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Navy/MC – Submarine Base New London – CT
BRAC COMMISSION – 2005
COFF: _____ DISPOSITION: Permanent

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The Case for
Naval Submarine Base New London
(SUBASE NLON)

"The First and Finest"

July 6, 2005





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The Case for Naval Submarine Base New London
"The First and Finest"

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STATE OF CONNECTICUT



M. JOE BELL, Governor
CHRISTOPHER DODD, Senator
ROBERT LIPINSKY, Senator
NORM C. J. JACOBI, Lieutenant Governor
CHRISTOPHER STOKES, MEMBER OF CONGRESS
RICHARD L. BLUMENTHAL, MEMBER OF CONGRESS
KATHY B. TAYLOR, MEMBER OF CONGRESS
RICHARD S. BLUMENTHAL, MEMBER OF CONGRESS

UNITED STATES CONGRESS



July 6, 2005

2005 Base Realignment and Closure Commission (BRAC I)
2525 South Clark Street
Suite 600
Arlington, VA 22202

Dear Chairman, Principals and BRAC I Commissioners:

Thank you for this opportunity today to present information we believe credibly supports the removal of Submarine Base New London from the Department of Defense (DOD) closure list.

The strategic arguments for removing Submarine Base New London from the closure list are clear:

- DOD made the decision to include Submarine Base New London based on a questionable change to the force structure.
- Through the review process, the value of what is at risk—the Navy's Submarine Center of Excellence—was lost.
- The importance of the proximity of the submarine base to the Naval Undersea Warfare Center, the vital significance of the collocation of the New London Submarine Base and Electric Room and the immense difficulty of reconstituting a nuclear-certified submarine base were overlooked in the review process.
- And, somewhere in the numbers, the fact that this proposal eliminates the only remaining operating naval base in the Northeast United States was overlooked.

In assessing Submarine Base New London, we found that DOD substantially and repeatedly deviated from the required BRAC criteria. To aid your thorough review, we have endeavored to share the key deviations with you today in our presentation and this accompanying document. We continue to refine our arguments as we wade through the



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massive amount of data. It is our hope that we can continue to work with you and your staff to ensure that you have the information you require.

We believe that when the Commission considers these points and reviews the analysis of the military, economic, and social contributions of Submarine Base New London, it will conclude that the base should not be slated for closure or realignment.

Thank you for your consideration and we look forward to hearing your thoughts and reactions as the Commission moves forward with its work.

Sincerely,

M. Jodi Reil
Governor

Christopher I. Dodd
Senator

Joe Lieberman
Senator

Nancy Johnson
Representative, 6th District

Christopher Saxton
Representative, 4th District

Ross DeLuca
Representative, 1st District

John H. Larson
Representative, 1st District

Robert Simmons
Representative, 2nd District



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The Case for New London: Executive Summary

The proposal to close Submarine Base (SUBASE) New London by the Department of Defense (DoD) would irreversibly restrict capabilities of the U.S. submarine force as an instrument of national security. Strategically, it is an unwise plan that offers little in return to the nation by way of military value or cost savings.

The strategic arguments for removing SUBASE New London from the closure list are clear:

- ✓ DoD made the decision to include SUBASE New London based on a questionable change to the force structure.
- ✓ Through the review process, the value of what is in effect the Navy's Submarine Center of Excellence was lost.
- ✓ The importance of the proximity of SUBASE New London to the Naval Undersea Warfare Center, the vital significance of the co-location of the SUBASE and General Dynamics Electric Boat (EB) and the immense difficulty of reconstituting a nuclear-certified submarine base were overlooked in the review process.
- ✓ And somewhere in the numbers, the fact that this proposal eliminates the only remaining operating naval base in the Northeast United States was lost.

Not only is the plan strategically flawed, but also DoD substantially and repeatedly deviated from the required BRAC criteria. The substantial deviation in military value resulted from selective scoring on criteria 1 through 3.

- ✓ SUBASE New London received no extra points for hosting the nation's only submarine school.
- ✓ SUBASE New London should have received a higher score for its modern piers capable of berthing submarines in a safe and efficient manner.
- ✓ In the short term, closing SUBASE New London will saddle the Navy with high upfront costs that prevent recapitalization, curb operational flexibility, and create unnecessary readiness issues. In the long term, it will retard the subsurface fleet's support base and force level.
- ✓ The Commander, Fleet Forces Command confirmed that closing SUBASE New London would limit the flexibility of the attack submarine force across the board.

Cost savings are overstated by DoD in criteria 4 and 5. DoD substantially deviated in the extent and timing of potential costs and savings.

- ✓ One time military costs are understated by \$100 million.
- ✓ Moving costs are underestimated by \$31 million.
- ✓ Costs of reconstituting the Submarine School and of building new piers, Bachelor Enlisted Quarters (BEQs), messing facilities and family housing in Norfolk and Kings Bay are understated.
- ✓ Personnel costs are overstated by \$84 million.

There was also substantial deviation in the other BRAC criteria 6 through 8.

- ✓ For criterion 6, the economic impact of closing SUBASE is understated because the "region of influence" used in the DoD analysis is too limited. The total impact on the economy is closer to 30,000 jobs and nearly \$3 billion annually.



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- ✓ Substantial deviation from criterion 7 results from understating the regional significance of SUBASE New London from the standpoint of homeland security. The challenges facing the receiving communities were also understated.
- ✓ DoD substantially deviated from criterion 8 where it underestimated closure costs by at least \$30 million and remediation costs over \$100 million.

SUBASE New London must be removed from the closure list. If the Commission closes the base, it will be making a force structure decision that Congress never intended it to make. It will destroy a center of excellence and lock the Navy into a reduced SSN force level. There are no strategic, military value or financial arguments for closing SUBASE New London. As stated earlier, its closure would irreversibly restrict capabilities of the U.S. submarine force as an instrument of national security.

Keep the Subase:
Four Compelling Reasons

1. Unsettled Force Structure Projections Require Maximum Flexibility
2. Vital Benefits of Multiple Submarine Activities
3. Substantial Deviations from Military Value Criteria
4. Relocation Costs Grossly Underestimated & Outweigh Benefits

An IRREPLACEABLE National Asset



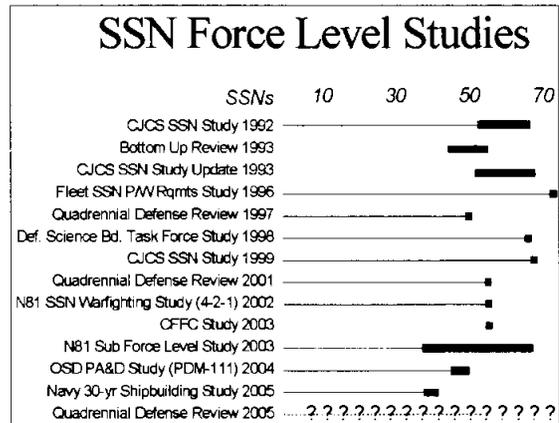
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The Case for New London: Strategic Overview

Questionable Change to the Submarine Force Structure

The recommendation to close SUBASE New London is based on questionable force level assumptions. The Government Accountability Office (GAO) in its *Analysis of DoD's 2005 Selection Process and Recommendations for Base Closures and Realignment*s released July 1, 2005, specifically addresses "the uncertainty of the number of submarines and surface ships required for future force." The submarine force has been studied repeatedly through 14 studies in the last 12 years. The SSN force projections used to justify the proposed closure of SUBASE New London have yet to be signed off on by the official stakeholders. The United States' SSN force stands at 54 today. Just last month, Vice Admiral Charles Munns, Commander, Naval Submarine Forces, testified before the House Armed Services Committee's Projection Forces Subcommittee that "54 submarines are about what we need into the future." We are also just months away from the release of the 2005 Quadrennial Defense Review for SSN force levels which will contain the official projection.



If closure of SUBASE New London is implemented, it is irreversible. In other words, closing SUBASE New London amounts to a final decision to retard the U.S. attack submarine fleet in quantity and quality. Without the base, the submarine fleet is stunted—double-berthed in crowded locations, unable to grow. Without the base, the submarine fleet's readiness suffers from rising costs and foregone efficiencies that come from the synergies surrounding New London. In the appendix of this document, is a letter from the Chairman of the House Armed Services Committee Duncan Hunter and the Chairman of the Projection Forces Subcommittee Roscoe Bartlett expresses their concern that the Navy used unacceptable assumptions about the future nuclear attack submarine force to justify its decision to recommend closure of SUBASE New London. Chairmen Hunter and Bartlett state clearly that: "A decision to close SUBASE New London would lock the Navy into an artificially low force level and damage the national security of the United States."

"A decision to close SUBASE New London would lock the Navy into an artificially low force level and damage the national security of the United States." Chairman Duncan Hunter, House Armed Services Committee, and Chairman Roscoe Bartlett, Projection Forces Subcommittee

Closing this vital military asset when foreign attack submarine forces are proliferating is a mistake. The Chinese Navy, alone, has at least 18 new submarines under construction as of June 2005. Of these, Russia is building eight and at least ten are in Chinese shipyards. Within ten years, China could have twice as many modern submarines than the United States; after 2025 the advantage could reach three to one. This influx of Chinese orders is actually allowing the resurgent Russian Navy to procure additional attack submarines at lower costs.



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Closure would also impact flexibility in the attack submarine fleet. The option to homeport SSNs in New London for use in the Pacific and Asia would be lost. From New London, Atlantic based submarines have a short path to the Pacific. Via the polar icecap route, the Taiwan Strait is 11,000 miles from New London and 12,300 miles from Kings Bay regardless of whether its boats take the polar ice cap route or the Panama Canal.

If SUBASE New London is closed, the synergistic benefits would be lost forever. This concentration of capabilities and knowledge is unique and irreplaceable. SUBASE New London is the linchpin of a regional partnership responsible for nearly all major advancements in U.S. undersea warfare tactics, strategies, design, maintenance and construction over the last century. The value of maintaining a viable nuclear-fueled submarine force into the future – a responsibility the United States Government cannot execute in full without SUBASE New London – cannot be overstated.

The undeniable reality is that the closure of SUBASE New London would irreversibly restrict capabilities of the U.S. submarine force as an instrument of national security.

Closing SUBASE New London is the wrong thing to do. The recommendation is based on questionable SSN force level analysis, it will be irreversible when the final force level is determined, it impacts negatively the flexibility of the attack submarine force and it destroys the synergistic benefits from multiple submarine activities. The undeniable reality is that the closure of SUBASE New London would irreversibly restrict capabilities of the U.S. submarine force as an instrument of national security.

Value of What is in Effect the Navy's Submarine Center of Excellence

The submarine industrial base is a unique, highly integrated "Mini Military-Industrial Complex" consisting of co-located and closely proximate facilities, installations, and people. SUBASE New London is the very heart of this community. Dedicated to all facets of Naval submarine warfare and technological development, it is focused on maintaining world superiority in this specialized area by the United States Navy. The challenges of operating in the depths of the ocean, with a nuclear propulsion plant and meeting war-fighting requirements have required this industry to achieve ever higher levels of technical excellence.

Any major change in current repair volume at EB will impact the costs of new submarine construction. A conservative estimate is that the yearly increased cost to the Navy would be \$30 million and could go as high as \$50 million.

There is a 'culture' of excellence related to nuclear and submarine safety, which has achieved levels of un-paralleled innovation. This culture was hard to develop and must be diligently tested to ensure it is not lost. The tremendous downsizing in the entire industry during the 1990s was a significant challenge – the ongoing performance of the fleet and the recent delivery of the first Virginia class submarine and the SSN#23 are very positive indicators of the quality of the industrial base and this culture. This overarching, unique "Nuclear Sub-Safe" culture extends over all parts of the submarine's life cycle.

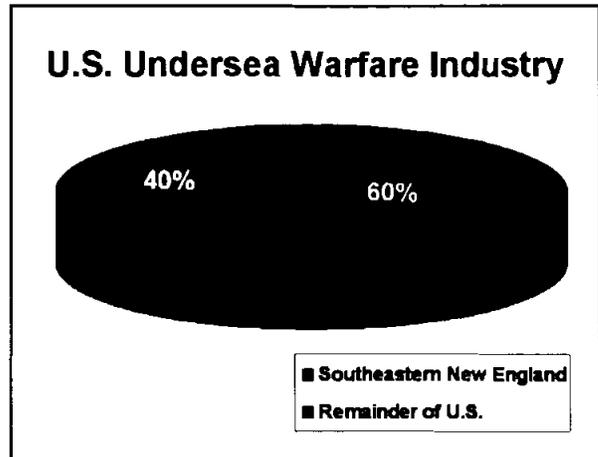


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Separating the homeport of active fleet submarines will negatively impact critical skills retention and the long-enjoyed benefit of synergy between SSN operators, designers, engineers, constructors and maintainers. The unique and proven nuclear and submarine safety and innovation culture resident in the CT/RI area would be degraded. Complete shutdown of SUBASE New London and its physical reconstitution per the BRAC plan will be expensive. More significantly, 100 years of experience by the regional civilian community would be lost as civilian professionals would be unlikely to relocate.

The Submarine Center of Excellence and its vital industrial base are a national security asset that depends on combined engineering, repair, and new construction activity. Significantly, any major change in current repair volume at EB will impact the costs of new submarine construction. The yearly increased cost to the Navy would be conservatively estimated at \$30 million and could go as high as \$50 million. Over the four-year construction period for a submarine, that would mean an added \$120 million to \$200 million to the price tag of a new submarine.





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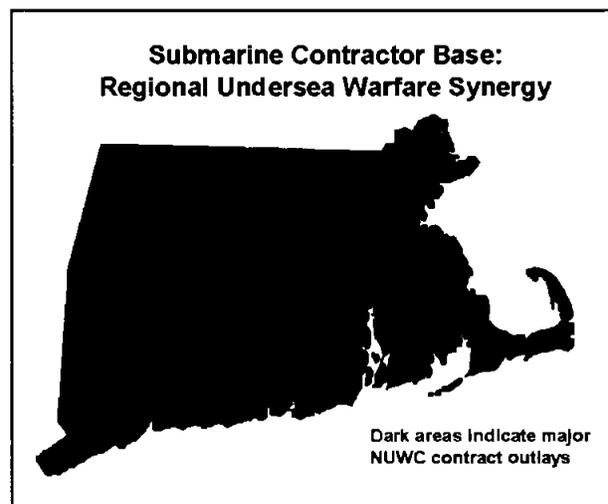
Importance of Proximity to Naval Undersea Warfare Center

The Naval Undersea Warfare Center (NUWC) located 40 miles from SUBASE New London in Newport, RI, is the Navy's full-spectrum research, development, test and evaluation, engineering and fleet support center for submarines and offensive and defensive weapons systems associated with undersea warfare. Its mission is to provide the technical foundation that ensures the Navy's undersea superiority.

The proximity of SUBASE New London and NUWC enables close collaboration resulting in innovation. If the proximity is lost, the collaboration and innovation are lost too.

The Center is a core component of the Submarine Center of Excellence. To achieve its mission, NUWC needs to look beyond its own organization for good ideas and best practices. While NUWC scientists often work with industry and academia to forge cooperative alliances, their work with practitioners is critical, particularly Submarine Development Squadron 12. The closure of SUBASE New London will limit easy and direct access to active submariners. Without this interface, our nation's undersea superiority will face a new challenge.

Subsequently, the value of what is in effect the Navy's Submarine Center of Excellence extends beyond the Connecticut border. NUWC and the Electric Boat Quonset Point Facility, where construction of every EB submarine begins, are key components. If the Navy closes SUBASE New London, this regional partnership, which has ensured America's undersea dominance, will be lost forever.



Vital Importance of NL-Electric Boat Co-Location

The mutually supportive relationship between EB and SUBASE New London is a national asset important to the country's security. The SUBASE and EB are only three miles apart and have worked together for almost 100 years in the development and life cycle support of U.S. submarines. This partnership supports submarine affordability, operability, and maintainability. Technical submarine design, engineering and maintenance expertise co-located with submarine operational expertise is invaluable in providing localized resources and maximum service to the Fleet, at minimum cost. In 2005 and beyond, EB projects additional overhaul and repair volume from SUBASE New London will generate \$50 million in overhead savings for the Navy on new construction per year.

Additional overhaul and repair volume from SUBASE New London will generate \$50 million in overhead savings for the Navy on new construction per year.

Beginning with concept formulation and submarine design development, and continuing through life cycle support, EB, SUBASE and its tenant commands have fostered a relationship focused on improving and supporting the fleet. EB relies on Navy submarine experts to provide operational insight, to prototype



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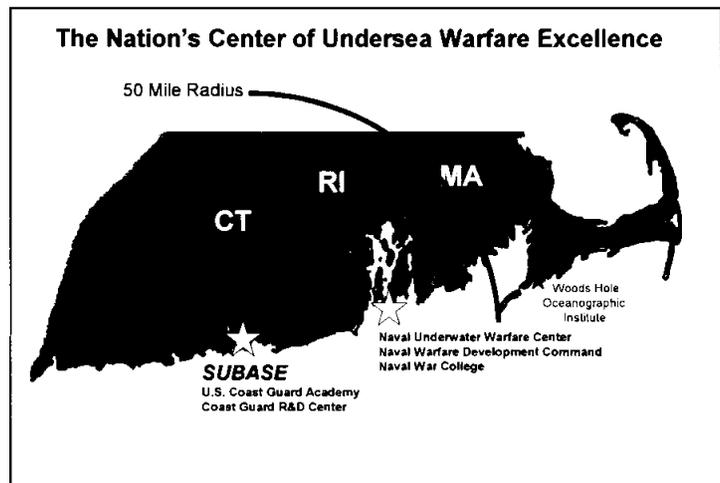
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new design concepts, and to participate in class design and operability reviews. Conversely, SUBASE depends on EB to provide skilled tradespersons, supervision, and engineering support for boats homeported at New London. SUBASE also depends on EB for training equipment used to certify submarine crews as proficient for deployment. About 500 of EB's 8,600 local employees actually work inside the gates of SUBASE every day.

Taking a broader perspective, SUBASE New London, NUWC, the Naval War College in Newport, RI, and EB form a unique concentration of naval submarine and undersea warfare expertise and capability. All phases of submarine development and operation occur within a 50 mile area, including strategic studies at the War College, advanced technology development at NUWC and EB, design, construction and life cycle support at EB, training and education of all submariners at the Submarine School, operation and maintenance at Submarine Group 2, and development of tactical employment at Submarine Development Squadron 12.

This concentration of capabilities and knowledge is unique and irreplaceable, and far exceeds the military value of SUBASE New London when viewed independently as a ship homeport and/or schools command.

As the Commission contemplates the future of the SUBASE, it should carefully consider the submarine design, construction, and life cycle support capabilities inherent with EB, the close relationship between EB and SUBASE New London, and the value this region delivers to the U.S. Navy.





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The Case for New London: Military Value Arguments

Criterion 1:

Current and Future Mission Capabilities

Substantial Deviation from Selection Criterion 1:

Closing SUBASE New London would have a startling impact on operational readiness. In recognition of this fact, the Commander, Fleet Forces Command (CFFC) opposed DoD's recommendation to close the base. There was inadequate consideration of the effect such closure would have on joint war fighting, training and readiness. Unique, special mission capabilities were also overlooked in the military value evaluation. The evaluation was such that SUBASE New London's nuclear waterfront was given no points. Further, moving the Submarine School to Kings Bay while 80% of the submarines are located in Norfolk could not be more inefficient.

Flaws in the military value scoring led to a systematic undervaluing of SUBASE New London. Relevant information was often disregarded and inconsequential data was largely overvalued. Disregarded questions SEA-14 and SEA-15, requesting information on unique and/or specialized capabilities and missions, were appropriate to showcase the synergistic value of keeping bases like SUBASE New London with clearly specialized missions. Yet, these questions were eliminated and the answers were never considered in the evaluation. Similarly, question SEA-22 asking for data regarding unique operational training facilities was subsequently deleted from the record.

Moreover, answers to irrelevant questions relating to anti-air warfare range and naval gunnery proximity were overvalued. Considering that New London's attack submarines have neither anti-air warfare capability nor naval gunfire capabilities, it is puzzling that these criteria would even be relevant. There was also inaccurate scoring in the evaluation. For example, the Navy's questions SEA-4 and SEA-5 on pier space appear to be inconsistent and inaccurate.

The combination of the inaccuracy and deviations resulted in a military value score for SUBASE New London of 50.68, placing it 14th on the list of 29 for Surface-Subsurface Operations. When this assessment is reasonably adjusted to overcome inaccuracies, the military value score for the base increases by 12.87 to 63.55. The new score would move New London upward to 4th place, a position that reflects more accurately its true military value and likely removing the SUBASE from closure consideration.

Piers	1.24
Bonus	4.15
Maintenance	0.73
DePerming	0.69
Nuclear	1.55
ESOC	1.54
AAW Range	0.54
Gun Range	0.79
Distance to 50	0.29
Dredging	0.34
Hospital	1.01
Total Adjustments	12.87
SUBASE NL MIL VAL	50.68
ADJUSTED MIL VAL	63.55



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Criterion 2:

Availability and Condition of Land, Facilities

Substantial Deviation from Selection Criterion 2:

The DoD deviated substantially from BRAC Selection Criterion 2. The availability and condition of land and facilities at SUBASE New London has not been challenged. Its buildings and piers are modern and represent a larger military construction investment over the last decade than at Kings Bay. The proposal to replicate the entire complex at two other locations, with substantial new construction, suggests an inaccurate assessment of conditions at the "existing location" and a substantial deviation from the selection criteria.

- ✓ At SUBASE New London, 10 piers exist, with berths for 20 SSNs. In Norfolk and Kings Bay, new piers must be constructed, and when completed will require nesting, an operational impediment.
- ✓ At SUBASE New London, Sub School exists, within walking distance of the piers. At Kings Bay, new training facilities must be constructed, and when completed will require a bus to get to the distant piers.
- ✓ At SUBASE New London, repair and maintenance facilities exist at the piers. At Kings Bay, new facilities must be built.
- ✓ Utilization of Cruiser Equivalent Length produces a distorted picture of SSN pier capacity and supports a sub-optimum berthing condition at the receiving locations, a clear deviation from the selection criteria.

The new berthing configurations at Kings Bay and Norfolk are costly and suboptimum. At Norfolk, pier construction and dredging is required. Even after this investment, SSNs will be berthed in a suboptimum nesting configuration. Significant in-port disruption of training, maintenance, and repair occurs each time either the inboard or outboard SSN must be repositioned for such routine events as weapons handling, crane support, underway departure or arrival. Repositioning is an all hands evolution taking up about half of an in-port day. The availability and condition of piers and facilities at SUBASE New London avoids this readiness impact. Furthermore, implementing this proposal actually adds new capacity, at substantial cost, to Norfolk, with no measurable increase in its military value.

At Kings Bay the berthing configuration is similarly problematic. The nesting requirement imposes the same operational limitations. As in Norfolk, new capacity must be added with new piers. Unlike Norfolk, pier construction dredging has not been stipulated, though unlike New London, Kings Bay must do channel maintenance dredging annually. Also the Explosives Safe Quantity Distance (ESQD) arc limits land use at Kings Bay. Though Kings Bay has significant available land, the utilization of the area circumscribed by the ESQD arc is restricted.



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Criterion 3:

Accommodate Contingency, Mobilization, Surge and Future Force Requirements

Substantial Deviation from Selection Criterion 3:

As discussed in earlier sections, there is uncertainty regarding future submarine force levels. The current proposal eliminates surge capacity for Atlantic nuclear attack submarines, though ample surge capacity already exists at SUBASE New London. One cannot overlook that it will be impossible to reconstitute the nuclear waterfront once closed. The selection criteria identified difficult-to-reconstitute facilities as a surge requirement. Accordingly, the recommended closure of SUBASE New London represents a substantial deviation from Criterion 3.

The Navy's configuration analysis appears to preordain the recommendation. The major elements of the configuration are:

- ✓ One strategic (ballistic missile) nuclear submarine homeport per coast
- ✓ Two ports on each coast capable of cold iron berthing a nuclear powered carrier
- ✓ Implicitly, no distinction between subsurface and surface capabilities

Even with these restrictions, SUBASE New London stays open in the majority of results and remains the optimum solution. Interestingly enough, two naval bases under similar circumstances were exempt from consideration. SUBASE San Diego was protected from the threat of closure and remains open in an effort to "align industrial facilities and capabilities" in a way that already exists in New London. A decision on Naval Station Everett was postponed until after the 2005 Quadrennial Defense Review, though the base scored the same exact military value (50.68) as New London.

Criterion 4:

Cost of Operations and Manpower Implications

Criterion 5:

Extent and Timing of Potential Costs and Savings

Substantial Deviation from Selection Criteria 4 and 5:

In assessing the cost of operations and manpower implications along with the extent and timing of the potential costs and savings, DoD used the Coast of Base Realignment Actions (COBRA) model to forecast costs and savings. It is important to note that COBRA is a non-budget quality-costing model. It depends on inputs of varying quality from numerous sources. In the COBRA modeling, DoD introduced flaws into the model such as mixed sources of inputs, mixed quality of inputs, omitted costs and overstated savings. It is the overstated savings that drove the results and confound the comparability and value of the COBRA output.

The SUBASE New London recommendation significantly deviated from Criteria 4 and 5 by greatly understating the cost of operations and manpower implications associated with the proposed closure. The manpower shift associated with closure actually doubles the personnel at Kings Bay. To accommodate this dramatic increase, substantial construction is required within the existing base. Kings Bay does not



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have existing SSN maintenance and supply support facilities and these will need to be built as well. Additionally, personnel transfers are included as savings.

The savings are overstated because there is an assumed overcapacity of billets/personnel at Kings Bay and Norfolk. In this way, the Navy was able to ~~claim~~ savings from elimination of billets through the closure of SUBASE New London. However, the same billets/persons and related savings could be eliminated without closure of SUBASE New London. Specific costs misstated in the Cobra analysis are shown in the chart below.

COBRA Analysis Overview

One-time military construction costs underestimated: **\$190 million**

One-time moving costs understated: **\$31 million**

Environmental closure costs understated: **\$31.1 million**

Environmental remediation costs ignored: **\$101 million**

Recurring personnel savings overstated: **\$84 million/year**

Recurring other unique costs underestimated **\$42 million/year**

DoD's analysis underestimated the cost of reconstructing the Submarine School training facilities. In its analysis, the Navy used a construction cost of \$211 per square foot to construct the training center. This is similar to the cost to build a typical high school. Recent experience indicates a more accurate figure would be \$325 per square foot. This increased cost can be attributed to higher structural & services requirements, such as IT services and security to a secret level. The \$114 per square foot increase results in additional costs of \$47 million. To actually construct an equivalent footprint to match the 10 buildings that exist at SUBASE New London, the cost would increase another \$28 million. However, this estimate does not take into account site issues that exist at Kings Bay, which may require deeper pilings/foundation. Per the Federal Emergency Management Agency (FEMA) report on the soil conditions at Kings Bay, construction costs would likely cost an additional \$30 million plus. This is because the soil conditions at Kings Bay require additional site work such as piles and stronger foundations.

Recurring personnel reduction savings were overstated by an estimated 50% or \$84 million/year. In fact, \$169 million of the \$192 million net recurring savings was due to the elimination of 1,560 billets.

DoD analysis eliminates:

- ✓ 136 officers @ \$124,972 = \$17 million per year
- ✓ 681 enlisted @ \$82,399 = \$56 million per year
- ✓ 743 Civilians @ \$59,959 = \$53 million per year
- ✓ Basic allowance for housing = Savings of \$43 million per year

The expected personnel savings are unrealistic and are not likely to materialize. Examples of overstated billet reductions include medical and security personnel. Today, 528 medical billets at SUBASE New London service 8,045 personnel. Only 62 are to be relocated to service 6,485 relocated personnel. This represents an unfathomable 725% increase in the ratio of service personnel to medical providers. Of the 197 security personnel at SUBASE New London, Norfolk requested 91 billets yet Kings Bay requested



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only one additional security billet, while it is scheduled to receive 6,000 personnel and six nuclear attack submarines.

The cost of relocating the personnel and assets of SUBASE New London was understated by \$31 million. The Navy's analysis did not include the cost of installing and testing equipment at the receiving facility, which is estimated to be \$16 million. The cost of personnel relocation was underestimated \$51 million.

*Correcting for the understated housing costs and environmental costs
extends the break-even date to 2057.*

The real break-even date for the closure scenario is so far in the future that all claims to savings are debatable. While DoD states the closure of SUBASE New London will break-even in 2013, correcting just some of the items above extends the date significantly. When the COBRA model is adjusted for understated costs and personnel, the break-even date extends to 2041. Correcting for the understated housing costs and environmental costs extends the break-even date to 2057.



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Criterion 6:

Economic Impact on Existing Communities in the Vicinity of Military Installations

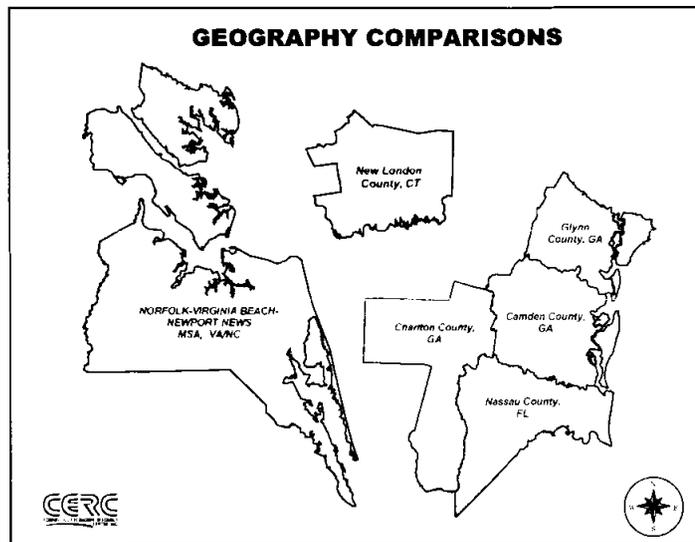
Substantial Deviation from Selection Criterion 6:

Closing SUBASE New London would destabilize the economy of the entire state of Connecticut. The state is home to 1.2% of U.S. population. Nearly 68 % or 8,586 out of 12,684 U.S. jobs lost due to base closures would result from DoD's recommendations to close SUBASE New London. Such a drastic and unwarranted measure could potentially impact \$3.3 billion of Connecticut's already fragile economy with more than 30,000 jobs lost. Experts estimate it could take an entire generation for the state to recover.

Experts estimate it could take an entire generation for the state to recover.

DoD's methodology is inadequate to address the full scope of the impact the closure of SUBASE New London would have. The region of influence used in the impact assessment is artificially small, excludes important economic linkages and understates the economic impact to Connecticut. DoD only measured the economic impact on New London County, failing to assess possible effects on surrounding counties. However, when assessing the functional economic region in Georgia, DoD included four state counties in their analysis. There was also an incomplete accounting of direct jobs including 1,000 contractor jobs and 2,950 spousal jobs.

Simply stated, DoD did not conduct the required complete economic impact analysis. DoD measured only the total potential job change in the economic area and the total potential job changes as a percentage of total employment in the economic area. Fiscal impacts, including \$28 million in unemployment compensation costs, were not properly considered.



Regional competitiveness was also largely overlooked. Remaining employers can expect a 2.5% increase in unemployment insurance costs due to the layoffs resulting from the closure of the SUBASE. These higher costs would lead to an additional 3,000 lost jobs in the region. Other critical considerations missing from the DoD's report include:

- ✓ Cost of the loss of veterans' services provided on base
- ✓ Loss of revenue to private education institutions from military and non-military households
- ✓ Mission critical contractors on base
- ✓ Replacement cost of public safety services provided by the base
- ✓ Impact of members of military and non-military households working in Connecticut's private sector
- ✓ Mutual benefit associated with the close proximity with EB



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Criterion 7:

Ability of the Infrastructure of Both the Existing and Potential Receiving Communities to Support Forces, Missions and Personnel

Substantial Deviation from Selection Criterion 7:

While the DoD was tasked with assessing SUBASE New London's ability to support forces, missions and personnel, its analysis failed to recognize that historically, the base had been selected as a preferred alternative to Norfolk and Kings Bay. In July 1995 in an exhaustive Final Environmental Impact Study (FEIS), New London was declared the preferred alternative to homeport the SEAWOLF class of submarines rather than Kings Bay or Norfolk. The decision was attributed to New London's significant added value to submarine force operations that accrue with the regional concentrations of submarine command, tactical development, maintenance, training and medical research assets. In total, SUBASE New London ranked first in 10 of the 14 evaluation criteria.

Adding to New London's regional significance is the base's role in homeland security. The region's gaming, tourist and industrial assets make it a target-rich environment. The Mohegan Sun and Foxwoods casinos alone draw between 40,000 and 60,000 patrons per day. The location of the SUBASE with its own fire department and HAZMAT team is critical to responding to local emergencies and events at other U.S. ports on the Eastern seaboard. Without SUBASE New London, submarines and other naval assets would need to come from Virginia and would not be able to respond as quickly or have the "omnipresent factor" that exists today. The SUBASE and the Navy have been leaders in regional counter-terrorism efforts. The base has responded to emergencies from South Weymouth, MA, to New York City. Because of its unique skills, it represents a key federal asset for Southern New England.

Criterion 8:

Environmental Assessment and Restoration

Substantial Deviation from Selection Criterion 8:

DoD significantly deviated from the BRAC selection criteria by excluding appropriate environmental closure and restoration costs from its evaluation. This exclusion of remediation costs and understatement of closure costs underestimates the impact of closure on communities and ignores the legal implications of the Federal Facilities Agreement and original land lease agreements. These environmental failures significantly skew the savings projections associated with the bases closure. All told, the Navy failed to consider more than \$132 million in environmental closure and restoration costs.

*All told, the Navy failed to consider more than
\$132 million in environmental closure and restoration costs.*



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The Navy did not accurately project the immediate and unavoidable environmental expenses associated with the closure of SUBASE New London. For example, the Navy estimated hazardous waste costs at only \$1,000, while the Connecticut Department of Environmental Protection (DEP) more accurately projected the same work at \$3,100,000.

While the Navy failed to identify costs associated with underground tanks, DEP estimated these costs at \$1,338,750. The Navy calculated only \$9,950,000 was necessary for radiological maintenance, yet DEP estimated \$31,510,000 would be required to accomplish the work. In total, the Navy estimated immediate/unavoidable closure costs at \$9,951,000 compared to DEP's \$41,123,250. Overall, the Navy failed to consider more than \$31 million in costs associated with closure.

Immediate/Unavoidable Consequence of SUBASE NL Closure

<u>Program</u>	<u>DEP Estimate</u>	<u>Navy Estimate</u>
•Hazardous Waste	\$ 3,100,000	\$ 1,000
•Underground Tanks	\$ 1,338,750	Not Identified
•Radiological	\$ 31,510,000	\$ 9,950,000
Total	\$41,123,250	\$9,951,000
Costs Not Considered by the Navy	\$31,172,250	

<u>Program</u>	<u>DEP Estimate</u>	<u>Navy Estimate</u>
•Superfund	\$65,019,975	\$23,000,000
•Hazardous Waste	\$12,682,806	0
•Underground Tanks	\$10,865,000	Partial in Superfund
•PCB	\$ 652,147	Partial in Superfund
•Pesticides	\$35,000,000	0
•Radiological	Unknown	
Total	\$124,943,228 (1)	\$23,000,000
Costs Not Considered by the Navy	\$101,000,000 (1)	

(1) Does not include costs attributable to radiological remediation. Costs unknown at this time. DoD has historically underestimated restoration costs (see case studies).

Similarly, the Navy underestimated costs associated with environmental remediation. The Navy estimated costs of \$23 million compared to DEP's \$65,019,975 just for the known superfund sites on the base. For pesticides, the Navy projected no cost, versus DEP's estimate of \$35 million. In sum, the Navy neglected to consider some \$101 million in costs associated with restoration.

Also not sufficiently considered are the additional savings and potential military benefits associated with natural resource conditions at New London:

- ✓ High shoaling rates at Kings Bay require significant annual channel and berth dredging and continuous sediment controls.
- ✓ High frequency of severe hurricanes and tropical storms at low-lying Kings Bay create a continuous high risk of impacts and related inoperability.
- ✓ Endangered right whales, manatees and sea turtles require costly operational protocols at Kings Bay.



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The Case for New London: Select Panelist Bios

Vice Admiral (Ret.) Albert H. Konetzni, Jr., United States Navy

A career nuclear submariner, Admiral Konetzni has successfully commanded at all levels and has extensive staff experience in strategic planning, personnel management, engineering, innovation, foreign affairs, and leadership. During his time as commander of U.S. submarines in the Pacific from 1998 until 2001, he engineered and executed an innovative plan to solve the Navy's high attrition of young sailors. The Navy immediately incorporated his program as a model, and today enjoys higher retention and lower attrition than ever before.

As Deputy Commander, U.S. Fleet Forces Command and U.S. Atlantic Fleet 2001 - 2004, Admiral Konetzni carried the responsibility for 156 ships, nearly 1,200 aircraft and 18 major shore installation manned by more than 129,000 personnel. The events of Sept. 11, 2001, tested the readiness of the Atlantic Fleet, and it was Admiral Konetzni who oversaw the readiness of Fleet assets.

He serves as chairman of the board of the U.S. Naval Institute and Board Member for the Larry King Cardiac Foundation. Admiral Konetzni has received the Distinguished Service Medal, six awards of the Legion of Merit, and three awards of the Meritorious Service Medal. He graduated from the United States Naval Academy and was commissioned an Ensign in 1966 and holds a Masters Degree in Industrial Personnel Administration from George Washington University. Admiral Konetzni retired from the Navy in September 2004.

George A. Sawyer, General Partner, John F. Lehman & Company

George A. Sawyer has been associated as a General Partner with John F. Lehman & Company (JFLCO) and its affiliated companies since 1991. JFLCO is a partnership focusing on aerospace, marine, and defense corporate mergers, acquisitions, and restructuring. He also serves as an independent consultant to a number of defense companies on technical, program management, and manufacturing issues.

Mr. Sawyer has been involved in major engineering and construction contract negotiation and execution for such major organizations as Bechtel Corporation, General Dynamics Corporation, and Sperry Marine. He served during the Regan Administration as Navy Assistant Secretary of the Navy for Shipbuilding and Logistics. Under his leadership, the Navy let contracts for over 40 ships, including ~16 to 20 involving major combatant ship design & construction (CVN, SSN, SSBN, CG, DDG, LHD, LSD and Refueling Overhauls). During this period, the SSN / CG / DDG / FFG / and LSD contracts were re-directed and organized to maximize competition under more stringent share lines and lower ceilings. Mr. Sawyer personally participated, along with NAVMAT & NAVSEA executives, in negotiations involving all naval nuclear new construction ship contracts plus those relating to CGs, DDGs and LHDs.

Mr. Sawyer received his BA in International Law from Yale University and did graduate studies in nuclear engineering at the U.S. Navy & Knolls Atomic Power Laboratories.

John P. Casey, President, General Dynamics Electric Boat

John P. Casey became president of General Dynamics Electric Boat on Oct. 1, 2003. Most recently, he served as Vice President - Operations, with responsibility for all construction activities at the Groton



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shipyard and the Quonset Point, R. I., facility. Before that, he was Vice President – Programs, overseeing existing submarine construction programs as well as strategic planning, business development and materials acquisition functions.

He also completed an assignment as site manager for Electric Boat's Quonset Point Facility, with responsibility for all facets of nuclear-submarine construction and manufacturing. These activities included steel processing and fabrication, machining, piping, sheet metal and electrical component assembly, and major unit packaging and outfitting to 1400-ton ship sections. Mr. Casey joined Electric Boat in 1979. A graduate of Worcester Polytechnic Institute where he earned a BS in Civil Engineering, Mr. Casey also holds an MBA from Rensselaer Polytechnic Institute and an MS – Management from MIT's Alfred Sloan Fellows Program.

John C. Markowicz, Executive Director, SouthEastern Connecticut Enterprise Region and Chairman, President, and Director, Technology for Connecticut

As Executive Director of the SouthEastern Connecticut Enterprise Region (seCTer) Corporation, Mr. Markowicz directs and coordinates a wide range of economic development projects designed to retain, expand, and recruit companies into the region's four industry clusters. As Vice Chairman of the Corporation for Regional Economic Development and Southeastern Connecticut Economic Development Coalition, he directly contributed to developing and defining the region's economic goals and strategies as well as implementing long-term and short-term objectives and policies.

As Co-Chairman of the State of Connecticut Nuclear Energy Advisory Council (NEAC), he was charged to monitor and observe the safe operation of nuclear powered electric generating facilities, with particular emphasis on maintaining public health and safety. As Member of the State of Connecticut Transportation Strategy Board (TSB) and two Transportation Investment Area Committees, Mr. Markowicz assisted in the research and evaluation of alternative approaches for addressing local and regional transportation challenges.

While serving in the U.S. Navy, he was Department Head aboard two fast attack nuclear submarines, on a submarine squadron staff, as Commanding Officer of four Reserve Units, and as the senior captain on the New England region headquarters staff. There he was cited for professional achievements with ten personal decorations including the Legion of Merit and awarded the Navy League Stephen Decatur Award for Operational Competence. He received his BS in Engineering with Distinction, from the U.S. Naval Academy in 1965.

James F. Abromaitis, Commissioner, Connecticut Department of Economic and Community Development

James F. Abromaitis was appointed Commissioner of the Connecticut Department of Economic and Community Development on September 26, 1997. Commissioner Abromaitis administers economic development and affordable housing programs for DECD, which is the lead agency for business and housing development related matters in the state. He has been instrumental in overseeing the state's Industry Cluster Initiative as well as coordinating all state and federal housing and community development programs within Connecticut.



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Commissioner Abromaitis is an ex-officio member of the Board of Directors of the Connecticut Housing Finance Authority, Connecticut Innovations, Inc., the Connecticut Development Authority, and a number of other boards, commissions and foundations. He held various management positions at Fleet Bank and the Connecticut Bank and Trust Company, including Vice President at both financial institutions. In 2000, the Biotechnology Industry Organization named him Outstanding State Executive of the Year.

Commissioner Abromaitis earned a BA in Urban Studies from the University of Connecticut in 1979 and an MA from the University of Connecticut in 1982.

Jeffrey Blodgett, Vice President of Research, Connecticut Economic Resource Center

As Vice President of Research at the Connecticut Economic Resource Center (CERC), Mr. Blodgett is responsible for the company's business and economic research services. Mr. Blodgett has held a variety of research positions in both academia and government over the past 25 years, including affiliations with Yale University and the Connecticut Department of Education.

Prior to joining CERC, he was research director at the Connecticut Department of Economic and Community Development. His extensive knowledge of Connecticut's economy is continually tapped to fill a number of vital roles both within Connecticut and the national economic development community.

Mr. Blodgett is a frequent presenter at national and international conferences dealing with economic development research. He is past president of the Hartford Area Business Economists (HABE) and is currently president-elect of ACCRA, the national professional organization for economic development researchers. He is also on the board of the New England Economic Project. He is on the editorial board of the Journal of Applied Economic Development Research. Mr. Blodgett holds a master's degree in research design and statistical methods.

Gina McCarthy, Commissioner of the Connecticut Department of Environmental Protection

Commissioner McCarthy previously served as Deputy Secretary of Operations within Massachusetts Governor Mitt Romney's Office for Commonwealth Development. There, she worked to coordinate the policies, programs and investments of the state's environmental, transportation, energy and housing agencies. In this capacity, she oversaw the formulation and implementation of major initiatives by the state's primary infrastructure agencies to promote smart growth and the development and implementation of the Commonwealth's first Climate Protection Action Plan.

Prior to that, Commissioner McCarthy was Undersecretary of Policy at the Massachusetts Executive Office of Environmental Affairs. In that senior advisory position, she expanded her oversight to include the preservation and protection of open space, farmlands and forests. Commissioner McCarthy has an extensive list of notable accomplishments at the local and state level and has served on numerous state and national committees, including the Massachusetts Low Level Radioactive Waste Management Board, the Massachusetts Renewable Energy Trust Advisory Board, and the New England Governor's Environment Committee. She received a BA in Social Anthropology from the University of Massachusetts at Boston and a joint Master of Science in Environmental Health Engineering and Planning and Policy from Tufts University.



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Brigadier General Thaddeus J. Martin, Adjutant General, Connecticut National Guard

Brigadier General Thaddeus J. Martin is the Adjutant General for Air, in the Connecticut National Guard. He is responsible for providing operationally trained, equipped and mission ready forces in support of both federal mobilization requirements and state emergency operations. There, he implements policies, programs, and plans as the direct link to all state assigned Air National Guard resources, providing information and evaluation, issue resolution and action recommendations.

The General's active military service began in 1977. Following his commissioning, through Officer Training School in 1980, he completed formal training as an Aircraft Maintenance Officer. Through his 12 years of active service, General Martin held several squadron and wing level assignments and completed a MAJCOM headquarters tour. Joining the Connecticut Air National Guard in 1990, the General held command positions at the squadron and group level and completed a statutory tour with the National Guard Bureau. Prior to his current assignment, General Martin served as the Vice Wing Commander, of the 103rd Fighter Wing. He received a B.A. in Management from Park College and a Masters in Public Administration from Golden Gate University.

Gabriel B. Stern, Director of Planning and Project Development, Connecticut Municipal Electric Energy Cooperative

Gabriel B. Stern is Director of Planning and Project Development for the Connecticut Municipal Electric Energy Cooperative (CMEEC), a joint action agency serving the electric transmission and generation needs of all Connecticut municipal utilities and the Mohegan Tribal Nation.

At CMEEC, Mr. Stern is responsible for a range of areas including resource development and acquisition, research and planning, economic development, legislative and environmental issues. He holds staff responsibility for Member generation and power resource development, customer contract negotiations, environmental compliance and Member services support. Prior to joining CMEEC, Mr. Stern's employment included energy and regulatory consulting, Director of Rates and Research at the Connecticut Department of Public Utility Control, and Chief of Forecasting at the Wisconsin Public Service Commission. Currently Mr. Stern is directing CMEEC's effort to establish new power supply sources in Connecticut at municipal utility sites, and to extend the life of existing generation. Mr. Stern holds a B.A. Degree in Mathematics from the University of Wisconsin, has done graduate work in energy and environmental studies, and completed the Executive Management program at the School of Management at Yale University.



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The Case for New London: Contacts and Contributors

Elected Officials:

Contributor	Contact	Phone	Email
Governor M. Jodi Rell	Phillip L. Dukes	(860) 524-6340	philip.dukes@ct.gov
Attorney General Richard Blumenthal	Joseph Rubin	(860) 808-5318	Joseph.Rubin@po.state.ct.us
Senator Christopher J. Dodd	Neal J. Orringer	(202) 224-2823	Neal_Orringer@Dodd.Senate.gov
Senator Joseph I. Lieberman	Frederick Downey	(202) 224-8707	Fred_Downey@lieberman.senate.gov
Representative Nancy L. Johnson	Dave Karvelas	(202) 225-4476	Dave.Karvelas@mail.house.gov
Representative Christopher Shays	Betsy Hawkings	(202) 225-5541	Betsey.Hawkings@mail.house.gov
Representative Rosa DeLauro	Ashley Turton	(202) 225-3661	Ashley.Turton@mail.house.gov
Representative John B. Larsen	Elliot Ginsberg	(860) 278-8888	Elliot.Ginsberg@mail.house.gov
Representative Rob Simmons	Justine Bernier	(202) 225-5004	justin.bernier@mail.house.gov

Government and Community Representatives:

Contributor	Organization	Phone	Email
Commissioner James Abromaitis	Connecticut Department of Economic and Community Development	(860) 270-8010	james.abromaitis@po.state.ct.us
Commissioner Gina McCarthy	Connecticut Department of Environmental Protection	(860) 424-3571	gina.mccarthy@po.state.ct.us
John Markowicz	Southeastern Region Connecticut Enterprise Region	(860) 437-4659	jmarkowicz@sector.org
Gabriel B. Stern	Connecticut Municipal Electric Energy Cooperative	(860) 889-4088	GStern@cmec.org
Jeffery Blodgett	Connecticut Economic Resource Center	(860) 571-6208	jblodgett@cerc.com
G.D. "Denny" Hicks	Chamber of Commerce Eastern Connecticut	(860) 464-7373	

Other Subject Matter Experts:

Contributor	Contact	Phone	Email
John P. Casey	Ted Hack	(703) 876-3000	thack@generaldynamics.com
Vice Admiral (Ret.) Albert H. Konetzni	Self	(912) 673-8430	konetzni@myway.com
George Sawyer	Self	(703) 418-6095	gas@jflpartners.com



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Appendix – Chairman Hunter and Bartlett Letter: Page One.

Congress of the United States Washington, DC 20515

July 5, 2005

The Honorable Anthony Principi
Base Realignment and Closure Commission
Polk Building
Suites 600 and 625
2521 South Clark Street
Arlington, VA 22202

Dear Tony:

We are seriously concerned that the Department of the Navy used unacceptable assumptions about the future nuclear attack submarine force to justify its Base Realignment and Closure recommendation to shut down Naval Submarine Base New London. A decision to close SUBASE New London would lock the Navy into an artificially low force level and damage the national security of the United States.

On May 17, 2005, the Chief of Naval Operations testified to Congress that the subsurface fleet has too much structure because the future SSN force level will be in the low-40s. The CNO said he believes the future SSN number is 41. Such a force level could not safely address the growing undersea warfare threats facing the United States.

Future defense requirements demand higher attack submarine numbers than those assumed by the Navy during the 2005 BRAC process – a gross departure from earlier plans. The last Quadrennial Defense Review specified a minimum force level of 55 SSNs necessary to fill the Combatant Commanders' high priority needs, with earlier and subsequent studies consistently placing acceptable SSN numbers well above 50. Vice Admiral Charles Munns, Commander, Naval Submarine Forces, recently testified to Congress that the attack submarine fleet should be kept at its current size of 54 because our Combatant Commanders already lack the vessels to complete priority operations. At the same hearing, Admiral Kirkland Donald, Director, Naval Reactors testified that a low procurement rate impairs the defense industry's ability to produce affordable, quality nuclear submarines for the United States Government, its only customer.

We are executing technology programs that may halve the size and cost of future attack submarines. The "Tango Bravo" (*technical barriers*) initiative is already yielding breakthroughs in submarine design and propulsion. These advances may soon allow the Navy to buy more SSNs with less funding; but closing SUBASE New London would prevent the Navy from exploiting these potential gains, because the service would lack the surge capacity to berth and maintain additional vessels.

Closing SUBASE New London would eliminate valuable berthing and facilities, locking the Navy into a dangerously low force level. Moving SUBASE New London's 18 homeported SSNs to Norfolk and Kings Bay — at great cost — would cede valuable surge capacity and squander the nation's leading submarine base.

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Appendix – Chairman Hunter and Bartlett Letter: Page Two.

The Navy's failure to use an adequate force level to produce its recommendation is a substantial deviation from the BRAC criteria. As you know, the first criterion of the BRAC process addresses the base's current and future mission capabilities and the impact on operational readiness of the total force of the Department of Defense, including the impact on joint warfighting, training and readiness. Another top criterion focuses on the base's ability to accommodate contingency, mobilization, surge, and future total force requirements at both existing and potential receiving locations to support operations and training.

The BRAC recommendation to close SUBASE New London does not conform to the Navy's true force needs. Closing New London will tie the SSN force to an insufficient force level and destroy the world's best submarine base in exchange for little or no savings. Please help us support the current and future needs of the Armed Forces by rejecting the Department of Defense recommendation to close Naval Submarine Base New London.

Sincerely,

Handwritten signature of Duncan Hunter in black ink.

Rep. Duncan Hunter
Chairman
House Armed Services Committee

Handwritten signature of Roscoe Bartlett in black ink.

Rep. Roscoe Bartlett
Chairman
Projection Forces Subcommittee



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Appendix – Article by Chairman of the House Armed Services Committee Duncan Hunter and U.S. Representative Rob Simmons

Hartford Courant

June 1, 2005

Members of a blue-ribbon commission are in Connecticut this week as part of a months-long process that will ultimately decide whether the submarine base near New London stays in business or the Pentagon is allowed to make a historic strategic mistake. We have confidence that the Base Realignment and Closure Commission will see the military and industrial value in New London that somehow the Department of Defense overlooked. Closing New London's base would destroy a center of excellence that's produced most major submarine advancements since the Navy took warfare undersea. Some of these milestones include the design and production of the USS Nautilus, the first nuclear-powered submarine, and the NR-1, a special sub that can dive almost half a mile to conduct research and perform search and recovery missions.

The Navy's submarine school, the Undersea Warfare Center, Electric Boat (the world's pre-eminent submarine-maker), hundreds of high-tech subcontractors and top ocean exploration resources all revolve around New London. Generations of shipbuilders, industry managers, educators, researchers and naval officers constantly trade experience and know-how that is passed on to future sailors and blueprints. On any given day, hundreds of Electric Boat employees from southern New England work within the gates of the submarine base, addressing problems at the source. Submariners of all ranks interact with designers to ensure that future boats incorporate every war fighting lesson our sailors have to offer. The partnership between these highly skilled workers and the Navy addresses the special needs of the submarine community perhaps better than any other local-military partnership in the United States today.

Meanwhile, instructors at the Naval Submarine School borrow lessons learned from the crews of the 18 attack subs homeported at New London to better train the silent service's newest volunteers. All of this interaction takes place both formally and spontaneously, because that is the nature of great Americans with common passions and the blessings of proximity. It is hard to imagine this level and quality of interplay replicated at any other U.S. naval base. The trend continues through Tango Bravo (the Navy term for overcoming "technical barriers"), a research and development program to develop a submarine with all the capabilities of today's Virginia-class model, but at half the size and cost. New London's community partnership also makes good business sense. Only a mile from the base, Electric Boat uses its century of experience to maintain standards of excellence in the design, construction and lifecycle support of submarines for the Navy. Electric Boat has operations at the shipyard in neighboring Groton and an automated hull-fabrication facility just across the Rhode Island border. The company is so good that many of its 11,000 employees can be found helping struggling submarine programs in friendly locations around the world.

"Transformation" doesn't just happen; it takes defense communities like the military/educational/industrial nexus in New London to conceive and execute big ideas. Sound military judgment argues for saving New London, too. Comprehensive force level reviews prove that the Department of Defense needs its basing capacity to house the submarines and the sailors required to execute the Navy's expanding maritime missions. Slim cost savings the Pentagon might someday find after rebuilding all of New London's military facilities and piers elsewhere and cleaning the century-old naval base are offset by the military and industrial advantages to be lost. Factor in the cost to the government of economically devastating Connecticut and Rhode Island by removing 15,000 jobs - nearly a tenth of the area workforce - and the decision to close New London looks mad. In 1993, the BRAC Commission overruled a recommendation to close New London because incomplete data led the Pentagon to underestimate its national security value. We believe that this year's BRAC Commission will reconfirm that New London is absolutely critical to America's total submarine force.

U.S. Rep. Duncan Hunter (R-Calif.) is chairman of the House Armed Services Committee. U.S. Rep. Rob Simmons (R-Conn.) is vice chairman of the naval forces subcommittee.


SUBASE NL

The Case for Naval Submarine Base New London

Defense Base Closure and Realignment
Commission
Regional Hearing
Boston, MA
July 6, 2005


SUBASE NL

Introduction

Governor M. Jodi Rell, U.S. Senator Christopher Dodd

- Governor M. Jodi Rell
 - Welcome/Introductions
 - Value of SUBASE NL to Connecticut
- U. S. Senator Christopher Dodd
 - Value of SUBASE NL to nation
 - Unsettled SSN force level
 - Closure would restrict flexibility to support future SSN force

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SUBASE NL

Presentation Overview

Introduction
Governor M. Jodi Rell, U.S. Senator Christopher Dodd

Video Presentation

Strategic Arguments
Vice Admiral Al Konezni, George Sawyer, U.S. Senator Jack Reed, John Casey

Military Value, Costs/Savings (Criteria 1-5)
John Markowicz, Gabe Stern

Other Considerations (Criteria 6-8)
Commissioner James Abramoitis, Jeff Blodgett, Commissioner Gina McCarthy

Summary of Arguments
U.S. Representative Rob Simmons

A-10 Presentation
Brigadier General Thaddeus Martin

Conclusion
U.S. Senator Joseph Lieberman


SUBASE NL

Introduction

Governor M. Jodi Rell, U.S. Senator Christopher Dodd

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SUBASE NL

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Video Presentation

Strategic Arguments
Vice Admiral Al Konezni, John Casey, George Sawyer, U.S. Senator Jack Reed.

Military Value, Costs/Savings (Criteria 1-5)

Other Considerations (Criteria 6-8)

Summary of Arguments

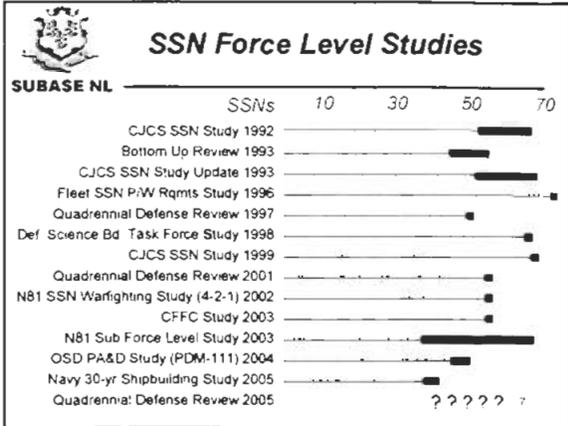

SUBASE NL

Closure of SUBASE NL

VADM Al Konezni, USN (Ret.)

- Based on questionable SSN force level analysis
- Irreversible when final SSN force level determined
- Impacts strategic flexibility SUBASE NL subs deploy to Pacific/SW Asia
- Destroys synergistic benefits from multiple submarine activities





Closure of SUBASE NL

VADM AJ Koneznic, USN (Ret.)

- Based on questionable SSN force level analysis
- Irreversible when final SSN force level determined
- Impacts strategic flexibility: SUBASE NL subs deploy to Pacific/SW Asia
- Destroys synergistic benefits from multiple submarine activities



SUBASE NL - Electric Boat Partnership

John P. Casuy

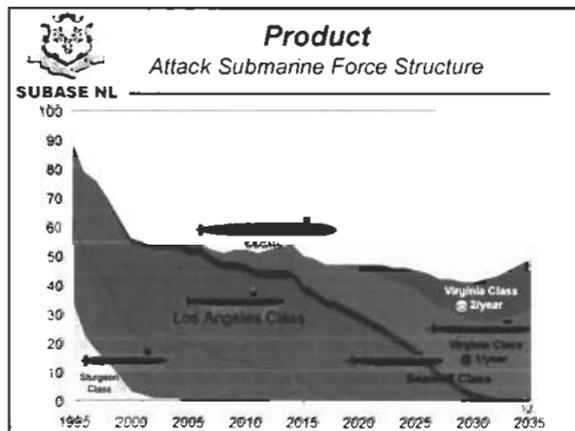
BRAC 2005

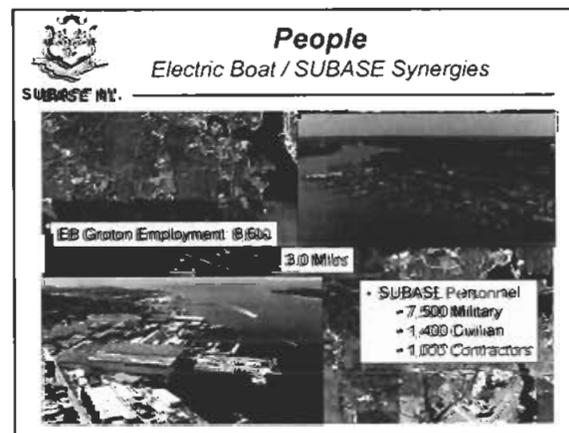
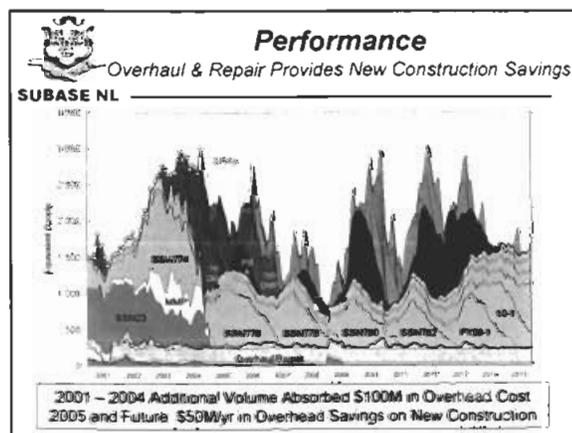
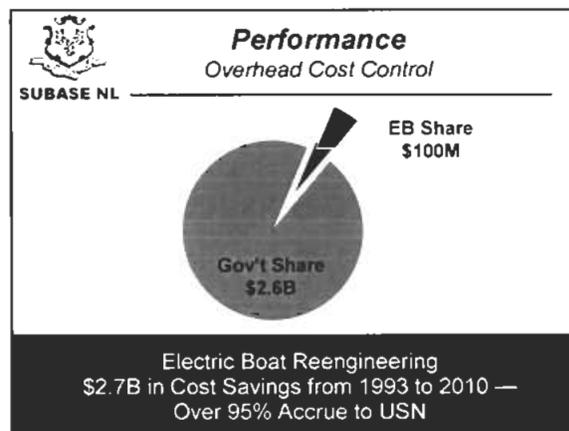
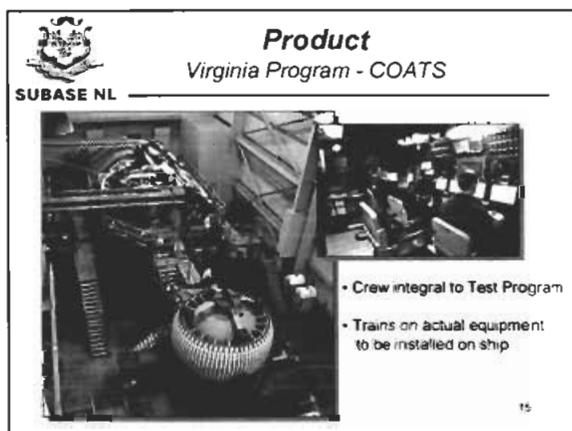
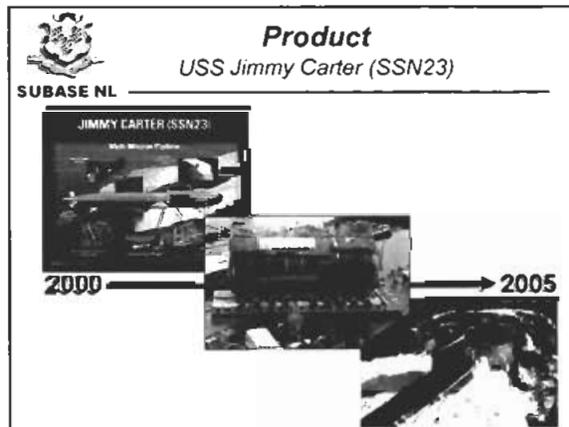
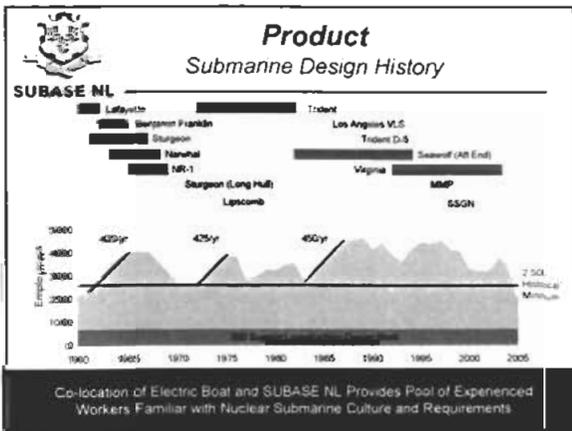
Dynamic Environment

- Three critical strategic issues facing nation
 - Submarine force structure
 - Shipbuilding Industrial Base health and configuration
 - BRAC and QDR process and outcome

SUBASE NL - Electric Boat Partnership

- Electric Boat strength - three synergistic business areas
 - Engineering and Design
 - New Construction
 - Overhaul and Repair
- Three common denominators
 - Product
 - Performance
 - People





SUBASE NL

Summary

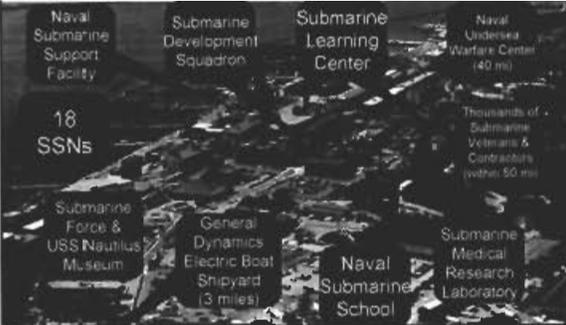


Product — Performance — People

SUBASE NL

Cultural Heart of the Submarine Force

George Sawyer



Naval Submarine Support Facility
Submarine Development Squadron
Submarine Learning Center
Naval Undersea Warfare Center (40 mi)
Thousands of Submarine Veterans & Contractors (within 50 mi)
Submarine Force & USS Nautilus Museum
General Dynamics Electric Boat Shipyard (3 miles)
Naval Submarine School
Submarine Medical Research Laboratory

18 SSNs

SUBASE NL

Multi-Dimensional Partnership

Greater New London Regional Complex Develops/Constructs All Elements of World's Finest Submarine Force

- Technology
- Submariners
- Submarines/life-cycle support systems
- Operational employment tactics

And . . .

All within a 50 mile radius
All Mutually interdependent/reinforcing
With . . . SUBASE NL at its center

Unique Military + Industrial + Educational Complex = World's Finest Submarine Force

SUBASE NL

Disastrous Impacts of Closure

- Unquantifiable
 - Culture of innovation (SUBASE NL/NUWC) degraded
 - Regional civilian submarine expertise lost
 - Strategic flexibility restricted
- Quantifiable
 - Reduction in Electric Boat repair volume will increase EB new construction costs

Adverse Effects on Undersea Superiority/Industrial Base

SUBASE NL

Impact on New SSN Construction

New SSN Construction Cost & SSN Life-Cycle Support Are Interdependent

- Navy/EB recognized this in 90's & planned accordingly
- Although planned new construction rates, loss of SUBASE NL will add significant costs to new SSN construction at EB due to:
 - Unabsorbed overhead (\$30M - \$50M/yr)
 - Loss of flexibility in leveling skilled trade activity

SUBASE NL

Naval Undersea Warfare Center

U.S. Senator Jack Reed

Proximity → Collaboration → Innovation



GuidoTime™ and a ZIP (Uncompressed) decompressor are needed to see this picture.

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SUBASE NL

Agenda

[Introduction](#)
[Video Presentation](#)
[Strategic Arguments](#)
Military Value, Costs/Savings (Criteria 1-5)
 John Markowicz, Gabe Stern
[Other Considerations \(Criteria 6-8\)](#)
[Summary of Arguments](#)
[A-10 Presentation](#)
[Conclusion](#)

SUBASE NL

Military Value, Costs/Savings

John Markowicz, Gabe Stern

We Will Demonstrate

- Substantial deviations from BRAC selection criteria
- Substantial deviation from force structure plan (GAO Report)
- Military value calculations flawed
- Capacity analysis flawed
- Configuration analysis flawed
- Costs understated
- Savings overstated
- Environmental and economic impacts understated

SUBASE NL

Military Value

John Markowicz



Today: 18 SSNs on 10 Piers + Sub School

SUBASE NL

Defense Base Realignment and Closure Act of 1990

Public Law 101-510 as amended by National Defense Authorization Act of Fiscal Year 2003 specifies

- Sec. 2901(b): a "fair process"
- Sec. 2903(c)(3)(A): "consider all installations inside the United States equally..."

SUBASE NL

DoD Proposal

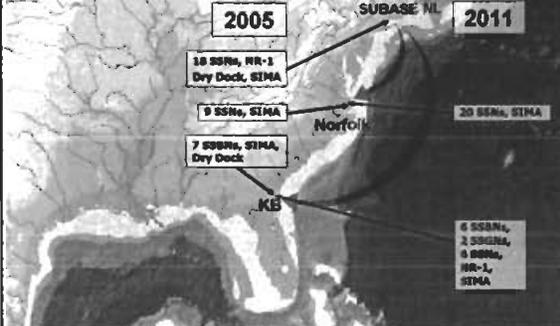


Complete Closure
SUBASE New London
Transfer All Assets

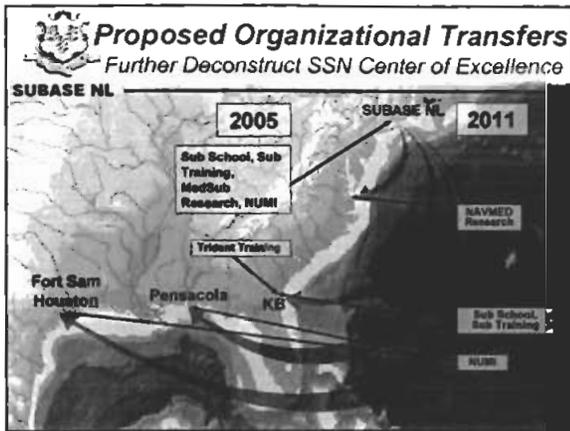
SUBASE NL

Proposed Ship Transfers

Deconstruct SSN Center of Excellence



Year	Location	Assets
2005	Norfolk	18 SSNs, NR-1 Dry Dock, SIMA
2005	Norfolk	9 SSNs, SIMA
2005	Norfolk	7 SSNs, SIMA, Dry Dock
2011	Norfolk	20 SSNs, SIMA
2011	KB	6 SSNs, 2 SSNs, 4 SSNs, NR-1, SIMA



Substantial Deviation from Criterion 1

SUBASE NL

Current and Future Mission Capabilities

- Impact on operational readiness
 - CFFC opposed recommendation to close SUBASE NL
- Impact on joint war fighting, training, readiness from flawed military value scoring
 - Unique/special mission/capabilities omitted from military value evaluation
 - No jointness/value in military value scoring
 - Separation of training from 80% SSNs not considered
 - Operational training at risk during relocation

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Military Value

SUBASE NL

- Process flaws led to systematic undervaluing of SUBASE NL
 - Questionable extra credit for irrelevant conditions

33

Military Value

SUBASE NL

Questions SEA-3

- Does installation have ability to homeport SSBNs and their missiles?
 - 4.15 points arbitrary
 - 6.4% of KB military value
- CVN capability only other category awarded bonus points

No Bonus Points for Nuclear-Certified Waterfront

Military Value

SUBASE NL

- Disregarded relevant information

35

Military Value

SUBASE NL

Questions Asked, Answered and Deleted

SEA-14
List/describe any unique capabilities/missions

SEA-15
List/describe any specialized capabilities/missions

SEA-22
List any unique operational training facilities

Relevant Questions Disregarded and Led to Systematic Undervaluation of SUBASE NL

Military Value

SUBASE NL

-
-
- Overvalued irrelevant information
-
-



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Military Value

SUBASE NL

Irrelevant Questions

SEA-25
What is transit distance to anti-air warfare range?
KB 3.01 SUBASE NL 2.47

SEA-26
What is transit distance to naval gunnery range?
KB 2.41 SUBASE NL 1.62

Irrelevant Questions Overvalued and Led to Systematic Undervaluation of SUBASE NL

Military Value
Operational Training

SUBASE NL

- 9 of 11 operational training questions deal only with distance from facilities
- One question addresses capacity, but only of C, F, and pipeline training (50 mi)
- One question addresses small arms capacity

Sub School Operational Training Largely Ignored

Military Value

SUBASE NL

-
-
-
- Inaccurate scoring occurred
-



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Military Value

SUBASE NL

Questions SEA-4 and SEA-5

- Total linear feet of berthing piers/wharves in categories of Adequate – Substandard – Inadequate

KB MILVAL	1.89	SUBASE NL MILVAL	0.00
KB CGE	13.5	SUBASE NL CGE	16.25

- Total linear feet of berthing piers/wharves where construction/renovation since 1990

KB MILVAL	0.88	SUBASE NL MILVAL	1.01
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Inaccurate Scoring?

Pier at SUBASE NL

SUBASE NL



Military Value

SUBASE NL



- Failure to distinguish between surface and subsurface bases caused distorted results
- 10 of 14 bases with lower military value remain open

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Military Value Adjustments

SUBASE NL

Piers	1.24
Bonus	4.15
Maintenance	0.73
Deperm	0.69
Nuclear Weapons	1.55
ESQD	1.54
AAW Range	0.54
Gun Range	0.79
Distance to 50 Fathoms	0.29
Dredging	0.34
Hospital Catchment	1.01
Total Adjustments	12.87

SUBASE NL MILVAL 50.68

Total Adjustments 12.87

Adjusted MILVAL 63.55

(KB MILVAL = 63.51)

SUBASE NL Among Top 5 Surf/Sub Installations

Substantial Deviation from Criterion 2

SUBASE NL

Availability and Condition of Land, Facilities

- SUBASE NL has surge capability vs. no capability
- Modern, capable piers exist vs. have to build
- No nesting at SUBASE NL vs. nesting
- Unique Sub School exists vs. have to build
- SSN maintenance facilities exist vs. have to build
- CGE standard gives distorted picture of pier capacity

45

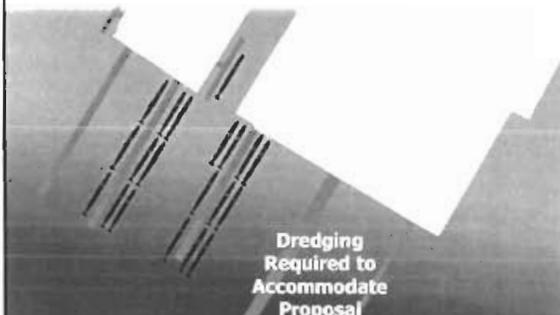
Existing SUBASE NL Berthing

SUBASE NL



Proposed NORVA Berthing

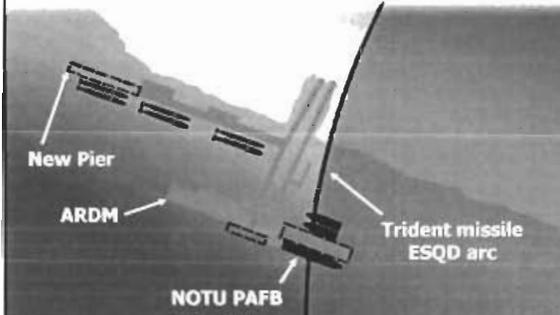
SUBASE NL



Dredging Required to Accommodate Proposal

Proposed Kings Bay Berthing

SUBASE NL



New Pier

ARDM

NOTU PAFB

Trident missile ESQD arc



Substantial Deviation from Criterion 3

SUBASE NL

Accommodate Contingency, Mobilization, Surge and Future Force Requirements

- Undecided future submarine force structure
 - March 2005 21% drop in SSN force level
 - Inconsistent with prior studies
- Proposal eliminates surge capacity for Atlantic SSNs
- SSN surge capacity available in SUBASE NL
- Difficult (impossible?)-to-reconstitute nuclear waterfront
- Configuration analysis predetermined recommendation

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Configuration Analysis

SUBASE NL

Constraints Reflect Pre-Decisions

- One strategic (ballistic missile) nuclear submarine homeport per coast
- Two ports on each coast capable of cold iron berthing a nuclear powered carrier

SUBASE NL Stays Open in Majority of Results and Optimum Solution



Exemptions from Consideration

SUBASE NL

- Naval Station Everett: Decision postponed until after Quadrennial Defense Review

NOTE: NS Everett and SUBASE NL military value scores exactly the same (50.68)

- SUBASE San Diego: Remains open to align industrial facilities/capabilities

"Fair process . . . consider all installations . . . equally"



Substantial Deviations from Criteria 4, 5

SUBASE NL

Gabe Stern

Cost of Operations, Manpower Implications: Extent/Timing of Potential Costs/Savings

- COBRA is DoD non-budget quality costing model
- Navy introduced flaws in COBRA models
 - Mixed sources of inputs
 - Mixed quality of inputs
 - Omitted costs e.g. environmental/non-DoD
 - Overstated savings
- Overstated savings drove results

Flaws Confound Comparability and Value of Model Output



Substantial Deviation From Criteria 4, 5

SUBASE NL

Cost of Operations and Manpower Implications

- Cost of proposal greatly understated
- Manpower shift doubles personnel at KB
 - Must substantially build within existing base
 - No existing SSN maintenance and supply support
- Personnel transfers included as savings

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Costs Underestimated

SUBASE NL

1993

- Transfer 15 SSN's and 2 Floating Drydocks from Groton to Norfolk and KB
- Use 4 Sub Tender for Maintenance/Repair
- Cost: \$300M (93 dollars) = \$450M (05 dollars)

2005

- Transfer 17 SSN's and 1 Floating Drydock from Groton to Norfolk and KB
 - Build New SSN Repair Capability at KB
 - Transfer Sub School from Groton and Rebuild Sub School in KB
 - Close and Fully Remediate SUBASE NL
- Cost: \$680M (05 dollars)

Δ=\$230M - Unrealistic!



Savings Overstated

SUBASE NL

- Assumes overcapacity of billets/persons at KB and Norfolk
- Claims savings from elimination of billets
- Same billet/persons and related savings could be eliminated without closure of SUBASE NL



55



COBRA Analysis

Overview

SUBASE NL

- One-time military construction costs underestimated (\$190M)
- One-time moving costs understated (\$31M)
- Environmental closure costs understated (\$31.1M)
- Environmental remediation costs ignored (\$125M)
- Recurring personnel savings overstated (\$84M/yr)
- Recurring other unique costs underestimated (\$42M/yr)



56



Military Construction Costs

Sub School Construction

SUBASE NL

Sub School Training Facilities

- Navy used a construction cost of \$211/sq ft
- Recent experience averaged \$325/sq ft due to higher structural and services requirements
- Difference of \$114/sq ft times 415,000 sq ft equals \$47M
- For an equivalent footprint, add \$28M
- Per FEMA report on soil conditions, add minimum 20% to KB construction cost (\$30M)



Total Construction Cost + \$105M



Personnel Costs

Elimination of Billets

SUBASE NL



Personnel Costs

Elimination of Billets

SUBASE NL

Examples of Overstated Billet Reductions Include:

- Today, 528 medical billets at SUBASE NL service 8,045 personnel
 - 62 to be relocated to service 6,485 relocated personnel
- Eliminated all billets (181) related to services normally variable with population size

59



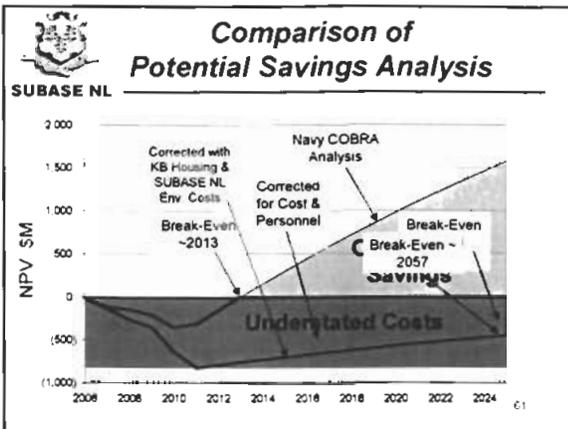
Other Unique Costs

Contractor Billets

SUBASE NL

- Underestimated by \$42M/yr (430 billets replaced by 143)
- 430 mission essential contractor billets at \$57/hr eliminated (\$50M) at NSSF & NRMD
- KB added 37 civilian billets at \$29/hr (\$2M)
- Norfolk NSY added 106 civilian billets at \$29/hr (\$6M)

60



Payback Improperly Considered

SUBASE NL

Correcting COBRA for Understated Costs and Overstated Savings Shows:

- Savings do not exceed costs until the year 2057, even using COBRA's artificially low discount rate
- No real payback

Substantial Deviation From Criteria 4 & 5

Agenda

SUBASE NL

- Introduction
- Video Presentation
- Strategic Arguments
- Military Value, Costs/Savings (Criteria 1)
- Other Considerations (Criteria 6-8)**
Commissioner James Abromaitis, Jeff Blodgett, Commissioner Gina McCarthy
- Summary of Arguments
- A-15 Presentation
- Conclusion

Substantial Deviation from Criterion 6

SUBASE NL

Commissioner James Abromaitis

Economic Impact on Connecticut

- Connecticut has 1.2% of U.S. population
- 8,586 out of 12,684 (68%) jobs lost in the U.S. as a result of DoD recommendations occur in Connecticut
- Potential impact of \$3.3B on Connecticut's already fragile economy with 31,500 + jobs lost

A Generation to Recover!

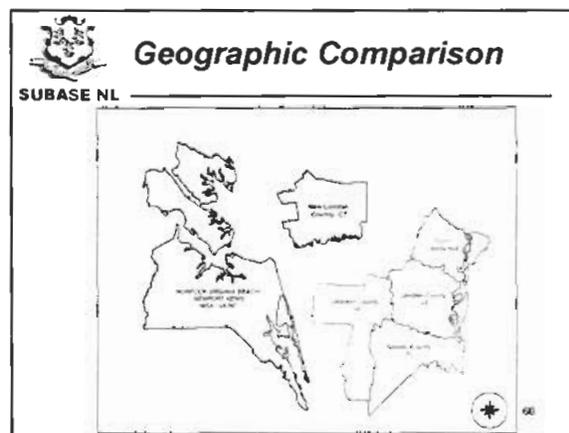
Substantial Deviation from Criterion 6

SUBASE NL

Jeff Blodgett

Economic Impact Analysis Methodology Incomplete

- Employment: incomplete account of direct jobs
 - 1,000 contractor jobs
 - 2,950 spousal jobs
- Region of Influence used does not equal the Functional Economic Region



 **Substantial Deviation from Criterion 6**

SUBASE NL

Economic Impact Analysis Methodology Incomplete

- Fiscal impacts not taken into account in BRAC economic model - \$28M in unemployment compensation cost
- Regional competitiveness
 - 2.5% increase in unemployment insurance rate
 - Up to 3,000 additional jobs lost

67

 **Substantial Deviation from Criterion 6**

SUBASE NL

Summary

- BRAC model does not capture long-term impacts
- Definition of economic regions is inconsistent
- Not all job losses captured
- State/local government costs ignored

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 **Substantial Deviation from Criterion 7** Jeff Blodgett

SUBASE NL

“Final Environmental Impact Statement for SEAWOLF Class SSN Homeporting on the East Coast,” July 1995

After Extensive Evaluation, SUBASE NL Selected As Preferred Alternative Over Norfolk & KB

 **SEAWOLF Homeporting Study**

SUBASE NL

SUBASE NL First in 10 of 14 Criteria

- ✓ Strategic Value
- ✓ Operational Suitability
- ✓ Quality of Life
- ✓ Maintenance Capability
- ✓ Training Capability
- ✓ Ordnance Capability
- ✓ Integrated Logistic Support
- ✓ Maintenance Dredging
- ✓ Built Environmental Impacts
- ✓ Community Support

70

 **SEAWOLF Homeporting Study**

SUBASE NL

“The preferred alternative to homeport the SEAWOLF is the SUBASE New London.” (over Norfolk and Kings Bay) – p. 2-96

“The significant added value to Submarine Force operations that accrue with the regional concentrations of submarine command, tactical development, maintenance, training, and medical research assets...” – p. 2-96

 **Substantial Deviation from Criterion 8** Commissioner Gina McGuffee

SUBASE NL

- Exclusion of consideration of restoration costs was improper
- Understated closure and restoration costs significantly skews savings projections
- Failure to consider legal implications of Federal Facilities Agreement and deed restrictions skews costs

Result: Costs to Navy/community severely understated, invalidating cost/benefit assessment



Closure Costs

SUBASE NL

Immediate/Unavoidable Consequences of SUBASE NL Closure

Program	DEP Estimate	Navy Estimate
Hazardous Waste	\$3,100,000	\$1,000
Underground Tanks	\$1,338,750	Not Identified
Radiological	\$31,510,000	\$9,950,000
Total	\$41,123,250	\$9,951,000

Costs Not Considered by the Navy: \$31,172,250



Remediation Costs

SUBASE NL

Immediate/Unavoidable Consequences of SUBASE NL Closure

Program	DEP Estimate	Navy Estimate
Superfund	\$65,019,975	\$23,000,000
Hazardous Waste	\$12,882,606	0
Underground Tanks	\$10,865,000	Partial in Superfund
PCB	\$ 662,147	Partial in Superfund
Pesticides	\$35,000,000	0
Radiological	Unknown	
Total	\$124,943,228(1)	\$23,000,000

Costs Not Considered by the Navy: \$101,000,000⁽¹⁾

- 
- ### Closure vs. Remediation Costs
- SUBASE NL**
- Closure Costs = Pay me now
\$41,123,250
 - Remediation = Pay me sooner
\$124,943,228

- 
- ### Legal Requirements for Cleanup Before Transfer
- SUBASE NL**
1. Federal Facilities Agreement requires clean up before transfer – period Navy assumption that the property will be transferred for reuse within six years (economic impacts beyond 2011 not considered) inconsistent with FFA
 2. Deed requires use of land by military or title forfeited to state
1+2 =
 3. Accelerated clean up and restoration; proceeds from sale or lease do not go to Navy

- 
- ### Additional Environmental Factors
- SUBASE NL**
- Shoaling Rates
 - SUBASE NL dredging every 15 years
 - KB Annual dredging and continuous sediment controls
 - Storm Severity and Frequency
 - SUBASE NL No interruption in operations
 - KB High frequency of severe hurricanes and tropical storms mean high risk of inoperability
 - Endangered Species
 - SUBASE NL No special restrictions
 - KB Costly operational protocols to protect right whales, manatees and sea turtles
- Environmental Issues Play Key Factor in Military Readiness and Operating Costs**

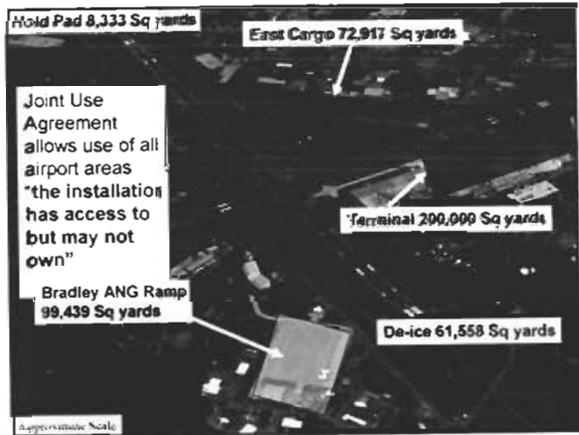
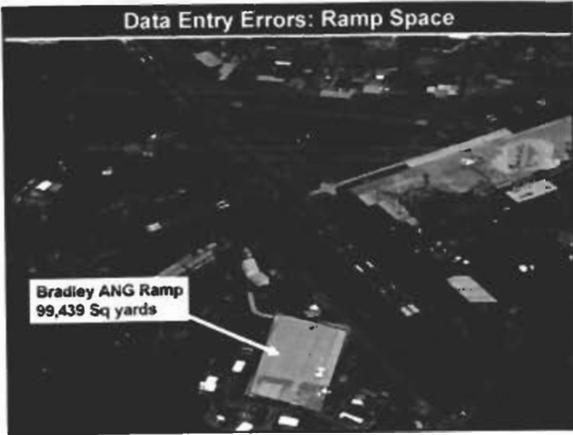


Agenda

SUBASE NL

Introduction
Video Presentation of Strategic Arguments
Military Value Arguments
Other Considerations: Criteria 5, 8

Summary of Arguments
U.S. Representative Rob Simmons



With Respect to Bradley ANGB Ramp/Apron Space

Impact on DOD Question #8 and AF Formula #8

	Sq yards	Earned points AF#8	Points to Overall MCI
Reported	99,439	25 of 100	1.17
Actual	442,247	100 of 100	4.67

Overall MCI increase of 3.5

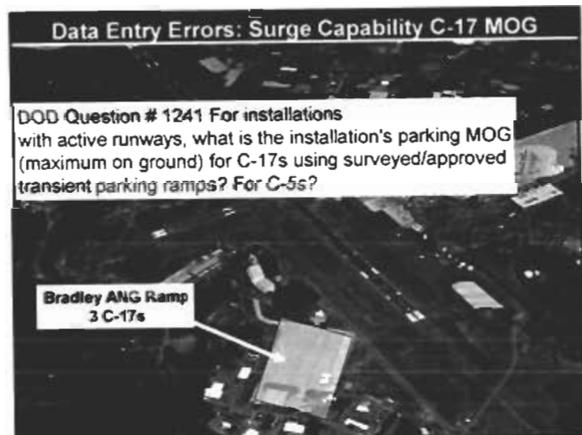
Existing A-10 unit BRAC Military Value (SOF/CSAR)

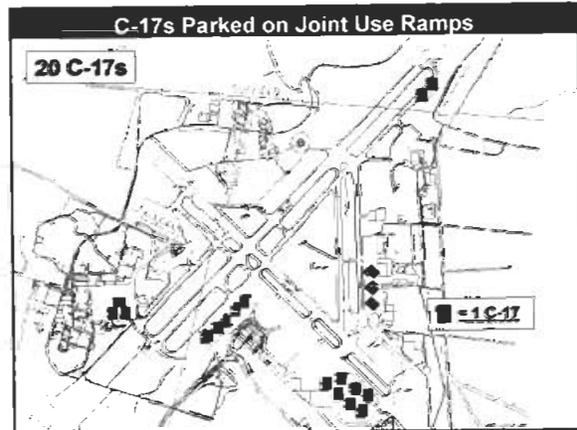
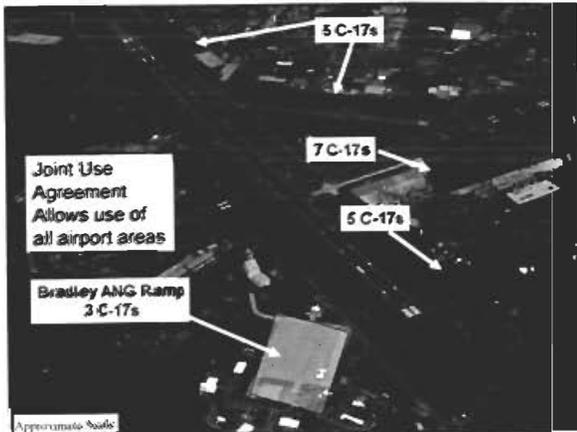
Rank	Base Name	Overall MCI
11	Moody, AFB	60.72
12	Shaw, AFB	58.51
20	Nellis, AFB	53.81
25	Davis-Monthan, AFB	52.45
29	Whiteman, AFB	50.93
34	Barksdale, AFB	49.81
62	Selfridge, ANGB	42.06
66	Boise, AGS	41.35
76	Martin State, AGS	39.45
97	Barnes, MPT	35.5
98	Bradley, AGS	35.4

(1/10 point behind lowest)

Corrected A-10 unit BRAC Military Value (SOF/CSAR)

Rank	Base Name	Overall MCI
11	Moody, AFB	60.72
12	Shaw, AFB	58.51
20	Nellis, AFB	53.81
25	Davis-Monthan, AFB	52.45
29	Whiteman, AFB	50.93
34	Barksdale, AFB	49.81
62	Selfridge, ANGB	42.06
66	Boise, AGS	41.35
76	Martin State, AGS	39.45
81	Bradley, AGS	38.9 (with missing 3.5)
98	Barnes, MPT	35.5





With Respect to Bradley ANGB Ramp/Apron Space

Impact on DOD Question #1241 and AF Formula #1241

	# of C-17s	Earned points AF#8	Points to Overall MCI
Reported	3	0 of 100	0
Actual	20	100 of 100	2.64

Overall MCI increase of 2.64

Combined Corrected Military Value - BRAC A-10 units

Rank	Base Name	Overall MCI
11	Moody, AFB	60.72
12	Shaw, AFB	58.51
20	Nellis, AFB	53.81
25	Davis-Monthan, AFB	52.45
29	Whiteman, AFB	50.93
34	Barksdale, AFB	49.81
62	Selfridge, ANGB	42.06
66	Bradley, AGS	41.54 (with missing 2.64
67	Boise, AGS	41.35 and 3.5 = 6.14)
77	Martin State, AGS	39.45
98	Barnes, MPT	35.5

Combined Corrected Military Value - BRAC A-10 units

Rank	Base Name	Overall MCI
11	Moody, AFB	60.72
12	Shaw, AFB	58.51
20	Nellis, AFB	53.81
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67	Boise, AGS	41.35 and 3.5 = 6.14)
77	Martin State, AGS	39.45
98	Barnes, MPT	35.5

Air Force Review of Bradley

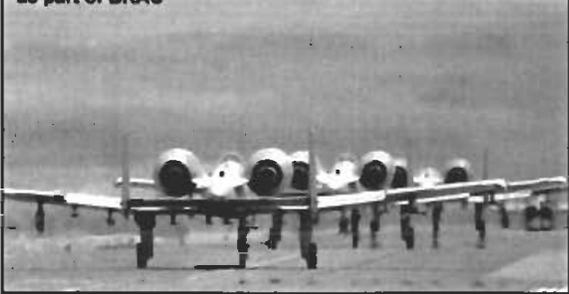
TABLE 2. MCI Values and Capacity Supporting Information (AF#1241) (12/1/21)

Bradley, CT Overview

As of	30 Sep 2005	30 Sep 2011
Assigned Weapon System Type(s) (WDS)	A-10	A-10
Total PAA	15	15
# Flying Squadrons	1	1
Total Available Aircraft	36	36
Unused Aircraft	21	21
Unused Aircraft Parking Spaces	21	21
Template used	A-10	
Standard PAA per squadron	24	

Side by Side Comparisons

Side by side comparisons of the capabilities of 3 Guard A-10 units would lead one to draw a different conclusion than the one drawn through the numerical process conducted as part of BRAC



State Owned Joint Airport Cost Efficiencies

Facility Capability	Bradley	Bates	Marin State
Base Operation Support Cost (BRAC COBRA Analysis)	\$2,117,000	\$3,123,872	\$3,566,199
FAR Class status	Class 1	Class 4	Not Certified
Federal Inspection capability	On station	On call	On call
Airport operations funded by	State	Municipality	State
ATC tower Operation	Federally Funded	Contract	Contract
Tower operating hours	24 hour operations	Limited 0700-2300	Limited 0600-2200
Ramp Snow removal	State Funded	Contract	Guard
ES approved deicing capabilities	Yes	No	No
Runway Approach capabilities	Three Cat I/LS One Cat II ILS	One Cat I/LS	One Cat I/LS
C-17 Runway Weight Limitations	501,000 lbs	484,000 lbs	274,000 lbs
Crash and Recovery Rating	Index D (High)	Index A (Low)	Index A (Low)
TSA Supervision Present	Yes	No	No
Dedicated 24/7 airfield perimeter patrols	State Police / base support	Local Police	State/Local Police

Summary

- We need our missing data counted, 6.14 more points to MCI raises Bradley's military value significantly to # 2 for ANG A-10 facilities.
- We have the current infrastructure to maintain 18 PAA at Bradley ANG Base, already the lowest cost facility, at no additional cost.
- Review the A-10 proposal folder for an additional unit
- Consider the process shortfalls as having had a more significant impact




Agenda

SUBASE NL

- Introduction
- Video Presentation
- Strategic Arguments
- Military Value Arguments
- Other Considerations, Criteria 5-8
- Summary of Arguments
- A-10 Presentation
- Conclusion**
U.S. Senator Joseph Lieberman



Conclusion

SUBASE NL Senator Joseph Lieberman

Recommendation to Close SUBASE NL

- Understates military value
- Overstates cost savings
- Underestimates cost of moving
- Closure would be irrevocable

Reasonable Doubt