IV. Deviations from Military Value Criteria 4

4. The cost of operations and the manpower implications.

In examining the Airlift Military Compatibility Index formulas that made up the fourth category, Cost of Operations/ Manpower, no inaccuracies in the data were discovered. However, the MCI itself is flawed in this area as it only reviewed the cost of living and operating in a given locality. It assesses the Area Cost Factor, Utilities Cost Rating, the BAH rate, and the GS Locality Pay Rate. At no point does it actually assess "the manpower implications" of a given recommendation. In the case of all airlift bases, including New Castle County Air Guard Base, this is a significant deviation from the fourth military value criteria.

Manpower Implications for C-130 Squadrons

The consolidation of C-130 squadrons and creation of enclave bases (discussed in more detail in Section Seven of this Report) will have a disproportionate impact on Air Guard retention. As the table below indicates, the distances that would need to be traveled are extreme. There are a total of 29 C-130 moves, equaling 23,760 miles. The average distance for these moves is 819 miles. With the exception of the movement across town from Kulis to Elmendorf, the lowest distance moved is 174 miles. These movements will take most of the planes well beyond the 50 miles Guard personnel can reasonably be expected to travel to do their missions. Thus, the Air Force is likely to lose a significant number of experienced C-130 aircrews and maintainers.

Installation Losing Planes	Nearest City	Installation Gaining Planes	Nearest City	Distance (mi.)*
Boise AGS, ID	Boise, ID	Cheyenne AGS, WY	Cheyenne, WY	736
Dyess AFB, TX	Abilene, TX	Little Rock AFB, AR	Little Rock, AR	500
Dyess AFB, TX	Abilene, TX	Elmendorf AFB, AK	Anchorage, AK	3,923
Dyess AFB, TX	Abilene, TX	Peterson AFB, CO	Colorado Springs, CO	633
Gen. Mitchell ARS, WI	Milwaukee, WI	Dobbins ARB, GA	Atlanta, GA	845
Gen. Mitchell ARS, WI	Milwaukee, WI	Little Rock AFB, AR	Little Rock, AR	744
Kulis AGS, AK	Anchorage, AK	Elmendorf AFB, AK	Anchorage, AK	0
Little Rock AFB, AR	Little Rock, AR	Channel Islands AGS, CA	Oxnard, CA	1,723
Little Rock AFB, AR	Little Rock, AR	Quonset St. AGS, RI	Providence, RI	1,423
Mansfield-Lahm AGS, OH	Mansfield, OH	Little Rock AFB, AR	Little Rock, AR	792
Mansfield-Lahm AGS, OH	Mansfield, OH	Maxwell AFB, AL	Montgomery, AL	726
Martin State Apt AGS, MD	Baltimore, MD	Channel Islands AGS, CA	Oxnard, CA	2,715
Martin State Apt AGS, MD	Baltimore, MD	Quonset St. AGS, RI	Providence, RI	372
Nashville AGS, TN	Nashville, TN	Greater Peoria AGS, IL	Peoria, IL	445
Nashville AGS, TN	Nashville, TN	Louisville IAP AGS, KY	Louisville, KY	175
New Castle Co Apt AGS, DE	Wilmington, DE	Charlotte AGS, NC	Charlotte, NC	518
New Castle Co Apt AGS, DE	Wilmington, DE	Savannah AGS, GA	Savannah, GA	696

Niagra Falls ARS, NY	Niagra Falls, NY	Little Rock AFB, AR	Little Rock, AR	1,075
Pittsburgh ARS, PA	Pittsburgh, PA	Pope/Ft. Bragg, NC	Fayetteville, NC	557
Pope AFB, NC	Fayetteville, NC	Little Rock AFB, AR	Little Rock, AR	903
Reno-Tahoe AGS, NV	Reno, NV	Little Rock AFB, AR	Little Rock, AR	2,010
Schenectady Co Apt AGS, NY	Schenectady, NY	Little Rock AFB, AR	Little Rock, AR	1,319
Will Rogers World Apt AGS, OK	Oklahoma City, OK	Rosencrans AGS, MO	St. Joseph, MO	392
Will Rogers World Apt AGS, OK	Oklahoma City, OK	Carswell ARS, TX	Ft. Worth, TX	201
Yeager Apt AGS, WV	Charleston, WV	Pope/Ft. Bragg, NC	Fayetteville, NC	337
Total Miles				**23,761**

*Using MapQuest

In addition, the Air Force models do not count the cost of losing the traditional Guard personnel. This is discussed in more detail in Section Five, but the simple fact of not considering traditional personnel has a negative impact on morale. These traditional reservists are and have been serving in operations around the globe. For the Department of Defense to fail to consider them at all sends a message to the entire Air Guard that they are not valued. Even for units not being realigned, the general perception of not being valued will make it harder to retain both C-130 pilots and crews and members of all Air Guard units. Losing these experienced personnel will also mean a true loss of tactical airlift capability at a time when C-130 crews are regularly flying supplies in Iraq, reducing the need for dangerous land convoys.

This is contrary to both force structure submissions to Congress and stated Air Force goals. The March 15, 2005 Revised Force Structure submission says, "This force is predicated on the USAF's ability to supply highly trained, educated and motivated personnel at current authorized end-strength levels." The March 2004 force structure submission said almost the same thing, "This force structure is predicated on the USAF's ability to supply highly trained, educated and motivated personnel and current authorized end-strength levels." Air Force Assistant Secretary Nelson Gibbs' June 21, 2004 listing of Air Force imperatives begins with the following, "OSD Overarching Principle: Recruit and Train....AF Imperatives: Fully develop active, Reserve, Guard and civilian recruiting bases; Training units are independent of combat units; Operationally efficient proximity to the best ranges and training airspace." By significantly lowering Air Guard retention in the C-130 community, the Air Force is endangering its supply of highly trained, educated and motivated personnel.

In addition, it will be very difficult to recruit new Air Guard personnel without any aspect of "air" being apparent. At the end of the day, people choose the Air Guard over the Army Guard because of the airplanes. When that is gone, there is no reason to choose the Air Guard. The Air Force will not be able to fully develop Guard recruiting bases in

states like Delaware that have no flying mission. For the same reason, many current Air Guard personnel will not wish to stay in an "Air-less" Guard. So those personnel whose missions are not being realigned are also less likely to stay in the Air Guard if they are stationed at a base that has no contact with airplanes.

Conclusion

The decision to realign and consolidate C-130 squadrons is likely to have a harmful impact on recruitment and retention due to the excessive distances between C-130 bases, the impact of not considering traditional personnel on morale, and the impact of losing flying units in states. As a C-130 base, New Castle County Air Guard Base would also face these problems. The failure to consider these manpower implications is a significant deviation from the fourth of the eight final selection criteria.

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VIII. Legal Concerns

The May 13, 2005 Base Realignment and Closure recommendations from the Department of Defense to realign the Delaware Air National Guard's New Castle County Air Guard Base appears to violate both the specific language and the intent of the U.S. Constitution, several federal statutes, Delaware state law, and the direction of the U.S. Supreme Court.

The National Guard is a hybrid federal-state organization, and has been since the inception of the country. By focusing on federal level duty and financial needs, and ignoring the state role of the National Guard, the Department of Defense failed to acknowledge and recognize the unique, hybrid nature of the National Guard. The following sections detail the specific federal and state statutes supporting the national and domestic missions of the National Guard, most of which were usurped by the Department of Defense's BRAC process.

The United States Constitution and Federal Statutes

Article 1, Section 8 of the United States Constitution (known as the "militia clause") says that the Federal Congress will provide for organizing, arming, and disciplining, the militia. The Constitution allows several aspects of the Guard to be run by the state, specifically reserving "...to the states respectively, the appointment of officers, and the authority of training the Militia according to the discipline prescribed by Congress." Recognizing the constitutional basis for considering the National Guard to be a hybrid federal-state entity, Congress has since passed several statutes that demonstrate the dual responsibility the National Guard has to both the federal government and state governments.

Title 10 USC Section 18238 recognizes the authority of the Governor on the specific issue of the relocation of Guard units:

> A unit of the Army National Guard of the United States or the Air National Guard of the United States may not be relocated or withdrawn under this chapter without the consent of the Governor of the state or in the case of the District of Columbia, Commanding General of the National Guard of the District of Columbia.

Title 10 USC Section 10501(b) requires that the National Guard Bureau serve as a "channel of communication" between the Department of the Army and the Department of the Air Force and the states on matters relating to the National Guard. This statute recognizes the dual responsibilities of each state's Guard and is designed to ensure that the interests of each state will be adequately considered and protected. However, no information on the BRAC process was provided to the Governors by the Department of Defense during the BRAC recommendation process. This prohibited Governors and their Adjutants General from being actively involved in the recommendation and did not allow Governors their right, afforded by the Constitution, to approve or reject the removal of their Guard units.

Title 32 USC Section 104(c) further demonstrates the requirement of a Governor's approval for alteration of the National Guard of the United States:

> (c) To secure a force the units of which when combined will form complete higher tactical units, the President may designate the units of the National Guard, by branch of the Army or organization of the Air Force, to be maintained in each State and Territory, Puerto Rico, and the District of Columbia. However, no change in the branch, organization, or allotment of a unit located entirely within a State may be made without the approval of its governor.

Title 32 USC Section 102 recognizes the importance of maintaining the strength of the National Guard:

> In accordance with the traditional military policy of the United States it is essential that the strength and organization of the Army National Guard and the Air National Guard as an integral part of the first line defense of the United States be maintained and assured at all times.

Federal Court Rulings

The United States Supreme Court, in the case of *Perpich v. Department of Defense,* 496 U.S. 334, 110 S.Ct. 2418 (1990), also recognized the dual role of the National Guard and the legal right and responsibility of the Governor. *Perpich* recognized the Governor's right to veto certain federal training missions if those federal training missions interfere with the state Guard's capacity to respond to local emergencies. Section (b) and (d) of 10 USC 12301 prohibit the Secretary of Defense from ordering "units and members of the Army National Guard of the United States or the Air National Guard of the United States" to active duty "without consent of the governor of the State...". The Montgomery Amendment (now codified at 10 USC 12301(f)) was passed by Congress to allow state Guard soldiers and airmen to train overseas without obtaining the consent of the Governor. The Montgomery Amendment states:

> The consent of the Governor described in subsections (b) and (d) may *not* be withheld (in whole or in part) with regard to active duty outside the United States, its territories, and its possessions, because of any objection to the location, purpose, type, or schedule of such active duty.

While the U.S. Supreme Court upheld the Montgomery Amendment in the *Perpich* case, the Court recognized that the Amendment only deprived the Governor of certain veto powers, while the Governor retained the rest. The Court upheld this Amendment because of its narrow application, and the fact that depriving the Governor of these specific veto powers would not affect the Governor's ability to respond to local emergencies. The Supreme Court stated that a Governor retains the veto power if federal training missions

substantially impact the Governor's ability to respond to local emergencies. The U.S. Supreme Court stated:

> The Minnesota Unit, which includes about 13,000 members, is affected only slightly when a few dozen, or at most a few hundred, soldiers are ordered into active service for brief periods of time. Neither the state's basic training responsibility, nor its ability to rely on its guard and state emergency situations is significantly affected. Indeed, if the Federal training mission were to interfere with the state Guard's capacity to respond to local emergencies, the Montgomery Amendment would permit the Governor to veto the proposed mission.

The Supreme Court has clearly stated that a state Guard must be left with the capacity to respond to local emergencies. As Section Two explained, the complete removal of any airlift capacity for the State of Delaware will have a dramatic effect on the Governor's ability to respond to local emergencies. Thus, the New Castle County realignment recommendation violates the law as explained in the *Perpich* case.

Delaware State Law

Delaware state law directly adheres to both federal statutes and the rulings of the Supreme Court with respect to the power held by the Governor over the Air National Guard of the United States and how the Guard shall be directed.

Title 20, Delaware Code, § 103 states:

> The National Guard of this State shall conform to Federal statutes and regulation relating to and governing the armed forces of the United States, insofar as they are applicable and not inconsistent with the Constitution of Delaware or this title.

Delaware state law recognizes that the State must conform to the guidelines established nationally for the Air National Guard of the United States and the Army National Guard of the United States. Delaware state law also acknowledges the important role that the Governor has with respect to the Guard and the powers entrusted to the Governor by the federal government.

24 Del. Laws, c. 62, § 1; Code 1915, § 295; 32 Del. Laws, c. 22, § 1; Code 1935, § 258; 20 Del. C. 1953, § 103; 64 Del. Laws, c. 258, § 1 state:

> The Governor of Delaware shall be the Commander in Chief of the National Guard, except as to any part thereof called or ordered into federal service.
>
> The Governor of this State, as Commander in Chief, may make such changes from time to time in matters or organization, administration and

> discipline as may be necessary to conform to the requirements made by Congress for the participation in federal appropriations for the National Guard.

These titles under Delaware law echo the responsibilities and powers granted to the Governor by Article 1, Section 8 of the Constitution, Title 10 USC 18238, and the Supreme Court ruling of *Perpich v. Department of Defense*. While the National Guard is to adhere to the organization of the Federal Congress, the Guard is under the authority of the Governor.

Delaware state law reinforces that it is the responsibility of the National Guard to provide assistance and protection during emergency situations. Those performing these duties serve at the discretion of the Governor.

Title 20, Delaware Code, § 171 clarifies these situations:

(a) When the Governor has determined that it is in the best interest of the state, the Governor by order may:

-Call out any unit or units, member or members of the Delaware National Guard to serve in a state duty status to respond to any emergency situation.

-Call out any member or members of the Delaware National Guard to serve on state duty status to plan for any emergency.

-Call out any unit or units, member or members of the Delaware National Guard to serve on state duty to fulfill obligations under any interstate emergency agreements or compacts; and such troops may be employed within or outside of Delaware as required by the agreement or compact.

-Call out units or members of the Delaware National Guard for training or review as deemed appropriate subject to funding availability.

Conclusion

Following the ruling in *Perpich v. Department of Defense* and the Montgomery Amendment, the recommendations for the Air National Guard units located at New Castle County Air Guard Base would prohibit the National Guard from performing these functions in the State of Delaware. At no point in the BRAC process was the Department of Defense given the authority to make recommendations counter to the U.S. Constitution and Supreme Court interpretations of the law. The New Castle County recommendations not only deviate significantly from the final selection criteria, they also appear to violate the law.

VII. Cross Criteria Concerns: C-130 Consolidation and Enclaves

In deciding to consolidate C-130 squadrons, the Air Force does not appear to have properly evaluated the need for larger tactical airlift squadrons nor the impact of creating twenty-three smaller "enclave" bases. This lack of analysis makes it difficult to accurately assess the degree to which the recommendations conform to several of the final selection criteria, particularly those dealing with current and future mission capabilities, homeland defense staging, the cost of operations, and the impact on manpower.

The only detail provided in the force structure submissions is that the Air Force will have 10 AEFs. Since the force structure submissions provided by the Secretary of Defense do not include any definitions of optimal squadron sizes, the Commission does not appear to be bound to retain the recommendations for consolidated 12 or 16 plane C-130 squadrons.

Insufficient Analysis for C-130 Consolidation

Volume Five of the BRAC Recommendations says the optimal squadron size for C-130s is 16, with 12 being "acceptable" (page 2). No justification is given for these numbers. Further research of available Air Force guidance documents shows that the *White Paper: Air Force Organizational Principles* (page 2) says that 16 possessed aircraft are optimal. Again, no justifying analysis is presented in this document and no mention is made of a lower number being acceptable.

In the Department of Defense's actual recommendations, almost all C-130 squadrons will have 12 airplanes. Two U.S. based squadrons will have 16 (Pope and Peterson). Little Rock will have 98 aircraft. Keesler will have 18 aircraft, but 10 are specialized weather WC-130s. In addition, Minneapolis' Guard and Reserve units will each have 8 C-130s, but by being co-located are considered the same as having 16 in one location. The only other anomaly is in Schenectady where there are 10 LC-130s, outfitted with skis. Clearly, a major motivation in C-130 restructuring was an effort to achieve units with 12 or more airplanes. In addition, there appears to have been a major effort to move planes from the reserve component into the Active Duty using associate units, and by moving so many planes to Little Rock. While the Active Duty may need additional and newer C-130s, the BRAC process is not the appropriate means for gaining those airplanes.

At this point, there appears to have been no cost-benefit analysis of the decision to move from 8 to 12 or 16 plane C-130 squadrons. There also has not been an overall analysis of the nation's C-130 needs. For example, the joint tactical airlift study that is currently underway is not expected to be completed until June 2006. To make these dramatic changes with no consideration of that study is premature. Repeated requests for data supporting this decision have led to the following written reply from the Air Force, June 9, 2005, "The collective military judgment and experience of the most senior mobility planners is that operating C-130 aircraft in optimum size squadrons (16 PAA being

optimum and 12 PAA being acceptable) is the most effective way to support the AEF warfighting construct and peacetime operations."

Noticeably absent from the statement is any explanation of why squadrons with 16 and 12 aircraft are the "better sized squadrons" or why they would do a better job supporting AEFs than the current smaller squadrons. Also absent are any data points indicating problems with the current operations. The GAO's recent finding that the Air Force did not properly analyze the restructuring of the B-1B fleet (GAO-02-846) is an important reminder that "best military judgment" is not always sufficient for restructuring decisions.

For example, it is not even clear that proper analysis has been done with respect to the Air Force's stated goals. In their *White Paper* they say, "As we optimize unit size, we will strive to keep formal training units separate from combat organizations. Training units should be distinct, independent, fully resourced entities, so training is not routinely impacted by deployments." (page 3) Yet, they plan to move 98 planes to Little Rock, home of the C-130 schoolhouse. Additional analysis needs to be done regarding the ability of that many flight crews and airplanes to safely make use of Little Rock's airspace and still accommodate training.

In considering the consolidation of C-130 squadrons, the following critical questions remain unanswered:

- How much money is saved by consolidating C-130 squadrons?
- How many experienced aircrews and maintainers will no longer be within 50 miles of a C-130 unit?
- What is the cost, in both dollars and possible impacts on mission capable rates, of losing those experienced personnel?
- What are the increased costs of having multiple variants of C-130s at one location? (It is our understanding that each variant requires different aircrews and different maintainers.)
- Have the existing 8 plane Guard units ever failed to provide the Air Force with C-130s needed for wartime missions?
- What are the dangers to the fleet of having a high concentration of assets in one place? Are there increased risks from weather or terrorist attacks?

Until these questions are answered, it is not possible to determine if changing the optimal squadron size is a good decision. It is also not possible to determine if there are real savings or any increases in mission capability compared to the costs and expected loss of experienced personnel.

Four Enclave Concerns

In order to consolidate squadrons, the Air Force has proposed removing the flying unit from New Castle County Air Guard Base, but leaving the Expeditionary Combat Support units in place, creating something called an "enclave" base. Twenty-two other Air Guard bases are also becoming enclaves. This raises four concerns: First, enclave bases cannot support ECS units; second, enclave bases circumvent the BRAC process; third, enclave bases fail to meet the homeland security needs of governors; and fourth, enclave bases fail to meet the needs of a democratic nation.

Sustainment Concern

First, it is not clear that an enclave base can sustain Expeditionary Combat Support units. Once flying units are removed from the enclave bases, many will no longer be able to support military or civilian aircraft operations. Even in cases where there is a civilian landing area, the loss of rated firefighters will lead many shared airports like New Castle County to lose FAA ratings and fail to meet minimal Air Force and civilian criteria for landing and loading larger aircraft. Since security police, civil engineers, and communications teams normally deploy with their equipment and weaponry, deployments would be delayed as those units transport their gear and weaponry to another airport that can secure their equipment and handle large planes. This will reduce the military's current capability to rapidly deploy to new locations.

In addition, it is not at all clear that Expeditionary Combat Support personnel will stay in Air Guard units that do not have airplanes or regular contact with air operations. The Air and Army Guard are designed to ensure that citizens are part of the actual warfight. They are not meant to only house support units and specialties. By disconnecting Air Guard personnel from aircraft, the entire nature of the organization will be changed. Based on reactions in Delaware, many personnel will choose to leave the Air Guard rather than stay in "enclaved" Air Guard units. Given the on-going war effort, more analysis is needed to determine what impact these enclaves will have on retention across the nation.

Circumventing BRAC Concern

Second, the enclave concept appears to be an effort to close bases while circumventing the BRAC process. The Air Force has indicated that these bases will be kept in anticipation of follow-on missions. At the same time, they plan to shrink the facilities. There is no evidence that the Air Force has made any adjustments to its budgeting policies to make enclaves work. Normal budgeting is done by allocating funds for an installation based on the personnel and missions it supports. For a base without a mission and greatly reduced personnel, the current system would provide minimal funds. It would then appear that such bases would have shrunk to such a degree that they could not accommodate the growth required for a follow-on mission that might be available two, three, or more years down the road. So, in reality, these enclaves are closures that will happen slowly, but without the more stringent review for closures done using the BRAC process.

Homeland Security Concern

Third, enclaves simply will not meet the homeland security needs of governors. Air Force documents indicate that the enclaved bases were originally going to be closures. After some discussion, it was realized that those closures would dramatically reduce the ability of governors to meet their homeland security needs. The solution was to create enclave bases. Yet, there is no evidence or analysis to indicate that enclaves will actually serve the needs of governors. As discussed in Section Two of this report, Delaware's governor will certainly not have what she needs for homeland security if the realignment proceeds. While each state has a different overall situation, it is likely that other states have similar concerns.

Democracy Concern

Fourth, enclave bases fail to meet the needs of a democratic nation. Moving the eight C-130s out of New Castle County Airport would leave the state of Delaware and four other states (and Puerto Rico) without an Air Guard flying unit. As discussed in Section Four, losing the state's only flying unit will be the beginning of the end of the Delaware Air National Guard because experienced members are likely to leave and young Delawareans will look for other opportunities to serve.

The loss of a flying unit is also the end of an ideal. When the Air National Guard was created in the late 1940s, it was designed to imitate the best of the Army National Guard concept – citizens serving in local militias. In their case, it was to be citizens serving in local air forces. This is and was a means of keeping the American people connected to their military. It is a critical aspiration of this democracy that those who fight and die for America's liberties and security are also America's sons and daughters; are also America's neighbors. This connection to the military, in all its branches, is critical to maintaining the informed support of the public for a strong military.

It is also critical that children in every state grow up seeing their neighbors serve. This is what fuels their desire to one day serve as well. Given the necessary consolidation of Active Duty bases over the past four BRAC rounds, it is more essential than ever to maintain at least an Army and Air Guard unit in every state. Congress has endorsed this concept since 1948 with specific budgets and authorities given to the Air Guard to maintain both a flying unit in each state and a vibrant Army Guard. Quite simply, the Guard is part of the foundation for maintaining the entire all-volunteer force and part of the connection between free citizens and their military.

Conclusion

The decision to consolidate C-130 squadrons has not received adequate analysis. It will lead to the creation of enclave bases that are unlikely to work as intended; it will create states that have no flying mission for their Air Guard; it will hurt recruitment and retention; and it will hurt democracy. Reverting back to the norm of eight planes for C-130 units would be consistent with the force structure submissions and rectify substantial deviations from the first, second, fourth, and fifth of the final eight criteria.

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IX. Conclusion

Based on the overwhelming evidence provided in this analysis that the Department of Defense substantially deviated from the final selection criteria and appears to have violated the law in its recommendation to realign New Castle County Air Guard Base, the Commission should overturn this recommendation.

If the Commission chooses to change the recommendation and retain the C-130s, aeromedical evacuation unit, aerial port unit, and firefighters at New Castle County Air Guard Base, it would be consistent with the final selection criteria and force structure submissions.

DCN: 12523

New Castle County Air National Guard Base:

Substantial Deviations from Final Selection Criteria Found in Department of Defense Recommendations

July 8, 2005

Report submitted to the Base Realignment and Closure Commission

Governor Ruth Ann Minner
Senator Joseph R. Biden, Jr.
Senator Thomas R. Carper
Representative Michael N. Castle

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V. Deviations from Other Considerations Criteria 5

5. *The extent and timing of potential costs and savings, including the number of years, beginning with the date of completion of the closure or realignment, for the savings to exceed the costs.*

In order to assess the extent and timing of potential costs and savings, the Air Force developed and used the COBRA model. This model attempts to evaluate the multiple factors that go into realignments and closures using a "one size fits all," Active Duty approach. Given that the Air National Guard is 6% of the Air Force budget, but represents 34% of the Air Force's capabilities, it is hard to understand how the same model could accurately capture costs and savings for both Active Duty and Guard moves. Close examination of the model indicates that it does, in fact, fail to properly model New Castle County Air Guard Base and does not capture important aspects of Guard operations.

Questionable Shift in Data

In the Air Force Base Closure Executive Group (BCEG) meeting March 10, 2005, the review of scenarios showed New Castle County in "category 5", meaning no savings would be generated. In Acting Under Secretary of Defense for Acquisition, Technology, and Logistics Michael Wynne's data update April 14, 2005, New Castle County is shown as having a negative Net Present Value, or no savings, and a payback of over 100 years. A mere month later, however, the Department of Defense recommended the realignment and stated that there would be a 20 year savings of $120 million. After two years of work and analysis, something changed in the very last month of the DoD BRAC process to take New Castle from creating no cost savings over 20 years to $120 million worth of savings. This raises questions about the validity of the assertion that realigning New Castle County would save money over five or twenty years.

Questionable Reduction in End-Strength Creates Savings

In examining the COBRA run in more detail, it becomes clear that the Air Force decided to take savings from the loss of 102 full-time positions (the remaining 46 full-time positions are assumed to move to Savannah or Charlotte). Twenty-six of those positions are military and 76 are civilian. In looking at the Recurring Costs and Savings tables, it appears that $9.82 million of the savings from 2006 to 2011 come from military salaries ($562,000 from officer salaries and $9.27 million from enlisted salaries). At no point is the cost of retaining these 26 military personnel reflected in the model. In addition, looking at the inputs on COBRA screen five, $1.456 million is listed as a "miscellaneous recurring saving." When the footnotes are examined, this is explained by an end-strength drop for drill personnel of 104. There is no explanation beyond that. These drilling reservists do not appear anywhere else as a personnel cost for the Air Force. So, 38%, or $11.28 million, of the five year savings is supposed to occur by eliminating 130 personnel. What is astonishing about this is that it raises the question of changes to the end-strength of the Air Guard since these 130 Active Duty and drill personnel are

eliminated and not placed anywhere else. This deviates from both the intent of the Air Force leadership and the law.

In their May 17, 2005 testimony to the Commission (page 15 and page 60), Acting Air Force Secretary Dominguez and General Jumper indicated that they were committed to no end-strength change for the Reserve or Guard. In point of fact, they are legally prohibited from making end-strength changes. 10 USC 115 makes it clear that the Secretary of Defense must first determine that it is in the national interest to deviate from the authorized end-strength for the Selected Reserve and even then may deviate by no more than 2% from the authorized end-strength. In addition, in the Fiscal Year 1987 National Defense Authorization Act, Congress made it clear that the end-strength authorization for the Selected Reserve is a minimum number (page 197 of House Report 99-718). So, it is unclear how there can be actual savings related to end-strength reductions if it is not the policy of the Air Force to remove those positions and if Congress has not authorized such a reduction for each of the years BRAC is being implemented.

COBRA Failure to Model Guard Personnel Moves

The United States Air Force Cost Center developed the original COBRA model to evaluate the cost of Air Force stationing actions by calculating the costs and savings of scenarios for Active Duty bases on a Net Present Value basis. The COBRA model does not accurately assess the costs and savings related to moving Guard missions because it simply ignores traditional drilling Guard personnel. The model only calculates using Full-Time Equivalents (FTEs). This greatly understates the impact of proposed scenarios. For example, the Department of Defense recommendations for New Castle County indicate that only 148 full-time positions are eliminated. In truth, once traditional drilling personnel are counted, a total of 512 Guard personnel are impacted by the proposed realignment.

In addition, as an Active Duty based model, COBRA is only capable of modeling personnel who will do a Permanent Change of Station (PCS) move. It does not factor in the reality that even full-time Guard personnel are unlikely to move. Even less likely to move are the traditional drilling Guard personnel who normally only receive 20% of their annual income from their Guard work. They are also members of the community with civilian jobs that provide the majority of their annual income. As the chart in Section One showed, 75% of Delaware Air National Guard personnel in units that are recommended for realignment are not planning to move. By not accounting for this, actual costs are understated.

It is also important to realize that the receiving base will have costs associated with both recruiting and training. In the case of the New Castle County recommendation, neither of the receiving units was manned at 100% as of May 2005 (Georgia is manned at 88.4% and North Carolina is manned at 95.6%). This suggests that additional personnel will be needed and will require training, which is not calculated by COBRA.

The COBRA model also fails to justify its assumptions regarding the movement of authorized positions. Even though the recommendation is that four aircraft are moved to Savannah and four to Charlotte, there does not appear to be a standard for how many personnel that requires. Charlotte is only slated to receive 6 new personnel authorizations from New Castle (4 officers and 2 enlisted), while Savannah is slated to receive 36 (1 officer, 12 enlisted, and 23 civilian). It is impossible to judge whether there is a consistent model being used or not as there is no explanation for these manpower assumptions in the data provided thus far by the Air Force.

Another area where the failure to accurately model Guard personnel moves is readiness reporting and mission capability. There will be a loss of mission capability during the move and start-up of the relocated unit, which will impact that unit's ability to perform its mission. While this is not an empirical figure, this should not be lightly discounted in understanding the true costs of a realignment.

COBRA Failure to Model Guard Training Costs

As described above, the failure of the COBRA model to accurately model likely Guard personnel movement means that training costs are significantly understated. These costs are material and significantly impact the base realignment cost savings assumptions.

COBRA puts all costs for training in a footnote category called "Other Costs" and assumes that training skills are captured by the PCS moves, an inaccurate model for Air National Guard bases and personnel. There is no algorithm or explanatory material to support the number inserted in "Other Costs". Results appear to have been hand calculated, hand entered, and their accuracy cannot be verified.

The chart below shows a conservative estimate of the cost to train and pay personnel to replace the basic experience of those who will not move from New Castle County. As discussed in Section One, an internal survey was done to determine the percentage of personnel expected to leave each unit. These figures do not include costs associated with recruiting, upgrade training, and other various personnel expenses. Thus, these figures likely understate the overall cost of the training requirement and its impact to the cost savings figure.

Unit	Personnel	Total Cost Per Position*	Loss Rate	Total Cost to Replace Personnel Leaving
Operations -- Flight Crews				
Pilot	24	$21,839,869	85%	$18,563,889
Navigator	12	$5,379,088	85%	$4,572,225
Flight Engineer	12	$3,014,178	85%	$2,562,051
LoadMaster	12	$993,030	85%	$844,076
Total for Flight Crews		$31,226,166	85%	**$26,542,241**
Aeromedical Evacuation Crews				
Officers	45	$2,447,267	70%	$1,713,087
Enlisted	55	$2,450,173	70%	$1,715,121

Total for AE Crews		$4,897,440	70%	**$3,428,208**
Maintenance				
Officers	4	$279,162	80%	$223,329
Enlisted	36	$2,116,507	80%	$1,693,205
Total for Maintenance		$2,395,669	80%	**$1,916,535**
Aerial Port		$14,542		$775,379
Officers	2	$118,790	86%	$102,159
Enlisted	56	$2,300,868	86%	$1,978,746
Total for Aerial Port		$2,419,658	86%	**$2,080,906**
Firefighters				
Officers	2	$183,253	21%	$38,483
Enlisted	37	$2,346,886	21%	$492,846
Total for Firefighters		$2,530,139	21%	$531,329
Total Training Costs				**+ $34,499,218**
COBRA Reported Savings through 2011				- $29,060,000
Total Savings/Costs				**+$5,439,218**

*Total Cost Per Position is comprised of the Air Force Specialty Code Training Cost, Salary Cost, Travel/PerDiem Costs, and the Basic Military Training/Academy of Military Science Costs, multiplied by the number of personnel.

Instead of a $29 million savings from 2006 to 2011, as the COBRA model predicts, just factoring minimal training costs leads to an overall cost of $5.44 million. Given the conservative approach taken, it is possible that the costs would be even higher if a more complete look at training and recruiting costs were included. Again, this also discounts the costs of the expected degradation in capability that would occur during the transition from New Castle County to new bases.

Conclusion

The analysis used to determine costs and savings for the New Castle County realignment recommendation involved a questionable shift in the data, a questionable reduction in end-strength, failed to model realistic personnel moves, and failed to consider the additional training costs resulting from Guard personnel not PCS-ing. In addition, no consideration was given to possible expenditures for recruitment and the cost of lost capabilities during the transition from experienced to less experienced personnel. These flaws are all significant deviations from the fifth of the eight final selection criteria.

VI. Deviations from Other Considerations Criteria 6

6. *The economic impact on existing communities in the vicinity of military installations.*

Data Collection Inaccuracies

The Office of the Secretary of Defense established a Joint Process Action Team to develop a Department-wide approach to the sixth of the final selection criteria, relating to the economic impact on local communities. The Team came up with an Economic Impact Tool (EIT) to provide a common method to assess all of the scenarios considered. Each service was then responsible for entering specific data into the EIT.

In the case of the Air Force's analysis of New Castle County, they did not enter direct job changes for Air National Guard military personnel, military trainees, civilian employees, and mission support contractor full-time equivalents that might be gained, eliminated, or relocated as a result of a proposed scenario. In addition, they did not enter any traditional military members whose positions were being transferred or eliminated from New Castle County. This appears to be a deviation from the guidance for using the EIT (see Economic Impact Joint Process Action Team Report). A more realistic analysis (see the chart below) indicates that 340 traditional drill positions will also be lost at New Castle County.

As explained in Section Five of this report, Guard personnel cannot be accurately modeled using the Active Duty Permanent Change of Station model. The majority are unlikely to move with the missions, so even the 340 estimate of traditional job losses is probably lower than the real impact. The basic justification presented with the New Castle County recommendation demonstrates the false premises upon which the Air Force based its model. It says, "This recommendation makes experienced Airmen from New Castle (120) available for employment at these nearby installations," however, the majority of experienced personnel whose units are being realigned work on or with the C-130s. There will not be a C-130 base left in the region. The closest will be 305 miles away in Rhode Island.

In the overall analysis of the economic impact, the Air Force also deviated from long-standing policy by using the wrong Metropolitan Statistical Area. In economic matters applying to personnel at New Castle County Airport, DE, the Department Of Defense/DFAS has mandated use of the Philadelphia, PA-NJ primary metropolitan statistical area. The Air Force deviated from that instruction and used something called the "Wilmington, DE-MD-NJ Metropolitan Division", which appears to be the Dover, Delaware Metropolitan Statistical Area (listed on page B-45 of Volume One of the Department of Defense Recommendations). Using the correct, Philadelphia, multiplier results in an additional loss of 71 indirect employees in New Castle County, Delaware (see below chart).

Finally, there was a significant failure to collect accurate data relating to direct positions like the firefighters at New Castle County. These employees are 100% federally paid through a Cooperative Agreement between the Air National Guard and the state military department. The Air National Guard and Air Force failed to incorporate these costs into the model as employee costs.

The below chart includes the loss of the firefighters, calculates the impact of the loss of traditional guard members by use of a full-time equivalent model approved by the Air Force, and uses the correct Metropolitan Statistical Area. This provides a more accurate assessment of the personnel losses that would result from realigning New Castle County. When direct and indirect losses are calculated, 435 more jobs are lost than identified by the Air Force.

Status	Authorized Manning 13 May 05	Department of Defense Proposed Losses	NCCA Revised Losses	Delta
AGR	78	47	47	0
Technician	177	101	101	0
Fire Fighters	24	0	24	-24
Traditional	838	0	340	-340
Civilian Contract	5	0	0	0
Direct Employees	1,122	148	512	-364
Indirect Employees	345	102	173	-71
				-435

Community Impact

As Section Two of this report detailed, the Delaware Air National Guard firefighters are a critical homeland security asset. Transferring them to Dover Air Force Base takes their quick response capability away from New Castle County. In addition, the support they provide to the civilian airport is an invaluable resource for the community. In order to provide minimal Crash Fire Rescue for the airport to retain an FAA Index A (with no capability to go to Index E), the community would need to spend at least $1.3 million as shown in the chart below.

NCC Airport Economic Impact, Class IV, Index Level A			
Description	**Quantity**	**Cost (Ea)**	**Total Cost**
Personnel	**9**	**$57K**	**$540K**
Training Cost	**9**	**$20K**	**$180K**
Fire Truck	**1**	**$595K**	**$595K**
Annual Operating Cost		**$100K**	**$100K**
Over all TOTAL			**1.3M**

New Castle County Airport is the only civilian airport in New Castle County that can support general aviation, corporate and military aircraft. While the Department of Defense is not obligated to provide these capabilities, if they are going to be removed, that cost should be reflected in the economic impact assessment.

Overall, each year, New Castle County Air Guard Base brings $27.8 million in federal funds for salaries and maintenance costs to New Castle County. The County Executive estimates that the current proposal will yield a loss of $15.2 million just from salaries. In addition, the Air Guard spends a considerable amount of money in the local economy. They patronize local businesses for regular services and for contracting. During the course of the past three years, the Guard issued $13.5 million in outside contracts and spent an additional $8.2 million to repair the apron area surrounding their hangars. That kind of spending will be dramatically reduced if the C-130s, aeromedical evacuation unit, aerial port unit, and firefighters are realigned.

Conclusion

The analysis used by the Air Force and Department of Defense to assess the economic impact on the local community greatly underestimated the real impact and utilized inaccurate data. The models used failed to properly count actual job losses for traditional Guard personnel and the firefighters. The model also used an incorrect Metropolitan Area Statistic to derive a lower indirect jobs cost. In addition, the model failed to include real costs to replace basic services at the airport and the cost to local businesses. These flaws are all significant deviations from the sixth of the eight final selection criteria.

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Executive Summary

What follows is a detailed analysis of the Department of Defense's recommendation to realign C-130s, the aeromedical evacuation squadron, the aerial port flight, and the firefighters from New Castle County Air Guard Base. The analysis indicates that there were substantial deviations from six of the eight final selection criteria in the recommendation for New Castle County. It also shows additional areas of concern that cross the eight criteria with respect to the overall consolidation of C-130 squadrons and the potential violations of the law that the New Castle County recommendation raise.

If the Commission chooses to change the recommendation and retain the C-130s, aeromedical evacuation unit, aerial port flight, and firefighters at New Castle County Air Guard Base, it would be consistent with the intent and purpose of the BRAC law. Such a change would be consistent with the final selection criteria and with the force structure proposals submitted by the Secretary of Defense to Congress and the Commission.

The Assistant Adjutant General for Air, Brigadier General Hugh Broomall, as a state official, verified that the calculations and analysis used in this report used Department of Defense models where applicable and certified that to the best of his knowledge the data presented is factual and accurate.

What follows is a brief summary of the major findings.

Military Value Criteria 1-3

First, in the consideration of New Castle County Air Guard Base's military value, the Air Force based much of their decision-making on a quantitative series of metrics called the Mission Compatibility Index (MCI) for each of eight mission areas. In reviewing the airlift MCI assessment for New Castle County, significant mistakes and out-of-date data were discovered that would lead to a dramatic change in New Castle's Airlift MCI. Only the Airlift mission category was reviewed as that has been the primary mission of the base for over 40 years. While other MCI's might also change if the correct data were used, no specific evaluation was done for those other mission areas.

Below is a summary chart detailing which formulas in each of the first three MCI categories led to an inaccurate evaluation of New Castle County. The Air Force Airlift MCI assessment for New Castle County was 36.96 points, putting the base at 120 out of 154 bases evaluated. When the data is corrected, the MCI assessment increases by 22.36 points, for a total of 59.32. Holding all other bases constant, New Castle County would move to an airlift rank to 26 out of 154 bases evaluated.

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Formulas With Inaccurate Data	Max MCI Could Earn	AF Assessed Data	AF MCI Points	Correct Assessed Data	Correct MCI Points	MCI Point Difference
Current/Future Missions						
1271: Prevailing Installation Weather Conditions	3.22	86	2.77	92	2.96	+ .19
1246: Proximity to Low Level Routes	13.98	23.9	3.35	53.53	7.48	+ 4.13
1248: Proximity to DZ/LZ	14.72	22.27	3.28	49.69	7.31	+ 4.03
Condition of Infrastructure						
1235: Installation Pavement Quality	11.95	37.5	4.48	75	8.96	+ 4.48
1249: Airspace Attributes of DZ/LZ	8.3	19.47	1.62	70	5.81	+ 4.19
8: Ramp Area & Serviceability	5.98	0	0	25	1.5	+ 1.5
19: Hangar Capability	3.32	26.36	.88	75.92	2.52	+1.64
Contingency/Mobilization/Future Force						
1241: Ability to Support Large-Scale Mobility Deployment	2.2	0	0	100	2.2	+ 2.2
TOTAL MCI Difference						**+22.36**
Air Force Assessed MCI for New Castle County						36.96
Corrected MCI						**59.32**

- **Of the 154 bases considered, New Castle County Air Guard Base moves from 120 to 26.**
- **Failure to use accurate data and to consider current mission capabilities and risks to future mission capabilities is a significant deviation from the final selection criteria.**
- **Failure to consider homeland security needs would leave the Mid-Atlantic Region and Delaware vulnerable.**

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- **Failure to account for historic support given large-scale mobility deployments and to acknowledge airport agreements misrepresents the ability of New Castle County to support C-5s and C-17s.**

Military Value Criteria 4

In the fourth military value criteria, while the MCI data was accurate, no effort was made to analyze the manpower implications of the proposed realignment. That is a significant deviation from the final selection criteria.

- **Likely loss of large number of experienced Air Guard personnel not accounted for in any fashion.**

Criteria 5 – Costs and Savings

The COBRA model was the primary device used by the Department of Defense to evaluate the costs and savings of given BRAC recommendations. The model was flawed in several areas. By inaccurately calculating Air Guard costs and savings using the COBRA model, the Department of Defense recommendations deviate significantly from the final selection criteria.

- **The COBRA model counts savings from what would be illegal reductions in Guard end-strength.**
- **The COBRA model fails to properly model Air Guard personnel moves.**
- **The COBRA model fails to calculate the training costs that would be necessary following the recommended New Castle County realignment.**

Criteria 6 – Economic Impact on the Local Community

The economic impact of the proposed realignment of the Air Guard at New Castle County Air Base would be greater than that identified by the Department of Defense. By failing to properly calculate it, the recommendation deviates substantially from the final selection criteria.

- **The Air Force used the wrong Metropolitan Statistical Area for New Castle County.**
- **The analysis underestimated the personnel losses expected.**
- **The analysis underestimated the costs to the County to replace lost services and the costs to local businesses.**

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Criteria 7 & 8 – Ability of Infrastructure to Support & Environmental Impact

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The analysis did not detect any problems with the application of final selection criteria seven and eight to New Castle County Air Guard Base.

Cross Criteria Concerns

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The analysis revealed several potential problems with the overall recommendation to consolidate C-130 squadrons and create enclave bases. These concerns indicate further substantial deviations from the final selection criteria.

- **The recommendation for C-130 squadron consolidation has not been properly analyzed.**
- **The creation of enclave bases will harm readiness, retention, homeland security, and democracy.**

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Legal Concerns

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At no point was the Department of Defense given the authority to make recommendations counter to the U.S. Constitution. The complete lack of consultation and concurrence from the Governor of Delaware, the Commander in Chief of the Delaware National Guard, appears to be a violation of the Constitution as interpreted by the Supreme Court and a violation of other laws.

- **The recommendation for realignment at New Castle County Air Guard Base appears to violate the law.**

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Conclusion

- **Based on the overwhelming evidence provided in this analysis that the Department of Defense substantially deviated from the final selection criteria and appears to have violated the law in its recommendation to realign New Castle County Air Guard Base, the Commission should overturn this recommendation.**

  Such a change would be consistent with the force structure proposals submitted by the Secretary of Defense and with the final selection criteria.

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Air Force Assessed MCI for New Castle County Air Guard Base =

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Correct TOTAL MCI for New Castle County Air Guard Base =

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New Castle County Air Guard Base Moves from 120 to

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I. Deviations from Military Value Criteria 1

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1. *The current and future mission capabilities and the impact on operational readiness of the total force of the Department of Defense, including the impact on joint warfighting, training, and readiness.*

Current Mission Capabilities

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In evaluating the 166th Airlift Wing and the associated squadrons' current and future mission capabilities, the Department of Defense failed to factor in the on-going contribution of these units to current missions in Operations Iraqi and Enduring Freedom and the degree to which experienced personnel would be lost to the Air Force and nation for future missions.

Since September 11, 2001, the Delaware Air National Guard has provided the following:

- 1,607 deployed personnel in support of the Global War on Terror
- 19%, or the 3rd highest percent in the nation, of personnel have volunteered or been mobilized as of May 31, 2004 (only NH and NV have higher percent)
- Personnel deployed to 59 locations around the world
- Over 8,000 combat hours flown in support of OEF/OIF
- 92% Mission Capable rate in theater (compared to AF C-130 average of 75%)
- As of June 27, 2005, 50 personnel are deployed away from home station in support of OEF/OIF
- Airlift for plan to move air-to-air missiles between Air Force bases

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Clearly, the Delaware Air National Guard has provided significant capability to current missions, but this was not recognized anywhere in the Department of Defense's analysis of the base and its missions. By not accounting for actual current missions, the recommendations deviate from the first military value criteria.

Data Inaccuracies

In the Air Force's analysis of each base's military value, they created a Military Compatibility Index (MCI). The first MCI category, Current/Future Missions, was worth 46% of the total MCI for Airlift. There were three data inaccuracies in this area for New Castle County. By correcting the data in three formulas, New Castle's MCI increases 8.35 points. These corrections would bring New Castle County's total MCI up to 45.31. Holding all other bases constant, this would move the base from 120 to 77 on the Airlift list.

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Below is a chart summarizing the inaccurate inputs and resulting adjustments. Following the chart is an explanation of the correct inputs for each formula.

Formulas With Inaccurate Data	Max MCI Could Earn	AF Assessed Data	AF MCI Points	Correct Assessed Data	Correct MCI Points	MCI Point Difference
1271: Prevailing Installation Weather Conditions	3.22	86	2.77	92	2.96	+ .19
1246: Proximity to Low Level Routes	13.98	23.9	3.35	53.53	7.48	+ 4.13
1248: Proximity to DZ/LZ	14.72	22.27	3.28	49.69	7.31	+ 4.03
TOTAL MCI Difference						**+ 8.35**
Air Force Assessed MCI for New Castle County						36.96
Corrected MCI						**45.31**

RESULT: New Castle County Air Guard Base Moves From 120 to 77.

Formula 1271: This formula used Air Force Combat Climatology Center (AFCCC) Tables to determine the number of days the base had weather with better than a 3000 foot ceiling and 3 miles of visibility. That is standard Visual Flight Rules (VFR) weather. After reviewing the AFCCC tables (shown below), it was determined that 19% of the year had less than VFR weather (bottom right on table). That means 81% of the year had VFR weather. Simple math indicates that 81% of 365 days in a year is 295.65. Thus, there were 296 VFR days, as opposed to the Air Force's assessment of 293. That would mean inserting 92 in the requisite formula, versus 86, which raises the MCI by 19 points.

OPERATIONAL CLIMATIC DATA SUMMARY

STATION: WILMINGTON ARPT DELAWARE STATION #: 724089 ICAO: KILG
LOCATION: 3941N 7536W ELEVATION (FEET): 79 LST = GMT -5
PREPARED BY: AFCCC/DOO, JUL 1998 PERIOD: 7301-9712

7. PERCENTAGE FREQUENCY OF OCCURRENCE (% FREQ) OF CEILING AND/OR VISIBILITY (CIG/VIS) LT 3000/3 STATUTE MILES (MI) (SOURCE NO. 1)

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANN
00-02 LST	21	19	19	18	19	16	16	16	18	16	19	20	18
03-05 LST	20	20	20	20	26	25	26	25	24	20	23	20	22
06-08 LST	23	23	24	22	28	30	32	34	31	27	25	22	27
09-11 LST	24	21	22	21	22	21	21	22	24	19	22	22	22
12-14 LST	22	19	21	17	16	13	13	12	14	13	18	21	17
15-17 LST	19	18	19	13	14	9	8	9	11	11	16	19	14
18-20 LST	19	17	17	13	13	10	9	10	11	11	16	18	14
21-23 LST	19	18	18	16	15	12	11	12	14	14	18	19	15
ALL HOURS	21	20	20	17	19	17	17	17	18	16	19	20	19

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Formula 1246: The below chart shows the correct inputs for this formula. Using this data, the input is 53.53, versus the 23.95 used by the Air Force. That leads to an MCI increase of 4.13.

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Org	1 Route Designator (Text)	2 Distance to Primary Route Entry Point (NM)	3 Distance to Primary Route Exit Point (NM)		Entry Point Score	Exit point
118	IR714	141	173		18.1	
118	IR760	141	173		18.1	0
				Total	36.2	0
				Highest	18.1	0
				Lowest Non-zero	18.1	0
118	VR1709	67	52		84.7	98.2
118	VR1711	67	92		84.7	62.2
118	VR1712	67	92		84.7	62.2
118	VR1713	67	236		84.7	0
118	VR1722	207	118		0	38.8
118	VR1753	143	236		16.3	0
118	VR1754	141	173		18.1	0
118	VR1755	143	119		16.3	37.9
118	VR1757	99	142		55.9	17.2
118	VR1759	135	253		23.5	0
118	VR704	80	70		73	82
118	VR705	80	70		73	82
118	VR707	104	70		51.4	82
118	VR708	86	113		67.6	43.3
				Total	733.9	605.8
				Highest	84.7	98.2
				Lowest Non-zero	16.3	17.2
BASE X				*Total*	IR	VR
				Highest	165	300
				Lowest Non-zero	30	50
NCCA Points				**Route**	**Entry**	**Exit**
				IR	**14.13**	**0**
				VR	**100**	**100**
					**	
						53.53

****Formula #1246 Calc = (.25 x IR entry) + (.25 x IR exit) + (.25 x VR entry) + (.25 x VR exit)**

Formula 1248: This formula relied on proximity to a list of landing and drop zones certified by Air Mobility Command (the Zone Availability Report). At this point, no explanation of how certification of landing zones or drop zones occurs has been provided by the Air Force. It appears, however, that the list does not include various landing zones used by the Air National Guard that the Air Force has long accepted for aircrew training. Initial review of the list indicates that few, if any, landing zones located on municipal airports are included. Again, this has not been explained at this time.

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New Castle County Airport received no credit for landing zones within 50 or 150 nautical miles of the installation. In reality, New Castle can claim two landing zones incorporated on its existing runways 14/32, and 09/27.

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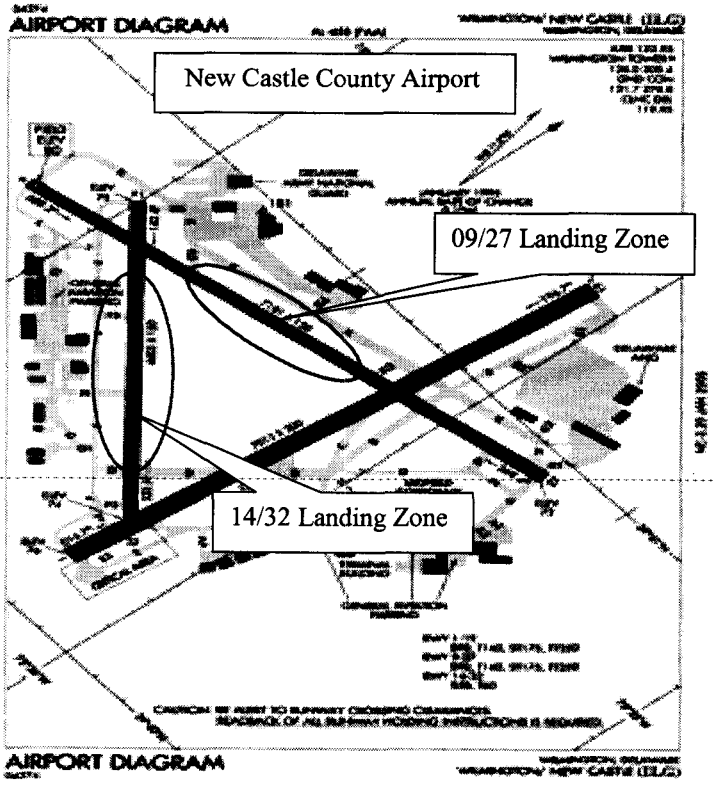

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The airfield diagram indicates the location of the landing zone on runway 14/32. This landing zone was completed in December of 2003 as part of a joint runway repair project between the FAA and the Air National Guard. It is a 3500 feet by 60 feet zone and has a flush mounted lighting system that can be configured to simulate a variety of assault landing scenarios in daytime or evening. It is utilized for Night Assault Landing and

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Night Vision Goggle Assault landing training. It is a regional asset that has been utilized by both Maryland and Delaware Air National Guard C-130 crews.

The landing zone on runway 09/27 is also an assault zone that is marked exclusively for daylight operations. It has been in operation for over a decade.

In addition, Shepherd Air National Guard base near Martinsburg, WV contains a landing zone where Delaware Air Guard personnel regularly train. This is 107 nautical miles and 121 statute miles from New Castle County Air Base. It is not clear why the Zone Availability Report includes Shepherd's drop zone and not the landing zones at Shepherd and New Castle County, even though both are regularly used to maintain currency. Again, Shepherd is part of a municipal airport.

Both landing zones at New Castle and the Shepherd landing zone are vital training assets for the Mid-Atlantic region that directly contribute to the mission readiness of combat qualified aircrews. Despite the regular training that occurs on these landing zones, no credit was given to New Castle County for either of its own assets, nor for its proximity to Shepherd. If both New Castle and Shepherd landing zones are included, the Formula 1248 input for New Castle County would be 49.69 points, leading to an MCI score increase of 4.03.

The errors in the Airlift MCI calculations for Current and Future Missions mean that the Department of Defense did not accurately assess New Castle County. These inaccuracies represent a substantial deviation from the first military value criteria.

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Future Mission Risks

In addition to an incomplete and inaccurate assessment of New Castle County's current missions, the recommendations for realignment put future mission capabilities at risk. These highly motivated and experienced professionals are not committed to staying in the Air National Guard if they have to commute 305 miles to the nearest C-130 base (Quonset State AGS near Providence, RI). Even the aeromedical evacuation personnel being moved to McGuire AFB and the aerial port personnel moving to Dover AFB, are largely not planning to remain in the Air Guard. It is important to realize that on average, Air Guard personnel in Delaware receive only 20% of their annual compensation from their Guard work, while 80% comes from their civilian jobs. This is a community-based force, with deep roots. It is very different from Active Duty personnel who live on base and expect to move with their missions.

After the May 13 announcement of the realignment recommendation, the leadership of the Delaware Air National Guard conducted a survey of members in each unit expected to be impacted by the realignment recommendations to determine how likely they were to stay. Below is a table summarizing each squadron's capabilities and the results of that internal survey.

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Internal Survey of Delaware Air Guard Personnel

Unit	Authorized Personnel	Planning to Leave	Lost Personnel	Average Experience	Types of Missions
Operations	99	85%	84	▪ 3,000 flight hours ▪ 18 years service ▪ 155,000 accident free flight hours in past 43 years	OEF/OIF combat flying; Inter and Intrastate Counterdrug & Hurricane Relief
Maintenance	221	80%	177	▪ 16 years service ▪ Save 2-6 maintenance manhours/flying hour vs. counterparts in AF and ANG ▪ 92% MC rate in theater	OEF/OIF support
Aeromedical Evacuation	100	70%	70	▪ 12 years service ▪ 250 flight hours	OEF/OIF support; state missions
CE-Firefighters	39	21%	8	▪ 17 years service ▪ Supported 114,000 flight operations in 2004 (compared to 37,000 ops. at Dover AFB)	OEF/OIF support; responded to 106 state incidents in past 6 years; 16 hazmat incidents in same time; part of state emergency plans
Aerial Port	62	86%	53	▪ 11 years service	44 have deployed for OEF/OIF; FEMA Region 3 Strategic National Stockpile plans
TOTALS	**521**	**75%**	**392**	▪ **15 years of service**	

As the above chart shows, 75% of the experienced personnel currently serving in the Delaware Air National Guard do not plan to continue to serve if the realignment recommendation is implemented. Not only are the distances excessive in most case, so too are the training complications.

For example, the two Air Reserve aeromedical evacuation units stationed at McGuire AFB currently travel to New Castle County to complete their C-130 training. They do not have access to C-130s at McGuire and must train on them to stay current. To move New Castle County's 142nd Aeromedical Evacuation Squadron to McGuire means a commute of over 70 miles from New Castle and fewer (if any) training opportunities. Another example of the problem with the distances is that most of the Delaware Air Guard personnel do not work for civilian airlines. There are only seven pilots in the 166th Airlift Wing that fly for civilian airlines. All other personnel would have to bear the cost

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in terms of actual travel costs and time to travel to training. Again, the closest C-130 base would be 305 miles away.

The 166th Airlift Wing has also been recognized over the past four years for its excellence as follows:

- 2000 Health Services Inspection rating of "Excellent"
- 2002 Aircrew Standardization Evaluation rating of "Excellent"
- 2004 Inspector General Exercise made the 166th a "Benchmark Unit"
- 2004 Health Services Inspection rating for Clinic and Aeromedical Squadron of "Excellent"

At no point in the BRAC assessment of capabilities for future missions is the experience and excellence of existing units like the 166th considered. As the above chart shows, the average years of service for all categories is over 15 years. The 166th Airlift Wing safety and reliability records exceed the Active Duty and Air National Guard averages for C-130s. Overall, the Active Duty is 16 times more likely to have a Class "A" Flying Accident (resulting in over $1 million worth of damage) than the Air National Guard for every 100,000 hours flown. In Delaware, aircrews have managed an astonishing 155,000 accident free flying hours over the past 43 years. That experience and tradition of excellent performance translates directly into the ability to provide working C-130s to the warfight.

Losing these experienced personnel will have a negative impact on mission capable rates and aircrew availability over the next five years. By not considering that impact at all, let alone in the specific case of Delaware's units, the Department of Defense's recommendations regarding the Air National Guard deviate substantially from the first military value criteria.

Last, there is a joint operations concern with the recommendations for New Castle County Air Guard Base. The National Guard Bureau has directed that all states create a joint Air and Army Guard Headquarters. The Army has already approved locating Delaware's Joint National Guard Headquarters at New Castle County Airport so that it would be next to the Air Base. The Army National Guard currently supports eight Army Guard UH-60s (all are overseas) and six UH-1 Hueys at the airport. Collocating the Army and Air Guard Headquarters at the airport was intended to improve joint operations. It is unclear if this joint headquarters will still make sense with the greatly reduced Air Guard presence at the Air Base. By not addressing this issue or considering this consequence, the recommendations deviated from the first military value criteria.

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Conclusion

The failure to consider current missions being performed by New Castle County Air Guard Base, the inaccuracies in the data used to measure Current/Future Mission MCI, the failure to consider the impact on future missions of losing highly experienced personnel, and the failure to examine the impact on future joint operations are all significant deviations from the first of the eight final selection criteria.

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TOTAL MCI Difference **+ 3.437.89**

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Air Force Assessed MCI for New Castle County Air Guard Base = 39.9636.96

Change in New Castle MCI with Correct Category 1 = 43.3944.85

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II. Deviations from Military Value Criteria 2

2. *The availability and condition of land, facilities, and associated airspace (including training areas suitable for maneuver by ground, naval, or air forces throughout a diversity of climate and terrain areas and staging areas for the use of the Armed Forces in homeland defense missions) at both existing and potential receiving locations.*

Data Inaccuracies

As discussed in Section One, the Air Force's analysis of each base's military value was primarily based on their Military Compatibility Index. The second MCI category, Condition of Infrastructure, was worth 41.5% of the total MCI for Airlift. There were four data inaccuracies in this area for New Castle County. By correcting the data in four formulas, New Castle's MCI increases 11.81 points. These corrections would bring New Castle County's total MCI up to 48.77. Holding all other bases constant, this would move the base from 120 to 60 on the Airlift list.

If the inaccuracies from the Current/Future Missions MCI category are also considered, then New Castle County's total MCI goes up a total of 20.16 points to 57.12. Holding all other bases constant, this would move the base from 120 to 31 on the Airlift list.

Below is a chart summarizing the inaccurate inputs and resulting adjustments. Following the chart is an explanation of the correct inputs for each formula.

Formulas With Inaccurate Data	Max MCI Could Earn	AF Assessed Data	AF MCI Points	Correct Assessed Data	Correct MCI Points	MCI Point Difference
Condition of Infrastructure						
1235: Installation Pavement Quality	11.95	37.5	4.48	75	8.96	+ 4.48
1249: Airspace Attributes of DZ/LZ	8.3	19.47	1.62	70	5.81	+ 4.19
8: Ramp Area & Serviceability	5.98	0	0	25	1.5	+ 1.5
19: Hangar Capability	3.32	26.36	.88	75.92	2.52	+ 1.64
TOTAL MCI Difference						**+11.81**
Air Force Assessed MCI for New Castle County						36.96
Corrected MCI						**48.77**

RESULT: New Castle County Air Guard Base Moves From 120 to 60.

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III. Deviations from Military Value Criteria 3

3. *The ability to accommodate contingency, mobilization, surge, and future total force requirements at both existing and potential receiving locations to support operations and training.*

Data Inaccuracies

The third Military Compatibility Index category, Contingency/Mobilization/Future Force, was worth 10% of the total MCI for Airlift. There was one data inaccuracy in this area for New Castle County. By correcting the data in that one formula, New Castle's MCI increases 2.2 points. That correction would bring New Castle County's total MCI up to 39.16. Holding all other bases constant, this would move the base from 120 to 109 on the Airlift list.

If the inaccuracies from the Current/Future Missions MCI category and the Condition of Infrastructure MCI are also considered, then New Castle County's total MCI goes up a total of 22.36 points to 59.32. Holding all other bases constant, this would move the base from 120 to 26 on the Airlift list.

Below is a chart summarizing the inaccurate input and resulting adjustment. A more detailed explanation follows the chart.

Formulas With Inaccurate Data	Max MCI Could Earn	AF Assessed Data	AF MCI Points	Correct Assessed Data	Correct MCI Points	MCI Point Difference
Contingency/Mobilization/Future Force						
1241: Ability to Support Large-Scale Mobility Deployment	2.2	0	0	100	2.2	+ 2.2
TOTAL MCI Difference						**+2.2**
Air Force Assessed MCI for New Castle County						36.96
Corrected MCI						**39.16**

RESULT: New Castle County Air Guard Base Moves From 120 to 109.

CUMULATIVE: New Castle County Air Guard Base Moves From 120 to 26.

(Current/Future Missions + Condition of Infrastructure + Contingency/Mobilization) = 21.90 additional points and 58.86 MCI total.)

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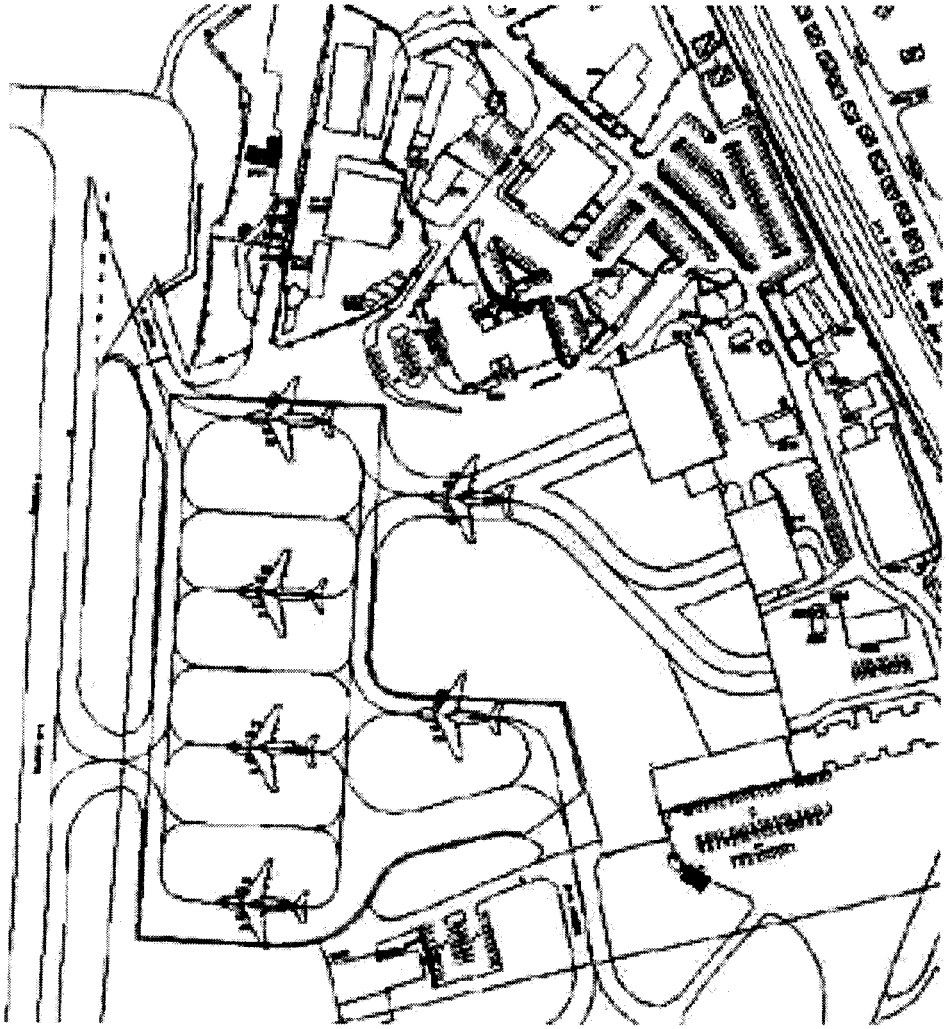
Formula 1241: This formula examines the ability of a base to support transient C-17s and C-5s. As the below picture demonstrates, the base can support no less than 6 C-17 aircraft on the military ramp. New Castle should have received credit for being able to accommodate 6 C-17s and should score 100 points. That would lead to an overall MCI increase of 2.2.



Real Capabilities Demonstrated

In addition, a verbal agreement for contingency parking has been in effect between the Delaware Air National Guard and the Delaware River and Bay Authority (DRBA, owner of the civilian side of the airport) for many years. That agreement has been used for actual contingency operations and for exercises supporting both C-5s and C-17s. This means either the C-130s or the larger aircraft can use the civilian ramp and parking apron as needed.

Despite New Castle County's regular support of both aircraft for OIF, Senior Scout, and during Operational Readiness Inspections, the base received zero points. What follows is a list of specific dates during which New Castle County has supported a C-5 or C-17 aircraft over the past 3 years and two scheduled support missions this summer.

Date	Type of Aircraft	Mission
March 2002	C-17	Senior Scout
March 2003	C-5	Operation Iraqi Freedom
April 2004	C-5	IGX
May 2005	C-5	Maintenance Problem
May 2005	C-5	classified mission
July 2005	C-17	Shula Dragon*
August 2005	C-17	Shula Dragon*

*Scheduled

Overall, this category did not have well defined guidance for bases to provide uniform responses. Some bases appear to have measured their ability to handle transient C-5s or C-17s, while others appear to have measured their ability to handle those aircraft in the absence of any of their own aircraft being home stationed. In addition, the fact that the data input was not able to account for real life examples of handling C-5s and C-17s suggests that the model was not capturing real capability to support contingency operations and mobilizations.

Conclusion

The identified inaccuracy in the data used to measure the Contingency/ Mobilization/ Future Force portion of the MCI, the potential inconsistencies in base responses, and the inability of the MCI to account for real life support of contingency operations and mobilizations are a significant deviation from the third of the eight final selection criteria.

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Base Realignment and Closure Commision Briefing

Base Realignment and Closure Commission Briefing

New Castle County
Air National Guard Base

The Mid-Atlantic's First Line of Defense

Base Realignment and Closure Commission Briefing

Governor Ruth Ann Minner

Highlights

- Legal Issues
- DOD Methods and Models
- Enclaves
- Homeland Security
- Personnel / Mission Capability

Legal Issues

- Dual Role
- Constitutional / Congressional Authority
- Consultation
- Do Not Consent

Economic Impacts

- Underestimated
- Inconsistent MSA
- Traditional Part-Time Members Discounted
- 435 Additional Positions Lost
- Total is 685

Revenue Impacts

- $27.8 million Operating Expenses
- $13.5 million Contracts
- $15.2 million Salaries
- Small Business Revenue

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Conclusion

- Recommendation to realign units at New Castle County Air Guard Base is not legal and will have a much greater impact than assessed by the Department of Defense

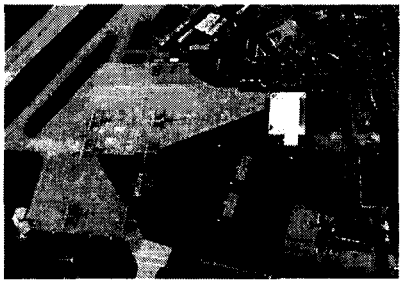
Base Realignment and Closure Commission Briefing

Congressman Michael N. Castle

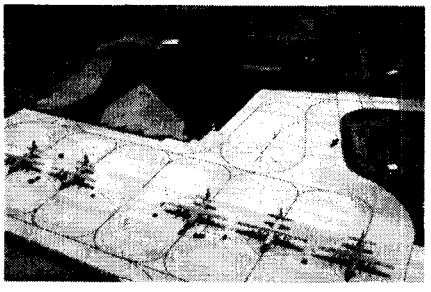
Mission Capability Assessment

- Apron
- Runway
- DZ / LZ
- Surge
- Enclaves

Pavement Photos Before



Pavement Photos After



Pavement Photos After

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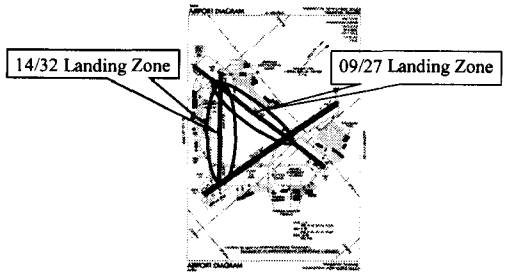
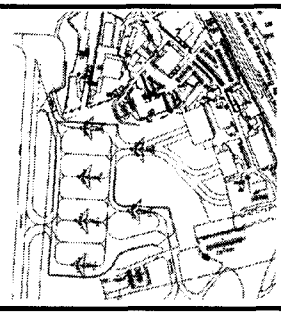
NCCA Landing Zones



C-17



C-5 / C-17 Missions Supported

Date	Type of Aircraft	Mission
March 2002	C-17	Senior Scout
March 2003	C-5	Operation Iraqi Freedom
April 2004	C-5	IGX
May 2004	C-17	IGX
May 2005	C-5	Maintenance Problem
May 2005	C-5	classified mission
July 2005	C-17	Shula Dragon*
August 2005	C-17	Shula Dragon*

*Scheduled

Summary of Inaccurate Data

Formulas With Inaccurate Data	Max. MCI Could Earn	AF Assessed Data	AF MCI Points	Correct Assessed Data	Correct MCI Points	MCI Point Difference
1271: Prevailing Installation Weather Conditions	3.22	86	2.77	92	2.96	+ .19
1246: Proximity to Low Level Route	13.98	23.9	3.35	53.53	7.48	+ 4.13
1248: Proximity to DZ/LZ	14.72	22.27	3.28	49.69	7.31	+ 4.03
1235: Installation Pavement Quality	11.95	37.5	4.48	75	8.96	+ 4.48
1249: Airspace Attributes of DZ/LZ	8.3	19.47	1.62	70	5.81	+ 4.19
8: Ramp Area & Serviceability	5.98	0	0	25	1.5	+1.5
19: Hanger Capability	3.32	26.36	[illegible]	75.92	2.52	+1.64
1241: Ability to Support Large-Scale Mobility Deployment	2.2	0	0	+ 100	2.2	+ 2.2
TOTAL MCI Difference						+22.36

Airlift Assessment

Air Force Assessed Airlift MCI	36.96
Increase to Airlift MCI	22.36
Resultant Airlift MCI	59.32

- Airlift ranking moves from 120th to 26th out of 154 bases evaluated

Enclaves

- Reduced Manpower
- Impact Homeland Security
- Questionable Budgeting
- Affect New Castle County Airport
- Impact on Recruiting / Retention

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Conclusion

- The MCI calculations were inaccurate and failed to properly evaluate New Castle County Air Guard Base. The creation of enclaves will harm homeland security, Air Guard readiness and retention. All of these facts indicate that this recommendation was a significant deviation from the final selection criteria.

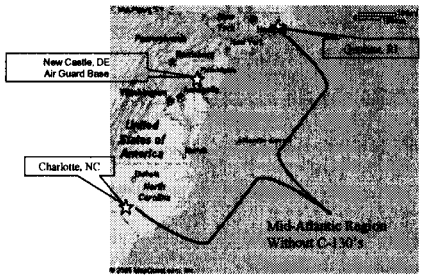
Base Realignment and Closure Commission Briefing

Senator Thomas R. Carper

Military Value Final Selection Criteria 2

- *The availability and condition of land, facilities, and associated airspace (**including** training areas suitable for maneuver by ground, naval, or air forces throughout a diversity of climate and terrain areas and **staging areas for the use of the Armed Forces in homeland defense missions**) at both existing and potential receiving locations.*

Regional Map



Regional Homeland Security Needs

- Over 800 Miles
- 20% of the Population
- Major Cities: New York, Philadelphia, and DC
- FEMA Region 3 Site for CDC Distribution of Strategic National Stockpile
- National Guard Civil Support Teams Travel with Equipment on C-130s

Delaware's Homeland Security Needs

- Air Guard Personnel Cut in Half
- DEMA Evacuation Plans
- Federal Response Standard - 72 hours
- State Response Standard - 4 hours
- Firefighters
- Aeromedical Evacuation

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Conclusion

- Recommendation for realignment of units at New Castle County Air Guard Base significantly deviates from criteria 2.

Base Realignment and Closure Commission Briefing

Senator Joseph R. Biden, Jr

Deviations from Criteria

- Governors Not Involved
- Economic Impact Inaccurate
- MCI Incorrect
- Enclaves Need More Analysis
- Homeland Security Ignored

Additional Deviations

- COBRA Model Failures
- No Savings
- Current & Future Mission Capabilities

Internal Survey of Delaware Air Guard Personnel

Unit	Authorized Personnel	Planning to Leave	Lost Personnel	Average Experience
Operations	99	85%	84	18 years service
Maintenance	221	80%	177	16 years service
Aeromedical Evacuation	100	70%	70	12 years service
CE-Firefighters	39	21%	8	17 years service
Aerial Port	62	86%	53	11 years service
TOTALS	521	75%	392	15 years service

Training Cost Chart

Unit	Personnel	Total Cost Per	Loss	Total Cost to Replace Personnel
Operations-Flight Crews				
Pilot	24	$21,839,869	85%	$18,563,889
Navigator, Ft Engr, LoadMaster	12 each	$9,386,296	85%	$7,978,352
Total for Flight Crews		$31,226,166	85%	$26,542,241
Aeromedical Evacuation Crews				
Officers	45	$2,447,267	70%	$1,713,087
Enlisted	55	$2,450,173	70%	$1,715,121
Total for AE Crews		$4,897,440	70%	$3,428,208
Maintenance				
Officers	4	$279,162	80%	$223,329
Enlisted	36	$2,116,507	80%	$1,693,205
Total for Maintenance		$2,395,669	80%	$1,916,535
Aerial Port		$14,543		$775,378
Officers	7	$118,700	86%	$102,159
Enlisted	56	$2,300,868	86%	$1,978,746
Total for Aerial Port		$2,419,658	86%	$2,080,904
Firefighters				
Officers	2	$183,253	21%	$38,483
Enlisted	37	$2,346,886	21%	$492,846
Total for Firefighters		$2,530,139	21%	$531,329
Total Training Costs				[illegible]
COBRA Recruiter Savings Bonuses				$35,000,000
Total Savings Costs				[illegible]

Mission Capability

Since September 11, 2001 Delaware Air Guard has provided:

- 1,607 Personnel Deployed - GWOT
- 19% of Wing Mobilized by May 31, 2004
- Deployed to 59 Worldwide Locations
- Flown 8,000 Combat Hours
- 92% Aircraft Mission Capable Rate
- 50 Personnel are Currently Deployed

Recognition

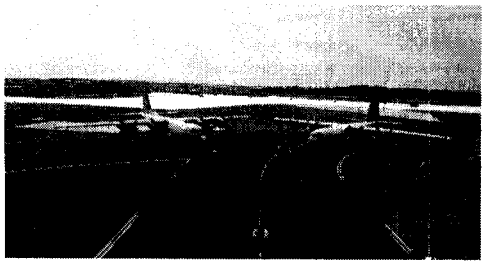
166th Airlift Wing Awards 2000-2004

- 2000 HIS - "Excellent"
- 2002 ASEV - "Excellent"
- 2004 IGX - "Benchmark Unit"
- 2004 HIS - "Excellent"

Mission Capability

- Average Experience = 15 Years
- 16 to 1 Safer
- 155,000 Accident Free Flying Hours / 43 years
- Lost Experience Means Lower Mission Capability.

Conclusion

- The failure to calculate manpower accurately and legally, the costs of training, and the mission capabilities that will be lost are significant deviations from final selection criteria four and five. Given the substantial deviations from the final selection criteria found in the recommendation for New Castle County Air Guard Base, the recommendation should be reversed.

Small Wonder - Great Military Value