

JUL 15 2005

Received

# State of North Dakota

July 14, 2005

The Honorable David M. Walker  
Comptroller General of the United States  
Government Accountability Office  
441 G Street, N.W.  
Washington, DC 20548

Dear Mr. Walker:

The Government Accountability Office recently sent the Congress a report containing a detailed analysis of the Secretary of Defense's recommendations for base realignment and closure. This report raised questions about the Secretary's decision to recommend that Grand Forks Air Force Base be realigned to receive an "emerging mission." While the report correctly notes that a candidate recommendation to close Grand Forks was changed to a realignment by the Infrastructure Executive Council one week before the BRAC recommendations were finalized, it appears that the GAO did not fully understand the reasons for that change.

Your report argues that:

The decision to realign rather than close [Grand Forks AFB] did not affect the need to move current aircraft and associated personnel to other bases to achieve the active and reserve mix. According to the Air Force BRAC report, this change to a realignment was based on military judgment to keep a strategic presence in the north central United States and on the fact that Grand Forks Air Force Base ranked high for acquiring a possible unmanned aerial vehicle mission. Even though Grand Forks Air Force Base was retained for strategic reasons, Minot Air Force Base is also located in North Dakota and is not affected by any BRAC recommendation. Furthermore, Minot Air Force Base scored only 3.4 points less than Grand Forks Air Force Base in the unmanned aerial vehicle mission area.

We disagree with several elements of this argument, some stated and some implicit.

### *Strategic Presence*

Regarding strategic presence, Grand Forks Air Force Base is currently the only active duty Air Force base between Minot and Massachusetts. The GAO authors apparently believe that retaining just one base between Montana and Maine is sufficient to provide "strategic presence." The Air Force and the Department of Defense's Infrastructure Executive Council simply disagree. Of the 18 Air Force bases with flying missions in the Northern tier in 1958, only three remain today – and one of those three is currently scheduled for closure.

Maintaining a strategic presence in the North Central United States does not mean keeping one base where once there were many. Nor is it simply about protecting local populations from a hypothetical attack. Maintaining a strategic presence in the Northern tier is important to protect a crucial recruiting base for the Air Force, for securing access to the least congested

airspace in the country, and maintaining access to polar flight routes needed in a potential future confrontation with China or a resurgent Russia.

#### *UAV Basing Alternatives*

Grand Forks is the Air Force's first choice for the UAV mission because it scores highest of all Northern tier bases on the UAV Mission Compatibility Index. Grand Forks' high MCI score reflects its suitability for other UAV missions in the future, which is why the Air Force has committed to basing a "family of UAVs" there.

Though it is not reflected in the MCI ratings, GFAFB also offers excellent potential for developing the tactics, techniques and procedures needed to operate UAVs in cold weather climates, essential for future operations. Military value selection criterion #2 was amended specifically to preserve "...the availability and condition of land...including training areas suitable for ...air forces throughout a diversity of climate...."

Most importantly, all current UAV bases are in the Southwest. Due to the closure of so many Northeastern bases in the past few decades and extremely heavy air traffic, the Air Force has determined that it is not feasible to base Global Hawk on the Eastern seaboard. The advantages of the great circle flying routes make Grand Forks the best available substitute for an East Coast Global Hawk base.

Grand Forks is uniquely suitable as a home for a family of UAVs for two other reasons: it is the only Northern tier base in close proximity to an Air Guard installation that can support an associate wing relationship and it is the only Northern tier base that is located near a world-class aeronautical university. The Air Force's Future Total Force plan contemplates increased reliance on the Guard for UAV operations, but UAVs cannot operate out of the international airport bases where most Guard units are located. As a result, active duty bases in close proximity to Guard units are particularly valuable. Both of these factors make Grand Forks an ideal location for Predator, Global Hawk, and other future UAV missions.

#### *BRAC Deliberative Process*

The GAO report appears to attach importance to the late date at which the Infrastructure Executive Council revised the Grand Forks candidate recommendation from a closure to a realignment. However, the timing of the IEC decision can be explained by two factors.

First, the IEC and Air Force were responding to concerns raised in late April by former Secretary of the Navy, General H.T. Johnson, who chaired a DOD "Red Team" that evaluated the draft Air Force list. The Red Team process was created to provide a final check on the Services' submissions and to raise overarching concerns like regional presence.

Second, only after all the service and Joint Cross-Service Group candidate recommendations were completed and could be evaluated in their entirety did the Infrastructure Executive Council examine the strategic presence issues associated with the closure recommendations for Grand Forks and Ellsworth Air Force Bases in the central United States. These issues were by design only considered at the end of the process, and the process worked. The fact

that the concerns which “saved” Grand Forks emerged in the final days of the BRAC process was almost a given due to the nature of those concerns.

The essence of the Air Force and DOD rationale for retaining Grand Forks Air Force Base is military judgment. Geography and clear unimpeded airspace are not amenable to simple economic analysis or a COBRA run. The Air Force’s requirement for UAVs and its need to establish a second UAV center has increased substantially and continues to increase, even since the publication of the last force structure plan. Prudent planning justifies retaining Grand Forks Air Force Base.

#### *Savings Estimates*

The GAO analysis finds that the decision to change Grand Forks from a realignment to a closure reduced the 20 year NPV estimate of savings from \$2.66 billion to \$1.98 billion, a cost of \$674 million. However, the report also expresses considerable skepticism with the DOD decision to include projected personnel savings in the calculations for BRAC, since the services do not intend to actually reduce their total manpower levels as a result of base closings. As the report notes, Air Force officials have indicated that active duty positions eliminated under BRAC will be redirected to relieve stress on high demand career fields, implying that no actual savings will be achieved. About half the net annual recurring savings DOD-wide can be attributed to projected military personnel reductions. The real savings from closing Grand Forks would be fairly small, and the long term strategic consequences – in terms of regional presence, access to airspace, and availability of a UAV base that can easily deploy both East and West – are very large.

I believe that it is important to note one other fact implicit in the GAO analysis. The aggregate data on the savings projected by each of the military services suggests that the Air Force is carrying more than its fair share of reductions in this BRAC round. Of \$19.2 billion in projected 20 year savings (NPV) achieved by the three services, \$14.6 billion is attributable to Air Force realignments and closures. That is over 75 percent of the tri-service total, and it seems disproportionate.

#### *Personnel Levels*

The GAO report also highlights the fact that “over 80 percent of the base’s personnel are expected to be eliminated or realigned under the revised proposal.” It is important to note that the 80 percent reduction figure only takes into account the departure of the tankers and the arrival of the Predator UAVs, which are to be flown by a Guard unit in Fargo. It does not take into account the anticipated arrival of Global Hawk nor other possible emerging missions – including a new generation of tankers. It also does not account for personnel billets that could remain at Grand Forks in order to man KC-135 tankers which do not flow from the active force to the Guard because of congressional prohibitions on KC-135E retirements.

#### *Flaws in the Air Force BRAC Tanker Analysis*

The GAO report ought to have highlighted several shortcomings in the Air Force BRAC analysis that led to an underestimation of the advantages of GFAFB as a tanker base.

Most notably, one of the Air Force's top principles for the BRAC round was to retain "tanker basing that optimizes proximity to mission." However, the method for determining "proximity to mission" was flawed. The measurement of proximity to mission was done using charts of domestic tanker refueling tracks that are used primarily for peacetime training. This measurement simply does not reflect the current reality of tanker operations. The domestic refueling tracks do not reflect operational deployments; in fact, about 80 percent of Air Mobility Command's effort is now being expended overseas. For the MCI tanker operations analysis, distance to associated training airspace should be complemented by distance to overseas mobility bases. Such a metric would advantage Grand Forks, because it can efficiently support deployments both to the east and west. In almost every case, GFAFB offers faster trip times to Baghdad, Mildenhall and other key overseas destinations.

Using only preset domestic refueling tracks also ignores the critical role of tankers in support of nuclear missions. This sells Grand Forks short, because it is the base best positioned to support B-52s from Minot AFB and is also well positioned to support B-2s from Whiteman AFB. (Grand Forks tankers also refuel Ellsworth B-1Bs, but these aircraft no longer have a nuclear mission.)

The Air Force analysis placed too much weight on existing infrastructure, especially ramp space, while undervaluing expansion possibilities. This error runs directly counter to the basic principle that BRAC ought to preserve that which cannot be easily duplicated. For bases like Grand Forks that have ample room to pour new concrete, expanding ramp space would cost a few tens of millions of dollars, a small amount in the context of BRAC. Grand Forks ranks near the top of all Air Force bases (8<sup>th</sup>) for unconstrained, buildable acreage for airfield operations with more than 400 acres. Yet ramp space effectively counts in three different places in the MCI, while unconstrained buildable acreage makes up only a tiny fraction of the overall score.

The standards for receiving high scores on the MCI for existing infrastructure appear to be arbitrary and far in excess of operational requirements. For instance, a tanker base only received a perfect score for ramps if it had over 851,000 square yards of parking space. You could park a hundred or more KC-135s in that much space – Grand Forks has only 334,000 square yards of apron space, yet is able to accommodate a super tanker wing. The Air Force has no plans to base 100 or more tankers at one location, so why set the standard for a tanker base to require that much ramp?

Finally, there is a significant disconnect between Air Force rhetoric about the importance of non-encroachment and attainment of air quality standards and the weight placed on those factors in the BRAC analysis. Grand Forks has no encroachment issues that could restrict operations and has plenty of uncrowded airspace for training and routine flight operations. Encroachment is not a problem in North Dakota now, and it won't be a problem twenty years from now. Grand Forks also has no air quality issues that could restrict operations. About eighty-five Air Force installations are located in areas that do not achieve minimum air quality standards; the Air Force may not be able to deploy additional systems at those bases in the future. Despite Air Force rhetoric about encroachment and air attainment, those factors

had tiny weightings in the MCI; encroachment counted only 2.08% of a tanker base's score and air quality accounted for only 1.35% of the score.

We appreciate your work analyzing the Secretary's recommendations. A copy of this letter is also being provided to the BRAC Commission.

Sincerely,



KENT CONRAD  
United States Senate



BYRON L. DORGAN  
United States Senate



EARL POMEROY  
United States House



JOHN HOEVEN  
Governor

cc: Anthony Principi, Defense Base Closure and Realignment Commission