

Congress of the United States
Washington, DC 20515

August 25, 2014

The Honorable John M. McHugh
Secretary of the Army
101 Army Pentagon
Room 3E700
Washington, DC, 20310-0101

Dear Secretary McHugh:

As you are aware, in a letter that we sent to you last year regarding the Army 2020 Programmatic Environmental Assessment, we encouraged you to pay particular attention to the costs inherent in your downsizing plans, the military value of the installations, and the socio-economic impacts on the communities where bases are located. We appreciated your absolute transparency and your willingness to consult regularly with us and the Fort Polk community throughout the process. In the end, you decided upon and executed tough decisions to return our Army force structure to pre-9/11 levels of 490,000 soldiers.

We believe further steps to reduce the Army, in the midst of the current downsizing, is ill-timed and dangerous. We realize that the Army's proposal is in response to legislative imperatives under the Budget Control Act. However, this will not prevent us and like-minded Members of Congress from working with you to satisfy the nation's requirement for an adequately sized Army in extremely unpredictable times. It appears that the Army is downsizing too quickly and without proper analysis, creating a much smaller force structure that is in misalignment with our national security requirements. We realize Congress needs to provide the resources necessary to ensure that Army is ready at the moment the nation may need it most. We are committed to doing so in a united manner.

We are also concerned that the Army continues to focus its reductions on its core combat strength, namely, and once again, on the Brigade Combat Team. We firmly believe that if cuts do become necessary, the Army should look across its entire enterprise to determine the most appropriate places for cuts to ensure that the Army can fulfill its mission. For these fundamental reasons, we believe the current proposal should be withdrawn, along with its accompanying SPEA.

Coupled with the above concerns, we believe that the SPEA suffers from fundamental flaws that prevent it from serving as an effective decision-making tool:

First, the SPEA uses an improper baseline for its impacts analysis. The SPEA must include a "no action alternative" to serve as a baseline for the Army to compare the magnitude of environmental and socioeconomic effects of the "action alternatives" it is considering. The

SPEA's no action alternative of 562,000 soldiers fails to account for the soldier reductions that the Army approved in 2013 and is currently implementing. An unrealistic baseline is both impermissible under NEPA and skews the SPEA's analysis of effects. The SPEA must include a proper no action alternative of 490,000 soldiers to reflect ongoing soldier reductions.

Second, the SPEA failed to evaluate the alternative of 440,000 to 450,000 soldiers. The SPEA must rigorously explore and objectively evaluate a reasonable range of alternatives to inform the Army's decision-making. However, the SPEA only evaluated a single action alternative – reducing end strength to 420,000 soldiers, which represents a “worst case scenario” based upon the potential that sequestration-level cuts are imposed in FY 2016 and beyond. Army failed to evaluate an end strength alternative of 440,000 to 450,000 soldiers, which is the end strength identified in the 2014 Quadrennial Defense Review and cited by General Odierno in testimony to Congress as the “absolute floor for end-strength reductions.” We urge the Army to include 440,000 to 450,000 soldiers as an alternative to be evaluated in the SPEA.

Third, as noted above, the Army failed to adequately look at the entire Army enterprise when considering force structure reductions. The notion that the Army cannot evaluate commands with less than 1,000 personnel is unconvincing. There are acquisition, logistics, training, R&D, arsenals and other activities that should be thoroughly analyzed for efficiencies before the Army simply pivots once again to Brigade Combat Team strength. The Air Force has effectively looked across its entire enterprise in making difficult cuts. We urge you to reconsider the activities and commands to be analyzed and will closely examine how you consider all of your equities in this next round of downsizing.

Consistent with our letter from last year, we appreciate the Army's commitment to studying socio-economic impacts in the SPEA. It is important to note that Fort Polk is the state's #1 employer, and the State has consistently invested significant funds to do its fair share in making Fort Polk a world-class facility. In the same spirit, Fort Polk is the only Army installation with a successful and ongoing land acquisition program. It is implausible for Fort Polk to lose soldiers at the same time that our citizens are cooperating with the Army to sell their land so that the base may expand.

Finally, while we realize your use of a Military Value Model will take place separately from the NEPA process, we note that the December 2013 GAO Report titled “*Defense Infrastructure: Army Brigade Combat Team Inactivations Informed by Analyses, but Actions Needed to Improve Stationing Process*,” finds that the Army has not formalized its Military Value Model nor is there a process to review and update the model. The GAO also cites the Center for Army Analysis's acknowledgement that “a new stationing decision may require different attributes to be included in the model.” Considering that this entire process is being driven by the budget, now is the time to formally include fixed costs at installations under review, including the cost of energy and the cost of living and housing for soldiers and Army civilians. The Army has focused significantly on energy costs and for good reason. However, we have seen no indication that these costs have been factored into your Army 2020 downsizing

decisions. We urge you to incorporate energy and fixed overhead costs in the Military Value Model and fully consider these comments to the SPEA during your decision making process.

Thank you for your consideration.

Sincerely,



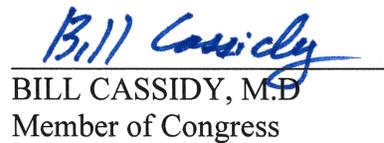
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