

NATIONAL SECURITY COUNCIL

September 19, 1994

94 SEP 19 P4:26

To: John Podesta

Bob Bell asked me to forward the attached copy of Rep. LaRocco's letter on Idaho Training Range, as you discussed this afternoon.


Steve Jones
Defense Policy

John -

This is a broadened
brush out memo. But
key remains putting flesh
in bones of the various
components, which requires consulting
with & getting product from
macle, Christine, Mark,
etc. D

LARRY LAROCCO

1ST DISTRICT IDAHO

COMMITTEE ON NATURAL RESOURCES

COMMITTEE ON BANKING,
FINANCE AND URBAN AFFAIRS

ATTORNEY AT LAW



Congress of the United States 99: 11
House of Representatives
Washington, DC 20515

077838

1117 LONGWORTH BUILDING
WASHINGTON, DC 20515-1201
(202) 225-6611

DISTRICT OFFICES

104 N. 314 STREET
BOISE, ID 83702
(208) 343-4211

109 S. KIMBALL AVENUE
P.O. BOX 87
CALDWELL, ID 83606
(208) 459-2362

621 MAIN STREET
LEWISTON, ID 83501
(208) 746-6694

404 S. HERMAN AVENUE
COEUR D'ALENE, ID 83814
(208) 667-2110

August 19, 1994

The President
The White House
Washington, D.C. 20500

Dear Mr. President:

I am writing today to express views relating to the Idaho Training Range or ITR. The proposed training range is associated with the Mountain Home Air Force Base in Mountain Home, Idaho, and would provide additional training options for the Air Force's 366th Composite Wing.

The new training range would be physically located in the canyonlands of Owyhee County. Thus, the 25,000 acres that comprise the immediate range, and most of the three million acres that would be affected by training activities are within Idaho's First Congressional District, which I represent.

According to some press speculation in Idaho, the environmental impact statement on the proposed ITR may have been delayed to provide me with some unspecified political advantage. I want to emphasize, from my perspective, any decision on ITR should not be delayed. In plain language, let's get on with it.

It is my understanding there may be as many as 24 points of legal challenge between now and final approval. To delay undermines the integrity of the process.

The integrity of the decision-making process continues to be of great concern and importance to me. Whether actual or perceived, a failure of the process to engage the public, and to reflect the breadth and depth of public concern about the ITR proposal has figured importantly in the questions I have raised.

I have said repeatedly that if the process is sound, Idahoans have good reason to believe that the decisions it produces will be sound.

Having made these points about the process of the decision, I want to draw your attention to the concerns about the substance of the issue as expressed in the enclosed copy of a letter which I submitted as comments on the Draft Environmental Impact Statement last February.

Mr. President, these concerns remain largely unaddressed.

For example, one of my concerns continues to be the apparent lack of a standard cost-benefit analysis. No one would question the need for fighter pilot training, but the question remains whether the proposed ITR is cost-effective?

It seems fundamental that costs and benefits should be analyzed from local, regional and national perspectives prior to a decision on the ITR. To date, however, my questions about this issue have produced nothing more exhaustive than the enclosed seven-sentence response. It appears to conclude that the range will provide \$20 million per year of incremental benefit with no cost.

Similarly, ambivalence by the Air Force about the need for the new range continues. As recently as last week, spokesmen for the Air Force were quoted in the press as saying, "Nowhere does [a prior environmental impact statement] say the range was absolutely critical, was required for the composite wing." According to this account, the Air Force is formally arguing in federal court that "the wing can operate at a mix of ranges, such as the existing Saylor Creek bombing range, the Utah training ground or others."

When the Air Force states the ITR is both essential and unnecessary, the failure of the EIS to fully analyze the question of need is simply unacceptable.

My February comments also referred to a perception among my constituents that the Air Force had already reached a decision to build the range, and was now simply going through the motions of involving the public. You should know that of 2,033 Idahoans who have contacted me about the proposed ITR, 1,986 have expressed opposition to it, and only 47 have expressed support.

Mr. President, it is my belief that these points must be resolved. It is my hope they will be adequately addressed in the Final Environmental Impact Statement, or ancillary documents.

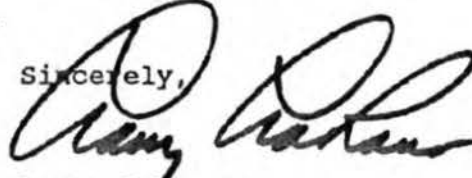
Furthermore, I am deeply concerned that Mountain Home and the residents of Idaho are being held hostage to the threat of the closure of the Base. Mountain Home Air Force Base was reportedly rated by the Air Force as one of its top three fighter-plane bases during the 1993 round of base closures. It is in the center of a vast tract of uncluttered airspace. The weather is stable and suitable for air operations year-round.

Perhaps most significantly, Mountain Home Air Force Base has strong public support. Idahoans understand if trouble erupts on the Korean Peninsula or some other hotspot, the 366th Composite Wing would likely be deployed immediately. They are proud of this role, as am I. To threaten abandonment of such an asset if the proposed ITR is not built is illogical and counterproductive.

Finally, I want to suggest the time may be right for a comprehensive ecosystem analysis of Southwest Idaho as part of the search for a consensus among the stakeholders. If so, I want to offer all possible assistance for such an approach.

Thank you for your attention.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry LaRocco", written over the word "Sincerely,".

Larry LaRocco
Member of Congress

Enclosures

LARRY LAROCCO

1ST DISTRICT, IDAHO

COMMITTEE ON NATURAL RESOURCES

COMMITTEE ON BANKING,
FINANCE AND URBAN AFFAIRS

AT-LARGE WHIP



Congress of the United States
House of Representatives
Washington, DC 20515

1117 LONGWORTH BUILDING
WASHINGTON, DC 20515-1201
(202) 225-8811

DISTRICT OFFICES

304 N. 8TH STREET
BOISE, ID 83702
(208) 343-4211

109 S. KIMBALL AVENUE
P.O. BOX 87
CALDWELL, ID 83808
(208) 468-2362

821 MAIN STREET
LEWISTON, ID 83501
(208) 746-8894

408 SHERMAN AVENUE
COEUR D'ALENE, ID 83814
(208) 887-2110

February 9, 1994

Brenda Cook
HQ ACC/CEVA
129 Andrews Street, Suite 102
Langley Air Force Base, VA 23665-2769

Dear Ms. Cook:

I am writing to express serious reservations about the Draft Environmental Impact Statement (DEIS) prepared by the Air Force concerning the proposed Idaho Training Range. It is my understanding that the period for public comment on the DEIS remains open until today. With that in mind, I intend that this letter be made a part of the record.

The Air Force training range's target areas would lie entirely within Idaho's First Congressional District, which I represent. I am aware that debate over the proposal has become increasingly polarized. But I have never doubted that Idaho citizens would be broadly supportive if evidence showed that a training range in the Owyhee County canyonlands was needed to secure our national defense.

This question of whether the national defense requires the new training range has been central to my own inquiry from the beginning. In my view, the Air Force's failure to address this issue directly in the DEIS is so fundamental that it calls the document itself into question. In addition, it reinforces public perceptions that the results of an ostensibly public process have been predetermined by the Pentagon.

The inadequacy I seek to draw to your attention is rooted in a contradictory and extraordinarily confusing string of comments Air Force officials have issued about the need for the range. The comment of Deputy Chief of Staff Lt. Gen. Michael A. Nelson in June of 1991 that "[e]xisting ranges are adequate to support training needs of the Composite Wing and other forces that will use them," may be one extreme. The other is perhaps represented by the recent statement of Air Force Secretary Sheila E. Widnall, as reported in press accounts, that "[i]t's crucial."

But the problem is most readily apparent in the failure of the DEIS to include a standard, cost-benefit analysis of how the

economics of training at a new Idaho range would compare, over time, to the economics of training at existing ranges in Utah or Nevada based on quantified needs, benefits and expenses. Without such a comparison, statements in the DEIS about the need for the range are little more than subjective conclusions.

On page 1-35, the DEIS identifies the need for an additional range as one of the issues raised during preliminary public input:

Commentors indicated that the need for an additional range should be established in the EIS. In many instances, the issue centered on a perceived contradiction with the policy of defense reductions. The comments also indicated that the Air Force should consider use of existing ranges in the region, such as the Utah Test and Training Range, as an alternative to developing a range in Idaho.

Nevertheless, on the same page, the draft includes the following statement as the first paragraph of the section entitled "Issues Beyond the Scope of This Environmental Impact Statement":

National Needs Assessment. A national needs assessment for training ranges and associated airspace is beyond the scope of this draft EIS, which defines the need for the proposed action in terms of mission and training requirements of the Composite Wing and IDANG.

The kind of training that would be carried out at the range is needed, and it is difficult to imagine pilots getting too much training. But are there viable, alternate ways of getting this training now? The Utah Test and Training Range (UTTR), for example, appears from the descriptions in the DEIS to be a place with the topography, size, and facilities to support realistic training for a composite wing based at Mountain Home. The proposed Idaho Training Range might be more convenient from a narrow point of view, but is it cost-effective from an empirical point of view? In my study of the DEIS I found no suggestion that current Composite Wing training is less than acceptable. The ITR would make it possible to train more often, but it does not follow that the absence of the ITR degrades our national security picture.

The DEIS makes a good case that the existing Saylor Creek range is increasingly limited as the training becomes more complex. But it leaps from that fact to a very general conclusion that becomes the premise of the entire draft study. This premise is that "additional assets" are needed to provide flexibility and realism "in support of mission readiness," and that these assets can only be provided for locally. The central flaw of the draft is that this premise is never seriously questioned. The DEIS does a good job of articulating the

advantages that would accrue to the Air Force and the Idaho Air National Guard if the proposed action is taken. But given that budgets are contracting, and the defense establishment itself is under pressure to adjust its expenditures to reflect a changed world, the absence of a section quantifying costs and benefits is glaring.

In short, the DEIS begins with an unsupported conclusion that the range is needed and then discusses the impact of various configurations in Owyhee County. It considers no alternatives to a range in Owyhee County. Its references to remote ranges are limited to perfunctory observations about the physical effects that additional ordnance and aircraft activity would have on areas already almost entirely degraded.

The failure of the DEIS to specifically discuss the effects of the range on sites of historical or religious significance to Native Americans is also problematic, but more understandable given the fact that until recently the information was being guarded by Native Americans as a precautionary measure.

By focusing on omissions I do not mean to minimize my concern about the biological impacts which the DEIS *does* identify. In particular, I am concerned about the impact of a range on the important bighorn sheep population in the Owyhee River Canyon. Since 1980, these sheep have been transplanted on a yearly basis from Owyhee County to other parts of the Great Basin region. In fact, the Owyhee County herd now provides the only potential source of transplant stock for this species nationwide, since export of California bighorn sheep from British Columbia was discontinued in 1991.

Catastrophic, all-age die-offs in bighorn sheep populations are well-known. They usually result from physical conditions known to exist in the Owyhee herd, coupled with external stress. The proposed training range obviously has the potential to increase stress. Under the circumstances, the Air Force's bare conclusion that bighorn sheep need to be monitored if the range proposal is implemented seems self-evident.

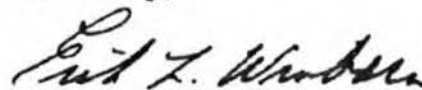
Still, the DEIS identifies this and similar specific impacts. If we move forward, it simply means that there has been a collective decision that the impacts are both justified and absorbable. At least that is what it *should* mean.

By contrast, the Air Force's approach has left citizens of Idaho believing that these questions are academic. There is a pervasive feeling that the Air Force has long ago decided the ITR is going to be built, and is simply going through the motions of involving the public. To put it more bluntly, many Idahoans feel they are being "slam-dunked" by the Air Force. The failure of the DEIS to address the most fundamental question about the range exacerbates this problem, be it perception or reality.

Using the UTTR, every 0.8 hour of demanding training time requires 1.5 hours of non-demanding (transit, air refueling, takeoff/landing) training time. By using the proposed range, the Wing can add an additional 0.3-0.4 hours to a local sortie. Thus, the Air Force gains 3,000 hours of demanding training time increasing the frequency of individual training events, with the additional benefit of more flexibility in how the training is done.

We trust the information provided is useful.

Sincerely,



ERIK L. WINBORN
Colonel, USAF
Deputy Chief, Programs and
Legislation Division
Office of Legislative Liaison

Attachments

**DEPARTMENT OF THE AIR FORCE
OFFICE OF THE UNDER SECRETARY**1670 AIR FORCE PENTAGON
WASHINGTON DC 20330-1670COMM: (703) 697-1361
DSN: 227-1361
FAX COMM: (703) 693-4303
FAX DSN: (703) 223-4303**FAX COVER SHEET**

94 SEP 23 P12:47

TO:	Mr. John Podesta
FROM:	SSgt Riche
SUBJECT:	STR
NUMBER OF PAGES (INCLUDING HEADER):	3

SPECIAL INSTRUCTIONS:

JF
Riche will
give us 48 hours notice
prior to sending the letter.
Release is being held pending
hearings on AF Chief of Staff.
P.

ERIK ay



DEPARTMENT OF THE AIR FORCE
WASHINGTON, D.C. 20330-1000

OFFICE OF THE UNDER SECRETARY

September 22, 1994

To: Katie McGinty
Pat Griffin (VIA Doug Sosnick)
John Podesta

From: Rudy de Leon R

Re: DRAFT LETTER ANNOUNCING AIR FORCE PLANS TO
PERFORM A SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT
STATEMENT FOR THE IDAHO TRAINING RANGE

Attached is the proposed letter the Air Force would send to (1) Idaho congressional Delegation (2) State officials in Idaho including all members of the State Land Board advising them that the Air Force plans to proceed with a Supplemental Draft Environmental Impact Statement for the proposed Idaho Training Range.

The Supplemental Draft EIS will take 6-8 weeks to complete, and following its release there will be a public comment period of approximately 90 days. This supplemental process will allow for further public comment before final decisions are made. The Air Force will also look at alternatives during this process.

DRAFT

*Let Pat know
exactly when it is
released.*

The post-Cold War era presents new challenges for our armed forces, making it necessary to refocus our defense posture. As our overseas presence declines, rapid mobility of our combat forces becomes an essential element of our national strategy. To rapidly project air power to a potential trouble spot we must have a highly trained expeditionary force that can quickly deploy anywhere in the world and be prepared to fight on a moment's notice. The Air Force responded by forming an air intervention wing, the 366th wing at Mountain Home Air Force Base, Idaho. In a future crisis, this composite wing will be the first to go, and if necessary, the first to fight.

If we are to ask the men and women of the 366th Wing to go in harm's way, we must give them the training they need. To fully realize the capabilities of the composite wing, they must train as they plan to fight. Facilities in Idaho today cannot support this type of training.

The Idaho Training Range (ITR) proposal is the product of an extensive public process to balance military readiness and environmental protection. By working closely with our neighbors in Idaho, the Air Force is identifying Native American and environmental concerns surrounding the location of the proposed range. In response to these concerns, we have developed a comprehensive mitigation plan.

Further, the Air Force will also continue to study alternatives that may further minimize environmental impacts while preserving military training utility.

and because we would like fully to consider other alternatives,

Because these mitigations represent a significant modification to the proposal, it is important that we reopen the issue for public debate. To provide the opportunity for complete review by the people of Idaho, the Air Force will release a supplemental draft environmental impact statement (EIS) detailing the new comprehensive mitigation plan. The release of the supplemental draft EIS will initiate another round of public discussion designed to bring us closer to a solution that balances military training and Native American and environmental concerns.

The Air Force has enjoyed a strong relationship with the people of Idaho over the last 50 years. We intend to build an even stronger relationship for the next 50 years.