity and (2) cumulatively in relation to other increases in personnel and staffing requirements for on-going and proposed military activities. An assumption that off-base (off-post) housing availability is the prerogative of military utilization needs to be reframed in relation to Guam's civilian community's housing requirements and a recognition that Guam is a homeland of an indigenous (CHamoru) people.

To assure accuracy in the planning process for the Proposed Action, the DEIS needs to conduct a more complete analysis that examines the cumulative effects of DoD pressures on the Guam housing market, including an examination of the socioeconomic impact on the CHamoru people.

An Incomplete Analysis Anticipates More Permanent Degradation of Guam's Natural Resources.

The Proposed Action acknowledges that the environmental analysis does not fully evaluate the impact on endangered species or on CHamoru cultural sites. Still, there is an assumption that "major, long-term and significant" impacts will occur as the EIAMDS project is constructed. If the anticipated destruction of indigenous cultural and terrestrial resources is addressed by the same ineffective guidelines that applied to Camp Blaz, the NEPA standard is unlikely to be met.

Comments from the Pacific Center for Island Security (PCIS)

The following Substantive Comments are offered by the Pacific Center for Island Security (PCIS) in response to technical items in the Missile Defense Agency's Draft Environmental Impact Statement (DEIS) for "The Enhanced Integrated Air and Missile Defense System on Guam" that require further review, correction, and action.

On August 16, 2023, PCIS submitted extensive Scoping Period comments and questions related to this Proposed Action (Attachment 1). The DEIS has not addressed many of these issues and questions as is outlined in our Substantive Comments that follow.

1. Defense of Guam

DEIS Assumptions: The Scoping documents for this proposed action noted that the proposed "Enhanced Integrated Air and Missile Defense (EIAMD) system (was) for the defense of Guam." At the time we noted that "defense" was not defined and provided extensive evidence from U.S. military officials that the proposed action would increase the island's exposure in conflict. We also noted that the Scoping documents did not anticipate any protection for the civilian community, even though the system itself was predicated on potential use in conflict.

The DEIS has gone a step further than the Scoping document. It explicitly claims,

"The action analyzed in the EIS is the construction, deployment, and operations and maintenance of a comprehensive, persistent, 360-degree EIAMD system to *defend the entirety of Guam* against the rapidly evolving threats of advanced cruise, ballistic, and hypersonic missile attacks from regional adversaries" (emphasis provided). (ES-1)

The foundational assumption of the Proposed Action is that the EIAMD is to "defend the entirety of Guam."

DEIS Foundational Assumption Cannot be Supported: We are unable to identify any credible source that validates the Proposed Action's claims. Ignoring the fact that no missile defense system can defend any area in its entirety (much less from yet developed, unknown, and evolving threats), even the Missile Defense Agency has been recorded as noting that;

"The addition of the missile defense system on Guam is intended to deter U.S. adversaries from attacking the island. Missile defenses, including the systems being acquired for the Enhanced Integrated Air and Missile Defense components, are intended to complicate adversary plans, induce doubt about the success of offensive missile use, and raise the threshold for

conflict by reducing adversary incentives to conduct small-scale, coercive attacks.”

The MDA’s description of the system’s intent and effectiveness, to “raise the threshold for conflict by reducing adversary incentives to *conduct small-scale, coercive attacks*” (emphasis provided) is materially different than the DEIS foundational claim that the Proposed Action will “defend the entirety of Guam.”

We recognize that the DEIS view may ascribe to notions of “deterrence by denial,” or as described by the head of the Guam National Guard,

By deploying these systems and demonstrating readiness, the U.S. signals to adversaries like Communist China that any attack would meet significant resistance and retaliation.

It is essential to note that a “deterrence by denial” infrastructure already exists around Guam. If the No Action alternative were taken, the existing onshore THAAD battery and the offshore rotation of Aegis-equipped U.S. Navy vessels provide a highly significant measure of anti-ballistic missile and air defense capabilities. These existing capabilities are already sufficient to reduce an adversary’s incentives to conduct a small-scale coercive attack on Guam. What the Proposed Action entails is to move some of these (e.g. Aegis, radars and interceptors (SM-3, SM-6)) from Navy vessels and distribute them around Guam.

The question is not whether Guam is served by a “deterrence by denial” infrastructure. It already is. Rather it is whether this deterrence by denial capability will remain principally deployed on military platforms afloat or as the Proposed Action anticipates be moved onshore, further militarizing Guam. Further, while the Proposed Action may add additional “deterrence by denial” infrastructure, how much is enough for “deterrence by denial” to be effective if attacks are larger than a small-scale coercive attack?

Without debating the vagaries of deterrence theory or “deterrence by denial” as a sustainable strategy in a determined conflict, it is clear from U.S. strategy that deterrence in Guam will not hold. U.S. strategists clearly understand that adversaries like Communist China will not be deterred from attacking Guam in the event of major conflict.

U.S. acknowledgement of the limits of its deterrence doctrine in Guam are evident in both (1) developing U.S. military services distributed and dispersed operational concepts and (2) large scale military construction “divert” projects in the region that are being developed on the assumption that military (and civilian) facilities in Guam will not be available in conflict. In short, U.S. plans and capital outlays anticipate that in conflict any defense of Guam will result in material damage to the island’s

military and civilian infrastructure. As such the DEIS claim that the Proposed Action will “defend the entirety of Guam” is—by observable U.S. actions in [Tinian](#), [Yap](#) and [Palau](#)—so weak that billions of dollars of expenditures for military facilities elsewhere are being constructed on the assumption that Guam will not be available for use.

The Proposed Action provides no Defense for the Civilian Population: The Proposed Action does not address the principal functional reason that the system is being proposed: how the EIAMDS would impact the community in a conflict situation. Since U.S. Department of Defense plans, supported by appropriations and authorizations, are anticipating Guam not being available for periods of time during a conflict, the impact of potential conflict is a significant unaddressed factor in the Proposed Action. Moreover, on-going actions related to the Proposed Action that involve conflict (e.g. construction requirements that anticipate specific types of attacks) are being scoped and required, but the DEIS does not address the weaponization of Guam that the Proposed Action entails.

As noted by the former head of the MDA, the Proposed Action in Guam is effectively a prototype of a system that in the future may be deployed to “a very large city” in the U.S. Future deployment, however, would be beset by the acknowledgement that the system results in “[weaponizing](#)” a community. As the on-going war in [Ukraine demonstrates](#), missile defense system components are [high value targets](#). To the extent that the Proposed Action results in “weaponizing” Guam, the DEIS fails to account for these effects on the community in the event of conflict.

The impact of being targeted is built into the component parts of the EIAMDS that is already being rolled out. For example, both the MDA’s [Initial Deployment Capability and Naval Facilities Engineering System Command’s Indefinite Delivery/Indefinite Quantity \(IDIQ\) contract for multi-discipline Architect-Engineer \(AE\) Services for Missile Defense System Projects](#), require construction of facilities that are effective against nuclear directed High-Altitude Electromagnetic Pulse (HEMP) weapons. The Proposed Action should similarly assess the impact of HEMP on a comprehensive range of potentially impacted sites and populations. The DEIS only discusses the potential effects of Electromagnetic Fields (EMP) (Section 3.2.1.1) from EIAMDS radars.

Similarly, when discussing blast radiuses, the DEIS only considers Explosive Safety Quantity Distance (ESQD) arcs (Section 3.2.1.2) and the potential effects of EIAMDS components being targeted in conflict. For the civilian community, this concern is highest at the launcher, radar, and C2 site proposed for NBG Nimitz Hill. The NBG Nimitz Hill site is adjacent to several civilian housing areas. An assessment of the range of impacts to these communities in conflict should be included in the DEIS (from human-directed small explosive attacks to large-explosive precision weapons). By not accounting for a likely impact in the event the systems are used

for their intended purpose, the Proposed Action fails to address fundamental issues related to the “well-being, safety, or health of members of the public.”

Finally, given the fact that the EIAMDS is a response to the likelihood of Guam being targeted in an adversarial regional conflict, the Proposed Action fails to account for a fundamental element of any defensive strategy—shelters. Even if this is a worst-case scenario, the DEIS is lacking if it does not take this into account. The absence of civilian shelters being included contradicts the DEIS claim that Proposed Action is to “defend the entirety of Guam.” The limits of anti-missile systems and air defense are understood in the context of saturation attacks. According to the head of the Guam National Guard, even the EIAMDS is “not solely about neutralizing every potential attack.” These limits need to be recognized in the Proposed Action. The inclusion of planning and funding for civilian shelters should be included in the Proposed Action to meet the NEPA standard related to the “well-being, safety, or health of members of the public” despite the bureaucratic jurisdiction rhetoric that is often presented in responding to this question.

If the No Action alternative is not selected, the Proposed Action needs to account for a likely impact in the event the systems are used for their intended purpose (i.e. in conflict). This should include an analysis of the impact of conflict in the civilian community, including the target value of the EIAMDS and adequate shelter protection and food security for the population. This is not an issue that can just be handed off to different parts of the federal government and be indefinitely deferred.

2. Housing

DEIS Assumptions: The Proposed Action recognizes that “housing availability on Guam is low.” (Page 3.6-25). The Proposed Action, however, fails to address the discrete housing requirements of military personnel (and contractors) that will support the EIAMDS. Instead, the Proposed Action indicates that Army personnel will be assigned on a “rotational basis” while DoD reviews housing requirements in Guam “holistically” and “plans to address the EIAMD System housing needs in the near future.”

DoD contractors and civilian support workers are expected to make up almost half of the estimated total staffing end-strength. (Table 2.1-6) Housing for these individuals staffing EIAMDS operations is not addressed in the Proposed Action.

Construction personnel are also expected over a 10-year period beginning in 2025. The Proposed Action assumption is that foreign workers (estimated at 60% of the total requirement) “would be expected to have or find housing and related amenities/services in local communities.”

Generally, the Proposed Action views available and vacant off-base housing only

from the view of its disposal as a function of military need. This myopic view overlooks the overall housing needs of Guam's civilian population (and the disastrous effects on the cost of homes for island families.)

Housing Needs to be Addressed Directly: The impact of increasing numbers of military personnel without adequate on-base housing availability continues to contribute to low availability and high prices in the civilian housing sector. Government of Guam agencies (e.g. Guam Housing and Urban Renewal Authority) are best able to provide guidance on the effects of off-basing housing dependency for military personnel and the related local socio-economic impacts. It is, however, well established that this is a significant socio-economic issue for Guam's civilian community and the island's indigenous CHamoru people.

This issue of housing for this Proposed Action was the subject of a Congressionally directed, Secretary of Defense commissioned report. The Massachusetts Institute of Technology's Lincoln Labs study, in part, was to assess the availability of housing infrastructure in Guam to support EIAMDS manning levels. The Lincoln Labs assessment was reportedly provided to the Secretary of Defense in June 2024. Despite assurances from military officials in Guam, an unclassified version of this report is not yet available. The Proposed Action may benefit from the Lincoln Labs assessment with respect to housing issues in Guam.

What is abundantly clear is that on-base housing for military personnel in Guam is inadequate. Two separate on-going actions (the relocation of U.S. Marines from Okinawa to Guam and the planned bed down of Singapore Air Force fighters at AAFB) demonstrate existing and growing shortages of housing at AAFB. Based on the DoD's Justification Book submissions for FY24 and FY25, even with 281 housing units planned, the on-base "unmet" requirement (for just the Marines) will increase from 637 units in FY2023 to over 1,750 units in FY2028. The addition for approximately 400 personnel associated with the Singapore Air Force beddown will be additive to this unmet requirement since that Proposed Action assumes "[all personnel would reside in off-installation housing on Guam.](#)" Any additional Army, other service, or contractor requirement will only add to the pressures on the off-base (civilian) housing sector to address the military's failure to plan for its staffing requirements.

The Proposed Action's acknowledgement of the housing problem without providing a directed solution is insufficient. Housing construction is a long lead process. By not directly addressing the housing requirement as a function of the operational plan, the Proposed Action is adding to existing and cumulative socioeconomic impacts that are directly related to the U.S. military's failure to properly plan for its activities in Guam. A prototype for this planning failure is already apparent in the U.S.

Marine relocation from Okinawa. Although the Record of Decision (2015) for the Marine relocation provided that housing for personnel be on base at AAFB, the housing at AAFB was not appropriated for until FY2024 and personnel will not be able to move in until FY2028 (at the earliest). Even when available, (and assuming the FY2025 authorization is appropriated) the off-base housing requirement will increase by 1,000 houses.

It is notable that funding for this requirement has not been recommended by the Army or otherwise included in any recent military construction request as a part of the annual budget cycle. The Army, understanding the fiscal requirements of the Proposed Action, has repeatedly missed opportunities to contribute to a holistic solution to military personnel housing requirements in Guam by requesting Army military construction funds. This absence of funding priority by the Army is notable given the impact that unmet on-base housing requirements will have on the civilian housing market. Notably the FY2025 NDAA (Section 1103), directly increases the pressures on the civilian housing market by making DoD civilian personnel in Guam eligible for off-base housing allowances.

The Proposed Action needs to account fully for the socioeconomic impact of the housing requirements of military personnel, civilian support workers, contractors and foreign workers. This accounting should be (1) in relation to this activity and (2) cumulatively in relation to other increases in personnel and staffing requirements for on-going and proposed military activities. An assumption that off-base (off-post) housing availability is the prerogative of military utilization needs to be reframed in relation to Guam's civilian community's shelter requirements and a recognition that Guam is a homeland of an indigenous (CHamoru) people.

To assure accuracy in the planning process for the Proposed Action, the DEIS needs to conduct a more complete analysis that examines the cumulative effects of DoD pressures on the Guam housing market, including an examination of the socioeconomic impact on the CHamoru people.

3. Cultural and Terrestrial Resources

DEIS Assumptions: Cultural and terrestrial resource impacts will not be mitigated but will impact at least 10 cultural and historic sites and the destruction of “approximately 269 acres of limestone forest habitat” at nine (9) separate sites in Guam.

The indigenous mammal and federally protected species, Mariana fruit bat/*Fanihi* (*Pteropus mariannus*), is an inhabitant of limestone forests. Although its roosts are

known within areas to be developed for the EIAMDS, the DEIS notes that “focused surveys were not conducted for Mariana fruit bats within the EIAMD system study areas.” (p. 3.4-47).

Similarly, studies for the endangered Marianas Swiftlet/*Yayaguak* (*Aerodramus bartschi*) “were conducted only at NBG Dandan and NMS Northeast” (p. 3.4-35). Host plant species for the endangered Mariana Eight-Spot Butterfly/*Ababang* (*Hypolimnys octocula marianensis*) were identified in half (8 of 16) of the EIAMDS study areas (Table 3.4-3). In total twenty-five (25) federal and Guam designated endangered and threatened fauna and flora are identified in the sixteen (16) DEIS study areas.

The Expectation of Degradation of Guam’s Cultural and Natural Resources: The Proposed Action would continue the degradation of Guam’s cultural and natural resources that has most recently come into focus with the destruction of virgin limestone forests in the development of Camp Blaz. The additional acres of limestone forests that would be destroyed by the Proposed Action and the impact on protected animal and plant species endemic to Guam are significant even while the DEIS does not fully study them.

At the core of the issue is the value of additional security-related activities in relation to the Guam homeland, its biodiversity, and U.S. military’s mitigation of the adverse cultural and ecological impacts. The recent history of the military’s actions at Camp Blaz informs the significant divide between Guam’s cultural and terrestrial resource base and the military’s activities to develop Guam lands and claims to mitigate the cultural and ecological impact. Approximately 1,200 acres of limestone forest were destroyed for Camp Blaz, with numerous cultural sites and burials disturbed. This bulldozer impact was acknowledged by the U.S. Secretary of the Navy by awarding the Marine Corps Base Camp Blaz Guam Cultural Resources Team with services top environment award for 2021. On the other hand, it is clear that the impacts on threatened and endangered species are not reversible and that the U.S military’s heralded and awarded group at Camp Blaz has [failed to implement the mitigation and conservation measures that were advertised as mitigation](#).

The Proposed Action for the EIAMDS raises similar divides between impact and reality. Beyond the failure of the Proposed Action to fully evaluate the impact of radar induced Electromagnetic Radiation (EMR) on fauna within the EIAMDS affected area, the expected destruction of indigenous cultural and terrestrial resources, with mitigation limited to the same ineffective guidelines that applied to Camp Blaz (the 2008 Programmatic Agreement), represents a failure of the NEPA standard.

4. Guam Impacts Measured Against Proposed Action’s Objective

DEIS Assumptions: The Proposed Action proposes the deployment of a yet-to-be-developed EIAMDS to “defend the entirety of Guam” from known, and future (evolving) advanced threats. To accomplish this objective, existing weapons, radars and command and control systems (most of which are currently operating offshore of Guam) would be moved onto the island. These systems would be augmented and integrated with new (and developing) technology.

The socioeconomic and environmental and cultural impacts are estimated to be in the range of major, long-term and significant to not significant. Some of the potential impacts are recognized as economically inflationary (i.e. triggering housing price inflation). Other impacts will result in permanent adverse effects.

Guam Impacts from Proposed Action Are Not Balanced by Enhanced Security:

Guam today cannot be perceived as a low-cost target by an adversary. U.S. Navy Aegis vessels provide extensive ballistic missile intercept capabilities and air defense support. The U.S. Army-operated THAAD battery adds additional ballistic missile intercept capability. The ability of the U.S. military to “complicate adversary plans, induce doubt about the success of offensive missile use, and raise the threshold for conflict by reducing adversary incentives to conduct small-scale, coercive attacks” exists today. Moreover, an adversary’s attack on U.S. military installations in Guam would almost certainly result in punishing consequences, including the use of Guam homeported attack submarines. The Proposed Action would not fundamentally change this calculus.

Importantly, the Proposed Action, does not, however, “defend the entirety of Guam.” If the US military is planning and funding operating concepts and alternative operating areas on the assumption that Guam may not be available in the event of conflict, claims that the Proposed Action “defend the entirety of Guam” is undercut by other U.S. actions. By failing honestly on its foundational claim, the Proposed Action opens itself to other questionable claims.

- *The fidelity of the EIAMDS itself is in question.* The EIAMDS is a system of systems involving equipment from the U.S. Navy, the U.S. Army and the U.S. Missile Defense Agency. Individual components of this proposed system are known to work. For example, the recent Guam Flight Test involved a Navy vertical launch system (VLS) placed on land and used a Navy interceptor (SM-3) to shoot down a target at a predetermined location. The Governor of Guam noted, “The system works.” This component also works when launched from a ship.

Whether an individual component, or the combination of components proposed for the EIAMDS can effectively identify, track, communicate and manage fire control across a range of incoming threats outside of a

scheduled test environment is a different matter. Those questioning the fidelity of the Proposed Action range from the Pentagon's Directorate of the Office of Testing and Evaluation (for 2 years running) to the Armed Services Committee of the U.S. Congress which this year noted flaws in the EIAMDS current development track. By law, the FY2025 NDAA (Section 1648) requires an annual reporting on the state of the system's architecture, and year-over-year comparisons of the project across a wide range of components and where the EIAMDS is in relation to its proposed end-state. Additionally, Lincoln Labs conducted a Congressionally directed, Secretary of Defense commissioned independent evaluation of the system (2024); this remains classified.

- *The security of the people of Guam does not fall within the Proposed Action's definition of defense.* The Proposed Action moves the principal elements of the current deterrence configuration from offshore U.S. Navy vessels onto the island. As noted by the head of the MDA, this will result in "weaponizing" the community. Under the current configuration, if deterrence fails, the primary targets will be military targets, many offshore. Under the Proposed Action, if deterrence fails there will be more targets dispersed in Guam. The U.S. military's preparation of "divert" areas around the region and building requirements for the EIAMDS project in Guam (specifically nuclear-directed electromagnetic pulse weapons defenses) illustrate the extent to which military planners anticipate the effect of conflict in Guam. Still, there are no plans in the Proposed Action to secure the population. In this context, a fundamental flaw in the Proposed Action is that it fails to respond to the NEPA's standard related to the "well-being, safety, or health of members of the public."

The Proposed Action expects that the civilian community will continue to absorb significant impacts, many of which the DEIS itself cannot quantify. In exchange, the systems offered by the Proposed Action would provide no significant increase in the island's defense and would likely result in exposure of the civilian community to greater insecurity. In short, the purported value of the Proposed Action is overstated in its effectiveness for a series of complicated and uncertain contingencies and understated in the real and potential damaging repercussions to the Guam community. While the anticipated threat of conflict may ebb and flow due to diplomatic as well as military policies, the damaging repercussions to Guam will be manifest on the island for decades.

Attachment 1

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.		https://www.federalregister.gov/documents/2023/05/05/2023-intent-to-prepare-an-environmental-impact-statement-for-an-environmentally-integrated-air-and
	“It is not simple—it is hard, hard work.” Hill said. “We’re running lots of studies right now to see which is best.”	https://www.airandspaceforces.com/after-long-wait-guams-missile-defense-is-about-to-get-a-whole-lot-better/
	DOT&E have determined that the architecture is not adequate	https://www.dote.osd.mil/Portals/97/pub/reports/FY2022/other-report.pdf?ver=71JCDFcAIC9z_UnuI9BOUQ%3d%3d
	Congressionally mandated independent study of the architecture is not yet completed.	Independent assessment of EIAMDs architecture by Lincoln Lab 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.”	https://www.defenseone.com/threats/2022/08/biggest-challenge-missile-defense-presence-guam-finding-right-site/375816/
	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 of below the threshold of IOC?	https://breakingdefense.com/2023/08/tying-it-together-army-eis-test-plan-new-capabilities-bound-for-guam/ https://www.defensedaily.com/armys-ibcs-test-plan-preparation-mission/army/
"An Enhanced Integrated Air and Missile Defense		https://www.federalregister.gov/documents/2023/05/05/2023-intent-to-prepare-an-environmental-impact-statement-for-an-environmentally-integrated-air-and

(EIAMD) system for the defense of Guam"		
	Is "defense of Guam" defined? What defense of Guam is intended to be accomplished by this action?	
What potential alternatives has the MDA considered?		https://www.thedrive.com/the-war-zone/41819/decommission-could-be-the-answer-to-guams-missile-defense-needs
	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	https://news.usni.org/2021/03/04/davidson-aegis-ashore-on-guam-up-3-navy-destroyers
	Freeing up USN vessels afloat has been cited as a major reason to locate an EIAMDs in Guam	https://news.usni.org/2021/03/04/davidson-aegis-ashore-on-guam-up-3-navy-destroyers
	The fact that afloat capabilities have analog (not digital) radars is another reason to move ashore	https://www.navalnews.com/naval-news/2021/12/mda-discusses-aegis-ashore-options-for-guam/
This system will be more distributed than Aegis ashore in Europe		https://www.navalnews.com/naval-news/2021/12/mda-discusses-aegis-ashore-options-for-guam/
	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.		https://news.usni.org/2021/03/04/davidson-aegis-ashore-on-guam-up-3-navy-destroyers
	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.		https://csis-website-prod.s3.amazonaws.com/s3fs-public/event/220523_MDA_2023_Budget.pdf?VersionId=8UXYMGg.2TswRa2icWc
	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?		https://missiledefenseadvocacy.org/alert/theory-will-only-take-robert-oppenheimer/
	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?	

Issue			
NEPA Cumulative Effects			All past effectives are considered accumulative pursuant to Guam status as an unincorporated territory.
	PFAS	Past/Present	DoD installation CCRs for 2022 have PFAS/PFOS above the new GWA did not disclosure PFAS/PFOS in its 2022 CCR, but it is expected will also be above EPA's new HA levels. PFAS/PFOS expected to wells transferred from U.S. DoD, but PFAS/PFOS migration through Guam freshwater aquifer is anticipated.
	Agent Orange or other dioxins	Past/Present	https://vaclaimsinsider.com/list-of-agent-orange-exposure-locations/#:~:text=Despite%20previous%20denials%20and%200exposed%20to%20Agent%20Orange.
			https://www.pacificislandtimes.com/post/guam-leaders-urged-inclusion-of-civilians-in-agent-orange-claims-program
	MITT/CJMT/	Past/Present /Future	How many candidate sites are related to and have an impact on obligations for these actions?
	USMC Realignment	Past/Present /Future	How many candidate sites have an impact on existing obligations met its obligations pursuant to the USMC realignment to Guam?
	Project Pele (microreactor)	Foreseeable	https://www.armed-services.senate.gov/imo/media/doc/fy2024_ndaa_bill_report.
			https://www.militarytimes.com/news/your-military/2022/04/1/build-nuclear-microreactor-to-power-far-flung-bases/
	IRBM placement in Guam	Foreseeable	https://www.armed-services.senate.gov/imo/media/doc/fy2024_ndaa_bill_report.
			https://armedservices.house.gov/fy24-ndaa-resources
			https://www.rand.org/pubs/research_reports/RRA393-3.htm
	Conflict in Guam	Foreseeable	This EIAMDs action anticipates conflict in Guam
	Directed Energy Weapon being considered for Guam.	Future?	https://missiledefenseadvocacy.org/alert/theory-will-only-take-robert-oppenheimer/
	Power source for DEW?	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?	
	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?	
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?	https://sam.gov/opp/47cc18fa94c54236a16fd690a3e983b9/
	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?	
	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 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		https://www.defensenews.com/training-sim/2023/08/09/first-guam-missile-defense-planned-for-end-of-2024/
	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 (e.g. White Sands Missile Range)?	https://www.wsmr.army.mil/
	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		https://mitt-eis.com/About-the-MITT-Study-Area; https://www.cnmijointmilitarytrainingeis.com/
	Airspace	
	Directed Energy Weapons	
	Sonar	