

# United States Senate

WASHINGTON, DC 20510-2503

BRAC Commission

August 15, 2005

**AUG 19 2005**

Received

2005 Base Realignment and Closure Commission (BRAC)  
2521 South Clark Street  
Suite 600  
Arlington, Virginia 22202

Dear Chairman Principi and BRAC Commissioners:

Thank you for your continued dedication and commitment to ensuring that the 2005 Defense Base Realignment and Closure (BRAC) recommendations best serve our military and our Nation. We recognize and appreciate the diligence you have exercised in trying to resolve the Department of Defense (DOD) 2005 BRAC recommendations regarding the Air National Guard (ANG).

The ANG recommendations have set off a "fire storm" and have far reaching impacts, including: defining "acceptable risk" in an age of unpredictable, asymmetrical terrorism; creating holes in the Nation's air defenses; redefining the role of Governors as Commanders-in-Chief of their respective state militias; and codifying recommended "iron" movement. While the associated legal arguments are beginning to be clarified, it remains apparent that the ANG recommendations do little to further DOD's intent to reorganize its installation infrastructure, effectively support its forces and increase operational readiness while realizing significant cost savings. The BRAC Commission must carefully weigh all options in its attempt to resolve the ANG issue. Your decision will be critical in protecting the integrity of the BRAC process and ensuring that our homeland can be successfully defended from any internal or external threat.

We want to express our support for the proposal submitted by the Adjutants General Association of the United States (AGAUS) at the August 11 BRAC Commission hearing held in Washington, DC. The Adjutants General's plan is well thought out and tries to strike a proper balance with regard to the two most controversial issues created by the DOD recommendations. First, and most importantly, the plan provides for a robust air defense of the United States homeland. In the post September 11 environment, our citizenry demands that the government take all necessary steps to prevent, meet and defeat any terrorist threat; the AGAUS plan provides State and Federal authorities with the means to accomplish this goal. The plan acknowledges the transformational nature of the Future Total Force with a reliance on fewer more capable aircraft and evolving non-flying missions, while providing a transition "bridge" that moves U.S. airpower from the legacy fleet to the fully modernized force.

However, if the BRAC Commission does not see fit to adopt the entire AGAUS recommended plan, it is vital that the 131st Fighter Wing stationed at Lambert Field, MO be included in any final compromise. Arguments presented at the June 20 St. Louis field hearing effectively demonstrated substantial deviations to the BRAC criteria that are contained in the DOD recommendation to realign Lambert. Deviations in criteria were outlined in detail and an extensive array of materials, including the attached Executive Summary, was presented to BRAC staff at the June 21 site visit. Justifications for maintaining the 131st, include:

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- \* The 131st is defending vital surface and maritime transportation routes; nuclear reactors; military industrial productions facilities; such as the Boeing plant; chemical facilities; uranium enrichment capabilities; Whiteman Air Force Base and it's B-2 fleet; monuments; stadiums and millions of American citizens.
- \* The 1,200 highly trained citizen soldiers that serve and support the 131st Fighter Wing are very capable of performing Air Sovereignty missions and have been tasked to do so on many occasions.
- \* Replacing pilots and support personnel at another facility will be very difficult.
- \* Realigning Lambert will produce no savings for the nation. The Base Closure Executive Group (BCEG) could only create minimal cost savings by taking the unusual step of rolling Lambert costs/savings into Otis, MA documents.
- \* BRAC is intended to make the military more efficient by producing cost savings and reducing excess capacity. Realigning Lambert does neither.
- \* Realigning Lambert is focused on programmatic or moving "iron", not BAC goals and objectives. There is no legal basis to use BAC to implement transformation objectives.
- \* The "Enclave" concept remains poorly defined and may further hinder a Governor's ability to serve the people. The Enclave concept does not provide an air defense capability, allow the local community or state to redevelop property nor enhance military recruitment.

As you begin the task of making your final recommendations, we encourage the Commission to give serious consideration to the AGAUS ANG proposal. If the Commission does not elect to adopt the AGAUS plan, we strongly reiterate the importance of maintaining the 131st Fighter Wing at Lambert Field. St. Louis is truly the crossroads of America and the 131st is ideally located, staffed and equipped to continue protecting the critical assets and infrastructure residing in our heartland.

Respectfully,



Jim Valeri

W. Todd Albin



Jeff Bond

Wm Larry Clay



# 131st Fighter Wing

**Air Superiority,  
Anytime, Anywhere**

**10900 Lambert International Blvd.  
St. Louis, Missouri 63044**

Est. 1923

## Executive Summary

## **Introduction**

The Base Closure and Realignment (BRAC) process was intended to reduce capacity and save money. Realigning Lambert IAP does not accomplish either one of these objectives. Moving 131st Fighter Wing F-15Cs from their strategic location risks critical resources, wastes valuable human capital, and eliminates the world's most capable F-15 unit.

The following is an executive summary of the research data provided to the BRAC Commission on 21 June 2005. Other information gathered after this date is also included. Substantial deviations are as follows:

### **Homeland Defense**

The Secretary of Defense substantially deviated from final criteria 1 because he did not adequately or accurately address Homeland Defense. The recommendation to realign Lambert IAP AGS is inconsistent with the National Security Strategy's highest priority for this nation's military.

### **BRAC Process**

The Secretary of Defense substantially deviated from final criteria 1 through 4 because final Air Force criteria attributes were inadequate and did not accurately measure military value. Military judgment, used routinely, was arbitrary, inconsistent, and poorly documented. The recommendation to realign Lambert IAP AGS is inconsistent with the BRAC law.

### **Cost Calculations**

The Secretary of Defense substantially deviated from final criteria 4 and 5 because criteria attributes did not accurately measure or reflect the cost of operations, manpower impact, and cost savings. The recommendation to realign Lambert IAP AGS is inconsistent with final criteria.

## Homeland Defense

The National Military Strategic Plan's number one priority is to protect the homeland. When defining the attributes to determine a unit's military value, the Department of Defense did not incorporate any questions to define Homeland Defense capabilities. The Secretary of Defense substantially deviated from final criteria 1, current and future missions.

Military judgment is quoted numerous times as the overriding factor in BRAC decision-making. This does not appear to be the case when the decision to realign the 131FW was made. The heartland is home to numerous lucrative targets and vital resources. The 131FW is currently tasked with the Homeland Defense mission and provides a strategic location for the protection of these assets. Additionally, unknown to the Base Closure Executive Group (BCEG), the 131FW has been tasked to stand 24/7 alert and built facilities to meet that tasking. The recommendation to realign Lambert IAP AGS is inconsistent with the National Security Strategy.

- Homeland Defense Summary
- Homeland Defense is the Number 1 Priority
  - BRAC Homeland Quotes
  - McHale Statements
  - Homeland Security Presidential Directive-Hspd-7
  - National Strategies
- BCEG Avoids Homeland Defense Issues
  - BCEG struggles with MV and HLD
  - Military Value As It Relates To Homeland Defense
- Red Team Summary
  - Red Team White Papers
- St. Louis Strategic Location
  - ASA in the Midwest
  - Talking Paper on ASA in the Midwest
- St. Louis Homeland Defense Mission
  - Title 10 Orders
  - Maintenance Alert Guidance
  - Current Lines and Days Authorizations- 13 Sep 04
  - ASA E-mail Trail
  - 131FW Homeland Defense Support
  - 131FW Alert Cost Breakdown
  - ASA facilities at Lambert
  - Talking Paper ASA facilities at Lambert
- BCEG unaware
  - BCEG unaware 131st FW performing Homeland Defense
  - BCEG Unaware of 131FW Role in Homeland Defense
  - BRAC Vol 5 process relating to BCEG awareness of St Louis Alert
- Why the F-15 is Best Suited for the ONE Role
- Al Qaida Remains Interested in Aviation Attacks
- Strategy for Homeland Defense and Civil Support (Mar 05 draft)

## **BRAC Process**

Although the BRAC process may be an accurate and efficient tool when used with the active duty, it has numerous flaws and biases when attempting to apply the same principles and processes to the Air National Guard. Calculating military value (MV) using Air Force criteria is an inappropriate tool for Air National Guard units. Final results consistently placed Air National Guard units toward the bottom of the list.

Most of the Air Force attributes used in calculating the four final criteria did not measure a unit's true military value. For instance, MV-1 was intended to provide a score to the BCEG regarding a unit's current and future mission capability. However, questions such as proximity to low-level routes, location of divert fields, etc. do not measure this capability. MV-3, Surge capability, was biased toward very large bases, providing little opportunity for ANG bases to score well. MV-4, Cost of Operations, calculated a base's cost of operation using locality rates and housing allowances in the local area. Questions did not address wing efficiencies like cost of land, lease rates, etc. Since these questions centered on the base's cost of operations, individual units were not evaluated and were not given credit for operating efficiencies.

Capacity information was also gathered by the BCEG. Lambert IAP AGS hangar space was assessed incorrectly and appears to have possibly caused the 131FW installation to be a "show stopper". Lambert IAP AGS currently has facilities to support 40 F-15Cs.

The BRAC process did not consider ANG basing strategies. ANG units using civilian joint use airfields provide a force dispersal advantage for homeland defense and an alternate facility for emergencies. Bases must also be near population centers to facilitate recruiting. The Total Force basing strategy must find the proper balance between the preferred demographics for ANG recruiting and retention and the unit's operational responsibilities to support AEF.

- BRAC Process Summary
- AF Military Value Selection Criteria & Associated Weights
  - Attributes Point Paper
  - Mission Compatibility Index Detail
  - Scoring & Sub-criteria Errors
  - 131FW MCI and Military Value Discrepancies from MCI Data Scores
  - MCI Compatibility Index (Fighters)
  - Fighter MCIs
  - BRAC Fighter MCI Ranking - Adjusted
  - BRAC Fighter MCI Ranking - Unadjusted
- Lambert Facility Data Was Incorrect
  - Hangar Size
  - Hangar Space Support
- Enclave
  - Letter to Commission Regarding Enclaves
  - Red Team
- Air Force Organizational Principles - White Paper

## Cost Calculations

BRAC failed to meet its objective of cost savings because of four cost analysis flaws. First, BRAC has deficiencies when determining return on investment. Second, unit efficiency is not taken into account. Third, the loss of human capital is never determined when bases are realigned/closed. Last, the Cost of Base Realignment Actions (COBRA) model has deficiencies when analyzing Reserve Component actions.

The most significant argument of why the 131FW should not be realigned is highlighted in the United States Government Accountability Office (GAO) Report. As the report points out, Lambert IAP AGS results in a 20-year net present value cost (not savings) of \$22 million and a 63-year payback period. However, by combining Lambert IAP with the closure of Otis ANGB and the realignment of Atlantic City IAP AGS, the Air Force was able to mask the cost of Lambert IAP AGS in overall savings of \$336 million and a 3-year payback period. The savings at Otis ANGB are also being questioned.

As already mentioned in the BRAC process section, a unit's efficiency is never taken into consideration. Reserve Component squadrons are more cost effective than active duty units. The 131FW has the lowest operating budget and the lowest cost per flying hour of any F-15C unit in the Combat Air Forces (CAF). These details were never taken into consideration when deciding which bases to realign/close.

BRAC also does not take into account the loss of human capital that will occur with the realignment of the 131FW or the ANG as a whole. Although the BRAC report recognizes the importance of ANG experience level (24 versus 18 Primary Aircraft Assigned, and the Air Force Organization Principles White Paper), it makes poor assumptions that ANG personnel will follow realigned aircraft. This may be an accurate assumption with active duty personnel; however, Air National Guard members generally are local civilians with jobs and families and are unwilling to relocate.

Lastly, COBRA makes inaccurate assumptions and underestimates the total cost associated with realigning and closing reserve component bases. As one example, the cost associated with retraining pilots from one aircraft to another is not ever calculated in the COBRA model.

- Cost Summary
- 131FW Cost Summary
  - 131FW Cost Summary Point Paper
- Loss of Human Capital Summary
  - Loss of Human Capital Point Paper
- Return on Investment Summary
  - BCEG Slides - Hidden Cost
- COBRA Summary
  - COBRA Point Paper
- Primary Assigned Aircraft (PAA) Point Paper
- GAO Information
  - GAO Report Talking Paper
  - GAO-05-785 BRAC Assessment (Excerpt)

## Summary

The Department of Defense (DoD) recommendation to realign Lambert-St Louis AGS results in a reduced capability to perform the Homeland Defense mission. This recommendation was based on a flawed BRAC process that inaccurately assigned military value and fails to achieve any cost savings. Through this process, the Secretary of Defense deviated substantially from four of the eight final criteria.

Lambert-St Louis AGS plays an important role in the nation's Homeland Defense strategy. The 131FW provides a Homeland Defense capability in the midwest United States defending some of our nation's most vital resources. Removing the 131FW from Lambert-St Louis AGS will result in a gap in the nation's air defense network.

The BRAC process failed to properly assess the military value of Lambert-St Louis AGS. The choice of attributes that the Air Force applied did not evaluate Lambert-St Louis' current mission of Homeland Defense. Flaws in the collection and application of data resulted in Lambert-St Louis AGS being assigned an incorrect military value ranking.

The realignment of Lambert-St Louis fails to achieve any cost savings over the 20-year period of BRAC 2005. In fact, according to the GAO, this realignment will be at the cost of \$22 million and have a payback period of 63 years. In addition, the loss of human capital is significant and the cost of recapturing it has not been addressed in the COBRA model. The 131FW at Lambert-St Louis AGS has the lowest operating budget and the lowest cost per flying hour of any F-15C unit in the CAF. The realignment of this unit is not cost effective and is contrary to the primary goal of BRAC.