



**DEPARTMENT OF THE ARMY**  
**OFFICE OF ASSISTANT SECRETARY**  
**INSTALLATIONS AND ENVIRONMENT**  
**110 ARMY PENTAGON**  
**WASHINGTON DC 20310-0110**

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SAIE-IA

1 March 2004

MEMORANDUM FOR Mr. Peter Potochney, Director, BRAC Office, OUSD (AT&L)

SUBJECT: Headquarters and Support Activities (HSA) JCSG Military Value Analysis Report and ISG Briefing

1. I appreciate the opportunity to review the draft Military Value (MV) Analysis Report. In general, we found the report sufficiently detailed to understand the MV approach; the approach is generally sound and adequate to the task.
2. We are concerned that the level of detail required for some questions may be more than activities can accurately support. We provide examples in the attachment, and recommend the JCSG review their MV approach with this in mind.
3. The Army is concerned that the HSA is requesting activities that were not included in the Capacity Data Call to respond to questions during the Military Value Data Call. It was our understanding, per OSD guidance, that the responses to the capacity questions would permit the JCSGs to select which activities should answer the MV questions. The Army looks forward to working this list with the HSA JCSG.
4. Additionally, to offer our concurrence, we will need to review the final and complete list of questions and data elements (Section 3) that will be included by the HSA JCSG in Data Call #2. It would be particularly helpful to identify what portion of the data elements required for the MV Analysis were already acquired in Data Call #1.
5. TABS looks forward to continuing to work with the HSA JCSG on MV and other efforts.

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 Craig E. College  
 Deputy Assistant Secretary of the Army  
 (Infrastructure Analysis)

CF:  
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 Mr. Tison, Chair, HSA JCSG

Specific Comments  
(By Functional Models)

**Major Administrative HQs**

P. 13-14, Civilian Personnel: Variable Base Operating Costs. Recommend that the question supporting this metric carefully define which personnel should be in the denominator: Military, Civilian, government contract, etc.

P. 19, Fiber Network Architecture: Recommend HSA edit the metric to reflect percentage of buildings connected as in the description paragraph (same comment applies to Fiber Network Architecture question on p. 70).

P. 20, Continuity of Operations Metric: Requests number of Presidential declarations of disaster since 1965. Past occurrence of disaster in a 40-year time frame is insufficient to determine probability of disaster occurrence (e.g. 100 year flood plain). TABS environmental experts do not think this is an insightful metric. From a technical perspective, we would expect little variation in this metric, which means it will add little discrimination to your model. Given these difficulties, and the low weight of 2%, we recommend that HSA JCSG reconsider the use of this metric.

Page 21, Quality of Life (QOL) Metrics:

Basic Allowance for Housing (BAH) as QOL: BAH is a poor proxy for QOL criteria. In this model BAH is being used as a cost of living metric. If Cost of Living is desired to measure QOL, then Army recommends using a cost of living index as in other models to reduce potential inconsistencies.

Percent of population with bachelor's degree within 30 miles of installation: Recommend revising to calculate using contiguous counties. Our concern is that Census Bureau data will not provide such data for the 30-mile radius. The Army plans on determining the percent of population that have bachelor's degrees by weighted average of contiguous counties. This data can be provided to HSA.

Another possible resolution is that the HSA JCSG (as well as other JCSGs) use the QOL Military Value Attributes created by the DoD-level QOL Working Group for Criterion 7. This too, is an acceptable answer.

**Installation Management**

P. 68, Geographical Clusters: Question in draft report asks each installation to identify all DoD installations and their distance from the installation within 100 miles of the installation. This will determine where the installation management function is authorized for review under HSA's charter. In principle, this question

should have been included in the Capacity Data Call so not all 99 Army installations would need to respond to all installation management questions. It also appears we do not have a standard for the number of installations within 100 miles that constitutes a “geographic cluster.” A better approach may be for the HSA JCSG analysis support team to use current technology to develop a standard, and then use such to identify installations within a geographical cluster. This approach may actually provide more accurate and timely data for the JCSG.

### **Headquarters and Support Activities**

P. 76. HSA has resubmitted original Capacity Data Call Question #446 in a manner that now directs the question to activities above installation and below the level of Major Headquarters. Activities that were not part of Data Call 1 (which focused on AMHA organizations identified in 5100.732 and President’s Budget exhibit 22). There are additional follow-on questions directed towards these activities.

The Army’s concern is the HSA JCSG may be requesting information from activities not included in Data Call 1. We understand this to be contrary to OSD guidelines. Recommend HSA JCSG request guidance on this issue from OSD.

At this time, HSA JCSG is unable to identify these specific activities or provide further clarification or reference documents. The Deputy Chair, HSA JCSG acknowledges that more work and discussion is needed in this area to identify activities and that HSA must be able to advise MilDeps which specific activities they want to respond. We look forward to working this issue with the HSA JCSG to identify respondents based on Data Call 1.

### **Central Data Bases**

Several questions request data that can be obtained through existing databases maintained by other federal agencies. To ensure consistency and accuracy, recommend these data sources be used rather than passing these questions to installations/activities for response.

Question 9 - BAH (04 w/12 yrs) – (DFAS), Not necessary if alternative OSD QOL attributes are used.

Question 16 - Cost of Living Index.

Question 54 - Civilian Locality Pay (OPM Web site).

Recommend that OSD, through the DST, direct all JCSGs to retrieve data available from existing federal databases from those sources, rather than burden the installations. Further recommend that the JCSGs and the services coordinate this data collection to reduce workload.

### **Level of Detail Requested**

Questions concerning facilities are at the activity and building number level. In the Capacity Data Call, installations were asked to identify each activity and building number with administrative space located on the installation. Many installations registered a complaint that this level of detail was extremely time consuming and manpower intensive. The HSA JSCG was approached on several occasions to see if they would reduce their scope of efforts in this area, but in the end the installations were directed to respond to questions as written. Army desires to see how additional data at the building level will be used by HSA JSCG to conduct its MVA.