

GAO

Report to Congressional Committees

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DEFENSE INFRASTRUCTURE

Additional
Information Is Needed
to Better Explain the
Proposed 100,000-
Acre Expansion of the
Piñon Canyon
Maneuver Site



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Highlights of GAO-09-171, a report to congressional committees

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Why GAO Did This Study

In 2007, the Army announced that the Office of the Secretary of Defense (OSD) had approved its request to expand its Piñon Canyon Maneuver Site, Colorado, by acquiring up to an additional 418,577 acres. The National Defense Authorization Act for Fiscal Year 2008 required the Army to address 29 provisions related to the expansion in a report to Congress. In July 2008, the Army reported that, although it had revalidated the requirement for at least 418,577 additional acres at the maneuver site, in response to community, cost, and other concerns it now proposed to limit the acquisition of additional training land to 100,000 acres.

The act also required GAO to review the Army's report and the justification for the proposed expansion. This report examines the extent to which the Army's report (1) addresses the provisions of the mandate and (2) explains the selection of the 100,000-acre site. GAO compared the mandate requirements with the responses in the Army's report, met with Army officials to discuss the expansion, and visited the Piñon Canyon Maneuver Site and Fort Carson.

What GAO Recommends

GAO recommends that the Army provide Congress with additional information explaining (1) six of the responses to the mandate and (2) the rationale for selecting the 100,000 acres for the proposed expansion. DOD partially agreed with the recommendations.

To view the full product, including the scope and methodology, click on GAO-09-171. For more information, contact Brian J. Lepore at (202) 512-4523 or leporeb@gao.gov.

What GAO Found

While the Army's 2008 report on the Piñon Canyon Maneuver Site generally addresses the provisions of the National Defense Authorization Act for Fiscal Year 2008, the report is lacking certain information that would help clarify six of the Army's responses to the mandate. For example, the Army provided a list of all the training activities that occurred at Piñon Canyon from May 2007 to April 2008, but this information does not indicate how much of the training area was used, nor does it indicate whether any of these exercises were performed simultaneously. Therefore, the report is not clear regarding how much of the maneuver site was used for training in a given month or annually and whether the units could train simultaneously. It is also unclear how this information was used to support the required analysis of the maximum annual training load without the proposed expansion of the site. Without additional information on the mandated provisions, it is difficult for Congress and the public to fully understand six of the Army's responses to the mandated provisions.

The Army's report does not fully explain the current selection of the 100,000-acre site. Following are examples of specific issues not addressed in the Army's report:

- The Army reported that it has reduced the amount of land it intends to purchase from 418,577 to 100,000 acres but did not explain its basis for selecting fewer acres or the specific site.
- The estimated cost per acre used for internal planning to acquire additional land at the maneuver site has increased since 2007 but the Army's report does not discuss this increase.
- The Army completed the required analyses when requesting OSD's approval for the up to 418,577-acre expansion, but has not completed an analysis for the current 100,000-acre proposal that would help to understand, among other items, how much of the 100,000 acres would actually be used for training, what type of training can be conducted, and what are the estimated costs to maintain the 100,000 acres.

Army officials said that these questions and others would be difficult to address without the analysis required by the National Environmental Policy Act of 1969. Although the Army issued the mandated report, Army officials stated that, to date, the Army has voluntarily declined to spend other appropriated funds to begin the National Environmental Policy Act process due to congressional concerns about the potential effects of the proposed expansion. The officials further stated that uncertainty over congressional support for the potential expansion made a delay in expending funds to start the National Environmental Policy Act process appear to be prudent. Without the benefit of the analyses and information on how the Army identified the 100,000 acres currently being proposed for acquisition, especially in light of the growth in the estimated price per acre, it is difficult for Congress and the public to evaluate the full benefits and costs associated with the proposed 100,000-acre expansion.

Maneuver Site.⁹ We conducted this performance audit from August 2008 through January 2009, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. A detailed description of our scope and methodology is included in appendix I of this report.

Results in Brief

While the Army's 2008 report on Piñon Canyon Maneuver Site generally addresses the provisions laid out in section 2831 of the National Defense Authorization Act for Fiscal Year 2008 by providing responses to each of the 29 provisions,¹⁰ the report is lacking certain information that would help clarify the Army's responses about whether existing training facilities are sufficient to support the training needs and alternatives for enhancing economic development opportunities for southeastern Colorado for 6 of the 29 mandated provisions. For example, in one response about whether existing training facilities are sufficient to support the training needs, the Army provided a list of all the training activities that occurred at Piñon Canyon Maneuver Site from May 2007 to April 2008, but this information did not indicate how much of the training area was used, nor did it indicate whether any of these exercises were performed simultaneously. Therefore, the report is not clear about how much of the Piñon Canyon Maneuver Site was used for training in a given month or annually or whether the units could train simultaneously, and it is unclear how this information was used to support the required analysis of the maximum annual training load without the proposed expansion of the maneuver site. In another response, the Army was required to provide a training calendar showing all planned brigade combat teams stationed or planned to be stationed at Fort Carson at home station. The calendar depicts all the brigade combat teams that are planned to be stationed at Fort Carson as assigned to Fort Carson, but shows at least two of these brigade combat

⁹In addition to this review of the Army's 2008 report on the Piñon Canyon Maneuver Site, we also reviewed the Army's approach for acquiring additional training land, including the information in the Army Range Requirements Model. The results of both reviews will be published on January 13, 2009. See GAO, *Defense Infrastructure: Army's Approach for Acquiring Land Is Not Guided by Up-to-Date Strategic Plan or Always Communicated Effectively*, GAO-09-32 (Washington, D.C.: Jan. 13, 2009).

¹⁰The 29 provisions are listed in appendix II.

teams deployed. Since Army officials told us that the proposed expansion is based on peacetime assumptions, the Army report is not clear as to why the calendar depicts brigade combat teams as being deployed, given that in peacetime the teams would be less likely to be deployed. In a response to alternatives for enhancing economic development opportunities for southeastern Colorado, the Army reported that it eliminated from consideration the option to station an active duty unit at Piñon Canyon Maneuver Site during its Programmatic Environmental Impact Statement for Grow the Army and that surrounding communities do not have the infrastructure required to support the stationing of units. However, the Army's response does not explain or describe the analysis used in the environmental impact statement; therefore, it is unclear how the Army came to the conclusion that stationing units at the Piñon Canyon Maneuver Site is unfeasible. Without certain additional information on the mandated provisions, it is difficult for Congress and the public to fully understand some of the Army's responses in its report.

The Army's 2008 report on the Piñon Canyon Maneuver Site does not fully explain the current identification of the 100,000-acre site for the proposed expansion. Since OSD approved the expansion of the maneuver site in 2007, both the acreage proposed for acquisition and price per acre have changed, and several important questions about the 100,000-acre site selected for acquisition have not been addressed. First, in its 2008 report, the Army stated that it has reduced the amount of land it intends to acquire, but did not provide a detailed explanation of how it identified the smaller site. Second, the estimated cost used for internal planning to acquire additional land at the Piñon Canyon Maneuver Site has increased since February 2007, when OSD initially approved the Army's request to expand the maneuver site. However, the Army's report does not discuss this increase in the price per acre. Third, several important questions about the 100,000 acres selected for acquisition have not been fully explained. While the Army completed the required analyses outlined in Army Regulation 350-19¹¹ in requesting OSD's approval for the acquisition

¹¹Department of the Army Regulation 350-19, *Sustainable Range Program*, U.S. Army Chief of Staff (Washington, D.C.: Aug. 30, 2005). According to Army Regulation 350-19, a military land acquisition proposal is a series of questions intended to provide senior leadership with the essential information to make a decision about a major land acquisition. When preparing the proposal, the proponent installation is to summarize, where applicable, information detailed in the range complex master plan, range development plan, and analysis of alternatives study. The proposal is to include a map of the proposed acquisition, the purpose of the acquisition, potential effects on surrounding communities, and several other items related to the proposed land acquisition.

First
Argument

of up to 418,577 acres to expand the Piñon Canyon Maneuver Site, the request was justified on the estimated costs and benefits of the full 418,577-acre proposal and not on a smaller acquisition. However, the Army has not fully explained (1) how much of the 100,000 acres would actually be used for training, (2) what benefits would be gained from adding the 100,000 acres to the existing Piñon Canyon Maneuver Site, (3) what effect sustainment and maintenance activities would have on training on the 100,000 acres, and (4) what the future costs would be for sustaining and maintaining the 100,000 acres. Army officials said that these questions and others would be difficult to address without the analysis required by NEPA. As previously noted, the Consolidated Appropriations Act, 2008,¹² prohibited the use of funds appropriated or otherwise made available for any action that is related to or promotes the expansion of the Piñon Canyon Maneuver Site, and the Consolidated Security, Disaster Assistance, and Continuing Appropriations Act, 2009,¹³ prohibited the use of funds appropriated or otherwise made available in Division E, Title I of the act for any action that is related to or promotes the expansion of the Piñon Canyon Maneuver Site. Army officials said these funding restrictions apply only to Military Construction Appropriations and do not preclude the Army from further studying the 100,000-acre site or starting the NEPA process using other appropriated funds. The officials also stated that, to date, the Army has voluntarily declined to spend other appropriated funds to begin the NEPA process due to congressional concerns. The officials further stated that uncertainty over congressional support for the potential expansion made a delay in expending funds to start the NEPA process appear to be prudent. Further, Army officials explained that the Army would not begin the NEPA analysis for the potential expansion without consulting with congressional stakeholders and having a reasonable expectation that military construction funds would be available for the potential acquisition. Without knowing how the Army identified the 100,000 acres currently being proposed for acquisition and several other questions about benefits and costs of the proposed expansion, it is difficult for Congress and the public to evaluate the full benefits and costs associated with the proposed 100,000-acre expansion.

¹²Consolidated Appropriations Act, 2008, Pub. L. No. 110-161, Division I, Title IV, § 409 (2007).

¹³Consolidated Security, Disaster Assistance, and Continuing Appropriations Act, 2009, Pub. L. No. 110-329, Division E, Title I, § 127 (2008).

GAO recommendations
that the Army
has yet to comply
with.

We are recommending that the Army provide Congress and the public with additional information further explaining (1) the six responses about whether existing training facilities are sufficient to support the training needs and about alternatives for enhancing economic development opportunities for southeastern Colorado, and (2) the reasons the Army selected the current 100,000-acre site for the proposed expansion and the growth in the estimated price per acre, as well as more detailed information on how much of the 100,000 acres would actually be used for training, what benefits would be gained from adding the 100,000 acres to the existing maneuver site, what effect sustainment and maintenance activities would have on training on the 100,000 acres, and what the future costs would be for sustaining and maintaining the 100,000 acres. In written comments on a draft of this report, the Army partially agreed with our recommendations, but did not specify what actions, if any, it would take to implement them. In addition, the Army raised a variety of concerns including our characterization of its report and our initial inclusion of cost estimates used for internal planning purposes. While we recognize that the Army had certain concerns about our report, we continue to believe the opportunity exists to improve its responses to Congress, hence the need for our recommendations. We discuss the Army's comments in detail later in this report.

Background

The Army, in its initial Range and Training Land Strategy, identified Fort Carson—specifically its Piñon Canyon Maneuver Site—as one installation where potential land acquisition would be a feasible solution to addressing overall training land shortfalls.¹⁴ Fort Carson is located south of Colorado Springs, Colorado, and has command over and administrative responsibility for the existing Piñon Canyon Maneuver Site, a maneuver training facility located 150 miles away in the southeastern area of the state. The maneuver site consists of 235,000 acres, 95 percent (224,000 acres) of which is available for maneuver training for soldiers stationed at Fort Carson and other installations.

Proposed Expansion of the Piñon Canyon Maneuver Site

In March 2005, the Army completed a Land Use Requirements Study that examined the availability of training areas within Piñon Canyon Maneuver Site and concluded that a shortfall of approximately 418,500 acres existed that needed to be addressed in order to meet training requirements. The

¹⁴See Army's *Range and Training Land Strategy*.