



DEPARTMENT OF THE ARMY  
WASHINGTON DC 20310

09 JUL 2007

The Honorable Wayne Allard  
United States Senate  
Washington, DC 20510

Dear Senator Allard:

Thank you for your letter of June 21, 2007, inquiring about the Army's proposed expansion of the Piñon Canyon Maneuver Site (PCMS) in southeastern Colorado.

As you are aware, we are organizing, training, and equipping new modular Army units in ways that are very different from how the Army was organized and trained during the Cold War. The Army's interest in expanding training at PCMS derives from a need for larger land areas in which to train the new Brigade Combat Teams and associated units for contemporary warfare and the threats we expect to encounter in the future.

Our units can control more territory with fewer Soldiers. In order to accurately simulate anticipated, actual, combat conditions with the equipment required, we must train over larger areas of land, thus the need for the expansion of training at PCMS.

I would observe in general that the Army essentially does two things: it trains to go to war and goes to war. The Army must train to meet current and anticipated threats to the Nation, and we must train as we expect to fight.

Our new modular Brigade Combat Teams such as those in the 4th Infantry Division at Fort Carson require between 138,000 and 160,000 acres of training land to reach readiness for warfighting. In comparison, Cold War units required 45,000 to 108,000 acres for training to reach required readiness. Unit proficiency and individual readiness save the lives of American Soldiers in combat. We cannot send units and individual Soldiers into battle who will be performing tasks for the first time.

Planned requirements for training land at Fort Carson and PCMS will increase substantially in the near future. When we add up the impacts of the way we organize units and train Soldiers, plus new units to be stationed at Fort Carson, plus changes in training requirements, the Army faces a shortfall of

training land for Fort Carson units of more than 400,000 acres by 2011. This is the acreage the Army seeks to acquire.

This is a portion of the Army-wide training land shortfall of 5 million acres by 2011 previously reported to Congress. Expansion at PCMS is critical to meeting that shortfall, expressed not only in acres of land but in training and unit readiness.

Please see the enclosure for specific answers to your questions. I stand ready to answer any further questions and provide additional information you may need.

Thank you for your interest in this matter, and for your continued support of our Soldiers and their Families.

Sincerely,

A handwritten signature in black ink, appearing to read "Pete Geren", with a long horizontal flourish extending to the right.

Pete Geren  
Acting Secretary of the Army

Enclosure

## **Army Response to Questions in Senator Wayne Allard's letter dated June 21, 2007**

**Question 1.** Is the Army currently spending any money on an Environmental Impact Statement (EIS) for the newly publicly identified expansion area of interest? In your answer, please also identify any other recent EIS documents that have been prepared about PCMS not specifically relating to the possible expansion.

**Question 1 Answer.** The Army is not spending money on an EIS for PCMS expansion. There are no Fiscal Year 2007 funds programmed. There are three pending EIS documents that relate to Fort Carson and/or PCMS: 1) an assessment of alternative stationing impacts for the Hawaii-based Stryker Brigade Combat Team being prepared as a result of the Ninth Circuit Court decision in Lio'Ulaokalani Coalition, N Imi Pono, and K Puka v. Rumsfeld; 2) BRAC/Transformation impacts at Fort Carson; and 3) BRAC/Transformation impacts at PCMS. These three EIS documents do not assess expansion at PCMS. The Records of Decision for these are expected to occur well before a PCMS expansion EIS is undertaken.

**Question 2.** If money for an EIS on the proposed expansion is allowed to go forward, what specific alternatives will be included in the study?

**Question 2 Answer.** Four proposed alternatives for potential PCMS expansion would be included in an EIS: 1) No Action (mandatory under the National Environmental Policy Act (NEPA); 2) Southern expansion only; 3) Western expansion only; and 4) combined Southern and Western expansions. These four alternatives were previously briefed to Congress and released to the public on June 7, 2007. They may be revised under the NEPA scoping process.

**Question 3.** The Army has already analyzed the alternative of training units as much as possible at Fort Carson and PCMS and then transporting Soldiers and equipment to other training facilities off-site. Can you provide me details of these alternatives, including which off-site locations were considered and cost assessments of such off-site training?

**Question 3 Answer.** The Army conducted an Analysis of Alternatives Study (AAS) for PCMS examining the transportation of Soldiers and equipment to other, larger Army sites that would permit training to required readiness standards. The AAS showed that significant increases in transportation costs would render the alternatives unfeasible. The round-trip cost for moving one

Brigade Combat Team from Fort Carson to the National Training Center at Fort Irwin, California, for a training rotation is \$5.9 million. That cost can be used to estimate the cost of moving Brigade Combat Teams from Fort Carson to other locations for training, absent the use of PCMS. Moving one Brigade Combat Team to an alternate location would be approximately \$12 million per year, given the need for two training exercises per year.

Further, there are training requirements for Battalions. Transporting a minimum number of Battalions to an alternate training area would be \$2-3 million per year. Total costs for Brigade and associated Battalion training would be \$14-15 million per year over and above the cost of training the units at PCMS.

These estimates assume there would be range space and time at alternate locations for an additional Brigade Combat Team and its associated Battalions. The overall shortfall of Army training land is currently two million acres within CONUS, growing to five million by in 2011, previously reported as noted above.

There are few Army sites with excess capacity: Fort Bliss, Texas, will be at capacity for home unit training and is already planning to use space at White Sands Missile Range; Yakima, Washington, is at capacity supporting units from Fort Lewis; Alaska sites are available only seasonally and entail much higher transportation and logistics costs.

There are no Bureau of Land Management (BLM) or other federal lands within 200 miles of Fort Carson capable of supporting the required maneuver training. Federal lands outside this area would entail transportation costs as above. These lands do not provide the range and other infrastructure required for military training.

BLM and other federal lands, as well as leased land or land acquired under special use permits, have significant environmental restrictions on live fire and military construction, resulting in substantially increased costs and degraded quality of training.

The increase from 12 to 15 months for deployments in the war theater requires Soldiers to be home-stationed for one year between deployments. Training Soldiers and their units at alternate sites away from home station at Fort Carson would require Soldiers to be away from home four or five months out of their one year at home.

The Army owes a quality of life to our Soldiers and Families that equals the quality of service they give the Army and the Nation. Alternatives to training at PCMS would take scarce, precious time away from Fort Carson Soldiers and

their Families – an onerous sacrifice to ask of Soldiers and Families in addition to the sacrifices they have and will continue to make for the Nation.

**Question 4.** What are the potential economic or environmental impacts to Fort Carson if PCMS is not expanded?

**Question 4 Answer.** Fort Carson and its surrounding communities are an attractive location for additional Army missions. For example, in line with the planned increase in Army end-strength, the Army is analyzing the stationing of five new Brigade Combat Teams and their associated Combat Support and Combat Service Support units.

Stationing decisions will use the 2005 BRAC military value criteria, which include “mission capabilities and the impact on operational readiness” and “the availability and condition of land, facilities, and associated airspace (including training areas suitable for maneuver by ground...forces throughout a diversity of climate and terrain areas).”

Expansion of PCMS would improve Fort Carson’s military value and increase its ability to compete in any stationing decision.

Please note the positive economic impact on the Colorado Springs and Pueblo region from the 2005 BRAC decision to station a fourth Brigade Combat Team at Fort Carson: 4,377 direct and 3,309 indirect jobs in the Colorado Springs Metropolitan Statistical Area. New construction expenditures from an additional Brigade Combat Team at Fort Carson could total more than \$500 million with obvious benefits to the entire region, including Pueblo.

A new Brigade Combat Team would carry with it additional Base Operating Support (BOS) funds that pay installation management personnel and contractors. Each additional Soldier added to a base entails \$10,000-12,000 in BOS funds. A new Brigade Combat Team of 4,000 Soldiers would provide a recurring BOS budget of as much as \$50 million per year.

Absent an environmental assessment of Army use of PCMS, it cannot be stated in detail what the environmental impact would be, but the Army is required by law and its own doctrine and practices to be a good steward of the environment on the lands under its control. Training practices require controlled use and maintenance of land, water, and air resources, and mitigation when necessary. The Army is committed to minimizing the impact of training on PCMS lands. Training lands need to be rotated periodically to allow the land to recover from training exercises, and if training needs increase while the training space remains the same, environmental impacts will likely increase.