



**Scoping Comments to the
Defense Threat Reduction Agency
On the
Programmatic Environmental Impact Statement
For DTRA Activities at the White Sands Missile Range**

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By fax to 505.846.9670 and e-mail to TDTTS@ao.dtra.mil

To whom it may concern:

Nuclear Watch of New Mexico (NWNM) is pleased to submit the following scoping comments on the Programmatic Environmental Impact Statement for Defense Threat Reduction Agency Activities at White Sands Missile Range.

The stated mission of the Agency is:

The Defense Threat Reduction Agency [DTRA] safeguards America's interests from weapons of mass destruction (chemical, biological, radiological, nuclear and high explosives) by controlling and reducing the threat and providing quality tools and services for the warfighter.

In our view, there is currently an over-reliance by the U.S. government on *counterproliferation* (warfighting against potential threats) vs. *nonproliferation* (that is largely pre-empting potential WMD threats through diplomacy, binding treaty regimes and providing global leadership by example). While it is incontestable that the U.S. has quantitatively reduced its WMDs, the same cannot be said for a qualitative reduction of its arsenal of the most destructive and militarily useful WMDs (i.e., nuclear weapons). This is particularly true given the recent programmatic and legislative pushes towards developing a new Robust Nuclear Earth Penetrator (RNEP) and the so-called mini-nukes, issues which we suspect may be partially in play in this PEIS.

It is interesting to note that the current DTRA Director was formerly the senior associate director for national security affairs at the Los Alamos National Laboratory (LANL). He was also (still is?) a leading proponent for the revised "deterrence" capabilities of nuclear weapons. LANL and its sister lab the Lawrence Livermore National Laboratory have already formed "red teams" for RNEP design. It is also interesting that the DTRA web site prominently features what appears to be a nuclear-certified B-2 bomber test dropping a B61-11, the most recent modification of a nuclear earth-penetrator.

We would like to think that we are not naïve - - we concur that some counterproliferation "tools and

services” are indeed needed. However, Nuclear Watch of New Mexico argues that the overwhelming emphasis given to counterproliferation actually works against our national security interests. We think this will inevitably lead to other nations concluding that they must have their own WMDs as deterrence against the U.S., thereby directly undermining our national security. We contend this is already being demonstrated by current international events that are unfortunately being exacerbated and accelerated by the newly declared policy of pre-emptive strikes when deemed necessary.

Commenting on DTRA issues is new to us, but we do have extensive experience in commenting on Department of Energy (DOE) issues. Like DOE, we suspect that the Defense Threat Reduction Agency will hasten to point to various presidential directives to justify its work. What we think DTRA should do in this draft PEIS is to offer a stringent evaluation of what is in the country’s best interests. The question is: is it better to put an overwhelming emphasis on counterproliferation, or is it better to strengthen the global nonproliferation regime through concrete, near-term example? We think there is compelling urgency to this question, as the global nonproliferation regime appears to be reaching a current near-terminal crisis. We submit this is in large due to the emphasis of counterproliferation over nonproliferation.

Specific issues or questions that DTRA should address in the WSMR PEIS:

- The Agency fact sheet states that “DTRA conducts tests [at WSMR] to evaluate the lethality of conventional and advanced weapons against various targets.” Conventional weapons are commonly understood to be high explosives. Please describe the types and categories of “unconventional” or “advanced” weapons systems (e.g., “highly energetic,” thermobaric, electromagnetic pulse, nuclear, etc.) to be used in future tests.
- To what extent would DTRA activities at the WSMR dovetail with the RNEP initiatives at the nuclear weapons design labs (LANL, Lawrence Livermore and Sandia)? Please describe in full any relationship between the DOE labs and DTRA activities at the WSMR (including both nuclear and non-nuclear initiatives).
- Given that the mailing address for these comments is for Kirtland AFB, please describe the DTRA presence there. Additionally, what is DTRA’s relationship, if any, with the Air Force Space Weapons Lab (formerly the Phillips Lab) at Kirtland AFB?
- The DTRA fact sheet states that “[m]ock enemy targets, including deeply buried and concrete-reinforced structures are used to test weapon systems.” How deeply buried? What are the varied geologic features that DTRA plans to test in (e.g., sand, alluvium, granite, etc?).
- The DTRA fact sheet states that “[t]hese tests help reduce the effects that an attack on a WMD facility could cause on nearby areas.” In the event of an attack on a biological weapons facility mere reduction may not be enough. How is complete destruction of a stock of bioweapons select agents to be assured? What is the role of future tests in that assurance?
- Assuming that these tests could be related to RNEP development, how can they help to reduce collateral effects when that damage will be a function of the attack itself (i.e., directly related to the yield

of the nuclear warhead)? For that matter, what range of yields is being contemplated for the RNEP?

- The DTRA fact sheet states that the “use of increased quantities and an expanded selection of simulants in collateral test effect at additional WSMR locations” will be addressed. What is the complete list and description of these simulants and what pathogens or toxins are they simulating?
- What monitoring systems will be in place for tests on all forms of targets? The planned activities appear to dictate the need for the monitoring of biological simulants, chemicals and radiological materials. What are the spectrum and quantities of chemicals to be used in tests? What are the spectrum and quantities of radiological materials to be used in these tests? Would the actual chemicals and radiological materials be used, or would they also be simulated?
- Do any hardened deeply buried targets or tunnel tests require the use of any artillery, gravity bombs or missiles (both nuclear and nonnuclear)? Would unarmed RNEPs or replicas thereof be used in tests at WSMR? If any missiles are to be involved in any tests, from where would they be launched?
- To what extent, if any, is there any redundancy in planned tests and facilities between the WSMR and the Tonapah Test Range?
- What is the geologic setting of any tunnel targets tests? What is their applicability to potential targets in other countries?
- How powerful are explosive tests to be?

These constitute our comments and questions for now. We look forward to commenting on the Draft PEIS, which should provide the opportunity for more substantive discussion. Please keep us informed and please provide us with the Draft WSMR PEIS at the earliest opportunity.

Respectfully submitted,

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