



Figure 20

THE LOCAL METHODOLOGY

Figure 20 highlights the Army methodology for analyzing training land requirements. A more detailed flow chart from the governing Army regulation (210-21) is shown in Appendix B.¹⁵ The approach involves an Army-wide methodology employed and interpreted at the local level. Personnel in the Directorate for Plans and Training (DPT) are responsible for implementation. The regulation is written at headquarters and flows to the installations through a "stovepipe" as described in the discussion beneath Figure 17.

The initial step is for range control staff to determine the training tasks that military units will perform at the installation. Army Train-

¹⁵The process is described in Army Regulation 210-21, *Army Ranges and Training Land Program*, 1 May 1997.

ing Circular (TC) 25-1 specifies the land area required for each training task and how frequently the task must occur. A sample page of information from TC 25-1 is shown in Appendix C.

The third step is to compare the needs with the resources available at the installation. This step is called the Land Use Requirements Study (LURS). The LURS includes an assessment of the installation's land resource along with application of a TC 25-1 methodology describing how to sum land requirements from individual training events to km²/day. This methodology is known as the Army Training Land Analysis Model (ATLAM). The ATLAM produces two numbers to be compared against the installation's available resource:

1. The size of the largest training event
2. The total land needed to accommodate the sum of all training events in km²/day

If either number is larger than the installation's resource, the installation should identify compensating actions. AR 210-21 identifies seven specific criteria before a land expansion can be considered.

1. "Decisions must be keyed to a clearly defined study process."
2. "The study process must properly integrate mission and environmental considerations."
3. "All alternatives must be addressed, including improvement of existing internal land management practices."
4. "Justification must be complete, well documented, and analytical. Requirements cannot be based on judgmental factors alone."
5. "All training maneuver area constraints should be reflected in Unit Readiness Reports."
6. "Public participation early in the planning process must be well defined and encouraged."
7. "Annual real property utilization surveys of installations required by AR 405-70 must be completed and kept current."

If these criteria are fulfilled, the installation may initiate an expansion initiative. Most critical is the requirement to include an analysis of alternatives in a well-defined study process.

Any expansion will also require analysis and probably documentation under the National Environmental Policy Act and usually a full Environmental Impact Statement (EIS). The EIS also calls for early public comments and participation.

An important step is the requirement for an installation to review its LURS annually and to "review and update (as necessary)."¹⁶ The first three steps in Figure 20 should be occurring even if an installation is not pursuing a land initiative. We have found that few installations maintain an up-to-date LURS unless there is an ongoing land initiative.

THE ROLE OF HEADQUARTERS

Although the methodology is initiated and interpreted at the local level, higher Army headquarters does maintain an oversight role throughout the process. According to the figure in Appendix B, higher headquarters performs the following oversight roles:

- Major commands review and validate the LURS.
- The Army Staff and the Assistant Secretary of the Army for Installations and Environment (ASA (I&E)) must also approve the LURS.
- The Department of the Army will assign the major command or an external agency the task to conduct an analysis of alternatives.
- The Secretary of the Army must approve the analysis of alternatives and then get permission from the Office of the Secretary of Defense to pursue an expansion.¹⁷

Headquarters roles emerge from the environmental impact process. Specifically:

¹⁶AR 210-21, Section 1-12.

¹⁷The Secretary of Defense declared a moratorium on land expansions on September 13, 1990. A special permit is now needed to proceed.

- In virtually all cases, headquarters will need to approve funding for necessary documentation developed under the NEPA.
- Current Army policy requires ASA (I&E) approval for any Notice of Intent involving an EIS.
- There is a similar requirement for any Record of Decision (ROD) made in conjunction with the EIS.

Finally, headquarters will be involved at the end of the process, since a purchase of land will require additional funds. A withdrawal of public land of more than 5,000 acres will require congressional approval. Headquarters will need to work with congressional staff in designing the appropriate legislation.

Despite the significant role of headquarters in providing checks and balances, we conclude that the procedure is primarily a local analysis tool. Consistent Army-wide methods are employed, but the unit of analysis is the local base. An installation's needs are compared against its resources with no consideration of other Army-wide resources. Nevertheless, if the procedures are followed carefully and honestly, the requirement for an analysis of alternatives should offer protection against unnecessary land acquisition. There would be no installation-level "land grabs."