August 12, 2022

AFIMSC Public Affairs
2261 Hughes Avenue
JBSA-Lackland, Texas 78236

To Whom It May Concern:

We write as part of the public comment and review period for the Draft Environmental Assessment for the United States Space Command Establishment of Permanent Headquarters. We wish to share three specific comments, as well as reiterate our deep reservations about aspects of the ongoing basing process. Our primary concern relates to a lack of consideration of the renovation of Building 1 as a cost-effective and less environmentally impactful option. In addition, we believe full operational capability (FOC) should have been a core element of consideration, and any incentives be taken into consideration and adjusted.

Disregard for Cost-Effective Alternatives: We are concerned that the Draft Environmental Assessment did not consider the environmentally efficient and cost-saving option of renovating Building 1 at Peterson Space Force Base (SFB). USSPACECOM has already reached initial operational capability (IOC) at the facility, indicating that it is adequately meeting the mission of the combatant command at this urgent geopolitical moment. In fact, the projected final staffing level of 1,450 personnel matches almost exactly the existing capacity of Building 1. Remaining at Building 1 is already the No Action Alternative, which is required to be presented as a valid option. Given the role that NEPA plays in informing the final basing decision, we believe the Environmental Assessment should seriously explore the prospect of renovating existing facilities.

Unclear Rationale: In the 2019 Draft Environmental Assessment, the purpose of the basing action was “to establish a permanent operational USSPACECOM headquarters...to enable achievement of FOC by 2025.” In contrast, the language in the 2022 Draft Environmental Assessment emphasizes the need for a purpose-built facility and forgoes any mention of FOC. This omission is out of step with concerns raised by senior military leadership regarding the time it will take USSPACECOM to reach FOC. We request that the rationale for this shift in scope be clearly articulated using Air Force guidance.

Opaque Incentives: Some communities offered “incentives” during the revised basing process, the specifics of which were never released. We would urge an evaluation of the current availability any such offerings (e.g. temporary facilities for use during construction), given that their unavailability would have an associated environmental impact on the site under consideration.

More broadly, we remain concerned that the strong preference of senior military leadership to select Peterson SFB as the preferred choice for U.S. Space Command’s permanent headquarters due to its unique ability to achieve FOC faster than any of the other candidate locations was not given full consideration.
Both the Department of Defense Inspector General (DOD IG) and the Government Accountability Office reports state that FOC emerged as a critical factor toward the end of the process. The DOD IG instructed the Secretary of Defense to review the FOC concerns of senior military leaders. It is our understanding that the Secretary of Defense tasked the Air Force to conduct this review. As the Biden administration nears a final decision for U.S. Space Command’s permanent headquarters, we, once again, urge the Air Force to assess the option to renovate Building 1 at Peterson SFB, and consider the national security and cost implications of this scenario.

It is essential to public faith in the process that the Air Force conduct a thorough review of U.S. Space Command’s Full Operational Capability, including renovating Building 1 at Peterson SFB. We are confident it will highlight cost-saving options for consideration by the Secretary of the Air Force that would only accelerate U.S. Space Command’s path toward FOC.

Sincerely,

John Hickenlooper
U.S. Senator

Diana DeGette
U.S. Representative

Ed Perlmutter
U.S. Representative

Jason Crow
U.S. Representative

Michael F. Bennet
U.S. Senator

Doug Lamborn
U.S. Representative

Ken Buck
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Joe Neguse
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Lauren Boebert
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