

United States Senate

WASHINGTON, DC 20510

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August 10, 2005

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

Mr. Chairman and Members of the Commission:

Thank you for allowing me this opportunity to weigh in on the proposed decision to create a Joint Medical Command Headquarters in Bethesda, Maryland, by co-locating or consolidating the Bureau of Navy Medicine; Air Force Medical Command; TRICARE Management Activity, Office of the Surgeons General Military Departments and Office of the Secretary of Defense Health Affairs.

I apologize for not being at the hearing in person, but unfortunately, it coincided with my annual Listening Tour and previously scheduled events such as delivering the keynote address at the grand opening of the University of Appalachia College of Pharmacy. During my Listening Tour, I travel the Commonwealth for a number of weeks to meet with constituents, hold town hall meetings, and listen to the concerns that face Virginians – which for a number of Virginians includes the Department of Defense’s recommendations for Fort Monroe, Dahlgren, the leased office space in Northern Virginia, and the other military installations that have been negatively impacted by the Secretary’s recommendations as well as your decisions to add NAS Oceana to the list of considerations for closure and realignment and the creation of a Joint Medical Command Headquarters.

According to the Secretary of Defense’s first policy memorandum on the 2005 BRAC process, the Secretary stated that the BRAC recommendations should produce, “recommendations that will advance transformation, combat effectiveness, and the efficient use of the taxpayer’s money.”

As you have heard a number of times from me, it is imperative that we properly allocate taxpayers’ money. Congress intended the BRAC process to save the Department of Defense money over the long-term, while improving our military strength. However, I believe that this proposed recommendation to create a Joint Medical Command Headquarters is not in the best interest of the taxpayers. In fact, the Department of Defense, in their response of July 14, 2005, to your questions wrote, “Co-location [was] not cost effective.” In addition, the table that DoD provided to you all in their response, showed the one-time cost to move the recommended sites would cost approximately \$107.3 million if they were co-located at Bethesda. With a projected annual savings of \$6.6 million, DoD would not see a savings for at least 16 years.

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Moreover, even your BRAC staff indicated that the proposed move to Bethesda would cost more money than anticipated because of the other recommendations for Bethesda, more specifically, the proposed move of the Defense Advanced Research Project Agency (DARPA), the Office of Naval Research (ONR), the Defense Threat Reduction Agency, and other DoD research activity. Your staff stated on July 19, 2005, "While building both the research center and the medical command headquarters at Bethesda is feasible, the increased building density drives up the cost of the recommendations."

As I stated on July 7, 2005, at Virginia's statewide hearing, I am completely opposed to the Secretary's recommendations to move the research functions that are currently located in Arlington to Bethesda and elsewhere. Now, you all are looking to complicate that move by adding another facility at Bethesda, where space is already limited. It is my understanding that the proposed creation of a joint extramural research center at Bethesda will increase the density of buildings by approximately 500,000 square feet. Even Commissioner Turner stated, "Having toured that [Bethesda site] the other day, I would offer the opinion that there's just not a lot of excess capacity there to build, and I think this will take a good bit of square footage to make happen. I don't think it's going to happen there."

Mr. Chairman, I am deeply concerned with this apparent biased trend of trying to get out of leased office space. A majority of the moves disregard military value and have a significant negative impact on mission, especially those proposed moves for the extramural research functions in Arlington. In fact, if one reads through the minutes from the Technical Joint Cross-Service Group on January 19, 2005, relating to the recommendation to move the extramural research elements to Bethesda they will find the following statement, "the military value analysis is irrelevant as this scenario strives to get out of leased space per the OSD imperative." Mr. Chairman, in essence, this statement says that DoD cares more about getting out of leased office space than it cares about the military value of the research functions that occupy leased office space and will put this essential technology and mission at risk to achieve this goal.

My views on the importance of keeping mission are shared with a number of individuals including DARPA's Chief of Staff, Ron Kurjanowicz. During your leased office space site visit on May 27, 2005, Mr. Kurjanowicz stated that the move would affect DARPA's ability to successfully perform its mission. Hans Binnendijk, Director for the Center for Technology and National Security Policy at the National Defense University wrote to you regarding his views on the impact of BRAC recommendations on the Defense Labs. He stated that, "[T]he co-location of DOD science and technology funding organizations at Bethesda and the removal of DOD contingents from other government locations could reduce diversity of DOD science and technology efforts and hamper the coordination of DOD science and technology with efforts funded by other government agencies. Such an outcome would not be in the best long-term interests of DOD."

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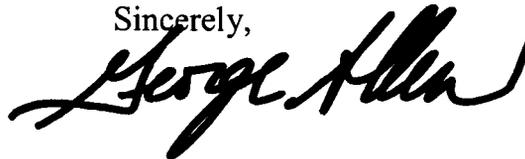
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Mr. Chairman, this conscious decision to vacate leased office space at all costs seems to violate BRAC law which requires all installations within the United States to be treated equally. It was the intent of Congress to uniformly apply the BRAC legislative criteria and force structure requirements to all military installations. OSD imperatives targeting a certain region should not be used to guide the BRAC recommendations.

Mr. Chairman and Members of the Commission, the Commonwealth of Virginia and its Congressional Delegation are prepared to work with you and the Department of Defense so that we can provide the best military value for our nation's defense. However, we face an uphill battle if OSD imperatives and a disregard for taxpayers' money are the guiding factor in many of the recommendations. I want the best for our military and I understand the need for this process, but the Commission should reject all proposals that could have a significant adverse impact on mission and those that substantially deviate from the BRAC criteria, most importantly criterion number one – military value. If the Commission truly looks at military value and cost savings, our armed forces will be stronger.

With kind personal regards, I remain,

Sincerely,

A handwritten signature in black ink that reads "George Allen". The signature is written in a cursive, flowing style with a large initial "G".

George Allen



STATE OF NORTH CAROLINA
OFFICE OF THE GOVERNOR
20301 MAIL SERVICE CENTER • RALEIGH, NC 27699-0301

MICHAEL F. EASLEY
GOVERNOR

August 10, 2005

The Honorable Anthony J. Principi, Chairman
2005 Defense Base Closure and Realignment Commission
2521 South Clark Street, Suite 600
Arlington, Virginia 22202

Dear Chairman Principi:

I want to thank the Base Closure and Realignment Commission (BRAC) for conducting this important hearing today as you continue to review recommendations from the U.S. Department of Defense (DOD). Throughout this process, I have been impressed with your hard work. You have been given a great deal of information to digest in a short amount of time.

To reiterate what I have said publicly on several occasions, I urge you to reject the DOD recommendation to move the 43rd Airlift Wing from Pope Air Force Base. Both Pope and the Fort Bragg Army Base continue to fulfill a vital mission for our military. They are a powerful one-two punch and provide an indispensable power projection platform for our armed forces. Army troops must deploy quickly and efficiently from Bragg to places worldwide. That mission is not going away, and we need to keep a highly trained and properly equipped air wing in place to support those needed requirements.

Fort Bragg is prepared to grow, and I urge you to approve DOD's recommendation to relocate the U.S. Army's Forces Command and the U.S. Army Reserve Command to the base. This realignment will achieve significant jointness by having the command headquarters located at Bragg alongside the operational headquarters.

Thank you again for allowing further public input during this review process. You can count on North Carolina's absolute commitment to sustaining our military bases for decades to come, and by doing so, we will continue to demonstrate that we are indeed the most military friendly state in the nation.

With kindest regards, I remain

Very truly yours,

Michael F. Easley

MFE/ets



COMMONWEALTH of VIRGINIA

Office of the Governor

Mark R. Warner
Governor

August 6, 2005

The Honorable Anthony Principi
Chairman
Defense Base Realignment and Closure Commission
2521 South Clark Street, Sixth Floor
Arlington, Virginia 22202

Dear Mr. Chairman:

One of the largest and most troubling recommendations made by the Department of Defense (DoD) during this BRAC process involves leased space in Northern Virginia. We continue to maintain this action represents a substantial deviation from established criteria. DoD proposes to relocate approximately 23,000 employees and vacate 8.4 million square feet of commercial office space to satisfy the Office of the Secretary of Defense (OSD) imperative to eliminate leased space, and to comply with its Minimum Anti-Terrorism Standards for Buildings.

On July 19, 2005, the Commission decided to add 275,000 square feet and 1,135 employees of the DoD's TRICARE Management activity, the Army Office of the Surgeon General and a portion of the Air Force Office of the Surgeon General for realignment. These entities currently occupy leased space in Fairfax County, Virginia and the Commission has indicated that realignment would support the creation of a Joint Medical Command Headquarters.

Virginia remains committed to the DoD's objective to provide a safe working environment for its employees and agrees that this must be a priority. However, the consideration of the Minimum Anti-Terrorism Standards for Buildings to guide BRAC decisions is misplaced and is a substantial deviation from the original Selection Criteria provided to guide the DoD's development of recommendations.

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The preponderance of the DoD's recommendations for realignment of its leased space nationwide involves military activities in Northern Virginia. The DoD's leased space in other parts of the United States remains largely ignored by the BRAC recommendations and this Commission. This would seem to be in violation of Section 2903(3)(A) of the Base Closure Act which clearly stipulates that all military installations - as defined in Section 2910 of the Base Closure Act to include "...any leased facility" - inside the United States be considered equally. It is apparent that leased space was not treated equally.

It is inappropriate for the DoD to arbitrarily assign all leased space a military value of zero simply on the basis of being leased space. This OSD imperative is documented by the Technical Joint Cross Service Group meeting minutes of 19 January 2005 that state, "the Military Value analysis is irrelevant as this scenario strives to get out of leased space per the OSD imperative." The substitution of OSD imperatives for the statutory BRAC Selection Criteria constitutes a significant deviation from the Selection Criteria and undermines the overall credibility of the BRAC process and, in our opinion, exceeds Congressional checks and balances placed on the entire process.

With a highly educated population and in-place varied housing stock; a private sector with substantial military knowledge, experience and technological capabilities; a transportation infrastructure that is already in place; and a quality of life which independent surveys rank high, these Northern Virginia communities should remain the preferred location of the current DoD activities. If not, the DoD is missing an important opportunity to consistently re-define its relationship with communities in today's environment and truly modernize.

Setting aside the leased space recommendations preserves the extensive discretion that the DoD has to reduce, expand or reallocate leased space it deems appropriate. The DoD is not dependent on the BRAC process to make these decisions. If the DoD determines that activities in leased space should be relocated to military installations, there are opportunities to do so as part of its annual authorization and appropriations processes. In fact, this option provides the Secretary of Defense a means to address concerns regarding assets and capabilities that only state and local governments can offer in partnership with the private sector to achieve the best possible outcomes for the military.

Affected local officials are ready to help the DoD achieve its security objectives. Rather than collaborating with these local communities to address security concerns, the DoD has arbitrarily used the BRAC process to side-step collaborative solutions. It is disingenuous to promote a DoD transformation process that fails in its ability to promote the evolution of the Department's association with local communities. Relationships with local communities and states built on the premise of modern economic development practices will allow the

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Department to truly achieve better efficiency of mission and cost effectiveness of its activities domestically.

An analysis of the recommendations as they impact these areas reveals additional concerns to those raised above, among them the costing of factors used in the COBRA model resulted in a cost and savings bias against non-military base office buildings. The DoD minimum anti-terrorism standards for new and existing buildings are overly prescriptive and not performance based as they should be. Performance based standards encourage private sector innovation and can achieve a better security end result for DoD. An open discussion in favor of performance based standards may well prove to be a win-win solution for all concerned. External costs to the DoD are not reflected in the COBRA analysis. For example, stranded lease costs for large blocks of leased space would fall back onto the Federal Government. Also, the definition of community used in the COBRA analysis to determine economic impact was the Standard Metropolitan Statistical Area (SMSA) for Washington, D.C., which is overly broad as it includes population from both Maryland and West Virginia which are unaffected by these recommendations.

Further, by comparing only the existing leased space with existing military installations, the process leaves no room for the possibility of potentially better options for locating administrative, research and headquarters functions.

As I previously testified at the Commission's July 7, 2005, hearing for Virginia's military installations and further detailed in written testimony submitted to the Commission prior to this hearing, the recommendations affecting leased space in Northern Virginia are not supported by facts. There are serious flawed assumptions, erroneous data and questionable judgments that were used to create these recommendations. Most notable is the assumption that the National Capital Region is not a secure environment. The DoD zero valuation of security of leased space is not supported by any qualitative data. It appears to be nothing more than conjecture, certainly not the basis for decisions costing billions of dollars and affecting tens of thousands of employees. These actions will severely degrade military effectiveness and strategic value.

Arguably, the National Capitol Region is one of the most protected regions in the world. While it is unrealistic to believe that we will ever be 100 percent risk-free, achieving appropriate levels of security for DoD employees and every American requires a reasonable, reassuring approach. Virginia and its communities have a proud history of working collaboratively with the DoD on security issues to achieve the right level of security in a manner consistent with national goals. We believe that we can continue that tradition in order to best meet the military's evolving requirements.

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The recommendation to move out of leased space in Northern Virginia is unnecessary for the security of our military forces, inordinately disruptive to the workforce, inconsistent with the BRAC legislation and demonstrates unequal treatment afforded leased space in other areas of the country.

Sincerely,

A handwritten signature in black ink that reads "Mark R. Warner". The signature is written in a cursive style with a large, stylized "M" and "W".

Mark R. Warner

MRW/vdh

Congress of the United States
Washington, DC 20515

August 4, 2005

The Honorable Anthony Principi
Base Realignment and Closure Commission
2521 South Clark Street, Suite 600
Arlington, VA 22202-3920

Dear Mr. Chairman:

First, let us thank you for the hard work you are doing and the sacrifices you are making for our country to support the DOD BRAC-05 efforts. We have an appreciation and understanding of the many challenges you face as the honest broker for the communities across America and DOD.

One of the difficult decisions you face is the task of sorting out the Air Force and Air National Guard realignment and closure issues. With this in mind, we would like to provide additional data on the Ohio Air National Guard 178 FW FTU at Springfield, Ohio.

Attached is a point paper on the 178 FW FTU that addresses many of the concerns about this Air National Guard location. This information hopefully will assist in answering questions on the consolidation of Reserve Component facilities in the Springfield, Ohio area, identify some of the errors we have found in the BRAC data, and provide a proposal which does not waste the taxpayers money to realign the 178 FW FTU. Rather, the point paper suggests using programmatic change to eliminate the F-16 pilot training capabilities when they are no longer needed by the Air Force.

Please look over the material; if you have questions, we would be glad to meet, respond or provide additional data in support of the information we have provided.

Again, many thanks for your service to our country!

Sincerely,



MIKE DEWINE
U.S. Senate



DAVID L. HOBSON
U.S. House of Representatives

To: BRAC Commissioners

Re: BRAC-05; Springfield-Beckley Air National Guard Base, Ohio

Dear Commissioners,

First, let me thank you for the hard work you are doing and the sacrifices you are making for our country to support the DOD BRAC-05 efforts. I have an appreciation and understanding of the many challenges you face as the honest broker for the communities across America and DOD.

One of the difficult decisions you face is the task of sorting out the Air Force and Air National Guard realignment and closure issues. With this in mind, I would like to provide additional data on the Ohio Air National Guard 178 FW FTU at Springfield, Ohio.

Attached is a point paper on the 178 FW FTU that addresses many of the concerns about this Air National Guard location. This information hopefully will assist in answering questions on the consolidation of Reserve Component facilities in the Springfield, Ohio area, identify some of the errors we have found in the BRAC data, and provide a proposal to not waste the taxpayers money to realign the 178 FW FTU but use programmatic change to eliminate the F-16 pilot train capabilities when they are no longer needed by the Air Force.

Please look over the material; if you have questions I would be glad to meet, respond or provide additional data in support of the information I have provided.

Again, many thanks for your service to our country!

DLH

Attach.

178th Fighter Wing, Springfield-Beckley Airport

DoD BRAC recommends realigning Springfield-Beckley Municipal Airport Air Guard Station, OH. Distribute the 178th Fighter Wing's F-16 aircraft.

Dayton-Springfield Recommendations:

- **Construction Joint Reserve Component Training Center at Springfield-Beckley Municipal Airport**
- **Maintain F-16 Fighter Training Mission at 178 FW FTU until no longer programmatically needed by the Air Force (AETC).**

Rationale:

- The BRAC RC-Pat (Reserve Component- Process Action Team) approved and supports the construction of a Reserve Component Center at Springfield-Beckley Municipal Airport. The Reserve Component Center will be built on land adjacent to the 178 FW RTU and will support the joint use of facilities such as the medical training facility, mobility processing areas, dining hall, vehicle maintenance facility, fuels storage systems, classrooms, and other common use areas like parking. BRAC does not change this RC Joint Use Concept and it is independent of the 178 FW FTU, Springfield ANG Base issue. The facility construction to support the Army National Guard and the Army Reserve would be on land contiguous the real estate of the 178 FW RTU.
- **Recommend the 178 FW F-16 FTU be maintained as an F-16 fighter training mission location.**
- **The BRAC justification for realigning the Springfield-Beckley Airport improperly identifies Lackland as the only ANG F-16 Flying Training Unit.**
- **The Springfield FTU is a critical link in meeting the Air Force pilot production requirements of 1100 pilots per year for the foreseeable future. Nothing has changed this requirement.**

Eliminating this pilot training capacity at the 178 FW will damage the Air Force.

- **The BRAC COBRA model calculations for Springfield-Beckley Municipal Airport 178 FW FTU show the reduction of key personnel from the Operations and Maintenance areas as the primary cost savings for 2007, and beyond. This reduction of key pilot training personnel that are needed to train F-16 pilots at the 178 FW FTU will not show a cost savings until 17 years after the personnel reduction is achieved.**
- **In 2025 (20 years after BRAC-05) the entire BRAC savings for the realignment of the 178 FW FTU only amounts to a total of \$693,000. (Yet, it will take an \$11,367,000 dollar investment in 2007 to realign the 178 FW FTU).**
- **The cost of training one fighter pilot according to the AFI 65-503, Table A34-1, Representative Officer Aircrew Training Costs shows it cost \$776,000 to graduate one pilot through the F-16 basic course. *(The total BRAC savings generated after 20 years by eliminating the 178 FW F-16 FTU in 2007 is less than it cost to train one F-16 pilot to a basic level).***
- **If the reduction of these key operations and maintenance personnel at the 178 FW FTU is slipped until 2010, or beyond, as shown in the BRAC data (The BRAC information shows some of the 178 FW FTU aircraft staying in place for pilot training through 2010) then there is no Net Present Value (NPV) cost savings generated according to the BRAC-05 COBRA data tables. The identified recurring cost savings for eliminating the key 178FW FTU training personnel is \$2.673 million annually. Slipping the proposed reduction of key personnel by only one year beyond 2007, let alone the three years identified by BRAC, will actually cost the tax payer millions of dollars to accomplish and produce no savings. The proposed realign of the 178 FW FTU is very marginal for cost savings in 2007 and there is no payback in the 20 year look by the COBRA data analysis if these personnel changes are postponed beyond the first or second quarter of 2007.**
- **Don't BRAC the training capability at the 178 FW FTU, allow the 178 FW FTU to train pilots at Springfield, Ohio until there**

is no longer a need that is clearly defined by AETC production requirements.

- **The Air Force has identified the need to train 1100 fighter pilots per year for at least the next 5 to 7 years. The 178 FW FTU is a critical facility for meeting this need. When this forecast level of F-16 pilot production changes and is no longer needed, the Air Force can programmatically close down the F-16 FTU school house at Springfield-Beckley Municipal Airport and move the 178 FW FTU capacity to other missions of value to the warfighter.**
- **Don't realign the 18 PAA 178 FW FTU to capture what appears to be marginal Net Present Value savings in the COBRA data, but transform the 178 FW FTU when F-16 pilot production is no longer needed.**
- **There are significant errors in the Mission Capability Index (MCI) calculations for Springfield-Beckley Municipal Airport as shown below. Some of these errors occurred as a result of the timeframe and the way questions were asked for BRAC data collection in 2003. Since then there have been numerous construction projects completed at Springfield-Beckley Municipal Airport. These MCI errors are identified in the following information.**

Significant Errors in Fighter Mission Capability Index (MCI) Category

There are significant formula calculation errors in the Fighter Mission Compatibility Index (MCI) category for the 178th Fighter Wing. When properly recalculated, the Springfield-Beckley Airport moves from a previously incorrect #128 ranking to #24 in the entire US Air Force.

These errors include:

1. Formula 1245.00 (3.75 POINT ERROR) Proximity to Airspace Supporting Mission: the oversight of 24 hour NOTAM and Restricted airspace capability, combined with other errors in calculating our MOA's strengths, severely miscalculated the value of the this fine military airspace. Another 144 cubic miles of airspace could not be accounted for and was not included in the formula calculation. This airspace, less than 40 miles from the runway, is one of only three operating areas east of the Mississippi River with an upper

altitude limit of 50,000 feet MSL; and the supersonic airspace above 30,000 feet MSL was excluded from consideration. When combined with the soon to be activated Racer MOA, the unique geographical location of Springfield-Beckley MPT AGS represents tremendous potential and opportunity for inclusion in the Future Total Force. These areas will support F-22, F-35, Unmanned Combat Aerial Vehicles (UCAVs), GPS Guided Joint Direct Attack Munition (JDAM), Laser Guided Bomb (LGB) and Small Diameter Bomb (SDB) employment. The extraordinary potential for synergy of these future weapon systems being tested in close proximity to Wright Patterson Air Force Base may not have been considered because there was no way to document these benefits to the Future Total Force in the BRAC process. Lastly, the close proximity to dozens of aerial refueling assets secured at Rickenbacker ANGB in Columbus, Ohio through 2040 was not included.

2. Formula 1246.00 (5.29 POINT ERROR) Proximity to Low Levels Supporting Mission: this formula was significantly miscalculated by DOD, ignoring dozens of IR and VR routes within 150 miles. There are not many other installations in the United States with access to as many low levels in close proximity to its home station as Springfield-Beckley MPT AGS. Unlike other parts of the country, practically every low level training route terminates in the same military and restricted operating areas detailed above yielding unprecedented value.
3. Formula 1271.00 (3.20 POINT ERROR) Prevailing Installation Weather Conditions: this formula was miscalculated by DOD using incomplete and misleading data. The apparent conclusion that Wright Patterson Air Force Base (only 8 air miles to the west of Springfield) has 33 better weather days per year seems to be a significant stretch. This is likely attributed to the use of reported vice realistic data as, unlike most every active duty base or regional international airport, our installation weather personnel are not "on station" 24/7. As a result, Springfield-Beckley MPT AGS received no points in this category.
4. Formula 1233.00 (4.79 POINT ERROR) Sufficient Munitions Storage: the existence of standing courtesy storage agreements at Wright-Patterson Air Force Base is disregarded, ignoring the capability and value with no additional costs to the ANG or DOD.
5. Formula 8.00 (0.74 POINT ERROR) Ramp Area and Serviceability: DOD data suggest that Springfield-Beckley MPT AGS only possesses ramp space for 24 fighter aircraft. This was reportedly based upon a satellite photo used in their determination; unfortunately, that photo was several years old. Currently, the installation has an additional brand new 18 parking spot ramp, as well as 2 brand new arming areas with 6 spots each, for an additional 30 spots and a total capability of parking 54 fighter aircraft. Further, the new ramp design allows for several more parking spots to be added between the new ramp and

the new arming area thanks to the foresight of the 178th Fighter Wing. DOD states that the cost to add a second squadron is \$45,300,000, yet their estimate is more than \$20,000,000 in error – and a large part of this error can be attributed to this oversight. This resulted in the installation receiving 0 points for what might be considered one of the finest fighter ramps in the ANG. Though the DOD calculation was in error, worse yet is the slighted formula itself which does not allow any sliding scale points for ramp space between 66k and 174k square yards (the next square yardage level required to achieve significantly more points in this category). This inconsistent calculation (there were other formulas that used sliding point scales) favored active duty over Air National Guard bases (and Springfield-Beckley MPT AGS) who have long remained disciplined in building sustaining only what is required for mission accomplishment.

6. Formula 1232.00 (2.44 POINT ERROR) Sufficient Explosive-sited Parking: DOD erred in their own estimate of 24 parking spots, with the correct number being 54 available. That miscalculation further misrepresented Springfield-Beckley MPT AGS by ignoring the existence of explosive sited parking. The fact that our installation is now an AETC operation means that the base does not have a current need for this siting. But that does not mean we are not capable. The original 24 aircraft parking spots at Springfield-Beckley MPT AGS were previously certified for explosive siting as recently as 1998 when it was an F-16 General Purpose (GP) fighter unit. It would only take a few weeks (worst case) to receive renewed explosive siting certification. Additionally, all 30 additional parking spots meet all explosive siting design requirements; yet the true 54 aircraft explosive siting capability at Springfield-Beckley MPT AGS goes completely unaccounted for in the DOD's recommendation.
7. Formula 1221.00 (0.32 POINT ERROR) Hangar Capability Small Aircraft: the formula drew data from a misleading question, and incorrectly summarized the storage capability of F-15 sized aircraft at Springfield-Beckley MPT AGS. Correcting the reporting error would result in additional Fighter MCI points.
8. Formula 1235.00 (1.49 POINT ERROR) Installation Pavement Quality: airfield ramp, apron, runway and taxiway additions improvements at Springfield-Beckley MPT AGS are so new that PCN and ACN data has only now become available – a full year after BRAC data collection began. The airport and its aprons taxiways runways can handle the absolute maximum number of passes for any aircraft, ranging in size and weight from every class of fighter to C-17; the result is absolutely no deficiency nor degradation in pavement quality. Unfortunately, this is overlooked in the formula calculation. This error does not reflect the superior infrastructure already in place at Springfield-Beckley MPT AGS which can meet DOD requirements of hosting 6 x C-17 aircraft.

9. Formula 1205.10 (1.88 POINT ERROR) Buildable Acres for Industrial Growth: the current land lease at Springfield-Beckley MPT AGS offers (at a minimum) an additional 167.9 acres in long term lease options through 2048, with 228.3 total acres secured in the already approved long range installation site plan. That the 178th Fighter Wing is not currently paying for the land grossly devalues and underestimates the buildable acreage upon which industrial growth could easily be erected. Agreements are already in place with the local government, and the land has been secured committed exclusively for ANG use. The installation frontage road has even been committed to future Springfield-Beckley MPT AGS exclusive use to further enhance the already substantial force protection capabilities currently in place. Visually comparing bases which survived DOD's recommendation using any commercially available overhead satellite imagery program reveals the miscalculation made in this formula. Moreover, this error resulted in significant points lost in many other MCI categories as well.
10. Formula 1205.20 (1.88 POINT ERROR) Buildable Acres for Air Operations Growth: the installation received lower scores not once but twice in the gross miscalculation of this formula as well. All subjects detailed above in Formula 1205.10 are exactly the same, resulting in misleading and significantly data errors and misrepresentation of Springfield-Beckley MPT AGS's capacity for air operations growth.
11. Formula 1241.00 (0.44 POINT ERROR) Ability to Support Large-Scale Mobility: as with Pavement Quality, the PCN and ACN data were not available during BRAC data calls for the countless new improved paved surfaces on the installation. Research of newly published data reveals that Springfield-Beckley MPT AGS is capable of the maximum large-scale mobility capacity, defined by DOD as the ability to support 6 x C-17's.

MPT AGS has long used courtesy storage of live weapons at Wright Patterson AFB, and to needlessly construct a facility here would have been unwise and a waste of taxpayer dollars; yet, this decision ultimately resulted in a deficiency rather than a strength. Further, the 178th Fighter Wing can stage Air Sovereignty Alert (ASA) missions out of Wright Patterson Air Force Base without dislocating any personnel, yet this is not even considered. Few ANG bases can tout such a capability, and the cost savings to DOD combined with the quality of life benefits for aircrew and maintenance personnel are enormous.

Other Significant anomalies exist:

1. The COBRA model was found to be flawed and in error. The calculations do not take into account the cost of human capital and the very expensive cost to reconstitute or replicate their training. The COBRA model does not address

the correct salaries of those assigned to supporting flying operations at Springfield-Beckley MPT AGS. Further, support personnel such as civilian simulator and ground training school house personnel aren't even included in the criterion, and hence the calculation itself. This becomes problematic when the COBRA model showed human capital leaving in FY07 but the aircraft remaining until FY10 (an additional three years). Currently, Springfield-Beckley MPT AGS has F-16 student PFT training loads scheduled through FY08. The end result is a \$13,062,000 error in purported DOD cost savings estimates. Ultimately, disbanding the 178th Fighter Wing and terminating flying operations at Springfield-Beckley MPT AGS will cost the American taxpayer \$12,362,000, and will likely never result in the previously reported low cost savings of \$700,000 in 17 years. Worse, when the 225 full-time federal jobs necessary to meet DOD recommendations for continued flying operations through 2010 are considered, an actual \$49,406,625 error was made (\$73,195 per year times 225 employees). This entire scenario completely calls into question the accuracy of the COBRA model itself.

2. The local community is severely impacted. Springfield-Beckley MPT AGS is the number 8 employer in Clark County, Ohio and the economic impact will be significant. Worse yet is that the bases and communities gaining our F-16's possess significantly more business activity and population base supporting their local community than Springfield, Ohio. Our total job loss among a local population of 67,753 results in a 0.6% loss, yet the redistribution of these positions as detailed in the DOD recommendation doesn't even amount to a 0.1% net gain for those three communities combined. In fact, the job loss relative to our population is 34 times greater than the gain experienced by those three communities. Even more disturbing is the oversight of actual jobs lost by disbanding the 178th Fighter Wing; in reality, 450 full and part-time Federal jobs will be lost – not the 291 jobs claimed by DOD. This significant discrepancy is the result of DOD overlooking contractor (Lockheed Martin L3 Communications personnel) and state employees (firefighters, tower personnel, weather forecasters, etc). The decision appears to have an unfair negative effect on a community with considerable dependence on the income of personnel assigned to Springfield-Beckley MPT AGS.
3. The DOD's claim that Springfield-Beckley MPT AGS is an ideal selection for realignment is untrue. The installation is much more ideally suited for conversion back to a General Purpose F-16 Combat unit. The best timing for this conversion would come at the expiration of the Air Force's requirement for the 178th Fighter Wing to serve in its current assignment as an F-16 Formal Training Unit. Ultimately, the installation is well positioned to become a 48 PAA F-35 Joint Strike Fighter General Purpose unit as part of the Future Total Force, currently under consideration and being drafted by DOD for implementation. To wit:

4. Current 178th Fighter Wing manning is at 109.08%; that's #1 in Ohio and #2 in the entire Air National Guard nationwide. Units on the list to which our aircraft are to be reassigned have as much as 20% lower in total manning percentages. In fact, current aircrew manning already in place at Springfield-Beckley MPT AGS would fulfill 100% of the projected full-time pilot requirements for a 24 PAA General Purpose F-16 or Joint Strike Fighter F-35 squadron as calculated by DOD. Not one full-time pilot needs to be trained or moved to the Springfield, Ohio area to support this mission as we're already in place, well trained, and highly experienced. The current investment in our cadre of instructor pilots alone is estimated to be more than \$120,000,000, and is likely to be lost in its near entirety should DOD's recommendation be approved.
5. The 178th Fighter Wing also has 78% of projected full-time aircraft maintenance personnel manning required for a 24 PAA squadron as calculated by DOD already in place. 80% of our maintenance personnel are 5 level or above, with 74% at 7 level or above. Our experience and performance are so highly ranked that our 15.49 UTE rate is practically equivalent to the 15.58 Active Duty Air Force Block 30 UTE rate. DOD should have considered that active duty Air Force units employ two fully manned maintenance shifts while Springfield-Beckley MPT AGS's only employs one to one-and-a-third maintenance shifts. This is made possible by our extensive experience and efficiency, something the BRAC process completely overlooked.
6. Springfield-Beckley MPT AGS has served numerous other units by relieving their past and present manning deficiencies, with aircrew maintenance support personnel deploying across the nation and overseas to fill gaps left by insufficient recruiting and retention. Further, several national leadership positions have been filled by former members of the 178th Fighter Wing, representing an irreplaceable success story in the defense of our nation.
7. Given the manning situation detailed above, the assumption that personnel at a realigned facility such as Springfield-Beckley MPT AGS would simply "move with the aircraft" to another location in order to support the forecasted increase in that unit's full-time employment is neither cost effective nor realistic. At best, it displaces the most people while at the same time ignoring the considerable cost and pain associated with relocation. More likely, a significant loss will be experienced as practically every unit member has close ties to their local community, with many living in the Columbus and Cincinnati areas as well. Many members of the 178th Fighter Wing who did not begin their career at Springfield-Beckley MPT AGS have moved here to be closer to their family and raise their children where they grew up.
8. A new state of the art operations building was recently completed (\$7,000,000 investment in 2002 \$12,600,000 value in 2010), and is already capable of completely housing two separate 24 PAA F-16 or F-35 JSF General Purpose

squadrons for a total of 48 PAA fighter aircraft and all associated aircrew personnel. Further, the facility is already Sensitive Compartmentalized Information Facility (aka SCIF) capable, an extremely costly requirement which will have to be duplicated elsewhere. The 178th Fighter Wing has spent years designing and configuring the building, and in my estimation there are few other operations buildings as functional and Joint Strike Fighter ready as that Springfield-Beckley MPT AGS.

9. Springfield-Beckley MPT AGS is one of only three ANG units in the United States to possess three or more flight simulators, and the only installation in the nation with 4 x Block 30 F-16C devices. Our scheduled 4000 square foot simulator expansion, previously approved and ready for construction, can house 4 x full 360 degree field of view simulator devices, complete with a state of the art brief and debrief system, for less than \$3,000,000 (\$1,500,000 in minor construction, and \$1,500,000 in additional equipment). This facility, previously scheduled for completion in Spring 2006, is capable of sustaining not only local Formal Training Unit workloads, but can also support up to 480 active duty Air Force and ANG pilots per year in fully immersive air combat simulation training. Our simulator facility has recently received a significant upgrade in long haul network connectivity, permitting our training devices to simultaneously connect to any other Army, Navy, Air Force, or Marine simulator around the world. The value of this impressive Distributed Mission Training (DMT) capability is further highlighted when compared to that which Air Force and ANG aircrew receive at the Air Force Research Laboratory in Mesa, Arizona. That facility only supports air-to-air mission training, whereas our facility permits full employment in all F-16 mission areas (air-to-air, air-to-ground, Night Vision Goggle, Laser Guided Bombs with Targeting Pods, etc). All of this is conducted using a photo-realistic terrain database of several critical areas of concern in the Global War on Terror, including North Korea, Iraq and Afghanistan. Even better, this training represents a potential \$15,360,000 annual flying hour savings—not to mention the wear and tear on our aircraft inventory.
10. Extensive additions and renovations have occurred since conversion to a Formal Training Unit (FTU) in 1998. The total expenditure to date has exceeded \$50M, and is significantly greater when forecasted in 2010 Dollars. If the 178th Fighter Wing flying operation is disbanded and is reconstituted at other locations, many if not all of the facilities and infrastructure improvements procured in the last 5 years at Springfield-Beckley MPT AGS will need to be completed at other installations at those installations. Many of these same gaining bases already have plans on the books to construct these same facilities, representing tens of millions in potentially wasted taxpayer Dollars. These facilities and infrastructure improvements include:
 - New explosive sited arming areas and an F-35 Joint Strike Fighter capable hush house (the only one in the ANG, a combined \$4,800,000 investment

in 2003 \$8,100,000 value in 2010). Note – Springfield-Beckley MPT AGS has one of only four 75,000 pound thrust tie downs systems in the United States. The remaining three locations are on active duty Air Force bases (Nellis, Eglin and Langley). This is a natural requirement for F-22 and F-35 Joint Strike Fighter aircraft and was purposefully designed and built with this capability in mind;

- New supply building (\$4,900,000 investment in 1999 \$10,000,000 value in 2010);
- New dining and medical facility (\$4,400,000 investment in 1995 \$10,600,000 value in 2010);
- New firehouse (\$5,600,00 investment in 2005 \$8,500,000 value in 2010);
- New civil engineering building (\$4,200,000 investment in 2000 \$8,200,000 value in 2010);
- New front gate with complete force protection (\$300,000 investment in 2005 \$600,000 value in 2010);
- New control tower (\$4,200,000 invested in 2005 \$6,100,000 value in 2010)
- New parking ramp (\$4,250,000 investment in 2003 \$6,800,000 million value in 2010);
- New taxiway barriers runway overruns (\$5,200,000 invested in 2002 \$8,800,000 value in 2010);
- New Non-Destructive Inspection (NDI) facility (\$700,000 invested in 2003 \$1,200,000 value in 2010). Note – Springfield-Beckley MPT AGS does NDI work for several other ANG bases. This necessary capability would have to be duplicated elsewhere, yet this fact goes unmentioned in the DOD's recommendation;
- New airfield lighting (\$1,200,000 invested in 2005 \$1,600,000 value in 2010);
- New corrosion facility (\$2,100,000 invested in 1999 \$5,200,000 value in 2010);
- Total aircraft hangar renovation (\$6,400,000 invested in 2003 \$10,200,000 value in 2010);

- Extensive airfield perimeter force protection measures too numerous to detail.
11. The proximity to Wright Patterson Air Force Base is completely ignored. The Air Force seeks to institute a “community basing” concept at Burlington, Vermont; yet this overlooks the benefit to active duty personnel assigned to Springfield-Beckley MPT AGS of having access to the third largest Air Force Base in the United States as measured by active duty, civilian and contractor personnel. The hospital itself is expanding in size and scope, and the housing commissary exchange privileges constitute irreplaceable value. It is difficult to imagine another area better suited for consideration as the ideal geographical model for the community basing concept.
 12. The value of the Air National Guard to the Homeland Security Mission and Global War on Terror (GWOT) is extraordinary. Springfield-Beckley MPT AGS and the 178th Fighter Wing epitomize this in every single way, from infrastructure, to growth capacity, to the countless professionals that have committed their lives to serving their nation, their state and their community. Springfield-Beckley MPT AGS is the number two fighter sortie generation squadron in the Air National Guard, second only to another ANG fighter wing with three times the number of aircraft. We’re the number one F-16 student producer since inception as a Formal Training Unit in 1998, even training other Active Duty instructors from Luke AFB in Night Vision Goggles (NVG) when the Air Force could not meet their own requirements.
 13. Springfield-Beckley MPT AGS graduates its F-16 students in 16 fewer training days than does the Active Duty using an imbedded syllabus; the result is a graduate fully qualified in Targeting Pod (TGP) employment who needs only one home station certification flight to become an NVG combat wingman. As a result of our incredible efficiency, Springfield-Beckley MPT AGS was only credited for producing one student per syllabus. In contrast, Luke AFB, which re-enrolls their students twice in order to complete two additional follow on courses (TGP and NVG) was credited for three times the student flow as Springfield-Beckley MPT AGS. This is hardly fair since we produce a more combat capable student in a shorter time period using a more effective syllabus. The superior experience level of our Instructor Pilots and maintenance personnel makes all of this possible, and the resulting UTE rate detailed herein. In stark contrast, the Active Duty chose not to adopt our approach given their lesser experience levels among Instructor Pilots and maintenance personnel – a testament to our ability to excel on many levels.