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DEPARTMENT OF THE NAVY
OFFICE OF THE ASSISTANT SECRETARY
(INSTALLATIONS AND ENVIRONMENT)
1000 NAVY PENTAGON
WASHINGTON, D.C. 20350-1000

9 July 2004

MEMORANDUM FOR DIRECTOR, OSD BRAC OFFICE

Subj: REVIEW OF DRAFT BASE REALIGNMENT AND CLOSURE (BRAC)
IMPERATIVES

Encl: (1) DON Comments on Proposed Draft Imperatives

Attached is the Department of the Navy (DON) additional input on the draft BRAC Imperatives forwarded to the Chairmen of the Joint Cross-Service Groups (JCSGs) by the Acting Under Secretary of Defense (Acquisition, Technology and Logistics) memo dated 2 July 2004. I thoroughly reviewed these imperatives at a meeting this morning attended by DON Infrastructure Steering Groups (ISG) and JCSG representatives, and the input represents the Department's position. To the extent this input conflicts with comments received from the JCSG Chairmen or other Military Departments, our ISG members request those items be specifically discussed at the next ISG meeting.

In several cases, we have recommended rewording imperatives to cast them as a positive goal, rather than as a negative prohibition. We recommend all of the imperatives be reviewed to see if they can be so written, since the meaning of some appears to be lost by the reverse drafting. We recognize that, as modeling constraints, the imperatives may need to be cast as prohibitions on inclusion or exclusion of certain activities, but do not think it generally clear or helpful to write the entire set of imperatives in the negative.

We also are including in the attachment some imperatives that could act as limits on the JCSG analysis. While we fully support the JCSG process as a means to ensure thorough analysis, and thus understand the need for an imperative criterion that seeks to preserve joint cross service analysis, we also believe parameters should be set to ensure that analysis will fully consider the Services' requirements and responsibilities. Imperatives are one way to establish such boundaries. If there is a perceived over-limitation in our suggested imperatives, our ISG members request those items be specifically discussed at the next ISG meeting.

Finally, there are a number of imperatives we have recommended deleting. In some cases, the recommendation is based on a view that an explicit imperative (at least as currently written) just is not a necessary constraint. In other cases, we have recommended deletion because the imperative as written appears so broad that it could be construed to prohibit almost any action. We suggest that, if those imperatives suggested for deletion are revised to state them as a positive goal, they be re-reviewed to see whether they are necessary imperatives.

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The Department of the Navy appreciates the opportunity to review these draft Imperatives and provide input. I look forward to working with your office to compile a final package for ISG review.



Anne Rathmell Davis
Deputy Assistant Secretary of Navy
(Infrastructure Strategy & Analysis)

Copy to:
Acting Under Secretary of Defense (Acquisition,
Technology and Logistics)