

BRAC 2005
 183d Fighter Wing
 Capital ANGB, Springfield, Illinois
 (Abraham Lincoln Capital Airport)

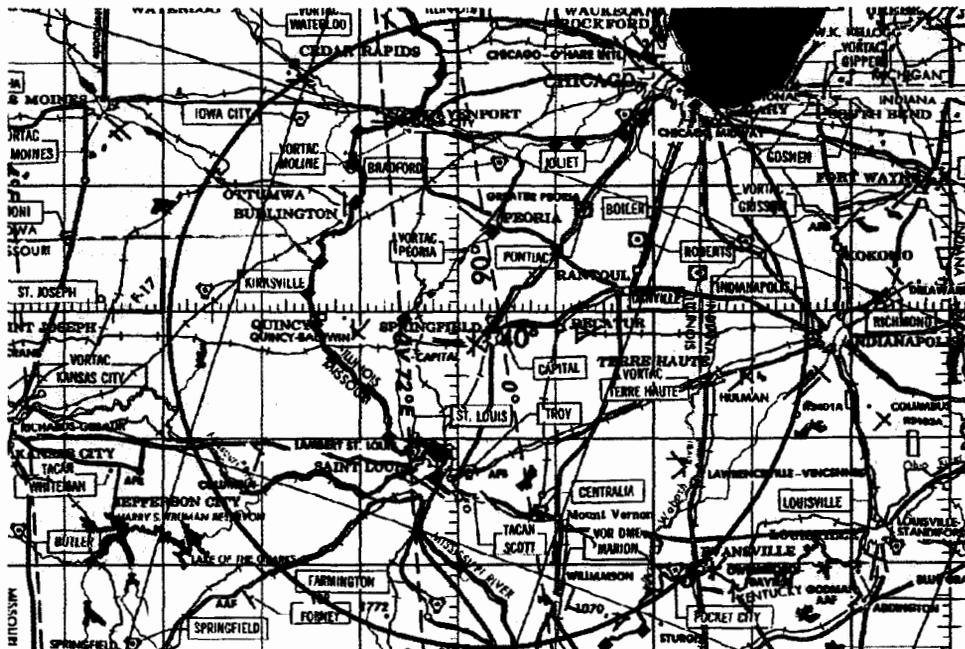
HOMELAND SECURITY

Closely related to military value is the ability of a base to support America's homeland security mission. Secretary Rumsfeld, in his Quadrennial Defense Review of our military's capabilities, has stressed the importance of relying on adaptable military units – able to respond quickly to threats overseas or at home. The 183 FW adheres to these principles and is uniquely suited to perform homeland security functions as outlined below.

Capital ANGB is uniquely positioned for future growth for homeland security missions given its proximity to major metropolitan areas. Fighter coverage emanating from Springfield, Illinois will be within easy reach of several major metropolitan areas including: Chicago, St. Louis, Indianapolis, and Milwaukee and could even quickly reach Kansas City, Louisville or the Paducah, Kentucky area.

Nautical Miles	Chicago	St Louis	Indianapolis	Milwaukee	Kansas City	Louisville
183 FW	151.2	73.0	156.2	202.7	235.2	209.3

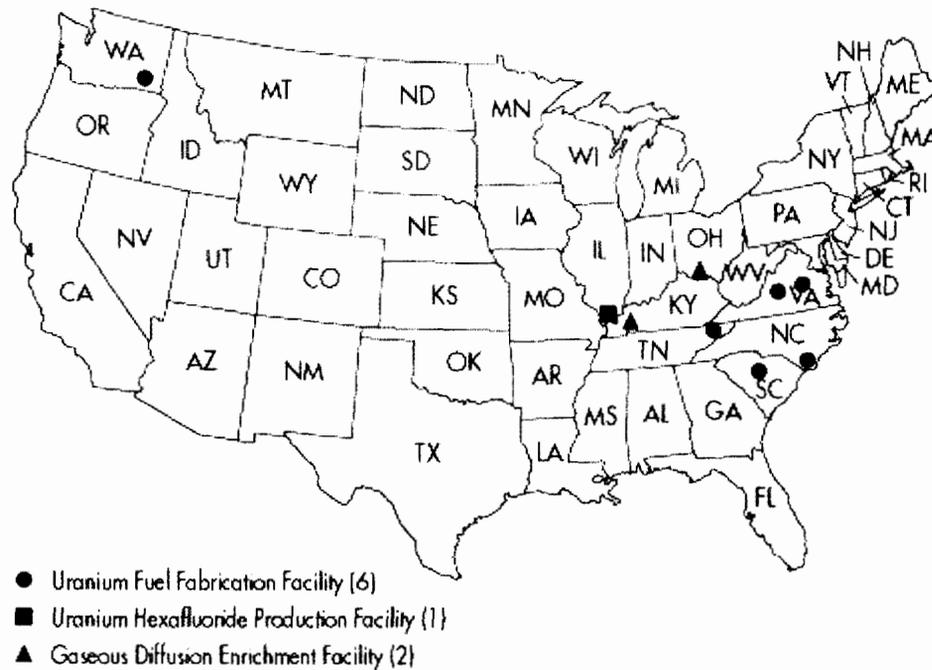
Illinois is home to key national assets and a large population that must be covered by nearby fighter protection (75 million people live within 375 NM of Capital ANGB – 25% of the US population). Among these key national assets are 28 locks and dams along the Mississippi, Illinois, Ohio and Chicago Rivers within Illinois' border (see chart below). There are also 11 nuclear power generation facilities in the state of Illinois and between one and four nuclear facilities in the immediate surrounding states. Nuclear energy supplies 50.1% of the electricity generated in Illinois. Following September 11th, nuclear power plants were one of the most protected facilities in our country – and rightly so.



Locks and Dams - 150 Nautical Mile Radius

In addition to nuclear power generation facilities, plants that produce fission materials for commercial nuclear power production must be protected as well. Two of these plants are located just south of Springfield, Illinois on the Ohio River. Specifically, there is a Uranium Hexafluoride Production facility located in Metropolis, Illinois and a Gaseous Diffusion Enrichment facility located just across the river in Paducah, Kentucky (see chart below).

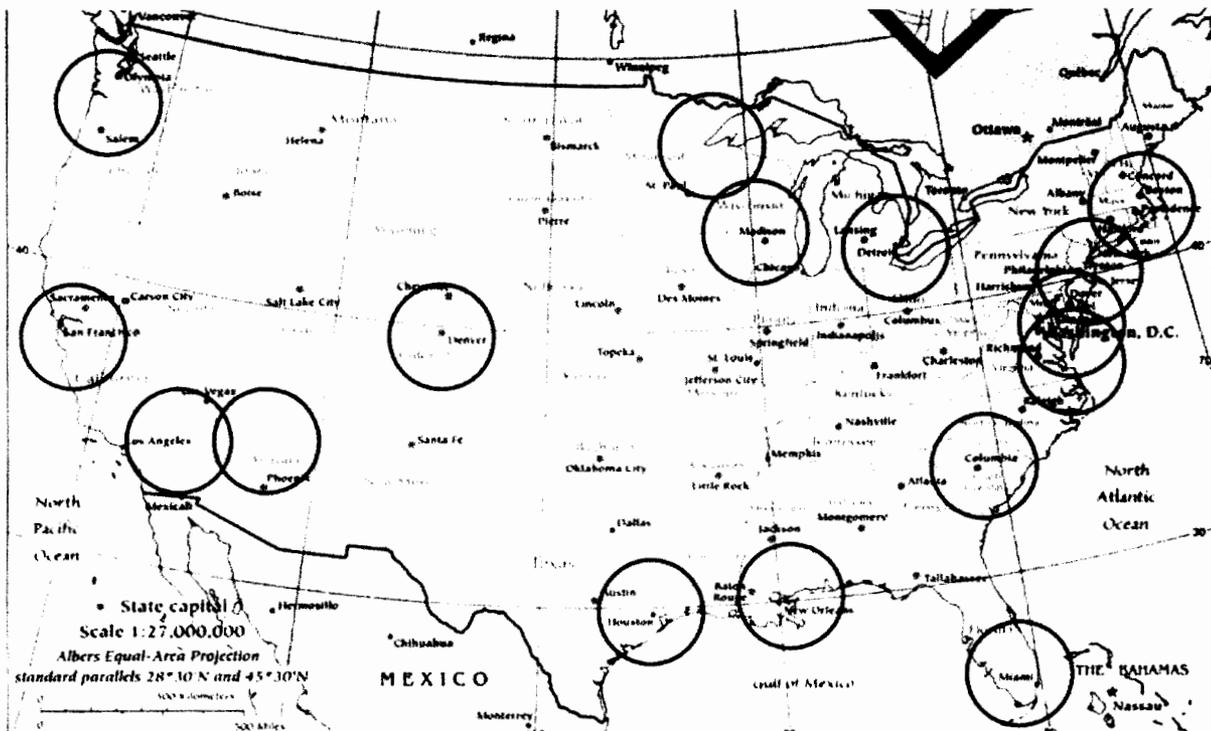
Major U.S. Fuel Cycle Facilities



Note: There are no fuel cycle facilities in Alaska or Hawaii.

The Uranium Hexafluoride Production (Conversion) Facility (run by Honeywell International, Inc.) in Metropolis, IL is the only facility of its kind in the United States. Similarly, the Paducah facility is the only operational Gaseous Diffusion Enrichment Plant in the United States. These two plants produce all of the raw fission materials for commercial nuclear energy in this country and they need protection available at all times. Fighter coverage needs to be located near these facilities for continued homeland security protection. This function cannot be effectively accomplished without the 183 FW at Capital ANGB.

The Air Force has designated 16 Air Sovereignty Areas (ASA) in the United States. A map depicting the ASA locations follow (shown with rings around them depicting the 150 NM coverage areas around the base that can be arrived at within 20 minutes of a call):



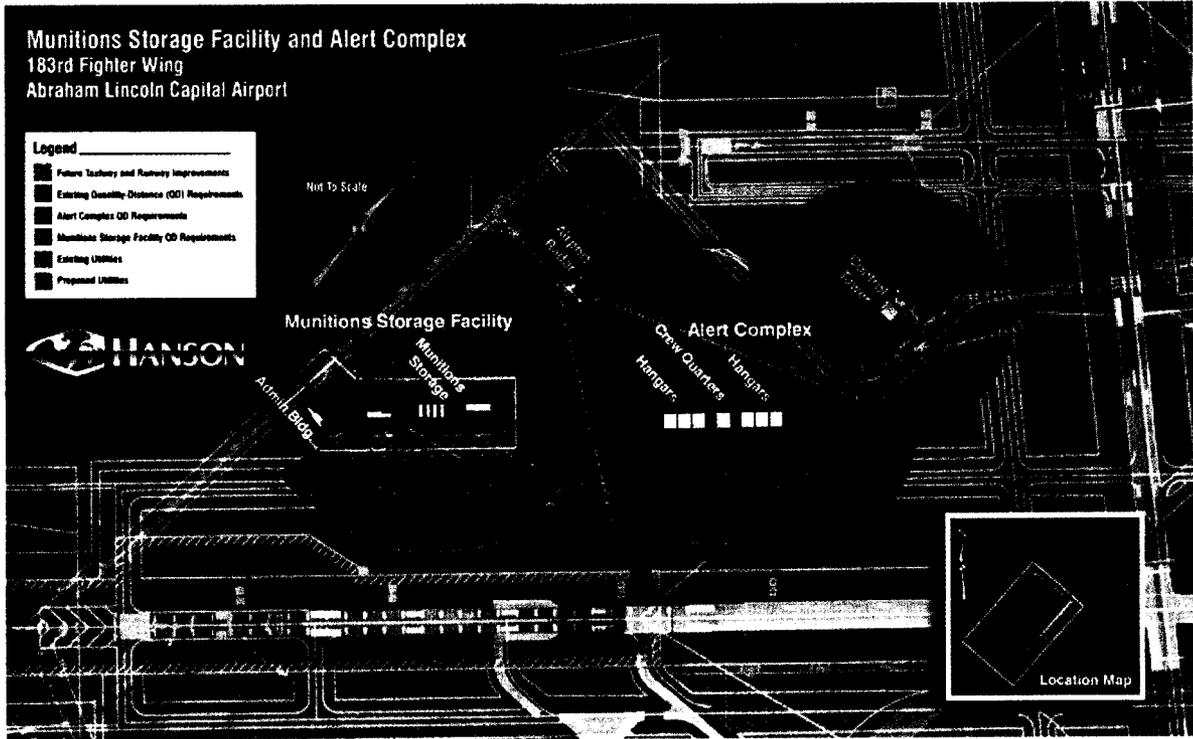
The 16 ASA sites are as follows:

- 1) Portland, Oregon (142 FW; F-15 AD)
- 2) Otis, Massachusetts (102 FW; F-15 AD)
- 3) Homestead, Florida (Jacksonville; 125 FW; F-15 AD)
- 4) New Orleans, Louisiana (159 FW; F-15)
- 5) Fresno, California (144 FW, F-16 AD)
- 6) March ARB, California (Great Falls; 120 FW; F-16)
- 7) Davis Monthan, Arizona (Tucson; 162 FW; F-16)
- 8) Buckley, Colorado (140 Wing; F-16)
- 9) Duluth, Minnesota (148 FW; F-16)
- 10) Madison, Wisconsin (115 FW; F-16)
- 11) Ellington, Texas (147 FW; F-16)
- 12) Selfridge, Michigan (127 Wing; F-16)
- 13) Atlantic City, New Jersey (177 FW; F-16)
- 14) Andrews AFB, Maryland (113 Wing; F-16)
- 15) Shaw AFB, South Carolina (158 FW; F-16)
- 16) Langley AFB, Virginia (119 FW; F-16)

As shown on the map above the lower Midwest is left exposed from a homeland security perspective which is unacceptable given the exposed population and critical infrastructure described above.

Due to the great risk and the fact that there is no nearby fighter protection, the State of Illinois and local communities are committed to providing the necessary funding to keep the 183 FW in Springfield and expand its homeland security capability. The State and the local community believe so strongly that Illinois and the Midwest will be at a greater homeland security risk without the 183 FW, that they have developed a plan to fund and construct (via a combination of state and local funds) a munitions storage facility and alert pad to facilitate the air sovereignty alert missions from Capital ANGB.

Depicted below are plans that the state of Illinois and the Abraham Lincoln Capital Airport Authority have developed to provide munitions storage, and alert complex facilities for the 183 FW. These plans were developed after the completion of a feasibility study that determined that this project could go forward at Capital Airport.



The goals of this BRAC round are unlike any previous rounds. Because of what happened on September 11th, the Commission can no longer look only beyond our nation's borders for potential threats. We must consider what can happen here at home – and be prepared. Keeping the 183 FW in Springfield prepares Illinois and the surrounding area for those domestic threats.

Leo Clark

183rd FW Capital
217 - 757 - 1219

msg 8/2

Col Michael Meyer

Michael.meyer@ilspri.ang.af.mil

Tim MacGregor visit here 22 JUL
20 ~~18~~ SUN

Tim Abrell

Blot 50+ wide mouth Lighting AT pods
No sch date 2010-2012
No concrete emergency missions -
Problem w/ FAA on Predator

9801
982

Tankers @ Scott 1 1/2
Hercs @ Peoria 1.25

monthly "rehearsal"

MCI ① MCI set up for AD F-22 operation
AS over Urban better for midwest F-35
② Base is for combat capability
Ramp Space : Why for 48 a/cft.

Have skill and cap for CIRF
good loc transport area

170 FT / trad
50% FT

Buc

* Plans to move people X-country in workable

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MILITARY VALUE

The Department of Defense has significantly deviated from the Congressionally approved BRAC criteria for military value. According to a Department of Defense (DoD) memo from the Under Secretary of Defense (AT&L), priority consideration is to be given to the Military Value Criteria (including criterion 1 on current and future mission capabilities, criterion 2 on the availability and condition of land, facilities, and associated air space, criterion 3 on surge capabilities, and criterion 4 on the cost of operations and manpower implications).

The Air Force took these four (4) criteria and applied weighted factors in order to determine priorities for each of the bases in eight mission areas. A summary of the Air Force's detail, weighted, Fighter MCI data is shown in the following table for the 183 FW (Capital ANGB), 181 FW (Hulman ANGB) and 122 FW (Ft Wayne ANGB):

Title	Max Wt	183 FW	181 FW	122 FW
Ramp area and serviceability	2.97	0	0	.74
Runway dimensions and serviceability	2.28	2.28	2.28	2.28
Attainment/Emissions Budget Growth Allowance	1.68	1.68	.91	1.01
Access to adequate supersonic airspace	6.72	0	0	0
Buildable acres for industrial operations growth	1.96	.15	0	.03
Buildable acres for air operations growth	1.96	.04	0	0
Level of mission encroachment	2.28	2.28	2.26	2.23
Fuel dispensing rate to support mobility and surge	2.64	.46	.24	.22
Hangar capability – small aircraft	3.88	1.46	1.94	1.78
Sufficient explosive-sited parking	3.65	2.41	2.41	0
Sufficient munitions storage	4.79	0	0	0
Installation pavements quality	2.97	1.48	1.48	2.23
Ability to support large-scale mobility deployment	1.76	.44	.44	.44
ATC restrictions to operations	5.98	5.98	5.98	5.98
Proximity to airspace supporting mission (ASM)	22.08	2.90	4.41	3.52
Proximity to low level routes supporting mission	7.25	1.09	1.39	1.10
Area cost factor	1.25	.39	.86	.86
Range complex (RC) supports mission	11.95	6.35	6.62	6.48
Utilities cost rating (U3C)	.13	.07	.09	.08
Suitable auxiliary airfields within 50NM	5.18	3.88	2.59	2.59
Prevailing installation weather conditions	5.52	3.86	2.43	1.88
BAH rate	.88	.72	.86	.79
GS locality pay rate	.25	.25	.25	.25
Total MCI	100.01	38.17	37.44	34.49

The above scores show that there are only two areas which the 122 FW scored higher than the 183 FW or 181 FW. Even in this one area, ramp area and serviceability, the Air Force's data shows that the 183 FW can accommodate up to 48 aircraft on its ramp while the 122 FW can only accommodate 42 (reference 24 Aug 04, ANG/XP Overview Briefing). Overall, the 183 FW scores higher in Fighter MCI than the other two locations.

On the subject of Mission Capable (MC) Rates, the 183 FW has out performed 5 out of 6 units (which they are compared to) for the reporting period of 1 Oct 01 to 31 March 05. The 6 units are: 115 FW Madison, WI; 122 FW Ft Wayne, IN; 127 FW Selfridge, MI; 132 FW Des Moines, IA; 180 FW Toledo, OH and 181 FW Terre Haute, IN. The 183 FW was above the Big Inlet average MC rate 83% of the time. The following is a table of some statistics on the bases involved:

Unit	183 FW Capital	181 FW Hulman	122 FW Ft Wayne
A/C; Block; Engine; Inlet	F-16; Blk 30 GE-100; Big Inlet	F-16; Blk 30 GE-100; Small Inlet	F-16; Blk 25 PW-220
# A/C	17	19	17
Average Hours ¹	4285	4139	4379
Average MC Rate ²	75.20%	71.46%	70.38%
Average TNMCM ³	21.34%	25.63%	25.85%

¹as of 17 Feb 05

²Mission Capable (MC). Higher is better

³Total Not Mission Capable for Maintenance (TNMCM). Lower is better

The Department of Defense report states, "Capital (115) and Hulman (119) were both ranked low in military value by the fighter MCI. Although somewhat lower (130) the ANG recommended Fort Wayne be retained because of its record of recruiting and its proximity to Hulman--allowing the experienced airmen there to remain available to the Indiana ANG. This recommendation also helps align common versions of the F-16." By choosing to move the F-16s from Capital and Hulman to Ft Wayne, DoD disregarded the military value rating for these bases, and therefore deviated from the Congressionally approved BRAC criteria and their own policy memorandums. In addition, although the 181 FW and 122 FW are both in the same state, the 181 FW is actually closer to the 183 FW than it is to the 122 FW. In reality, Springfield, Illinois is 112 Nautical Miles from Terre Haute, while Ft Wayne is 133.3 Nautical Miles from Terre Haute.

The Air Force's apparent goal is to increase F-16 squadron size from 15 to 24 aircraft through this realignment. The Air Force contends that 24 aircraft are needed to meet deployment requirements and continue training for active duty units. However, as stated by Major General Heckman, "In the Guard and reserves, it's a little bit different. They don't have the ongoing mission qualification training that we have coming into as a constant drumbeat in an active duty unit. They have very experienced crews, and therefore you can accommodate an 18-UE squadron." This same principal is expressed in the "Expeditionary Air Force Principals White Paper", 18 PAA is the optimal size for stand alone reserve installations. The 183 FW has 17 aircraft. One additional aircraft would bring this unit to 18 PAA. Accordingly, it makes sense to add the three additional aircraft at Capital ANGB to bring it up to optimal size than to stand up a 24 PAA unit at a lower value installation. This question becomes even more critical considering the move from Capital ANGB to Ft Wayne ANGB will actually cost, not save, money in the long term (See Cost of Realignment discussion).

Finally, the scoring for criteria 2 is strongly biased towards active duty bases with large infrastructure (e.g., longer runways, large ramp space, more acreage, etc.) which calls into question whether the Air Force and DoD were actually looking at ways to reduce infrastructure cost, a stated major premise for BRAC. Air National Guard bases can operate and perform their missions with less infrastructure and cost. In addition, the Air National Guard operators and maintainers are more experienced than their active duty equivalents. The BRAC recommendation on Air National Guard bases appears to be a way for DoD to eliminate units without dealing with the politics involved with individual states.

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RECRUITING

The strength of recruiting at Capital ANGB has, and continues to be, exceptional. The State of Illinois provides benefits to its Guard members that exceed any state in the union, which includes educational opportunities, employment preference, and increased benefits for military families. These benefits have allowed the 183 FW to consistently maintain staffing levels above 100% of authorized positions. The 183 FW maintains a highly educated force with over 72% of its members holding a minimum of a two-year college degree. Of the **critically coded** positions, the 183 FW is over 100% manned, with 776 positions filled out of 774 authorized. **Until May 2004, the 183 FW was manned overall at, or above, 100%.** Starting in June 2004, the 183^d Fighter Wing fell below 100% for the first time (99.89% - due to the temporary loss of a recruiter on medical leave). The recruiting rate remained below 100% through the month of April 2005 with the lowest rate occurring in December 2004 at a negligible 99.28%. During May 2005, the Wing once again achieved 100% manning. It is noteworthy that the National Guard Bureau rated Springfield "green" (the best category) for recruiting. Here is a table of the recruiting rates solely for the 183 FW for the period from FY99 to the present. The numbers for the State HQ and the 217th Engineering Installation Squadron are excluded. The use of only the figures from the 183d Fighter Wing better reflects the unit's ability to support the aviation mission. The 217EIS is a GSU and in a separate command. In addition, under the BRAC proposal both the State HQ and 217EIS remain at Capital ANGB. Finally, State HQ solely controls its own manning; the Wing does not recruit for the State HQ positions.

	Authorized	Assigned	Percent Manned
FY99			
October	973	1022	105.03%
November	973	1009	103.69%
December	974	1016	104.31%
January	974	1006	103.28%
February	974	991	101.74%
March	974	987	101.33%
April	976	984	100.81%
May	976	983	100.71%
June	976	993	101.74%
July	970	998	102.88%
August	970	1004	103.50%
September	970	999	102.98%
FY00			
October	971	998	102.78%
November	971	995	102.47%
December	971	995	102.47%
January	972	988	101.64%
February	972	989	101.74%
March	972	991	101.95%
April	972	989	101.74%
May	972	998	102.67%
June	972	996	102.46%

July	972	1001	102.98%
August	972	1017	104.62%
September	975	1025	105.12%
FY01			
October	975	1015	104.10%
November	972	1018	104.73%
December	972	1020	104.93%
January	972	1018	104.73%
February	972	1029	105.86%
March	972	1035	106.48%
April	972	1034	106.37%
May	972	1042	107.20%
June	972	1049	107.92%
July	972	1050	108.02%
August	970	1047	107.93%
September	970	1041	107.31%
FY02			
October	983	1042	106.00%
November	983	1041	105.90%
December	983	1044	106.20%
January	983	1043	106.10%
February	983	1038	105.59%
March	983	1036	105.39%
April	983	1040	105.79%
May	984	1044	106.09%
June	984	1040	105.69%
July	984	1032	104.87%
August	984	1036	105.28%
September	984	1045	106.19%
FY03			
October	978	1034	105.72%
November	978	1027	105.01%
December	978	1019	104.19%
January	978	1022	104.49%
February	978	1015	103.78%
March	978	1018	104.08%
April	978	1019	104.19%
May	978	1019	104.19%
June	983	1017	103.45%
July	983	1014	103.15%
August	983	1014	103.15%
September	983	1012	102.95%
FY04			
October	981	1006	102.54%
November	981	1008	102.75%
December	981	1007	102.65%
January	981	1005	102.44%
February	981	1003	102.24%
March	981	998	101.73%
April	981	994	101.32%
May	981	987	100.61%

June	981	980	99.89%
July	981	977	99.59%
August	981	968	98.67%
September	981	966	98.47%
FY05			
October	969	964	99.48%
November	969	963	99.38%
December	969	962	99.28%
January	969	965	99.59%
February	969	966	99.69%
March	969	967	99.79%
April	969	965	99.59%
May	969	969	100.00%
June	969	967	99.79%
July	969	966	99.69%
August	969	N/A	N/A
September	969	N/A	N/A

Also questionable is the reliance by the DoD recommendations on recruiting as a defining tool in determining which unit would grow and which would realign. Of the recommendations levied against the F-16 units, six (6) units that grow to 18/24 PAA wings are shown as “red” (the worst category) for recruiting statistics provided by the National Guard Bureau. These wings are the 113 FW (Andrews AFB, MD), the 144 FW (Fresno, CA), the 149 FW (San Antonio, TX), the 158 FW (Burlington, VT), the 169 FW (McEntire, South Carolina), and the 187 FW (Montgomery, AL). The 183 FW is “green” and continues to be strong in recruiting future personnel. The DoD recommendations mistakenly made an issue of recruiting as a determining factor in the realignment of Springfield’s F-16 aircraft to Ft. Wayne. This rationale was not applied consistently throughout the recommendations. The chart below compares published scores and recruiting status.

Number	Designator	Location	State	Mil	Ftr MCI	C2ISR	UAV	SPACE	ACTION	State Recruiting
				Value		MCI	MCI	OPS MCI		Status*
1	114th FW	Sioux Falls	S. Dakota	112	38.59	60.23	62.15	36.26	18 PAA	GREEN
2	115th FW	Madison	Wisconsin	122	37.22	53.83	54.40	35.14	18 PAA	GREEN
3	122nd FW	Ft. Wayne	Indiana	130	34.49	57.57	54.87	35.89	24 PAA	GREEN
4	127th FW	Selfridge	Michigan	70	48.07	63.74	62.07	21.35	A-10s	GREEN
5	132nd FW	Des Moines	Iowa	137	32.35	58.26	59.73	33.18	18 PAA	GREEN
6	138th FW	Tulsa	Oklahoma	114	38.41	61.51	57.50	13.34	24 PAA	GREEN
7	140th FW	Buckley	Colorado	64	49.82	68.94	71.28	84.96	18 PAA	GREEN
8	148th FW	Duluth	Minnesota	136	32.55	44.87	55.85	37.02	LOSE	GREEN
9	150th FW	Kirtland AFB	New Mexico	16	66.44	79.11	79.62	82.93	18 PAA	GREEN
10	162nd FW	Tucson	Arizona	N/A	49.54	70.37	63.14	38.33	N/C	GREEN
11	178th FW	Springfield	Ohio	128	35.37	46.86	48.50	34.48	LOSE	GREEN
12	180th FW	Toledo	Ohio	123	36.85	57.76	56.55	36.29	24 PAA	GREEN
13	181st FW	Terre Haute	Indiana	119	37.45	55.94	59.10	35.22	LOSE	GREEN
14	183rd FW	Springfield	Illinois	128	35.37	46.86	48.50	34.48	LOSE	GREEN
15	192nd FW	Richmond	Virginia	49	55.34	51.81	68.08	13.74	F-22	GREEN
16	113th FW	Andrews AFB	Maryland	21	64.83	74.60	75.80	53.96	24 PAA	RED
17	120th FW	Great Falls	Montana	117	37.85	60.79	57.35	36.64	LOSE	RED
18	144th FW	Fresno	California	87	43.09	51.51	66.19	35.00	18 PAA	RED

19	147th FW	Ellington Fld	Texas	80	45.39	62.34	68.78	19.75	LOSE	RED
20	149th FW	Kelly Fld	Texas	47	55.79	67.20	63.72	37.23	24 PAA	RED
21	158th FW	Burlington	Vermont	N/A	40.79	46.63	58.94	35.14	18 PAA	RED
22	169th FW	McEntire	S. Carolina	48	55.74	56.98	75.68	45.31	24 PAA	RED
23	187th FW	Montgomery	Alabama	60	50.66	46.99	65.21	36.54	18 PAA	RED
24	119th FW	Fargo	N. Dakota	125	36.11	54.39	56.74	38.37	LOSE	YELLOW
25	174th FW	Syracuse	New York	N/A	42.03	43.80	53.74	55.93	LOSE/UAV	YELLOW
26	177th FW	Atlantic City	New Jersey	61	50.22	41.04	67.55	55.53	F-15s	YELLOW
27	188th FW	Ft. Smith	Arkansas	110	38.63	58.75	66.40	77.76	LOSE	YELLOW

Source: NGB, Loss Data Through April 05

The loss of the fighter mission at the 183 FW will negatively impact recruiting and hurt the overall force structure of the unit. This impact will not be unique to Springfield but will take place at all Guard units that are losing their aircraft. The meager to nonexistent cost savings generated by the Air Force does not warrant the damage that will be done to the reserve components if the recommendations are followed.

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TRAINING AREAS AND RANGES

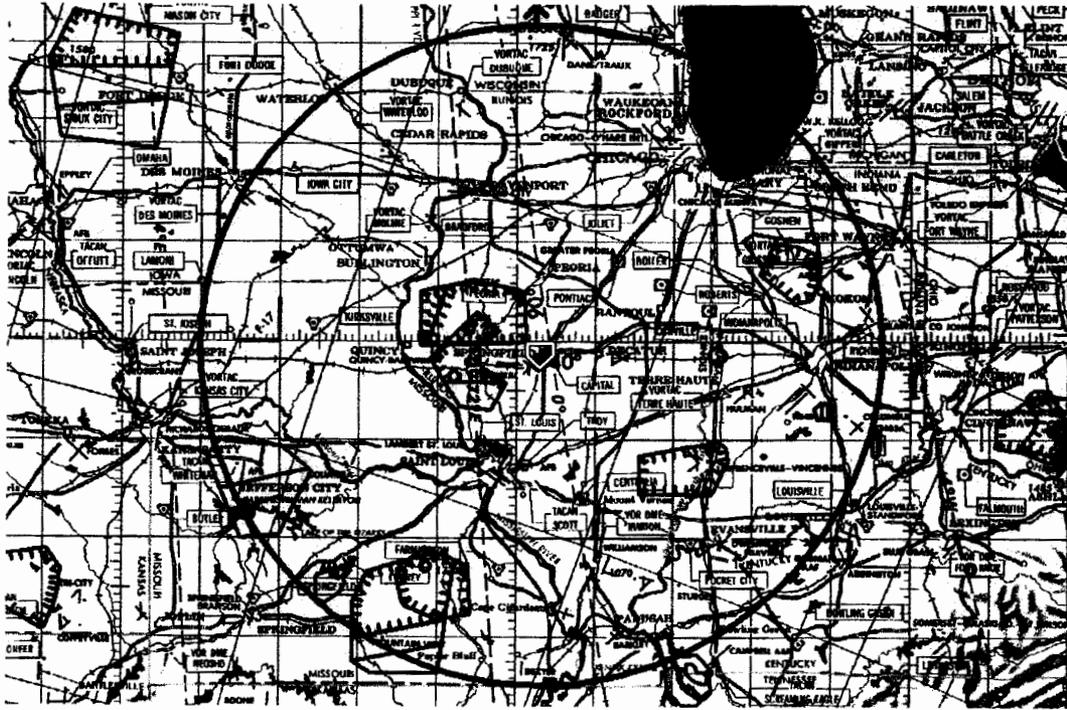
The 183 FW's central location in the Midwest allows for access to exceptional training opportunities within a short distance from the base. The 183 FW is located near eleven (11) Military Operating Areas (MOAs), seven (7) air-to-ground ranges, and twenty (20) low-level training routes that are routinely used. This capability allows for low and high-level training, air interdiction, air-to-ground exercises, combat search and rescue, and counter air operations. These training areas are located north, south, east, and west of Springfield, greatly reducing the number of training sorties missed due to weather. Further, the 183 FW is located within an area of ample tanker support and dissimilar fighter units – thereby increasing training effectiveness.

The 183 FW has access to seven (7) MOAs within 150 miles. This allows the unit to perform low and high-level training, air interdiction, air to ground, Combat Search and Rescue and counter air. There are four additional MOAs within an additional 100 miles out that the unit can get to within 15 minutes of flight time. The following table lists the MOAs and ranges routinely utilized by the 183 FW:

MOA	Distance from 183 FW Capital ANGB	Capability
Howard	12 NM (2 Min)	Subsonic; Primary airspace
Pruitt	25 NM (4 Min)	Subsonic; Primary low altitude
Lindbergh/Salem	135 NM (19 Min)	Subsonic; Primary Large Force Exercise
Red Hills	82 NM (11 Min)	Subsonic; Backup to Howard
Volk Airspace	225 NM (30 Min)	Subsonic; Primary Air Combat Maneuver Instrumentation range
Crypt	255 NM (34 Min)	Subsonic; Ground Control Intercept
Truman	152 NM (20 Min)	Subsonic; CAS, DACT & BDFM
Hilltop/12 Mile	135 NM (18 Min)	Subsonic
Minnow	225 NM (30 Min)	Supersonic
Ranges		
Cannon	175 NM (23 Min)	Subsonic
Atterbury	170 NM (22 Min)	Subsonic
Jefferson	205 NM (27 Min)	Subsonic
Hardwood	260 NM (34 Min)	Subsonic
Fort Campbell	215 NM (28 Min)	Subsonic
Fort McCoy	250 NM (33 Min)	Subsonic

The central location of the 183 FW can easily support any mission in the region whether it is federal, state or homeland security. The maps below identify the MOAs/ranges within 200 nautical miles (NM) of Capital ANGB, Springfield, Illinois:

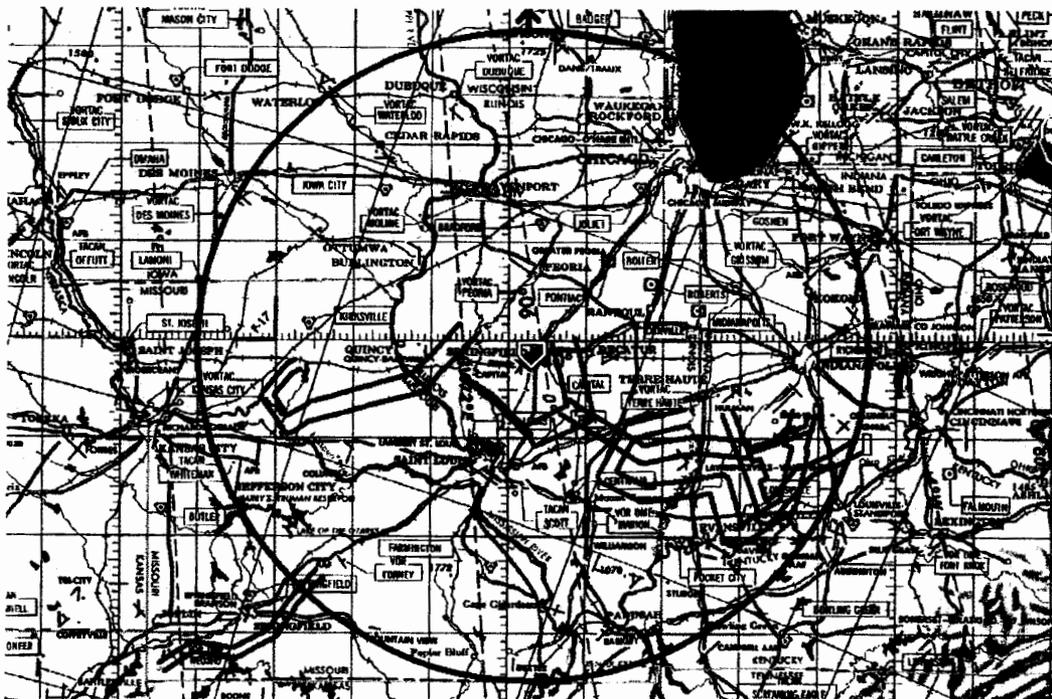
183FW LOCAL FLYING AREA



200 NM RANGE RING

Also depicted on the map below are the Military Training Routes (MTRs) that our wing can use to support our training requirements. These MTRs are easily accessible and readily available to the 170th Fighter Squadron to realistically train our pilots for their wartime taskings.

183FW MILITARY TRAINING ROUTES

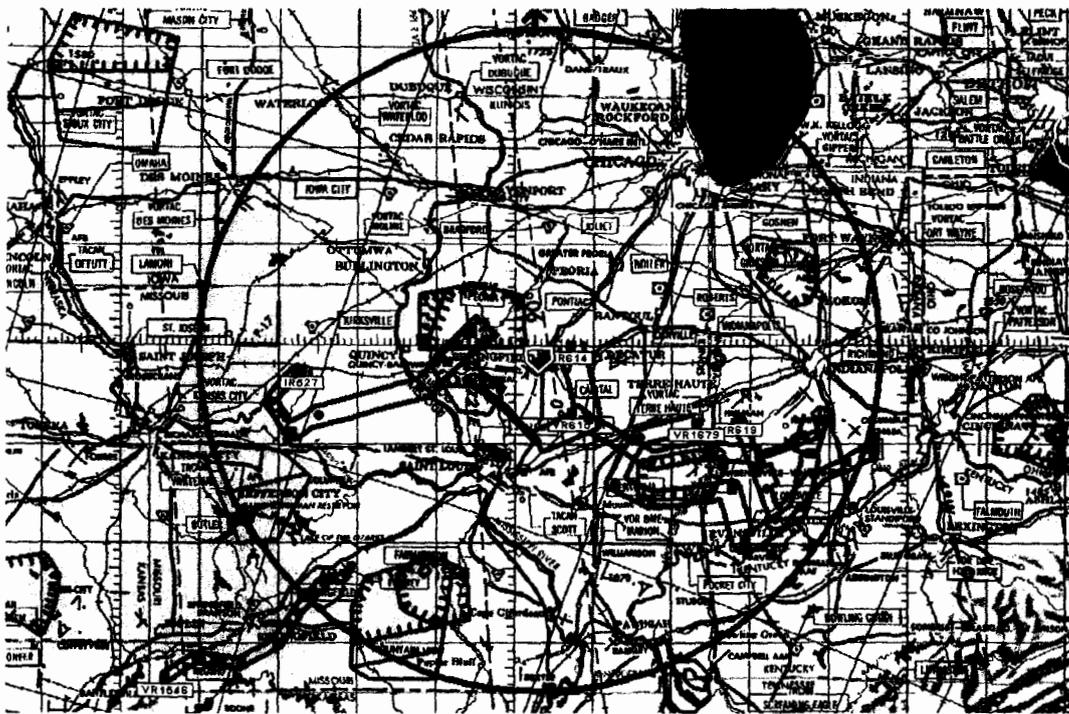


When coupled together, the eleven MOAs and twenty Military Training Routes allow for our pilots to have both creativity and flexibility in their Mission Planning sessions and execution of the training mission. This is an invaluable opportunity for our combat pilots. The availability of the numerous ranges and low-level routes allows our pilots to build skills for combat, adjust for home station weather situations, and not become set in a routine scheduling practice of going to same range everyday.

The ranges that we use on a routine basis are all Day/Night ranges with laser certifications. They also have electronic emitters to intensify the situation for the pilot to comprehend and to react to and this allows for the pilot to “hone his/her skills” before being in an actual combat situation. At several of the ranges and MOAs, our pilots routinely practice with with both ARMY and Air Force Forward Air Controllers (FACs). This inter-service, inter-functional training allows our pilots to prepare for the missions that are generally used in the Southwest Asia Theater of Operations in support of ground troops and air support.

When viewed together, the ranges and MTRs available for use by the 183 FW give us the flexibility we need to “train as we fight” and to provide tangible results to the command staff during wartime. The numerous ranges and routes allow for our wing to be flexible and adjust for weather situations in Central Illinois. The MCI score on *Prevailing Installation Weather Conditions* serves witness to our flexibility in dealing with weather as the 183 FW garnered 69.92% of the available points in this measurement (3.86 out of 5.52 available points). In addition, our wing also can use the Hardwood Range Complex at Volk Field if weather dictates since it is only 225NM north of Capital ANGB. As you can see from the map below, our location at Capital ANGB allows our wing many options to accomplish our training mission.

183FW RANGES, MOAs and MTRs



200 NM RANGE RING

As you can see, the availability of numerous military ranges, military operating areas and low-level routes gives the 183 FW the flexibility and creativity it needs to conduct training missions of various kinds and to deal with changing weather conditions. (Note: Capital ANGB scored well above most other nearby fighter installations in the Midwest in the “prevailing installation weather conditions” category of the Fighter MCI, being awarded 3.86 out of a total of 5.52 points.)

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(Abraham Lincoln Capital Airport)

FINANCIAL IMPACT OF REALIGNMENT

In scenario S128C2, the Air Force claims that it will cost \$19.9 million to implement the realignment of aircraft from Capital ANGB and Hulman ANGB to Ft Wayne ANGB and to establish a CIRF (Consolidated Intermediate Repair Facility) for F110 engine maintenance in Capital ANGB. The projected net cost/savings during the implementation is a cost of \$13.3 million. The annual recurring savings is only \$2.0 million with a payback (return on investment) expected in 13 years.

The cost analysis is misleading to the detriment of Capital ANGB. According to the Infrastructure Executive Committee Council meeting minutes dated 23 Feb 05, the Air Force stated (p. 148) that the cost to close the 183 FW is \$9.917 million with a net cost/savings of \$9.898 million in 2011. The payback (return on investment) is listed as "never".

The Minutes of the Air Force Base Closure Executive Group Meeting (Candidate USAF-0111Vs/S128.1c1, Realign Capital Airport) held on 31 March 2005 documented that the One Time Cost of the realignment was \$15.0M with a Payback Period of 26 years. The Annual Recurring Savings was documented as only \$1.0M (Note: The 31 March 05 analysis includes the creation of the CIRF mission which accounts for all the savings). The minutes went on to state that the Return on Investment (ROI) was a *negative* 0.21%. No scenario run by the Air Force indicates that realigning the fighter mission out of Capital ANGB makes any financial sense.

Listed below is a table tracking the Air Force's scenarios on Capital ANGB as it is reported in AF Base Closure Executive Group (BCEG) minutes:

Date	Action	Scenario Number	Description	One time cost	Net (cost)/savings	Annual recurring savings	ROI ¹	NPV ²
19 Jan 05	Close	S102	183 FW ³ A/C to 132 FW ⁴				100+ years	
3 Feb 05	Close	S128	183 FW A/C to 122 FW ⁵	\$10M	\$(10M)	\$(.1M)	Never	\$(10M)
3 Feb 05	Close	S139	181 FW ⁶ A/C to 122 FW	\$6M	\$.2M	\$1M	5 years	\$10M
31 Mar 05	Realign	S128C1	183 FW A/C to 122 FW; CIRF	\$15M	\$12M	\$1M	26 years	\$3M
28 Apr 05	Realign	S128C2	Combine S128/S139	\$20M	\$13M	\$2M	13 years	\$6.3M

¹ Return on Investment

² Net Present Value

³ Capital ANGB

⁴ Des Moines ANGB

⁵ Fort Wayne ANGB

⁶ Hulman ANGB

The Air Force has combined three realignments into one to devise some type of cost savings - \$2.0 million a year over 13 years to justify the proposed realignment since moving the fighter mission out of Capital ANGB makes no sense on its own. Without including Hulman ANGB and the addition of the CIRF mission in the Capital ANGB realignment to Ft Wayne ANGB, there would be **no savings at all** and the Air Force would have no justification for their recommendation. (Note: the June 2005 GAO report on BRAC noted that the Air Force often inappropriately merged recommendations to make them appear to have a shorter, more acceptable, payback period - see page 111 of Appendix V).

Additional concerns with the Air Force's proposal are found written in the Air Force's report dated 19 Jan 05, noting that Ft Wayne's cost of living is higher than Springfield's. This does not support moving aircraft to Ft Wayne ANGB and expanding operations at that location. As an example, the cost of the Wage Grade (WG) employee is higher in Ft. Wayne than Springfield, IL. The tables from Office of Personnel Management show the following:

Illinois - (046 Central IL table)

WG 10/step 5 = \$22.96/hr

WG 12/step 5 - \$25.33/hr

Indiana (049 Ft Wayne-Marion table)

WG10/step 5 = \$24.18/hr

WG12/step 5 = \$25.73/hr

With this hourly wage difference, it would cost approximately an additional \$2,537 dollars per year (based on 2,080 hours) to employ each WG10/Step 5 employee at the 122d Fighter Wing than at the 183d Fighter Wing. The majority of the Crew Chiefs and Aircraft Maintenance personnel fall into the WG category of work.

The lack of cost savings resulting from the realignment of Capital ANGB would have been obvious to the Air Force if it had complied with its statutory obligations. The BRAC statute in Sec. 2903(C)(3)(A) states that, "the Secretary shall consider all military installations equally...." It is the clear intent of the statute that every base is to be treated equally. This was not the case with Capital ANGB. No scenario was ever run by the Air Force keeping the fighter mission at Capital ANGB. **By not doing so, the Air Force violated both the language and the spirit of the BRAC statute.** If such a scenario was run it would show that it would be much more cost effective to move the F-16s at Hulman ANGB to Capital ANGB. By doing so you would avoid the \$10M cost of moving the 183 FW aircraft to the 122 FW and still capture the \$10M savings from realigning the fighter mission out of Hulman ANGB. Further savings would be achieved according to Air Force figures, by establishing a CIRF mission at Capital ANGB given its central location. This would not only result in real savings but also achieve the goal of aligning similar Block 30 versions of the F-16.

Instead of justifying the Capital ANGB realignment based upon acceptable military value or cost considerations, the Air Force merely made up a reason to hide the fact that the realignment makes neither military nor financial sense. The Air Force BRAC meeting minutes indicate that at first the Air Force was going to make Ft Wayne ANGB an ASA site to justify the consolidation. This reasoning was later dropped because facilities at Ft Wayne ANGB are not suitable for this mission. The Air Force then had to search for another reason, eventually settling on Ft Wayne's recruiting advantage which is totally unfounded as noted in the recruiting discussion. In sum, the Air Force's proposed realignment of Capital ANGB makes neither military nor financial sense and it must be rejected by the BRAC Commission.

BRAC 2005
183d Fighter Wing
Capital ANGB, Springfield, Illinois
(Abraham Lincoln Capital Airport)

ECONOMIC AND ENVIRONMENTAL IMPACTS

The Air Force has drastically underestimated the economic impact of moving the 183 FW from Springfield and has overlooked potentially damaging environmental restrictions posed by moving the mission to Ft. Wayne. These issues include:

Economic

A. Job Loss Figures.

Employment figures in the Air Force BRAC submittal indicate 163 total positions will be lost at Springfield as a result of the realignment. This figure is extremely low and does not include the 450 plus part time positions that will leave with the aircraft. Figures developed by the 183 FW indicate that 185 full time and 452 part time positions will be lost as a result of the realignment. Accordingly, an accurate job loss figure is over 600 full and part time positions. This does not include the hundreds of tangential job losses associated with the realignment of the unit such as the loss of business opportunities, local marketing power, and tourism income. The Air Force is clearly minimizing the perceived economic and job loss impact of the realignment.

B. Economic Impact.

The loss of the Capital Airport firefighting unit to Madison, Wisconsin will cost Capital Airport between \$500,000 and \$600,000 per year. This cost is significant given that the Airport's operating budget is only approximately \$3.5 million per year. This impact is even more significant considering that there are no savings associated with moving the fighters out of Springfield (see Cost of Realignment discussion). Accordingly, both Springfield and the federal government's coffers are negatively impacted from this move. Further, the Air Force has not answered the question of how it plans to bring deployed aircraft to the Capital ANGB enclave when there is no fire fighting services at the airport.

Environmental

A. Air Quality Issues.

Springfield, Illinois is not burdened by any air quality issues. The Indiana county of Allen, where Ft. Wayne is located, however, is classified as a non-attainment area for eight-hour ozone standards. These air quality restrictions will come into play should the Air National Guard choose to grow and expand at Ft. Wayne.

B. Aircraft Noise Issues.

Ft. Wayne is also encumbered, according to Air Force briefings, by excessive aircraft noise issues that are not present at Springfield. Some 1,667 off base acres included within Ft. Wayne's Air Installation Compatible Use Zone (AICUZ) are within the noise contours zoned by the local community. Over 170 of these acres are residentially zoned. The community has not purchased easements for the area surrounding the installation. This will lead to future issues associated with the growth of the fighter mission at Ft. Wayne.

As a result of these environmental concerns, future expansion and mission capability at Ft Wayne ANGB could be compromised. These issues will not be a concern at Capital ANGB. Accordingly, if the BRAC Commission is going to accept the Air Force recommendations, it must address these concerns.

AFSC	AFSC TITLE	AUTH	ASSD	PROJ LOSS	PROJ DEL POS	RECRUITS ID'D
1C3X1	COMMAND POST	6	7	1	0	0
1N0X1	INTEL APPLICATIONS	7	8	2	0	0
1T1X1	AIRCREW LIFE SUPPORT	8	8	0	0	0
1W0X1	WEATHER	4	2	0	0	1
2A0X1	INTEGRATED AVIONICS SYSTEMS (BACKSHOP)	25	22	0	0	1
2A3X2	F16 AVIONICS SYSTEMS	27	27	0	0	0
2A3X3	TACTICAL AIRCRAFT MAINT	69	69	5	0	5
2A6X1	AEROSPACE PROPULSION	30	32	1	0	0
2A6X2	AEROSPACE GROUND EQUIPMENT	14	12	2	0	0
2A6X3	AIRCREW EGRESS SYSTEMS	6	7	0	0	0
2A6X4	AIRCRAFT FUEL SYSTEMS	19	19	0	0	0
2A6X5	AIRCRAFT HYDRAULIC SYSTEMS	6	5	0	0	1
2A6X6	AIRCRAFT ELECT AND ENV SYSTEMS	17	18	1	0	0
2A7X1	AIRCRAFT METALS TECHNOLOGY	6	5	0	0	1
2A7X2	NONDESTRUCTIVE INSPECTION	5	6	0	0	0
2A7X3	AIRCRAFT STRUCTURAL MAINTENANCE	11	13	0	0	0
2A7X4	SURVIVAL EQUIPMENT	3	4	0	0	0
2E1X1	STELLITE WIDE BAND COMM	14	13	1	0	1
2E1X3	GROUND RADIO COMM	21	20	2	0	0
2E2X1	COMM, NETWORK, SWITCHING & CRYPTO SYS	4	4	1	0	1
2E6X2	COMM CABLE SYSTEMS	48	43	1	0	0
2E6X3	TELEPHONE SYSTEMS	4	5	0	0	0
2F0X1	FUELS	16	15	0	0	1
2G0X1	LOGISTICS PLANS	4	3	0	0	1
2R0X1	MAINTENANCE DATA SYSTEMS ANALYSIS	6	4	0	0	0
2R1X1	MAINTENANCE PRODUCTION MANAGEMENT	5	3	0	0	0
2S0X1	SUPPLY MANAGEMENT	40	42	5	1	1
2T0X1	TRAFFIC MANAGEMENT	7	5	0	1	1
2T1X1	VEHICLE OPERATOR DISPATCHER	9	10	1	1	0
2T3X1	SPECIAL PURPOSE VEHICLE AND EQUIP MAINT	8	8	1	0	0
2T3X2	SPECIAL VEHICLE MAINTENANCE	2	3	0	0	0
2W0X1	MUNITIONS SYSTEMS	44	38	0	0	2
2W1X1	AIRCRAFT AMRAMENT SYSTEMS	69	65	8	0	2
3C0X1	COMM COMPUTER SYSTEMS	13	13	1	0	0
3C2X1	COMM COMPUTER SYSTEMS CONTROL	3	5	0	0	0
3E0X1	ELECTRICAL	5	5	0	0	0
3E0X2	ELECTRICAL POWER PRODUCTION	7	9	0	0	0
3E1X1	HEATING, VENTILATION, AC & REFRIDGERATION	6	7	2	0	1
3E2X1	PAVEMENTS & CONST EQUIP	7	8	0	0	0
3E3X1	STRUCTURAL	7	8	1	0	0
3E4X1	UTILITIES SYSTEMS	8	8	0	0	0
3E4X2	LIQUID FUEL SYSTEMS MAINTENANCE	3	3	0	0	0
3E4X3	ENVIRONMENTAL CONTROLS	2	2	0	0	0
3E5X1	ENGINEERING	7	8	1	0	0
3E7X1	FIRE PROTECTION	27	28	0	0	0
3E9X1	READINESS	6	7	1	0	0
3M0X1	SERVICES	19	21	2	0	1
3P0X1	SECURITY FORCES	70	80	1	0	1
4A1X1	MEDICAL MATERIAL	2	2	0	0	0
4H0X1	CARDIOPULMONARY LAB APPRENTICE	1	1	0	0	0
4N0X1	MEDICAL SERVICES	17	16	2	3	0
		774	776	43	6	22

BRAC 2005
183d Fighter Wing
Capital ANGB, Springfield, Illinois
(Abraham Lincoln Capital Airport)

TITLE 10/32 vs. BRAC

The 1995 BRAC deemed that "...these bases (Reserve and Guard) do not readily compete against each other, and as Air Reserve Component units enjoy a special relationship with their respective states and local communities. Under federal law, relocating Guard units across state boundaries is not a practical alternative. In addition, careful consideration must be given to the recruiting needs of these units."

Title 10; Subtitle E; Part V; Chapter 1803; §18238 states the following:

§18238. Army National Guard of United States; Air National Guard of United States: limitation on relocation of 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, the commanding general of the National Guard of the District of Columbia.

Title 32; Chapter 1; §104 states the following:

§104. Units: location; organization; command

- (a) Each State or Territory and Puerto Rico may fix the location of the units and headquarters of its National Guard.
- (b) Except as otherwise specifically provided in this title, the organization of the Army National Guard and the composition of its units shall be the same as those prescribed for the Army, subject, in time of peace, to such general exceptions as the Secretary of the Army may authorize; and the organization of the Air National Guard and the composition of its units shall be the same as those prescribed for the Air Force, subject, in time of peace, to such general exceptions as the Secretary of the Air Force may authorize.
- (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.*

- (d) To maintain appropriate organization and to assist in training and instruction, the President may assign the National Guard to divisions, wings, and other tactical units, and may detail commissioned officers of the National Guard or of the Regular Army or the Regular Air Force, as the case may be, to command those units. However, the commanding officer of a unit organized wholly within a State or Territory, Puerto Rico, or the District of Columbia may not be displaced under this subsection.
- (e) To insure prompt mobilization of the National Guard in time of war or other emergency, the President may, in time of peace, detail a commissioned officer of the Regular to perform the duties of chief of staff for each fully organized division of the Army National Guard, and commissioned officer of the Regular Air Force to perform the duties of the corresponding position for each fully organized wing of the Air National Guard.
- (f) Unless the President consents—
 - (1) An organization of the National Guard whose members have received compensation from the United States as members of the National Guard may not be disbanded; and
 - (2) The actual strength of such an organization in commissioned officers or enlisted members may not be reduced below the minimum strength prescribed by the President.

Governor Blagojevich (Illinois) recently filed suit against Secretary Rumsfeld and the 9 BRAC Commissioners pursuant to 10 U.S.C. §. 18238 as stated above and the following facts:

1. The Illinois National Guard constitutes a portion of the reserve component of the armed forces of the United States.
2. Defendant Rumsfeld has recommended that units of the Illinois Air National Guard be relocated or withdrawn.
3. Plaintiff [Blagojevich] has not consented to withdrawal or relocation of units of the Illinois Air National Guard.
4. Plaintiff [Blagojevich] has informed defendant [Rumsfeld] that he did not consent to withdrawal or relocation of Air National Guard units and stated that:
 - a. The Springfield Air National Guard Base is a highly strategic location for homeland security missions for both Illinois and the entire Midwest. Illinois is also home to 11 nuclear power plants that provide 50 percent of our power generation. Further, Illinois has 28 locks and dams on the Illinois, Mississippi and Ohio rivers. If these recommendations are adopted, these vital assets and many others will be at greater risk without the F-16s in Springfield. On top of all that, this move will cost the taxpayers \$10 million. These are the wrong recommendations, at the wrong time and for the wrong reasons.

Prior to the BRAC announcements, the State of Illinois through Governor Blagojevich went out of its way to consult with the Air Force on Air Guard force structure issues. On December 2, 2004 Governor Blagojevich traveled to Washington, DC to meet with Lieutenant General Daniel James, Director, Air National Guard. The subject of relocating the 183 FW was

never mentioned despite questions about the status of the Wing from the Governor. If the Air Force and the National Guard Bureau were planning to be above board on the subject of including Air National Guard bases in the BRAC process, this topic should, at the very least, have been brought up during this meeting. It was not and no consultation of any kind was ever attempted by the Air Force.

Governor Rendell (Pennsylvania) also recently filed suit against Secretary Rumsfeld pursuant to the "militia clause" of the United States Constitution, art. I, sec. 8, cl. 10 U.S.C. § 18238 and 32 U.S.C. § 104.

This action arises out of the Department of Defense's (the "Department") attempt, unilaterally and without seeking or obtaining the approval of the Governor of the Commonwealth of Pennsylvania, to deactivate the 111th Fighter Wing of the Pennsylvania Air National Guard stationed at naval Air Station Joint Reserve Base, Willow Grove, Pennsylvania (the "111th Fighter Wing"). The Department's attempt to deactivate the 111th Fighter Wing without first obtaining Governor Rendell's approval violates federal law, which expressly grants rights to the Commonwealth of Pennsylvania and its Governor, as commander-in-chief of the Pennsylvania National Guard. While this action arises in the context of the 2005 Base Realignment and Closing process, Plaintiffs do not challenge The Defense Base Closure and Realignment Act of 1990, as amended, codified at 10 U.S.C. § 2687 note (the "BRAC Act") or allege that Secretary Rumsfeld has violated any provision of the BRAC Act. To the extent that Plaintiffs object to the Department's procedure and substantive judgments in the current Base Realignment and Closing process, they have raised those objections in other, appropriate forums. Instead, the gist of the instant action is that the Department of Defense derogated rights granted by Congress to Governor Rendell independent of the BRAC Act.

Based upon the plain wording of the above cited statutes and the admitted failure of the Air Force to consult with State Governors relating to Air Guard force structure issues, these suits are likely to be successful. Accordingly, the BRAC Commission should not adopt proposed realignments, such as the one involving Capital ANGB, where the Air Force failed to follow well established federal law.

BRAC 2005
183d Fighter Wing
Capital ANGB, Springfield, Illinois
(Abraham Lincoln Capital Airport)

THE 183D FIGHTER WING AND THE REPUBLIC OF POLAND

The Illinois Air National Guard and the 183d Fighter Wing, in particular, have developed a unique and deep bond with the Polish Air Force. For over ten years, the Illinois National Guard has worked closely with the Polish military. The 183 FW has worked together with the Polish Air Force since 1994 when members of the Polish Air Force visited the 183d in order to observe F-16 operations. The purpose of that visit was to assist the Polish Air Force in its process of selecting a new fighter aircraft for their air force. The visit was under the auspices the U.S. State Department program, Partnership in Peace, which paired the Republic of Poland with the Illinois National Guard. The joining of Poland and Illinois in a cooperative effort was a logical union due to Chicago, Illinois, possessing the largest concentration of Polish speaking people outside of Warsaw. For many decades the Chicago area has maintained a thriving Polish culture with many expatriates, merchants, schools, churches, community groups, restaurants, and newspapers. These familiar ties between Illinois and Poland have been strong for almost a century.

The relationship between the 183 FW and Polish Air Force matured when the wing deployed to Powidz Air Base, Poland, as part of the exercise Eagle Talon in 1997. The 183 FW was the first Air Guard unit to deploy to an air base under the former Warsaw Pact. The Polish Air Force and the U.S. Embassy in Poland looked to the 183 FW to help the Polish Air Force adopt NATO standards of operations. The 183 FW was prepared to deploy to Poland in the spring of 2002, but post 9/11 taskings caused a cancellation of the proposed exercise. Poland later decided to purchase new F-16 aircraft. The acquisition will serve as a forcing function to help the Polish Air Force transform from a former Warsaw Pact air force to a force employing at NATO standards. The 183 FW has played a vital role in the military-to-military visits that are necessary to assist the Polish Air Force in its transformation to F-16s.

Personnel from the 183 FW have made numerous trips to Poland and Europe to work with Polish and USAF leaders providing them with key information on F-16 facilities, training, and operations. The unit hosted visits by members of the Polish Air Force F-16 Acquisition Team, providing them information on day-to-day operations, deployment processing, and employment at a deployed location. The 183 FW recently deployed to Krzesiny Air Base, Poznan, Poland, to participate with the Polish Air Force in a EUCOM Joint Contact Team Program exercise, Sentry White Falcon 05. The primary objective of the deployment was to assist the Polish Air Force in meeting their NATO Force goals and to provide familiarization to Polish Air Force operations and Maintenance personnel on F-16 operations and maintenance procedures. The 183 FW has developed strong ties with key members of the Polish Air Force and, in particular, the Polish F-16 Implementation Team. The members of the unit take personal pride in being

able to share their knowledge and expertise. Unit members are cognizant of the strong ties between Poland and Illinois, and Because of this, the Polish Air Force is looking to the 183 FW to provide them additional assistance in reaching their goal of employing their F-16s at NATO standards. The Polish Air Force has indicated a desire to send maintenance technicians to the 183 FW for training in the next two years. The Polish Air Force F-16 Implementation Team has already approached the unit for a follow on deployment in the first quarter of FY07. Continued partnership between the Polish Air Force and the 183 FW is essential to the timely achievement of the common U.S., NATO, and Polish goal of the Polish Air Force being able to employ the F-16 to NATO standards in a timely fashion.



ILLINOIS AIR NATIONAL GUARD
HEADQUARTERS 183D FIGHTER WING (ACC)
3101 J DAVID JONES PARKWAY
CAPITAL AIRPORT, SPRINGFIELD ILLINOIS 62707-5001

13 July 2005

MEMORANDUM FOR MEMBERS OF THE 183D FIGHTER WING

FROM: 183FW/CC

SUBJECT: Pride and Duty in the Face of an Uncertain Future

1. After consulting with senior operations, maintenance, and mission support commanders and supervisors, the 183d Fighter Wing has decided that it will be the Lead Unit for the next Aerospace Expeditionary Force (AEF) rotation starting in May 2006. Since the end of our rotation this last January, there has been a lot of discussion on this issue between members of our unit and our AEF partners, the 115FW (WIANG) and the 187FW (ALANG). Prior to the BRAC announcement, we at the 183d were pretty neutral on this issue. Since May we, as individuals and as a unit, have had to do a lot of soul searching and thinking.
2. We now have a strong opinion as to our role in the next Aerospace Expeditionary Force rotation. We feel that it is extremely important that we assume the role of Lead Unit. This may seem illogical with the threat of closure, but it is not. First of all we have the people and talent to do this mission. Secondly, we as a unit need a laser-light point of focus for the next year, especially if the final recommendation is loss of the aviation package. Thirdly, it is a point of unit pride that we accept this role.
3. We have a long and proud heritage in fighters. We could not live with ourselves or look former unit members in the eye if we are not willing, ready, and able to do our job next year. It will not be easy. We will need help from others. It will be a challenge. But it is one in which we will be able excel. With that being said, we are still optimistic for our future. To have a future of two years, five years, or many more, we must now make the commitment that we will do our duty to the fullest of our capabilities until the final day that we are tasked. Col "Sid" Clarke, commander of the 187FW and our AEF partner, recently wrote us on our decision, [there are] "a lot of proud warriors in the ANG and the 183rd is no exception. We support fully [your position]."
4. Being the Lead Unit will give us an opportunity to do our job and exhibit the pride and professionalism that others know we possess. It is now time to lift up our head, roll up our sleeves, and get to work. We have a big job ahead of us.

//SIGNED//
MICHAEL A. MEYER, Col, IL ANG
Commander

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION

ROD BLAGOJEVICH, Governor of the)
State of Illinois,)

Plaintiff,)

-vs-)

No. _____

DONALD RUMSFELD, Secretary of Defense)
of the United States; ANTHONY J. PRINCIPI,)
Chairman of the Defense Base Closure and)
Realignment Commission; JAMES H.)
BILBRAY; PHILLIP E. COYLE; HAROLD W.)
GEHMAN, JR.; JAMES V. HANSEN;)
JAMES T. HILL; LLOYD W. NEWTON;)
SAMUEL K. SKINNER; and SUE ELLEN)
TURNER, members of the Defense Base)
Closure and Realignment Commission,)

Defendants.)

COMPLAINT

Plaintiff, ROD BLAGOJEVICH, Governor of the State of Illinois, by his attorney, Lisa Madigan, Attorney General of the State of Illinois, and for his complaint against defendants, DONALD RUMSFELD, Secretary of Defense of the United States; ANTHONY J. PRINCIPI, Chairman of the Defense Base Closure and Realignment Commission; JAMES H. BILBRAY; PHILLIP E. COYLE; HAROLD W. GEHMAN, JR.; JAMES V. HANSEN; JAMES T. HILL; LLOYD W. NEWTON; SAMUEL K. SKINNER; and SUE ELLEN TURNER, members of the Defense Base Closure and Realignment Commission, states as follows:

1. Plaintiff, Rod Blagojevich, is the Governor of the State of Illinois.
2. Pursuant to the Constitution and laws of the State of Illinois, plaintiff is the Commander and Chief of the military forces of the State of Illinois, except for those persons who are actively in the service of the United States. Illinois Constitution of 1970 art. XII, §4.

3. Defendant Donald Rumsfeld is the Secretary of Defense of the United States.

4. Pursuant to the Defense Base Closure and Realignment Act of 1990, as amended, Secretary Rumsfeld is authorized to make recommendations for the closure and realignment of federal military bases in the United States to the Defense Base Closure and Realignment Commission.

5. Defendant Anthony J. Principi has been named by the President of the United States to be Chairman of the Defense Base Closure and Realignment Commission.

6. Defendants James H. Bilbray; Phillip E. Coyle; Harold W. Gehman, Jr.; James V. Hansen; James T. Hill; Lloyd W. Newton; Samuel K. Skinner; and Sue Ellen Turner have been named by the President of the United States to be members of the Defense Base Closure and Realignment Commission.

7. Pursuant to Sections 2903 and 2914 of the Defense Base Closure and Realignment Act of 1990 as amended, the Defense Base Closure and Realignment Commission is empowered to consider the recommendations of the Secretary of Defense and make recommendations to the President of the United States for the closure and realignment of military bases.

8. Pursuant to Sections 2903 and 2904 of the Defense Base Closure and Realignment Act of 1990 as amended, the Secretary of Defense of the United States shall close the bases recommended for closure by the Commission and realign the bases recommended for realignment, unless the recommendation of the Defense Base Closure and Realignment Commission is rejected by the President of the United States or disapproved by a joint resolution of Congress.

9. The Air National Guard base at the Abraham Lincoln Capital Airport is used for the administering and training of the reserve components of the armed forces.

10. Defendant Rumsfeld has recommended to the Base Closure and Reassignment Commission that the 183rd Fighter Wing be realigned.

11. The 183rd Fighter Wing of the Illinois Air National Guard is presently located at the Abraham Lincoln Capital Airport in Springfield, Illinois.

12. A "wing" is defined by Air Force Instruction 38-101 as a level of command with approximately 1,000-5,000 persons which has a distinct mission with a significant scope and is responsible for monitoring the installation or has several squadrons in more than one dependent group. AFI 38-101 §2.2.6.

13. The 183rd Fighter Wing is composed of Headquarters Staff, the 183rd Operations Group, the 183rd Maintenance Group, the 183rd Medical Group, and the 183rd Mission Support Group.

14. The 183rd Operations Group includes the 170th Fighter Squadron.

15. A "group" is a level of command consisting of approximately 500-2,000 persons usually comprising two or more subordinate units. AFI 38-101 §2.2.7.

16. The Groups which make up the 183rd Fighter Wing are composed of various squadrons and flights.

17. A "squadron" is the "basic unit of the Air Force." AFI-38-101 §2.2.8.

18. A "numbered/named flight" is the lowest level unit in the Air Force. AFI 38-101 §2.2.9.1.

19. The wing, groups, squadrons, and flights at the Abraham Lincoln Capital Airport are "units" as the term is defined by AFI 38-101.

20. The proposed realignment would result in the withdrawal or relocation of the fifteen F16 fighter planes currently assigned to the 183rd Fighter Wing and the relocation

or removal of the positions of 185 full time and 452 part time personnel.

21. Plaintiff has information and believes that the proposed realignment will result in the withdrawal or relocation of various units of the Illinois Air National Guard, including the 170th Fighter Squadron, the 183rd Operational Support Flight, and large portions of the 183rd Maintenance Group.

22. The result of the withdrawal or relocation of these units is that the 183rd Fighter Wing will cease to exist, because the units remaining will be insufficient to meet the definition of a "wing."

23. The Illinois National Guard constitutes a portion of the reserve component of the armed forces of the United States.

24. Defendant Rumsfeld has recommended that units of the Illinois Air National Guard be relocated or withdrawn.

25. Pursuant to 10 U.S.C. §18238, "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."

26. Plaintiff has not consented to withdrawal or relocation of units of the Illinois Air National Guard.

27. Plaintiff has informed defendants that he did not consent to withdrawal or relocation of Air National Guard units and stated that:

The Springfield Air National Guard Base is a highly strategic location for homeland security missions for both Illinois and the entire Midwest. Illinois is also home to 11 nuclear power plants that provide 50 percent of our power generation. Further, Illinois has 28 locks and dams on the Illinois, Mississippi and Ohio rivers. If these recommendations are adopted, these vital assets and many others will be at greater risk without the F-16s in Springfield. On top of all that, this move will cost the taxpayers \$10 million. These are the wrong recommendations, at the wrong time and for the wrong reasons.

See Exhibits A, B.

28. Pursuant to 32 U.S.C. §104(a) each State may fix the locations of the units and headquarters of its National Guard.

29. Pursuant to 32 U.S.C. §104(c) "no change in the branch, organization, or allocation of a unit located entirely within a state may be made without the approval of its Governor."

30. The units of the 183rd Fighter Wing are presently located entirely within the State of Illinois.

31. Federal law prohibits defendant Rumsfeld from taking action to realign the 183rd Fighter Wing without the consent of the Governor of the State of Illinois.

32. Pursuant to 10 U.S.C. §18235(b)(1) the Secretary of Defense may not permit any use or disposition of a facility for a reserve component of the armed forces that would interfere with the facilities' use for administering and training the reserve components of the armed forces.

33. The realignment of the 183rd Fighter Wing as proposed by defendant Rumsfeld would interfere with the use of the Abraham Lincoln Capital Airport for the training and administering of reserve components of the armed forces and is barred by 10 U.S.C. §18235(b)(1).

34. By virtue of defendant Rumsfeld's proposal to realign the 183rd Fighter Wing without the consent of the Governor of the State of Illinois an actual controversy exists between the parties.

35. The members of the Base Closure and Realignment Commission have interests which could be affected by the outcome of this litigation and are made defendants

pursuant to Rule 19(a) of the Federal Rules of Civil Procedure.

36. This Court has jurisdiction pursuant to 28 U.S.C. §1331 and *Bivens v. Six Unknown Named Agents*, 403 U.S. 388 (1971).

37. Venue is proper in the Central District of Illinois by virtue of the fact that the Abraham Lincoln Capital Airport where the 183rd Fight Wing is based is in the Central District of Illinois and by virtue of the fact that the official residence of the Governor of the State of Illinois is in the Central District of Illinois.

WHEREFORE, plaintiff prays that this honorable Court grant the following relief:

- A. Enter a declaratory judgment declaring the realignment of the 183rd Fighter Wing as proposed by defendant Rumsfeld without the consent of the Governor of the State of Illinois is prohibited by federal law; and
- B. Granting such other relief as is warranted in the circumstances.

ROD BLAGOJEVICH, Governor of the State of Illinois,

Plaintiff,

LISA MADIGAN, Attorney General,
State of Illinois,

Attorney for Plaintiff,

BY: /s/Terence J. Corrigan

Terence J. Corrigan, #6191237
Assistant Attorney General
500 South Second Street
Springfield, IL 62706
Telephone: 217/782-5819
Facsimile: 217/524-5091
E-mail: tcorrigan@atg.state.il.us



OFFICE OF THE GOVERNOR

Rod R. Blagojevich

JRTC, 100 WEST RANDOLPH, SUITE 16-100

CHICAGO, ILLINOIS 60601

July 11, 2005

The Honorable Donald H. Rumsfeld
Secretary of Defense
U.S. Department of Defense
The Pentagon
Room 3E800
Washington D.C. 20301

Dear Secretary Rumsfeld:

According to the recent BRAC recommendations issued by the Department of Defense, the fighter mission of 183rd Fighter Wing at Abraham Lincoln Capitol Airport in Springfield, Illinois would be realigned to another state. If this recommendation is upheld by the Defense Base Closure and Realignment Commission, the 183rd Fighter Wing will no longer have a flying mission.

The Department of Defense did not coordinate this recommendation with either my office or the Illinois Adjutant General. This lack of consultation compromises the integrity of the process used to develop the BRAC recommendations and completely disregards my role as Commander-in-Chief of the Illinois National Guard. Further, pursuant to 10 U.S.C. §18238 and 32 U.S.C. §104(c), my consent is necessary for the actions contemplated by the Department of Defense with regard to the 183rd Fighter Wing.

Chairman Principi recently wrote you expressing his concern about the impact realigning Air National Guard facilities would have on homeland and national security. The Springfield Air National Guard Base is a highly strategic location for homeland security missions for both Illinois and the entire Midwest. Illinois is also home to 11 nuclear power plants that provide 50 percent of our power generation. Further, Illinois has 28 locks and dams on the Illinois, Mississippi and Ohio rivers. If these recommendations are adopted, these vital assets and many others will be at greater risk without the F-16s in Springfield. On top of all that, this move will cost the taxpayers \$10 million. These are the wrong recommendations, at the wrong time and for the wrong reasons.

**DEFENDANT'S
EXHIBIT**

A

By this letter I wish to formally notify you that I do not consent to the proposed realignment of the 183rd Fighter Wing. Accordingly, pursuant to the above reference statutory citations, the actions proposed by your Department cannot proceed.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rod Blagojevich".

Rod Blagojevich
Governor of Illinois



OFFICE OF THE GOVERNOR

Rod R. Blagojevich
JRTC, 100 WEST RANDOLPH, SUITE 16-100
CHICAGO, ILLINOIS 60601

July 11, 2005

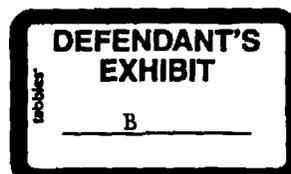
Anthony J. Principi
Chairman of the Defense Base Closure and Realignment Commission
2521 South Clark Street
Suite 600
Arlington, Virginia 22202

Dear Chairman Principi:

As you are aware, Secretary of Defense Donald Rumsfeld has recommended that the fighter mission of 183rd Fighter Wing at Abraham Lincoln Capitol Airport in Springfield, Illinois be realigned to another state. If this recommendation is upheld by the Defense Base Closure and Realignment Commission, the 183rd Fighter Wing will no longer have a flying mission.

The Department of Defense did not coordinate this recommendation with either my office or the Illinois Adjutant General. This lack of consultation compromises the integrity of the process used to develop the BRAC recommendations and disregards my role as Commander-in-Chief of the Illinois National Guard. Further, pursuant to 10 U.S.C. §18238 and 32 U.S.C. §104(c), my consent is necessary for the actions contemplated by Secretary of Defense Rumsfeld with regard to the 183rd Fighter Wing.

In your recent letter to Secretary Rumsfeld, in addition to asking whether we were consulted about this recommendation, you expressed concern about the impact realigning Air National Guard facilities would have on homeland and national security. The Springfield Air National Guard Base is a highly strategic location for homeland security missions for both Illinois and the entire Midwest. Illinois is also home to 11 nuclear power plants that provide 50 percent of our power generation. Further, Illinois has 28 locks and dams on the Illinois, Mississippi and Ohio rivers. If these



recommendations are adopted, these vital assets and many others will be at greater risk without the F-16s in Springfield. On top of all that, this move will cost the taxpayers \$10 million. These are the wrong recommendations, at the wrong time and for the wrong reasons.

By this letter, I wish to formally notify the Commission that I do not consent to the proposed realignment of the 183rd Fighter Wing. Accordingly, pursuant to the statutory citations referenced above, the actions proposed by Secretary Rumsfeld cannot proceed. I expressed similar sentiments to your fellow commissioners on June 20, 2005, at the BRAC Regional Hearings in St. Louis via both oral and written testimony.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads "Rod Blagojevich". The signature is written in black ink and is positioned above the printed name.

Rod Blagojevich
Governor of Illinois