

DECLARATION OF JAMES L. GRAY

Pursuant to 28 U.S.C. section 1746, the undersigned hereby declares the following under oath:

1. I am aware that this declaration may be submitted before the Special Water Master and the Arizona Superior Court for the County of Maricopa in connection with the case of In re Fort Huachuca, No. W-1-11-605, and that this declaration is the equivalent of testifying in court. I am the Chief of Plans for United States Army Intelligence Center and Fort Huachuca, Fort Huachuca, Arizona. In this capacity, I am the official who is responsible for the planning and mobilization of any potential force protection, homeland security, mobilization, or any other contingency scenario at Fort Huachuca.
2. I have over forty years of combined military and federal civil service experience in the area of planning and mobilization. My experience includes generating the requirements for Time Phased Force Deployment Data (TPFDD) for U.S. Army Europe from 1990-1996. In this capacity, I had responsibility for planning the mobilization requirements for approximately 325,000 personnel. Moreover, from April 1993 through November 1996, while in Europe, I was the U.S. Army official responsible for planning the mobilization and support requirements for Bosnia—an operation involving approximately 25,000 personnel. In my government career, I have

participated in numerous courses and conferences concerning mobilization scenarios, and have been a guest speaker at such courses. I have been at Fort Huachuca since 14 November 1997.

3. The current Fort Huachuca mobilization and training base expansion plans are designed to support the activation, reception, training, and deployment of up to 30,000 troops beyond the current Fort Huachuca noon-time population of approximately 11,000 civilian employees, private-contractor employees, and military personnel and their dependents. Without revealing any military secrets, I can say that within the past six months, in connection with Operation Enduring Freedom, Fort Huachuca has a plan to house a significant number of additional troops in temporary quarters called "relocatables."

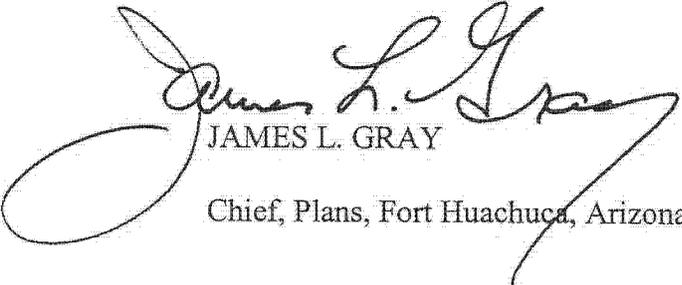
4. Furthermore, the current mobilization plans that Fort Huachuca references in the planning process only accounts for approximately 1/3 of the Army's 565,000 Reserve and National Guard personnel, and does not address 2/3 of such personnel. Specifically, the mobilization TPFDD that Fort Huachuca uses only addresses 185,000 personnel. There is no formal planning process for the difference between the 185,000 personnel formally accounted in the planning process and the 565,000 personnel assigned to the Army Reserve and National Guard. Under a full-scale mobilization scenario, such as the one hundred percent mobilization that occurred during World War II, the 380,000 Reserve and National Guard personnel not formally accounted in the planning

process would have to be mobilized at installations such as Fort Huachuca. Under a full scale mobilization scenario, some of the 365,000 troops would undoubtedly have to be assigned and trained at the small number of Army installations comparable in size and capacity to Fort Huachuca. Additionally, many National Guard units have weapons larger than 20 mm. Unlike most Army installations in the United States, Fort Huachuca has the capability to support weapons larger than 20 mm. In a full scale mobilization scenario, therefore, National Guard units would, in all likelihood, be assigned to Fort Huachuca so that such units could train with weapons that are larger than 20 mm.

5. In the Army planning process, Fort Huachuca is designated a power support platform. A PSP, by definition, is designed to receive troop overflow from other Army installations that cannot support all of their assigned mobilized personnel. Operation Desert Storm and Operation Enduring Freedom offer recent example of a troop overflow. In both Operations, Fort Huachuca unexpectedly received units originally assigned to other installations. In a full scale mobilization scenario, Fort Huachuca would, in all likelihood, unexpectedly receive units because of troop overflow from other installations.
6. I further note that, in the recent past, some Army installations have been closed down as a result of downsizing. Fort Huachuca will, in all likelihood, be called upon to assume missions formerly performed by such installations,

including to, but not limited to, full scale mobilization of Reserve and National Guard units at various and unanticipated times such as was experienced during Operation Desert Storm, and is now being experienced during Operation Enduring Freedom. I further note that while Fort Huachuca's mission requirements in future years cannot be precisely determined, it can reasonably be anticipated that in order to meet such future mission requirements, Fort Huachuca must have enough water to support any troops deployed at Fort Huachuca to meet future mission requirements.

7. I hereby declare, under penalty of perjury, under the laws of the United States, that the foregoing is true and correct. Executed this 31st day of January 2003.


JAMES L. GRAY
Chief, Plans, Fort Huachuca, Arizona