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Congress of the United States
Washington, DC 20515

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Honorable David M. Walker
Comptroller General of the United States
441 G Street, NW
Washington, DC 20548

Dear Mr. Walker:

Pursuant to Section 2912 of Public Law 101-510, the Government Accountability Office is charged with evaluating the accuracy and analytical sufficiency of the Department of Defense's Final BRAC 2005 Report. In light of the recommendations of the Department to vacate 65% of DoD's leased space in the National Capital Region (NCR), we request that you specifically review the accuracy and sufficiency of the data used to arrive at those recommendations.

The BRAC law contemplates a process that is neutral on its face and determines the outcome through the analysis of the inputs into that process. In the case of leased space, the process itself was biased against leased space. On page 16 of Volume VII of the Final BRAC 2005 Report, it specifically states that eliminating leased space was part of the strategy. In the description of the various recommendations such as "Collocate Miscellaneous OSC, Defense Agency, and Field Activity Leased Locations", the justification states:

Implementation will reduce the Department's reliance on leased space which has **historically** higher overall costs than government-owned space and **generally** does not meet Anti-terrorism Force Protection Standards in UFC 04-010-01. [Emphasis added]

This justification appears throughout the recommendations. The BRAC process was not supposed to determine its outcomes on generalizations or assumptions of what things may have historically cost. There was no effort made to determine the actual costs of leased space. There was no effort made to determine which facilities, in fact, did or could meet the new ATFP standards.

DOD's reliance on the ATFP standards to justify BRAC recommendations itself appears to substantially deviate from the BRAC criteria as established by law. The ATFP standards, **by their own terms**, do not apply to DOD owned facilities in the same manner in which they are applied to DOD leased space and will not apply to any leased space currently occupied by DOD until the leases for that space are renewed or extended in lease actions taken after October 1, 2009. Thus, the ATFP standards, **by their own**

terms, provide that space currently occupied by DOD under leases that expire as late as September 2009 could be renewed or extended to 2014 or even 2019 with no requirement that the buildings meet the prescriptive ATFP criteria in UFC 04-010-01.

Furthermore, a review of the Military Value Analysis Results Report by the Headquarters and Support Activities Joint Cross Service Group reveals the same built-in bias that determines the outcome before any analysis. On page I-2 it specifically states:

- Leased space is less desirable than government owned space on DoD installations, and is devalued in scoring plans.

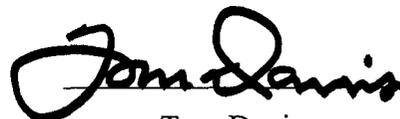
This is demonstrated by the modeling used to determine the military value for major administrative and headquarters activities in appendix B. For example, leased space was automatically and arbitrarily assigned a score equal to the worst military installation for such metrics as “Percent of Bachelor’s degree or higher” and “Distance to Major Airport” even though, in reality, no military installation could score higher than Arlington County on those two points. How can a process which sets out to eliminate leased space in leased space in Northern Virginia , that does not collect and compare actual data, and that misapplies DOD’s own ATFP standards, be accurate and sufficient to meet the requirements of the law?

One of the statutory criteria used to make recommendations for closure or realignment is the ability of a potential receiving community to support forces, missions and personnel. The DoD recommendation to vacate leased space in the NCR will result in a requirement to construct millions of square feet at a substantial cost to the taxpayer which will take years to complete. Whereas the BRAC process is to determine and reduce *excess capacity*, the Department’s recommendations will result in a proliferation of new construction. While each individual leased space closure was determined to have little or no impact on the community, the Department of Defense failed to adequately assess the cumulative impacts of all these closures funneling into Ft. Belvoir, Ft. Meade, and Bethesda at the same time. This is also a failure of the Department to accurately assess the data used to arrive at its recommendation.

We urge you to review these issues and address them in your report and official testimony to the Base Realignment and Closure Commission. Thank you.

Sincerely,


Jim Moran


Tom Davis

cc: The Honorable Anthony Principi
Chairman, Defense Base Closure and Realignment Commission