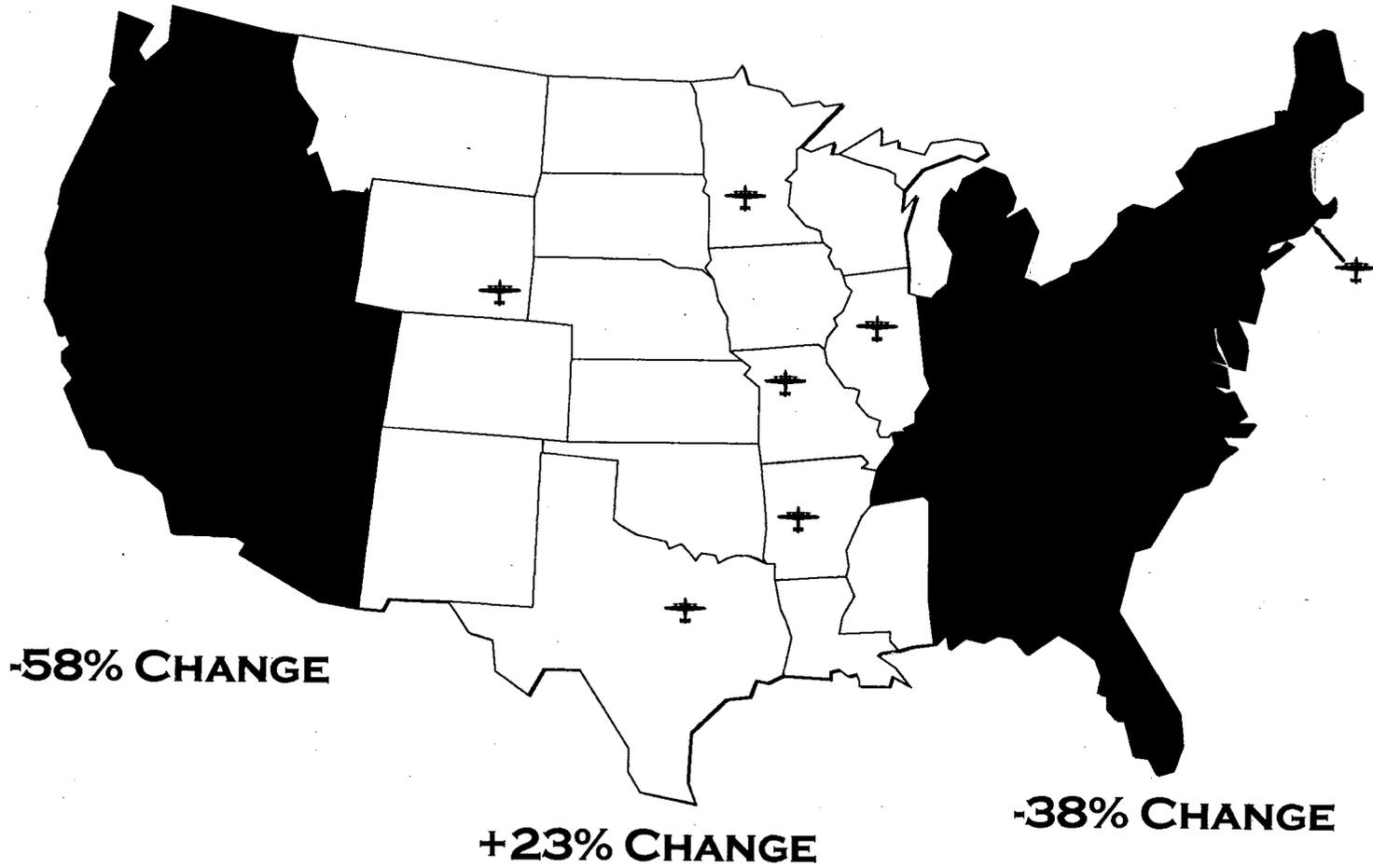
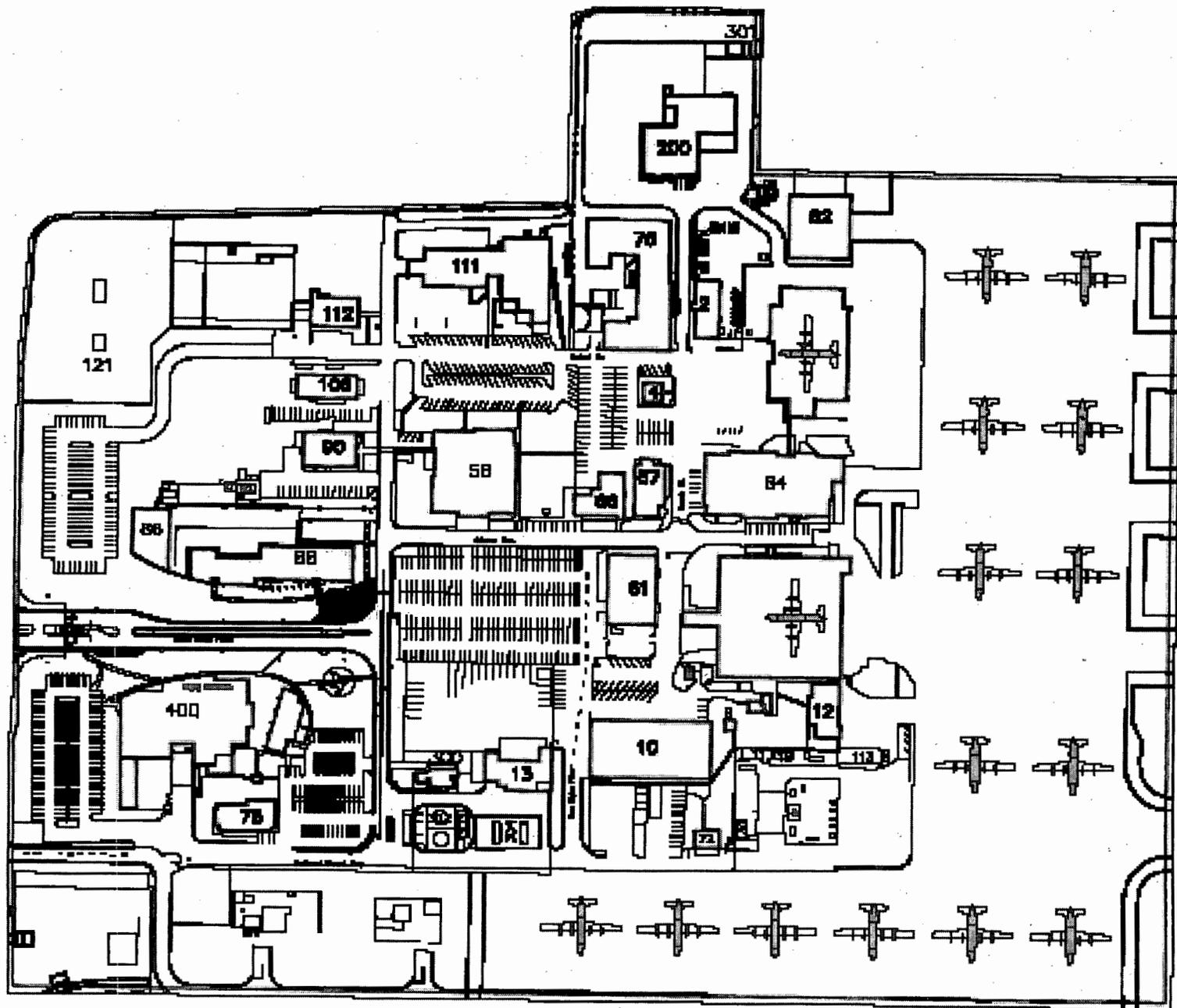


Geographic Comparison Between Nevada Counties and U.S. States
A Sampling of Five Counties out of 17
(Listed in Square Miles)

Nevada Geography	Nearly Equal To	U.S. States
Clark County 8,090	New Jersey	8,721
Elko County 17,202	Maryland + Connecticut	17,950
Lincoln County 10,636	Massachusetts	10,554
Nye County 18,158	New Hampshire + New Jersey	18,071
Washoe County 6,551	Connecticut + Rhode Island	7,088

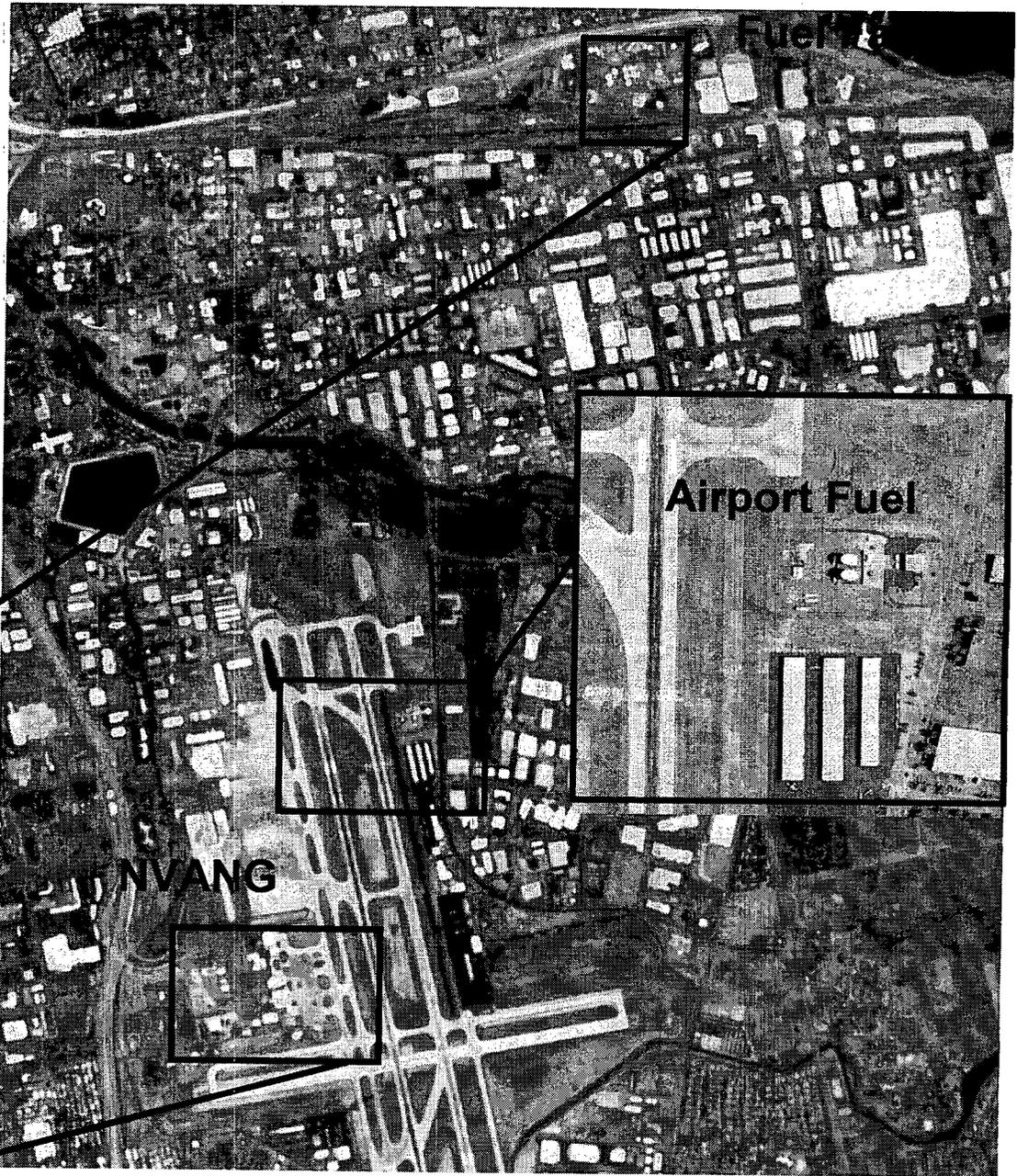
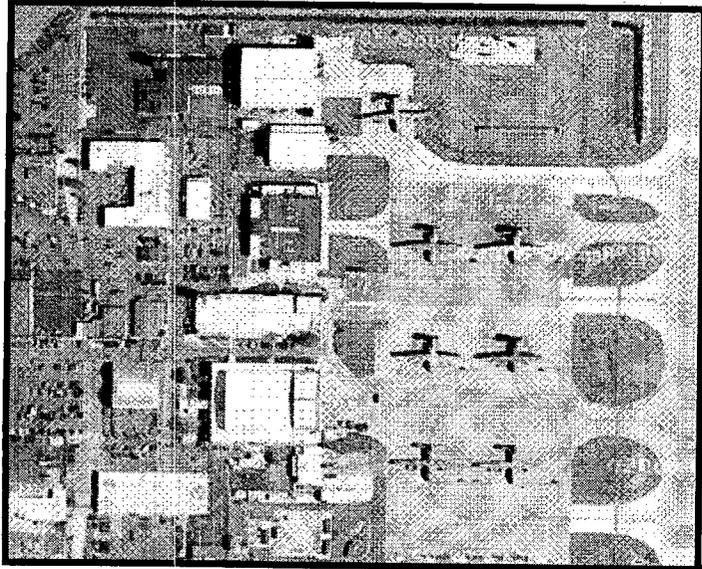
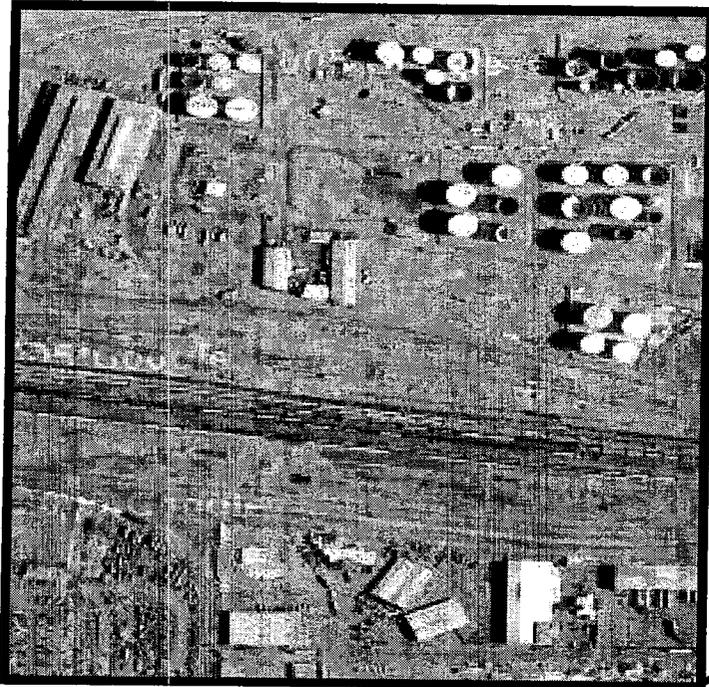
**POST-BRAC DISTRIBUTION OF
AIR NATIONAL GUARD
C-130 AIRLIFT AIRCRAFT**

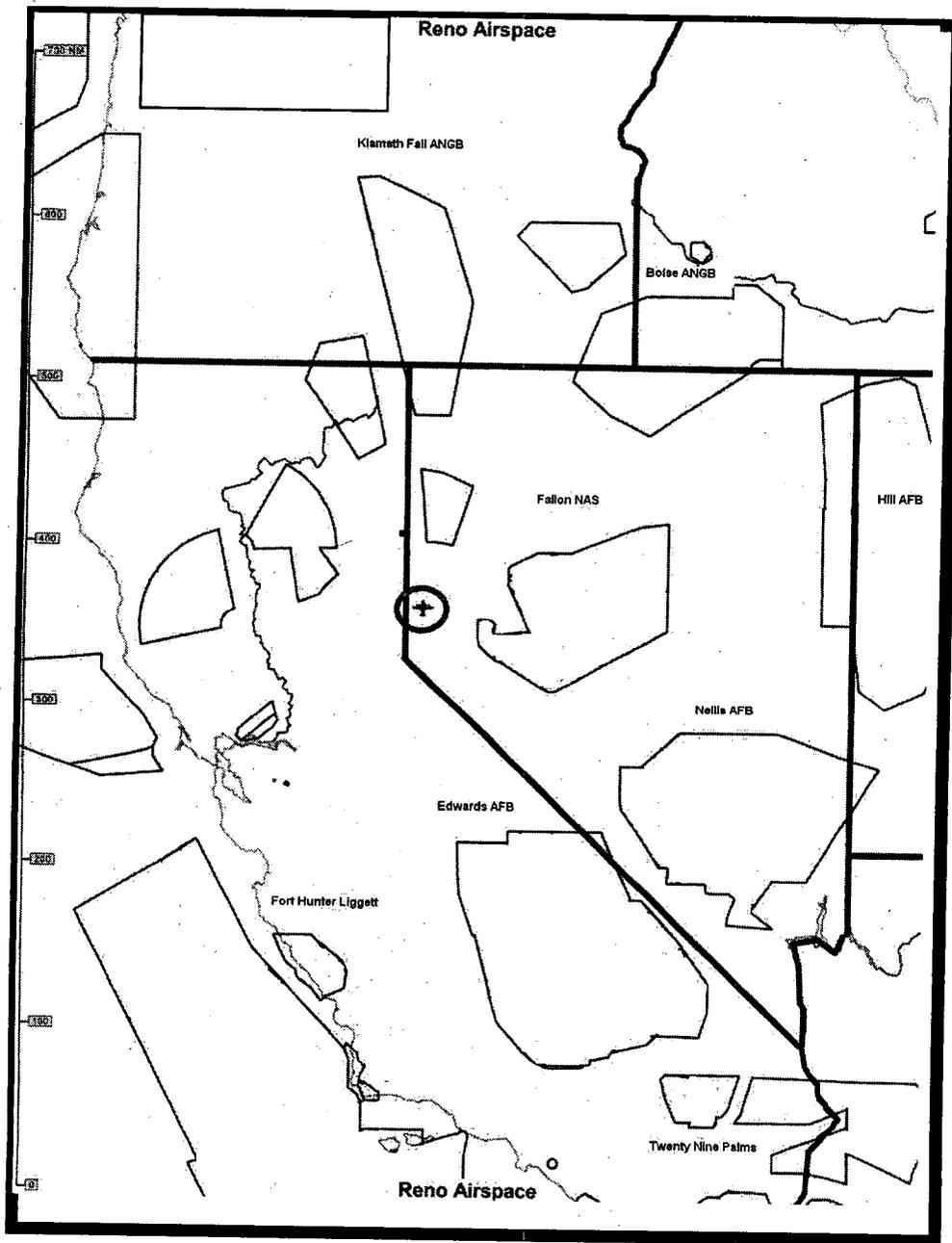




NORTH
SCALE 1" = 300'

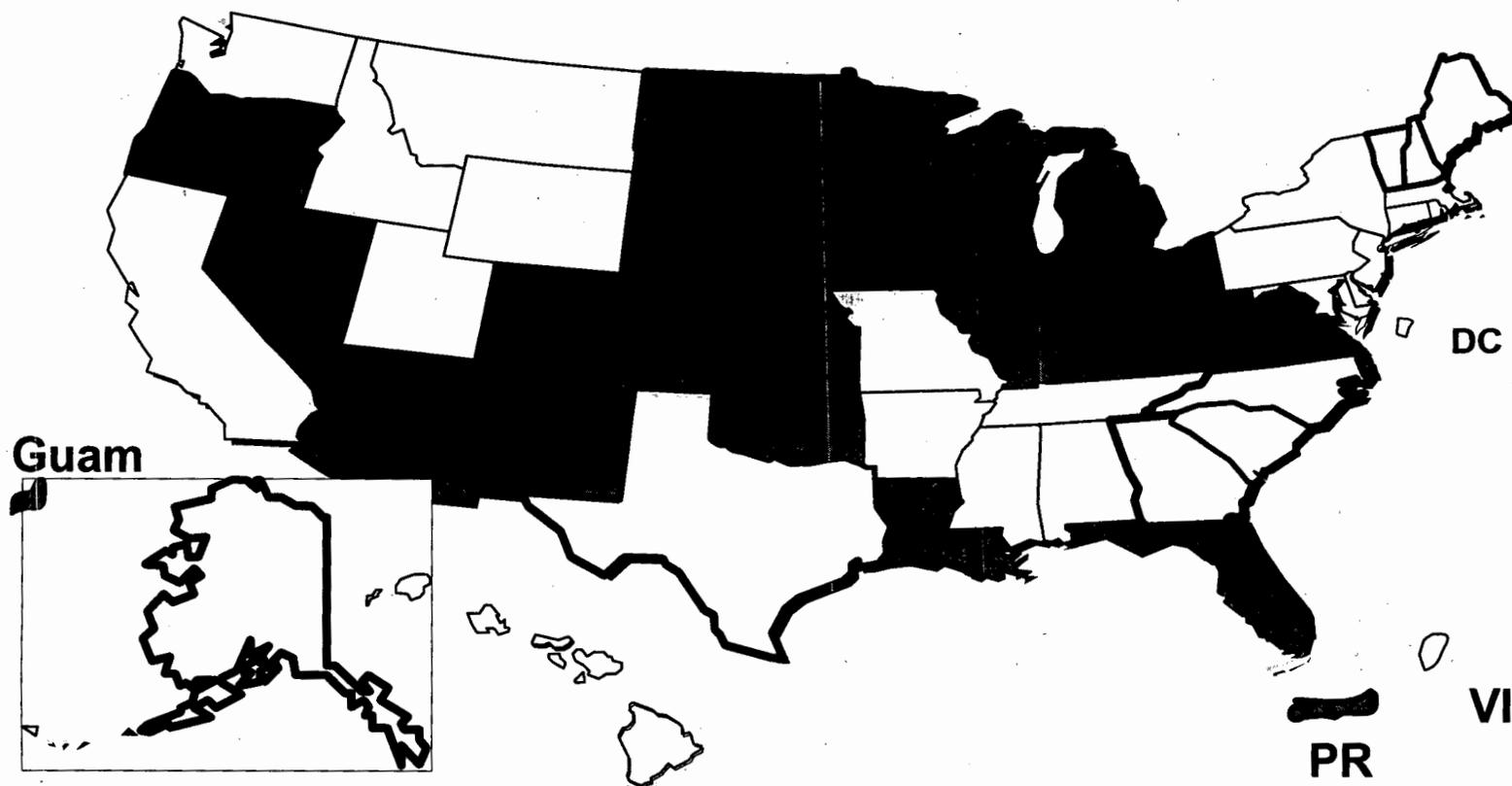
BASE BOUNDARY





ANG Demographics

Military Value = Effective Recruiting and Retention



24 Green: => 96.7%

10 With Yellow Border = Losing Strength

30 White: <= 96.6%

7 With Red Border = Gaining Strength



KENNY C. GUINN
Governor of Nevada

Kenny C. Guinn

Governor of Nevada
Testimony before the BRAC Commission
Ref: Reno-Tahoe International Airport/Air Guard Station and Hawthorne Army Depot
Clovis, N.M.
June 24, 2005

Mr. Chairman and members of the Base Realignment and Closure Commission, I would like to begin by thanking you for your commitment in facing the tough challenge of reviewing and validating the recommendations made by the Department of Defense in the 2005 Base Realignment and Closure process. Nevadans appreciate and support the efforts of Congress and support the concept of the BRAC process.

However, in reviewing the recommendations released in May, it is clear there was no objective review or application of any standard criteria to many of the locations identified for realignment or closure. In particular, the recommendations call for the realignment of the One Hundred and Fifty-Second Airlift Wing of the Nevada Air National Guard and closure of the Hawthorne Army Depot. These recommendations require your close scrutiny for many reasons.

Review of the data collected and the conclusions supposedly based on that data reveal the information is either incorrect or the format of the "data call" prohibited a true picture of these facilities. Several key leaders in the state are with me today and will provide more detail, but I'd like to start by addressing how the BRAC process failed.

Regarding the Nevada Air National Guard, not only was the call for information flawed in the way it was gathered and analyzed, it made conclusions that are categorically wrong. Others here today will identify some specific errors in this part of the process, including "skewed data calls" that failed to present a true picture of the land, logistics, and capabilities of the Nevada Air Guard base, but I would like to talk to you about issues that appear to have been omitted from the process altogether.

First and foremost is the department's failure to comply with the federal law that requires both consultation and concurrence with the Governor of a state before acting to close or move a Guard unit assigned in a state. Our founding fathers understood the need for the federal government to provide support and resources to the militia of the states. They also recognized states must have the authority to ensure the safety and best interest of its citizens. The department's failure to recognize any Governor's role in this process is simply unacceptable.

I do not believe the BRAC process gave any consideration to the vast state mission the Nevada Guard performs. In a state with yearly wildfires, annual flooding ... one which lies on hundreds of fault lines ... one with the largest dam in the United States ... one with hundreds of miles between metropolitan centers ... and one with cities and tourist attractions that are very attractive targets to terrorists ... it is apparent that BRAC process disregarded the National Guard's Constitutional obligation to the State of Nevada.

Unless called to federal active duty service, the National Guard is under the control of the Governor, the commander-in-chief. In Nevada's situation, the C-130s are an invaluable asset to such a geographically large state.

The Air Guard ... at state expense ... transports personnel and equipment to assist our citizens when their homes are in danger of being flooded.

The Air Guard ... at state expense ... trains our city, county, and state first responders, helping keep Nevadans safe.

The Air Guard ... at state expense ... serves as part of our Nevada emergency response plan, and delivers medical supplies in the most expeditious manner, should a mass casualty event occur.

The Air Guard ... at state expense ... fights raging wildfires and keeps flames away from homes and families.

The Guard C-130s are a resource the State of Nevada depends upon heavily ... and simply cannot do without.

Basing the realignment decision on flawed data collection and analysis methods, then disregarding one half of the Guard's dual state and federal mission, does great injustice to our military as a whole and the citizens of our state. But I ask you to take a careful and thoughtful look at what Nevada and the nation stand to lose in the BRAC process and to also examine how the information was obtained. I think you'll see what a disservice this BRAC process did to the Nevada Air National Guard.

I am also compelled to bring your attention to the severely flawed data and incorrect analysis in the Army BRAC Report which recommends closure of the Hawthorne Army Depot. The process considering Hawthorne seems to have followed the same pattern of flawed data calls and erroneous conclusions.

From a macro view, the Army report is unsound in five areas; 1) Statistical data on employment and production capabilities, 2) Joint DoD activity and potential activity associated with the base, 3) Cost of base closure, 4) Encroachment and 5) Analysis of alternate scenarios.

Regarding employment data, DoD measured employment displacement resulting from the base closure to the total employment of the Reno/Sparks Metropolitan Statistical Area. It determined the loss of jobs represented less than 0.1% of total employment. In fact, Hawthorne is 133 miles from the Reno/Sparks area. The loss of employment from the closure represents more than 30% of the jobs in the entire county. Add in indirect jobs lost and the figure rises to more than 50% of the current employment in the county. The recommendation has the potential to change this community forever. We all know the damage that a 50 percent drop in employment can do to a community, and in particular, what impact it could have on such a small community like Hawthorne.

The Army report also does not take into account Joint DoD activity at Hawthorne such as the Navy Special Forces High Desert Training and Navy Undersea Warfare Center, Marine Corps Sniper Team training and weapons testing, Army Ranger high desert training, nor the processing of range scrap from Air Force and Navy bombing ranges. Of note, more than 80 percent of this nation's live ordinance is dropped on Nevada bombing ranges.

DoD estimates the cost of closing the depot at approximately \$180 million. Additional costs such as retiring outdated military munitions, creating duplicate military capability elsewhere, and such costs such as environmental remediation could well exceed \$840 million.

Encroachment issues face many military facilities nationwide. However, the Hawthorne Army Depot has the largest, most diverse, environmentally compliant state-of-the-art military munitions dismantling facility in the depot system. It encompasses 230 square miles of unencumbered land surrounded by other federal lands of the Bureau of Land Management and the U-S Forest Service. The town of Hawthorne is situated with no threat of encroachment. Meanwhile, other depots that will have to absorb Hawthorne's mission do not enjoy such relief from encroachment. In fact, it will take 5 to 7 years to complete environmental permitting necessary to build similar capabilities at other facilities that are already suffering encroachment issues.

There was no analysis done considering alternate solutions such as closing another facility and moving its function to Hawthorne. I believe the BRAC process requires such an analysis.

I also believe the statistical data concerning Hawthorne is sufficiently flawed to warrant full re-consideration of the decision to close the depot. Additionally, several current joint functions of the Hawthorne Army Depot were not cited and are assumed to have not been considered in the process. Finally, the proposal to close a munitions base that does not suffer encroachment issues and move the functions to a base that does, inherently counters the BRAC mission. I ask you to give serious consideration to my remarks, and the more detailed remarks of the following Nevada participants.

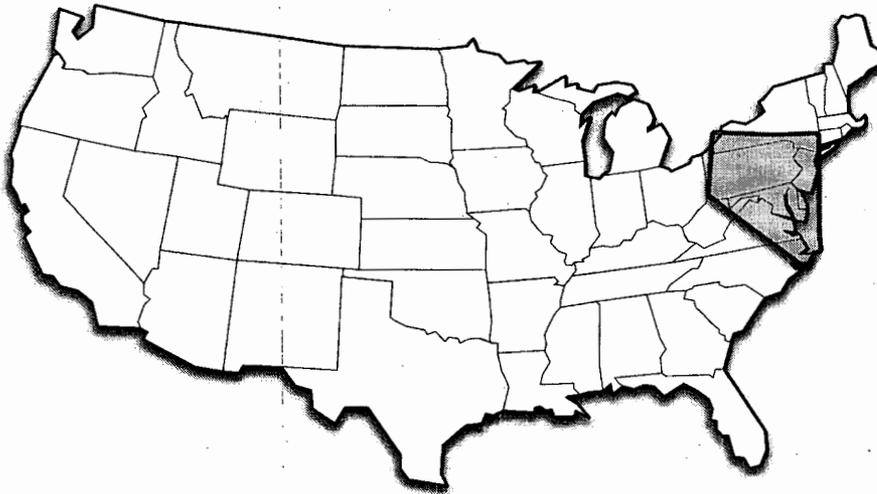
Thank you.

Giles E. Vanderhoof
Nevada Homeland Security Administrator
Testimony before the BRAC Commission
Ref: Reno-Tahoe International Airport/Air Guard Station
June 24, 2005
Clovis, New Mexico

Good Morning. I am Giles Vanderhoof, Nevada's Homeland Security Administrator.

Mr. Chairman and members of the Base Realignment and Closure Commission, I thank you for the opportunity to present information that will demonstrate how very serious and dangerous it would be if the recommendation to remove the Nevada Air Guard's C-130 aircraft and associated personnel is implemented. I cannot begin to understand how the Department of Defense gave no consideration whatsoever to homeland defense and security, especially when our national security policy establishes the security of our homeland as priority number one.

Nevada is the seventh largest state and has great distances between metropolitan areas. Notice the two slides that demonstrate the size of Nevada compared to states in the eastern U.S. Imagine the logistical nightmare these vast distances present in the face of a disaster, whether man-made or natural.



Geographic Comparison Between Nevada Counties and U.S. States
A Sampling of Five Counties out of 17
 (Listed in Square Miles)

Nevada Geography	Nearly Equal To	U.S. States
Clark County 8,090	New Jersey	8,721
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Nye County 18,158	New Hampshire + New Jersey	18,071
Washoe County 6,551	Connecticut + Rhode Island	7,088

We are especially concerned because every year we have serious floods and wildfires. Although not highly advertised, certain populated areas and a dam site in Nevada are considered among the top areas potentially targeted by terrorists. Additionally, Nevada is rated number three in the nation for serious earthquake potential, only behind California and Alaska.

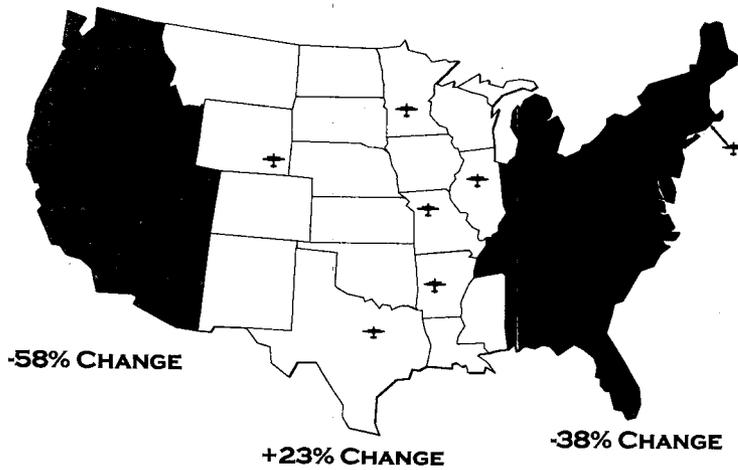
There are two absolutely essential functions the C-130s provide Nevada in an emergency situation: immediate airlift to move people and critical resources, and full motion, down-linked video with infrared capability.

Immediate airlift is essential and if BRAC recommendations are implemented, there will only be one Guard C-130 unit west of the Rocky Mountains. That single unit resides in the only state that is not a signatory to the Emergency Management Assistance Compact. The unit may help, but valuable time would be lost. Notice the before BRAC and after BRAC slides that graphically display C-130 coverage for our country and the west in particular.

**PRE-BRAC DISTRIBUTION OF
AIR NATIONAL GUARD
C-130 AIRLIFT AIRCRAFT**



**POST-BRAC DISTRIBUTION OF
AIR NATIONAL GUARD
C-130 AIRLIFT AIRCRAFT**



Active duty and Reserve units are not allowed to assist until a federal disaster is declared. Consider the loss of life and property if a major disaster occurred in one of our two primary population centers, Las Vegas and Reno, or another remote Nevada city. With the Nevada Air Guard C-130s' immediate availability, the governor can deploy the following assets and more from a safe area to an emergency area:

- military and civilian medical personnel, equipment, and medicine
- mobile medical facilities including the Air Force Expeditionary Medical Support equipment
- our world-class urban search and rescue team
- the superb, high-tech, Nevada National Guard Civil Support Weapons of Mass Destruction Team with their five C-130 loads of equipment
- the National Guard's Quick and Rapid Response Teams, trained to assist civilian law enforcement personnel
- the Centers for Disease Control Strategic National Stockpile "push package", which would only be distributed at the Nevada Air Guard base in Reno or the Nevada Army Guard Readiness Center in North Las Vegas
- thousands of sand bags and other equipment for potential or actual flooding

Nevada loses hundreds of thousands of acres to wildfire and the west as a whole loses millions of acres each year. The Scathe View system on Nevada's C-130s is an invaluable asset in minimizing the ravages of these fires. Scathe View's infrared camera can take and immediately send video of the fire to mobile ground stations. The infrared camera looks through the smoke, allowing fire bosses to see exactly where the fire is, where it is going, and the hot spots, allowing them to deploy personnel and equipment in the most effective manner. This system has also been deployed many times to other western states to aid in their firefighting efforts. It should also be noted that the Nevada C-130s are in the plan to receive Modular Airborne Fire Fighting Systems (MAFFS), which air drops fire retardant slurry on fires.

The Scathe View system and the Nevada Air Guard airborne imagery analysts (the only ones in the entire U.S. Air Force) have also saved lives in search and rescue operations involving downed aircraft or lost individuals.

I could go on and on, but I think the point is made – without our C-130s being available to the governor for emergencies, life and property is at an unacceptable risk. I cannot understand why the DoD did not even consider the unique capabilities of these aircraft and designate Reno as a location for additional aircraft.

I thank you for listening and considering the awesome loss if our aircraft are relocated to become mere trainer aircraft.

Thank you.

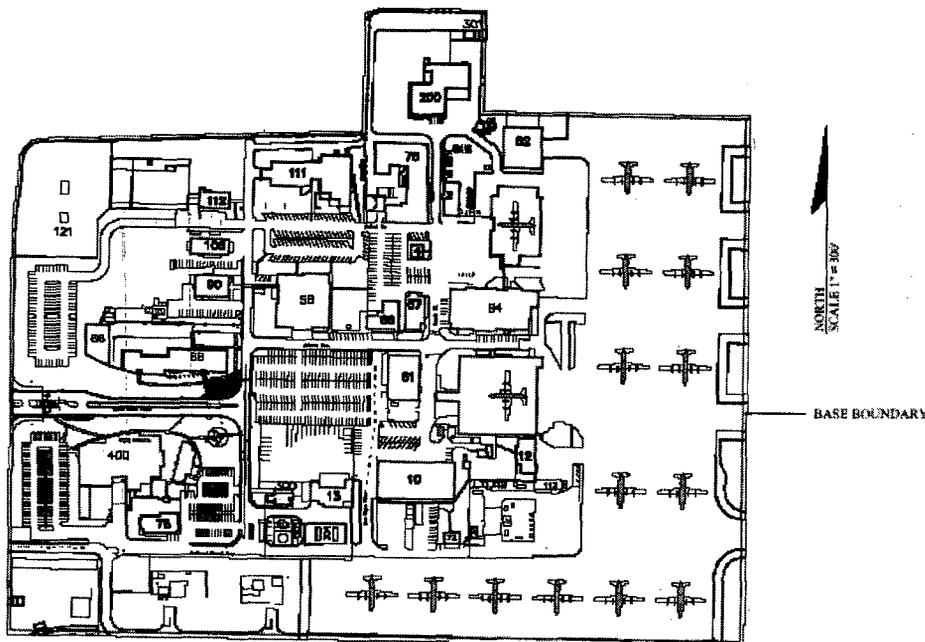
Brigadier General Cindy Kirkland
The Adjutant General, Nevada National Guard
Testimony before the BRAC Commission
Ref: Reno-Tahoe International Airport/Air Guard Station
June 24, 2005
Clovis, New Mexico

Mr. Chairman and members of the commission, please let me start by thanking you for giving me the opportunity to talk to you today and share some information that I think is critical to this process. The recommended realignment of the Nevada Air National Guard unit located at the Reno-Tahoe IAP/AGS in Reno is flawed and simply does not make sense.

It seems clear that the Air Force BRAC process was flawed and skewed against the efficient and cost effective Air National Guard bases. The Air Force used a one-size-fits-all approach while the other components all considered the unique attributes of the active, Reserve and Guard forces. The fact that a senior Air Force BRAC official told The Adjutants General at their meeting in May in Omaha, Nebraska that "they (the TAGs) were intentionally excluded from the process" tells me that this was not an open and sound process.

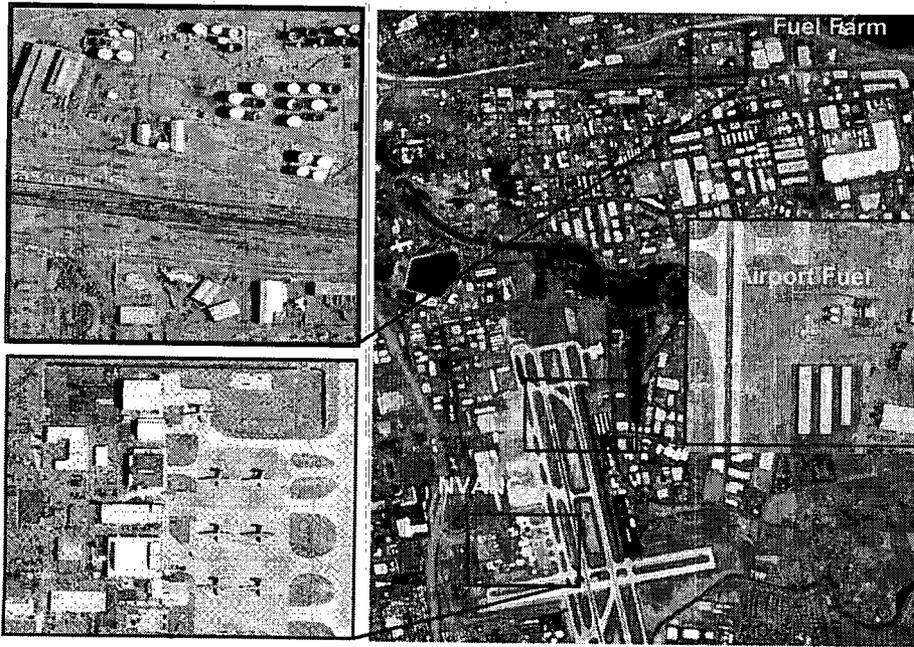
In reviewing the report and justification for realigning the Reno Air Guard Station, there are many flaws in data as well as complete omissions. Because of the format and skewed data call, many attributes of the base were not considered and the military value calculated much lower than it should have been.

The primary justification used to support the recommendation was based on the fact that the Reno base could not park more than 10 aircraft. Records show that both the National Guard Bureau and the Air Force acknowledged at one point that we could in fact park a larger number of planes, but the report and recommendation fail to recognize it. In fact, as you can see from this slide we can currently park up to 12 aircraft.



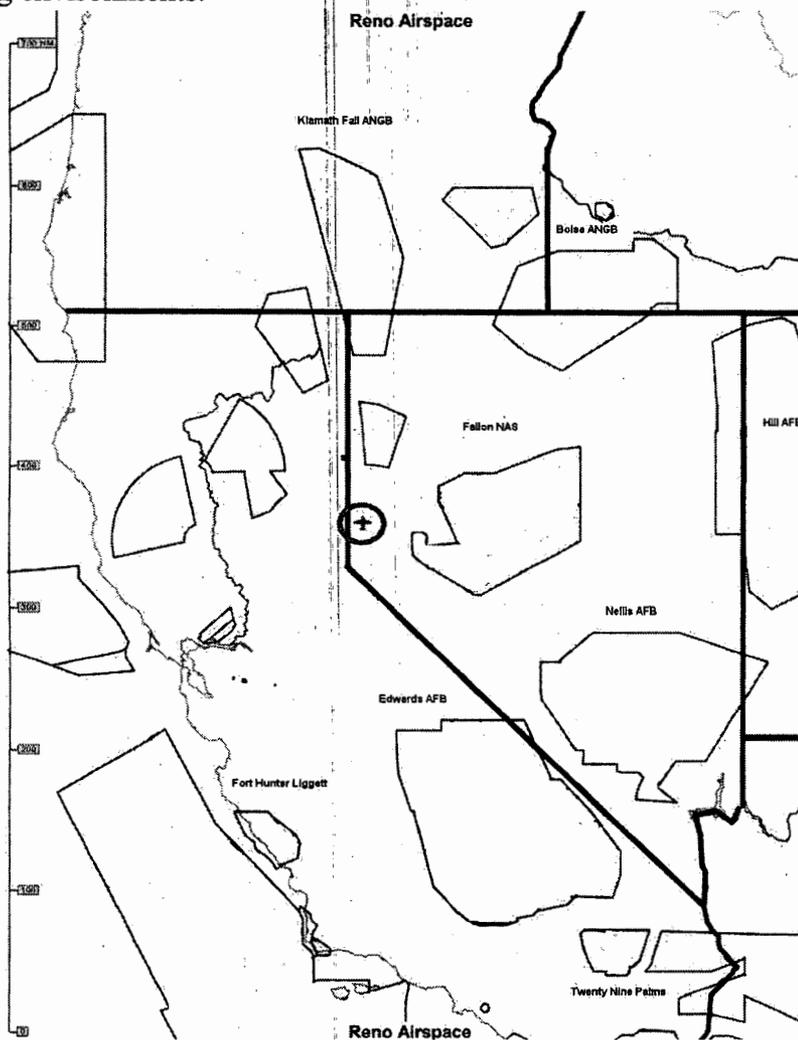
With a no-cost land swap that was approved by the Reno-Tahoe Airport Authority and forwarded to the National Guard Bureau more than four years ago, we could actually accommodate 16 aircraft.

In addition, the military value rating given to Reno Air Guard Station did not take into consideration resources available at minimal or no cost to the Department of Defense, resources all Air Guard stations co-located with a commercial airport enjoy.



Fuel storage capacity got us no points because we only have capacity on our facility for 150K gallons, though across the airfield we have unlimited access to the airport tank farm which is directly pipeline fed. We have unlimited fuel access.

We could also not identify our access to the world's most diverse and complex series of ranges and training areas because they are not physically located on our facility. Yet within minutes of taking off from the Reno base, that we have the ability to train in some of the world's finest training environments.



Had we been able to identify these resources in the data call, we would surely have received a much higher military value rating.

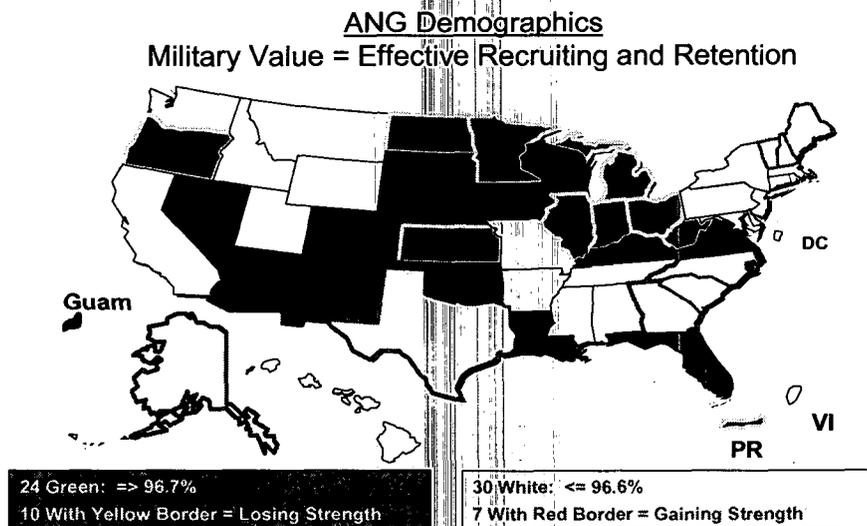
Keep in mind that by being co-located on a commercial airfield the DoD is not responsible for the maintenance and operational cost for the airfield infrastructure which runs many millions of dollars each year.

There are many more areas regarding infrastructure and surge capacity that were not considered by the DoD process because it did not fit their model. We received no points for our operating characteristics since we do not control the airspace and could not report that we have no take-off delays. We could not report that we have an agreement with the airport to accommodate a significant increase in aircraft parking to support surge or diversion requirements. And, by the way, there is no cost and we do not have to maintain additional ramps in a surge situation. In the report we have provided, you will find much more detail on specific flaws in the data and application of the established criteria.

Along with many other points of skewed data, the process failed to recognize the unique nature of the C-130s assigned to this unit. All eight aircraft have been modified at great expense to support one the Air Force's key intelligence gathering platforms. Only these eight planes can carry

the Scathe View system of which Mr. Vanderhoof spoke. War theater commanders have identified this system as one of their top five priorities. If the C-130s are sent to Little Rock, or elsewhere as is now being discussed, those modified aircraft will still have to return to Reno on a regular basis to train and maintain proficiency with the intelligence airmen remaining in Reno. Due to the intensive training required to maintain proficiency and coordination between the flight crew and the imagery analysts, loss of this capability in Reno means this key system will be significantly compromised. The BRAC Report doesn't even take into consideration the fact that the Air Force cost to frequently deploy the aircraft back to Reno to support training will cost millions. There are many additional costs for maintaining support of this system and the people who operate it that were also not taken into consideration. Those costs are reflected in the report we have provided.

Recruiting and retaining quality individuals to ensure the nation's ability to respond to threats is the number one BRAC Principle.



The active component and some Reserve components are challenged with meeting end strength. The Reno unit has consistently been at or above the National Guard Bureau's strength goals and with a growing population, has no concern with recruiting to future strength needs. Yet both General John Jumper and Mr. Michael Dominguez have indicated "installation characteristics" should be stressed and the Air Force can recreate the world class skills of the Guard.

Of the more than 500 people our unit will lose, about 90% have indicated they will not move to another state or location. The Air Force BRAC Report says that number is 20%. Our airmen have jobs in the local community and family and community ties will keep them at home. Guard members traditionally do not relocate throughout their career like active duty and Reserve members.

Replacing just one 6-year term airman is estimated by the Air Force to cost \$65,000. Multiply that by the vast numbers of airmen affected in this unit alone and the price tag is enormous. Add to that the combat and lifetime experience of senior members who will lose their positions and it will take the Air Force years to recoup experience lost through this Guard realignment. We've already received calls from unit members in southwest Asia asking if they'll have a job when they return. I offer that empty bases will not provide for the defense of our nation.

Governor Guinn and Mr. Vanderhoof have already talked to you about the impact to Nevada and the nation if we cannot respond immediately within the state during a major emergency. Homeland defense is given top priority in our National Security Strategy and National Military Strategy, yet the Guard's Constitutional responsibility to support the governor and state was not even considered.

Governor Guinn also spoke to you concerning the Title 10 requirement to consult and gain concurrence of the governor before affecting units in his state. The failure of the Air Force and DoD to follow the requirements of the U.S. Constitution and the simple obligation to all the men and women in uniform is not acceptable. We ask again that this commission look very closely at the evaluation and skewed criteria applied to the 152nd Airlift Wing in Reno, Nevada and consider increasing our assigned aircraft to support our growing missions. Thank you for your time.

Shelley Hartman
Mineral County Economic Development Authority Executive Director
Testimony before the BRAC Commission
Ref: Hawthorne Army Depot
June 24, 2005
Clovis, New Mexico

We wish to thank the Base Realignment and Closure Commission for this opportunity to clarify the erroneous facts which have been used as the basis for closing the Hawthorne Army Depot. Our appearance before the commission has three purposes this morning. The first is to cast doubt on the Hawthorne data and evaluations provided to the commission. The second is that based on the doubt cast, the commission will reevaluate the reasoning and the Hawthorne Army Depot data and conduct a site visit of the Hawthorne Army Depot facilities. The third point is that following the reassessment of the data coupled with physical evaluation, the commission will remove the Hawthorne Army Depot from the closure list. We believe that if a decision is made to close the Hawthorne Army Depot the decision should be made on a determination of sound military value and not incorrect data and eschewed information.

Our case to cast doubt on the Hawthorne Army Depot data and evaluations provided to the commission will be made by asking five questions. The factual back-up data to these questions is provided to the commission in our information binders.

The first question. Can the military really afford in cost and time to recreate the storage and demilitarization capability and lose the strategic location of the Hawthorne Army Depot?

The initial evaluation calculated that it will cost \$180 million to empty the Hawthorne Army Depot and relocate the munitions and recreate the demilitarization capability at the Tooele Army Depot. We believe that the cost will be closer to \$1.3 billion and will take approximately seven years.

In 2003 the Army conventional munitions storage in the continental United States was nearly 70% full and yet large quantities of munitions were still located overseas. Currently the military intends to bring nearly 600,000 tons of munitions from foreign countries to be consolidated back into the continental United States depot system. By 2007 the depot system will be at 98% occupancy. These storage computations include the 10 million square feet at the Hawthorne Army Depot, which has the capability of holding 600,000 tons of munitions. The computations do not take into consideration losing the 10 million square feet and relocating the nearly 600,000 tons of material currently stored at the Hawthorne Army Depot. Tooele Army Depot, which is already full, will need to build 1,000 magazines, at a cost of about \$500 million, simply to hold the Hawthorne Army Depot munitions.

Hawthorne Army Depot has a full complement of conventional munitions demilitarization capabilities for recycling munitions, including furnaces, plasma systems, wash-out, melt-out and decontamination facilities. Tooele Army Depot has only one furnace and is under-equipped to handle the wide variety of demilitarization processes currently available at the Hawthorne Army Depot. To recreate the demilitarization capabilities of the Hawthorne Army Depot facility at the Tooele Army Depot it will cost \$157 million and approximately seven years of construction and permitting. Additionally the community of Tooele has twice forced the Army to interrupt the construction of new demilitarization facilities at Tooele Army Depot. And the state of Utah EPA, because of Tooele's current environmental permits situation, may not even allow for the permitting processes to be completed.

Hawthorne Army Depot is strategically located to provide overnight shipping to the west coast ports and training facilities. Prior to the BRAC announcement the Navy was preparing to strategically locate 200,000 tons of conventional munitions to service their Pacific Carrier Groups. Also due to our centralized location and capabilities, the Navy had also signed a Memorandum of

Agreement with the Army to process range and target scrap from the Navy's bombing ranges at Fallon, Nevada, solving a critical state and federal environmental issue. The Army has signed another Memorandum of Agreement with the COE to process scrap from other BRACed activities. Hawthorne Army Depot was also working with the Defense Logistics Agency to become the national repository for Defense Mercury Stockpile.

The second question. Why was military judgment used in place of military value?

Moving the Hawthorne Army Depot mission and capabilities to Tooele Army Depot would be moving from an installation of high military value to a location of low military value. Hawthorne Army Depot is ranked as number 2 out of the 23 storage and distribution depots. Hawthorne Army Depot is ranked 1 out of the 13 facilities with demilitarization capabilities. Hawthorne Army Depot is ranked number 1 of the installations for future military value.

Hawthorne Army Depot is presently demonstrating its multi-functional joint services value. Hawthorne Army Depot currently supports a Navy Undersea Warfare Center, a Marine Corp munitions and weapons testing facility, and troop training for high desert, mountain, and water operations. In the last two years Hawthorne Army Depot has had a nearly permanent contingent of Navy SEALs for sea, air, and land pre-deployment training. This spring we had over 1,000 U.S. Marines at Hawthorne Army Depot for pre-deployment training because Hawthorne Army Depot is one of the few places in the U.S. where the Marines can practice live fire training, and the Marine Snipers practice on the only High Angle firing range in the United States. The Army Rangers use Hawthorne Army Depot for high altitude desert training.

Will the military ever be able to replace 230 square miles, with 2,400 munitions storage structures, that has no encroachment, and because 98% of the land in Mineral County, Nevada is under the control of federal government agencies, there will never be any encroachment. Prior to the BRAC announcement the Army was undergoing a land swap to acquire another 129,000 acres* of land adjacent to the depot from the Bureau of Land Management to expand the training and test capabilities of Hawthorne Army Depot.

The third question. Was Hawthorne Army Depot pre-selected to be closed?

By closing Hawthorne Army Depot the military will be able to reduce the property books of a large footprint including infrastructure and structures. The military will also be able to reduce employment by 500 contractors, who simply go away when relieved of their jobs and do not require relocation, early outs, or costly buy-outs.

The fourth question. Who manipulated the Hawthorne Army Depot data?

Why does the employment reflect only 199 people impacted rather than the real number which is 585? Why is the Hawthorne Army Depot employment included in the Reno/Sparks Metropolitan Area as 0.1% of the workforce when Reno/Sparks is 140 miles from Hawthorne Army Depot? Hawthorne Army Depot has shipped 712,000 tons and received 862,000 tons in the last 20 years, so why was the shipping and receiving capability at Hawthorne Army Depot incorrect, when Hawthorne Army Depot has recently spent several million dollars building state of the art shipping and receiving facilities? Hawthorne Army Depot has demilitarized over 19,000 tons of munitions between 2002 and 2004, more than any other depot in the organic base, so why was the demilitarization capability listed as zero? If the Army estimated that it would cost \$180 million to empty Hawthorne Army Depot and turn the depot over to commercial development, why is the actual cost nearly \$1.3 billion? Why was Hawthorne Army Depot the only depot considered for closure and why were no other scenarios calculated such as the closing and relocating the missions of Tooele, Letterkenny, Blue Grass, or Aniston?

The fifth question. Why was the economic impact to Mineral County not addressed?

The real impact to the depot is 585 jobs. The real impact to Mineral County will be 970 jobs. Mineral County has a total of 1,860 jobs, and the depot represents one half of all the county jobs. Was any consideration given to the employment impact? Mineral County is 70 miles from Fallon, the next closest town with employment, and so people in Mineral County who lose their jobs are

forced to move out of the community. This means that Mineral County will lose its human asset base. The cost of running the county government, infrastructure maintenance, utilities, and mandated expenses will be spread over a reduced number of people. Services such as the hospital, the only active hospital in central western Nevada, will be reduced to a first aid station, eliminating Hawthorne's viability as a retirement center. The school will lose a significant number of students, since most of the families in the community work at the depot, forcing class consolidation and the lay-off of teachers. Issues such as the school bond will go into default without the tax base to support it.

Eventually with the reduced tax base of Mineral County will be forced into receivership and taken over by the state. Hawthorne will become a ghost town.

As mentioned in our opening statement, we would understand if the Hawthorne Army Depot was being closed because it did not represent military value to the future of our armed services. But with our multi-functional capabilities ranging from logistics, to munitions recycling, to range scrap processing, to joint services training, we feel Hawthorne Army Depot is a future asset to the Department of Defense. Based on the above information, the commission should reevaluate the reasoning and data used to place the Hawthorne Army Depot on the BRAC list, as well as conduct a site visit of the Hawthorne Army Depot. We believe once the reevaluation and site visit occur, the commission will see fit to remove the Hawthorne Army Depot from the BRAC list.

Bernie Anderson
Nevada State Assemblyman
Testimony before the BRAC Commission

Ref: Reno-Tahoe International Airport/Air Guard Station and Hawthorne Army Depot
Clovis, N.M.
June 24, 2005

Nevada's Air National Guard has had a long and outstanding history serving the United States and the State of Nevada. Established in 1948, it originally operated out of the Reno Army Air Base (later renamed Stead Air Force Base). The unit later entered into various leases and agreements in 1953 and 1954, to use a portion of Hubbard Field (now the Reno-Tahoe international Airport). Through these early agreements, the Air National Guard agreed to spend \$1 million for a 25-year lease on 29 acres of land. Supplemental agreements extended the lease to the year 2054, and added 35 acres of land.

Over the next 50 years the unit's mission changed from a fighter squadron to a bomber squadron, to a reconnaissance unit, to its present mission of an air mobility wing. Such mission changes have often resulted in changes to the aircraft assigned. With the introduction of the highly versatile Hercules aircraft in 1995, the mission of the Air National Guard changed dramatically. The current mission now encompasses several support functions including airlift and airdrop capability for cargo and personnel during wartime and peacetime. Using the C-130 as a tactical reconnaissance platform, the unit also provides timely, accurate intelligence in support of national security.

The C-130 aircraft proposed for realignment from Nevada's Air National Guard are currently the unit's only planes. The loss of these assets would expose the state's residents to dangers from both natural disasters and potential terror attacks. It would profoundly change the unit's mission and capabilities. Members of the Air National Guard have played a critical role in essential airlift support for this country including the Korean Conflict; Operations Desert Shield, Desert Storm, Noble Eagle, Enduring Freedom, and Iraqi Freedom; and the continued Global War on Terrorism. Through highly developed technical expertise, the people and equipment of the Air National Guard also play an essential role in Nevada and the western states by providing airlift support in times of crisis, such as fire fighting and flood relief. Removal of this presence from Nevada to Arkansas would leave Nevada and western states without a critical airlift capability. Additionally, it is estimated that loss of the C-130s and the personnel and functions involved with them will cost the Reno economy about \$22 million per year.

In closing, the State of Nevada has long been an important contributor to our national defense. Nevada's military installations have served our state and nation proudly and effectively, and are of great importance to their local communities. The Air National Guard unit in Reno is a critical asset to the community, the state, and the nation. The unit's continued operation in its current form and location is critical. From the propeller driven P-51 Mustang in 1948, to the current four-turbo prop C-130 Hercules transport aircraft, the 1,100 members of the Nevada Air National Guard have performed with dedication and professionalism.

In response to the Department of Defense recommendations, the Nevada Legislature recently adopted Assembly Joint Resolution No. 17 which cites the importance of Nevada's military installations and urges the Base Realignment and Closure Commission to reconsider certain recommendations, including the proposed changes to Nevada's Air National Guard. Each member of the commission will receive enrolled copies of this resolution when they are printed. I brought copies of the first reprint with me today for your reference, which will be identical to the enrolled version.

Thank you for this opportunity to provide comment.

**Randolph Townsend
Nevada State Senator**

Testimony before the BRAC Commission

Ref: Reno-Tahoe International Airport/Air Guard Station and Hawthorne Army Depot

June 24, 2005

Clovis, New Mexico

Ladies and gentlemen of the commission, thank you for hearing us today. I am Randolph Townsend, Nevada State Senator, Washoe County Senatorial District 4 and I appreciate the opportunity to talk with you today. I am extremely concerned about the 2005 BRAC Report's recommendation to relocate the flying portion of the 152nd Airlift Wing, located in my district.

The unit has been a member of our community since 1948 and the 152nd Airlift Wing's participation in our city through volunteer activities and military service in times of crisis is unmatched.

In the last few months alone the Air Guard's C-130 aircraft provided valuable assistance in fighting a number of wildfires that threatened homes, families, and small businesses. The Air Guard not only assisted with their fire trucks and well-trained firefighters, but with their Scathe View camera sensors. Those sensors gave our fire commanders the most intimate knowledge of the large-scale fires, allowing them to fight the fire more effectively than ever before.

The aerial photos provided during a flood in downtown Reno a few years ago gave county emergency managers unprecedented views of the entire flooded region. They knew which roads and bridges were washed out, which way to direct emergency crews, and how to best rescue stranded citizens.

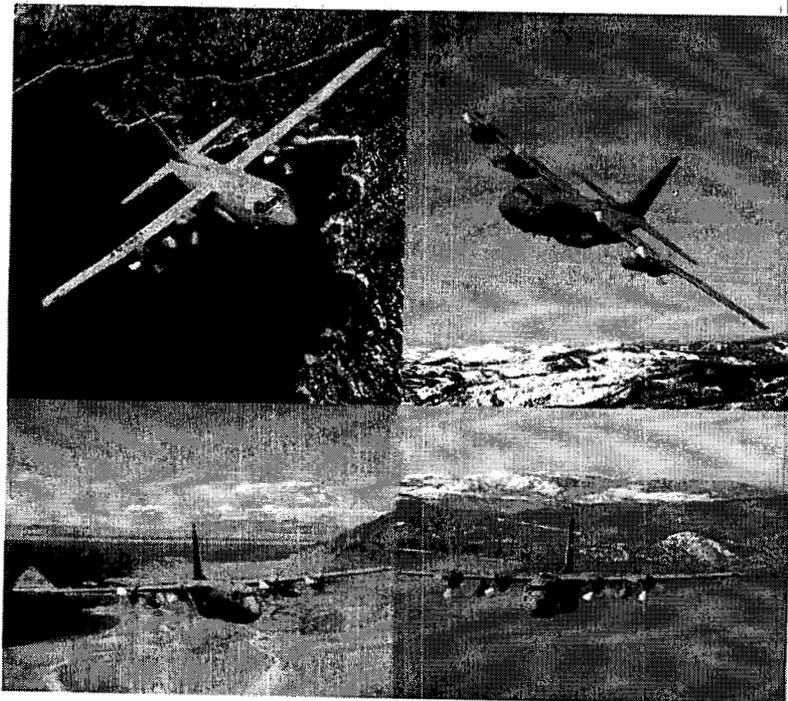
If the several hundred jobs are lost from the 152nd, the economic impact to our community can be gauged in dollar figures and it would be significant, but the emotional impact and the dependability we rely on are so much greater. I urge you to look closely at this realignment and look closely at this unit. I believe what they bring to us as a community and as a state far outweigh any cost savings that may be realized down the road.

Their availability to us as leaders of our state, though, is my biggest concern. The unit is able to provide tremendous airlift capability, so necessary to our large state. Reno is geographically distant from Las Vegas and the other population centers in the state. In times of crisis, our citizens cannot depend upon ground transportation for necessary response. It would be too slow and too dangerous to have to wait.

The recommendation to realign this unit and take away that necessary capability from Nevada leaves the state and my communities vulnerable to the myriad of natural disasters inherent to Nevada.

**NEVADA
AIR NATIONAL GUARD**

**RESPONSE TO
DEPARTMENT OF DEFENSE
2005 BASE REALIGNMENT AND CLOSURE
COMMISSION**



JUNE 22, 2005

SUPERSEDES ALL PREVIOUS EDITIONS

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EXECUTIVE SUMMARY

Availability and Condition of Land Facilities

BRAC Recommendation: Realign Reno-Tahoe International Airport Air Guard Station, NV. Distribute the eight C-130H aircraft of the 152d Airlift Wing (ANG) to the 189th Airlift Wing (ANG), Little Rock Air Force Base, AR. Flying related Expeditionary Combat Support (ECS) moves to Channel Islands Air Guard Station, CA (aerial port), and Fresno Air Guard Station, CA (fire fighters). The remaining ECS elements and the Distributed Common Ground System (DCGS) remain in place.

BRAC Justification: This recommendation distributes C-130 force structure to a higher military value base. Because of limitations to land and ramp space, Reno was unable to expand beyond 10 C-130s.

FACT

Response Fact: Justification was incomplete. Reno-Tahoe IAP/AGS is capable of supporting 12 C-130s on existing land and growing to 16 C-130s with ramp development.

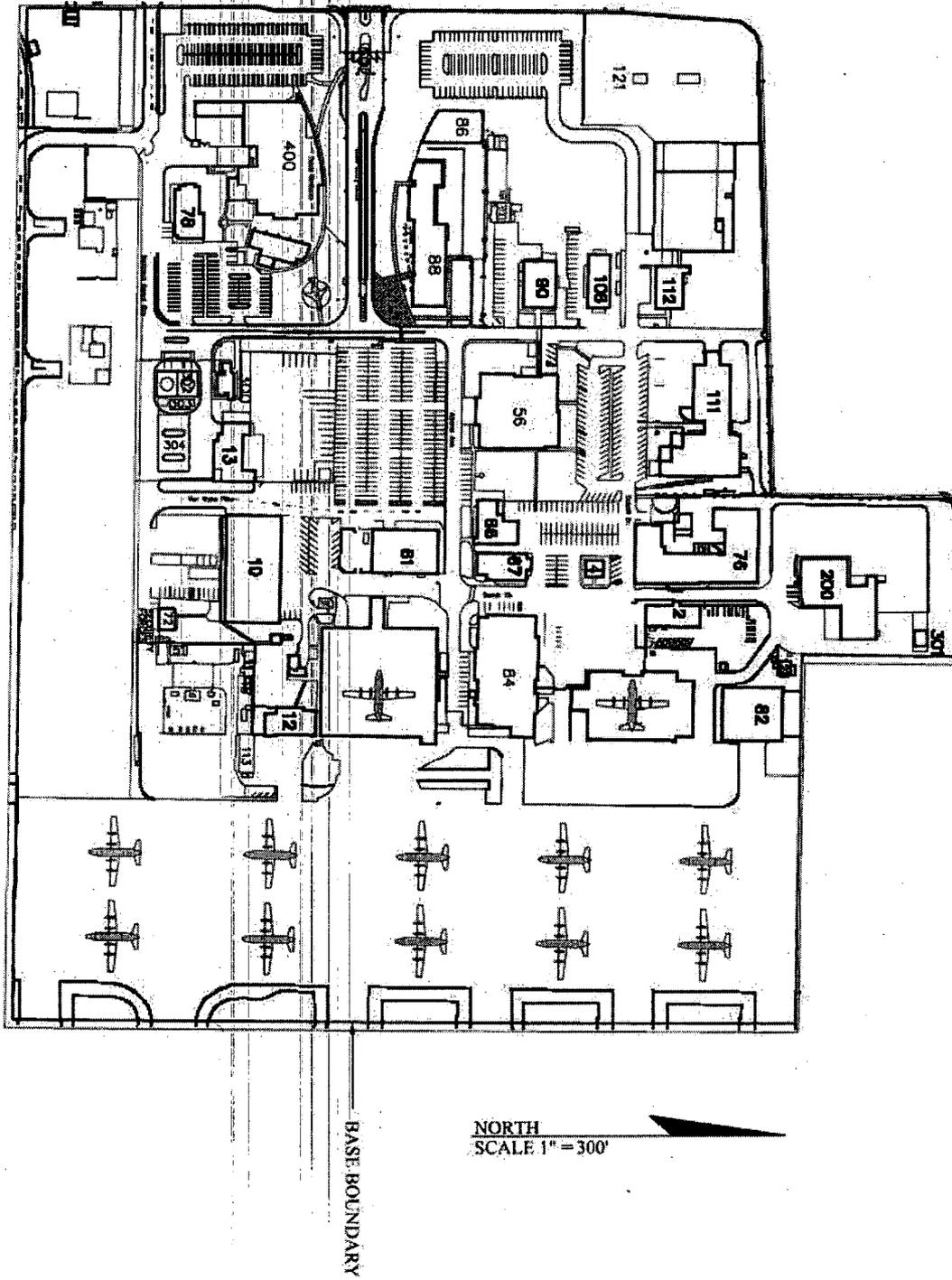
Availability and Condition of Land Facilities

Response in Detail

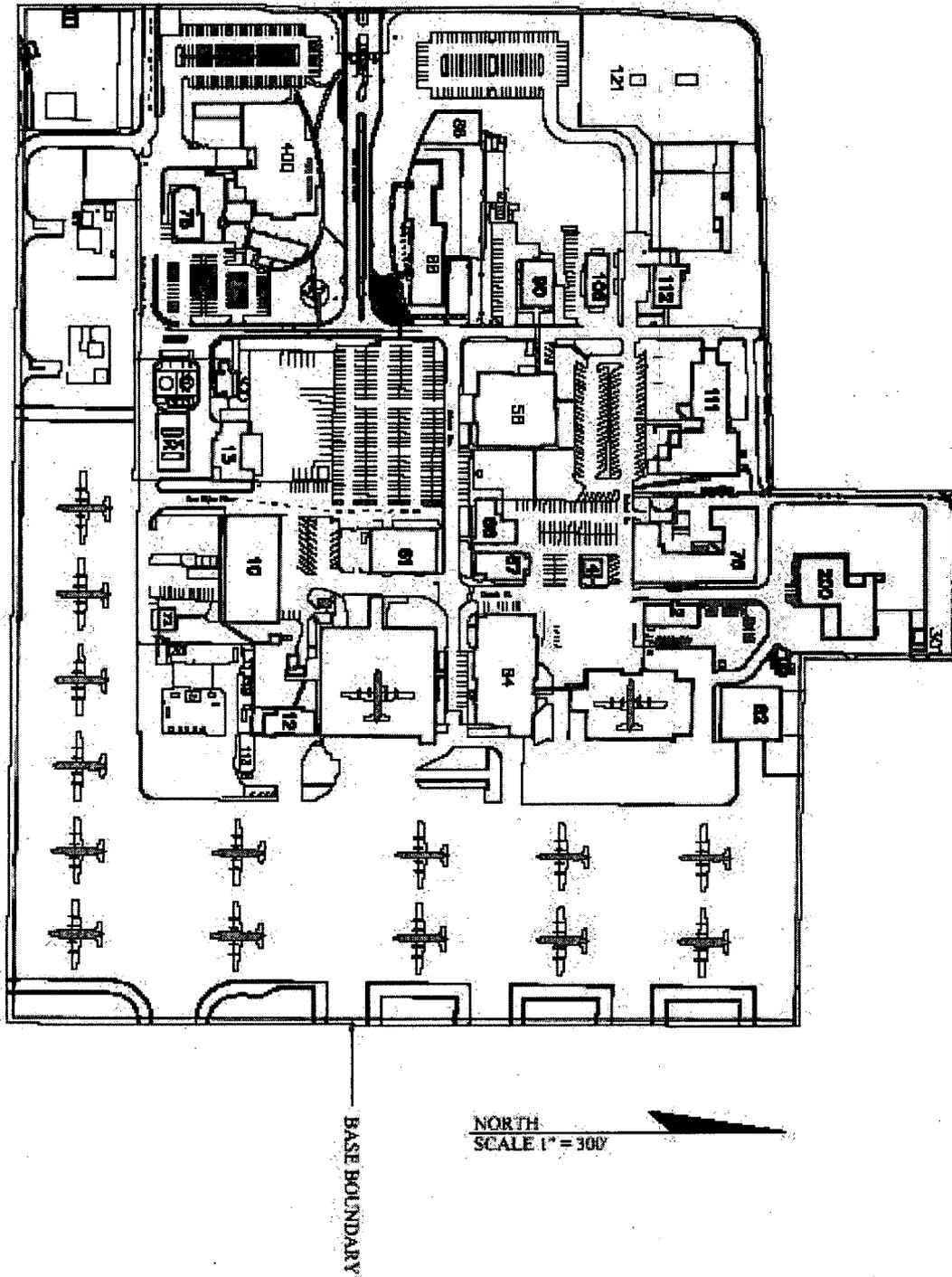
- Air Force confirms Reno-Tahoe IAP/AGS *can* robust to 12 aircraft, yet BRAC Report says unit unable to expand beyond 10 aircraft.
- The BRAC Report failed to take into account a land acquisition agreement approved by the National Guard Bureau and the Air Force providing space for up to 16 C-130s at this installation.² (See page 2a, 2b)
- Reno-Tahoe Airport Authority has spent millions revamping their existing infrastructure to accommodate the land swap.
- Available acreage (for expansion) did not take into account scheduled demolition of several existing structures or approved land swap deal, which would increase Reno-Tahoe IAP/AGS available real property to 9 acres.
 - Land acquisition agreement includes existing buildings suitable to accommodate any projected increase in manpower.
- The BRAC Report states, “No base of lesser military value by Mission Capable Index (MCI) is allowed to host force structure by Mission Design Series (MDS) until higher military value bases are at capacity limits defined by user input.”
- As a result of this unit’s invalid military value rating, the BCEG failed to follow their above noted imperative and inconsistently applied the rule of utilizing military value to make BRAC recommendations.
- Reno-Tahoe IAP/AGS is listed as a contingency facility for Fallon Naval Air Station. The 152nd Airlift Wing is also a supporting agency for Fallon’s mass disaster plan.
- Reno-Tahoe IAP has demonstrated space availability and willingness to house additional C-130 squadrons for training and contingency operations.

1. BCEG minutes dated April 30, 2004, slides 25 and 27
2. Ralph Conti, National Guard Bureau
3. Base Closure and Realignment Report, vol. 1, part 2 and 2, detailed recommendations, May 2005, Reno-Tahoe IAP/AGS, NV BRAC 2005 Recommendations, page C-15

Reno-Tahoe IAP/AGS Configured with 12 Aircraft



Reno-Tahoe IAP/AGS Configured with 16 Aircraft



EXECUTIVE SUMMARY

Cost of Operations and Manpower Implications

BRAC Recommendation: Realign Reno-Tahoe International Airport Air Guard Station, NV. Distribute the eight C-130H aircraft of the 152d Airlift Wing (ANG) to the 189th Airlift Wing (ANG), Little Rock Air Force Base, AR. Flying related Expeditionary Combat Support (ECS) moves to Channel Islands Air Guard Station, CA (aerial port), and Fresno Air Guard Station, CA (fire fighters). The remaining ECS elements and the Distributed Common Ground System (DCGS) remain in place.

BRAC Payback: The total estimated one-time cost to the DoD to implement this recommendation is \$22.9M. The net of all costs and savings to the DoD during the implementation period is a cost of \$12.2M. Annual recurring savings to the DoD after implementation are \$3.6M, with a payback expected in nine years. The net present value of the cost and savings to the DoD over 20 years is a savings of \$22.7M.

FACT

Response Fact: Eliminating the entire aviation program, aerial port, and fire department at Reno-Tahoe IAP/AGS incurs unaddressed costs of nearly \$100M in 2005 dollars over a 20 year period to support the remaining Expeditionary Combat Support and other joint missions. This is a significant departure from DoD's cost savings analysis outlined in BRAC Report.

Cost of Operations and Manpower Implications

Response in Detail

- The Department of Defense estimates the one-time cost to realign this unit at \$22.9M, but the net present value of the cost and savings over 20 years is only \$22.7M.⁴
 - However, shutting down the aviation portion of this wing incurs costs of \$96M in 2005 dollars over the same 20 year period. (See page 4a, 4b) The BRAC Report did not take into account the cost analysis of aviation support for the remaining intelligence unit's Scathe View mission. The Scathe View mission is a capability that provides a live television picture and direct communication to the soldiers on the ground. Replicating the loss of the wing's resources means an annual personnel cost of about \$2.6M annually to the 152nd Intelligence Squadron. There will also be additional annual training costs of about \$2.2M annually. There will also be an initial resource cost of \$1.6M with annual maintenance costs of about \$60K. Losing aircraft from the Reno-Tahoe IAP/AGS will actually cost the DoD money.
- The Reno-Tahoe IAP/AGS has a no-cost land lease-and-license until the year 2054. Current annual joint-use costs for the use of the facilities (runways, taxiways, tower, and navigational aids) total only \$59K per year, 25 percent of which is paid by the State of Nevada.⁵ Also, 25 percent of all utility costs incurred by the base are paid by the state. The Reno-Tahoe IAP/AGS is extremely cost effective because it has use of a multi-million dollar airport facility that places zero restrictions on the unit, for only about \$45K a year. That dollar amount is unmatched by any active duty base whose runway and facility maintenance costs range in the millions.
- The cost to replace one 6-year-term airman is \$65K.⁶ Losing 578 positions, 430 traditional and 148 technician/Guardsmen, means a minimum replacement cost of \$28M. Factor in additional training costs for officers and experienced Non-Commissioned Officers and the price tag is significantly higher. Nearly 90 percent of the 578 positions are combat veterans and 91 percent indicate they would not relocate to other units due to the extreme distances involved.
- Other unaddressed costs to realign the Reno-Tahoe IAP/AGS include \$1.5M for fire truck support to Amedee Airfield in Herlong, Calif., airdrop support to joint training taking place in Herlong, aerial port services to Sierra Army Depot and all related personnel costs.
- The Air National Guard will lose more than half the assets but will only save about one-tenth the cost. According to the BRAC Report, 60.5 percent of the cuts to Air Force flying missions come from the Air National Guard. Conversely, the result only accounts for 10 percent of the DoD-purported savings.⁷

4. BRAC Report, Volume 1, Part 2 of 2, Detailed Recommendations

5. Reno-Tahoe International Airport Joint Use Agreement

6. Air National Guard Recruiting Directorate

7. Unit Compilation from BRAC Report

EXECUTIVE SUMMARY

Current and Future Mission Capabilities

BRAC Recommendation: Realign Reno-Tahoe International Airport Air Guard Station, NV. Distribute the eight C-130H aircraft of the 152d Airlift Wing (ANG) to the 189th Airlift Wing (ANG), Little Rock Air Force Base, AR. Flying related Expeditionary Combat Support (ECS) moves to Channel Islands Air Guard Station, CA (aerial port), and Fresno Air Guard Station, CA (fire fighters). The remaining ECS elements and the Distributed Common Ground System (DCGS) remain in place.

BRAC Justification: This recommendation distributes C-130 force structure to a higher military value base. Because of limitations of land and ramp space, Reno was unable to expand beyond 10 C-130s. This recommendation realigns Reno's (101) C-130s to the Air National Guard at Little Rock Air Force Base AR, (17), where a larger, more effective squadron size is possible. This larger squadron at Little Rock also creates the opportunity for an association between active duty and the Air National Guard, optimizing aircraft utilization.

FACT

Response Fact: The BRAC report's Reno-Tahoe IAP/AGS military value rating of 101 failed to take into account a significant portion of the Nevada Air National Guard's missions, capabilities, and desirable training environment. Before traveling to Southwest Asia to participate in the Global War on Terrorism, the majority of Naval and Air Force aviation units train in Nevada.

Current and Future Mission Capabilities

Response in Detail

- According to the director of the Air National Guard, Lieutenant General Daniel James III, in testimony before the U.S. Senate Appropriations Committee April 7, 2004, "The ANG is transforming its force structure to meet escalating intelligence, surveillance and reconnaissance mission requirements and ever-increasing demand for Air Guard capabilities."
 - The Nevada Air National Guard currently conducts a transformational mission with the Scathe View C-130 and is optimized by the 152nd Airlift Wing working shoulder to shoulder with the 152nd Intelligence Squadron.
 - The Scathe View C-130 has been declared a high-priority aircraft by U.S. Central Command to support the Global War on Terrorism and the Nevada Air National Guard is the only place where the technology is funded and applied.⁸
 - The chief of staff of the Air Force, General John Jumper, directed the Nevada Air National Guard in January to do whatever it takes to provide this high demand intelligence C-130 asset to U.S. Central Command.⁹
 - The Reno-Tahoe IAP/AGS continues to support war fighters in Iraq and Afghanistan by providing both intelligence and airlift capabilities, many times concurrently.
 - This high-demand, high-value asset has been credited with 30 anti-Coalition forces killed in action, 350 anti-Coalition forces captured, six weapons caches found, the identification of numerous improvised explosive devices, and the prevention of two fratricides.⁹
 - Scathe View used in conjunction with the Rover ground receiver unit provides real-time streaming video and voice communications to combat-engaged soldiers and Marines and saves lives. Every other system incurs a time delay, a delay that can be deadly in a combat situation.
 - Reno-Tahoe IAP/AGS Scathe View C-130s are DoD's only aircraft from which the Predator unmanned aerial vehicle can be flown.
 - Re-assignment of these eight like-configured aircraft would mean a loss of the combat-proven synergy inherent only when the aircraft are collocated with the 152nd Intelligence Squadron, even though in BRAC Report, vol. 1 of 2, section 3, page 4 says, "Air Force flying units will be restructured into a smaller number of fully-equipped squadrons to increase operational effectiveness and efficiency. In the process, aircraft of like configuration (i.e. block) will be based together."
 - The 152nd Intelligence Squadron commander says reassigning 152nd AW aircraft will result in 50% mission degradation.
 - The Air Force will lose operational capability for several months if the Scathe View aircraft are reassigned. Reno-Tahoe IAP/AGS Scathe View C-130 crews are qualified in advanced survival training and the officers have the top secret clearances necessary for Scathe View operations. The Air Force will incur a large cost in training new Scathe View C-130 crews and with the substantial waiting period for clearances, lose trained, capable crews for a significant amount of time. Given the high demand of the Scathe View operation, can the DoD afford to lose this capability for even a short amount of time in the Global War on Terrorism?

8. Personal conversation between Gen Jumper and Maj Gen Giles Vanderhoof, Nevada Adjutant General
9. LtCol Gregory Harbins, Deputy Commander, 609th Combat Operations Squadron

- Reno-Tahoe IAP/AGS is one of only five units carrying the critical Senior Scout intelligence platform. Senior Scout is a high-demand signals intelligence collection asset currently employed in the Global War on Terrorism and all five Senior Scout-capable units are scheduled for re-alignment in the BRAC process.
 - Senior Scout provides a reach back data-link to both Salt Lake IAP/AGS and Reno-Tahoe IAP/AGS allowing global interoperability with the Air Force Distributed Ground Stations. This reach-back capability requires a dedicated modified C-130.
 - The Salt Lake City IAP/AGS has a requirement for a replacement training unit for Senior Scout-capable C-130s which will require a significant increase in dedicated flight hours.

- The BRAC report did not address Nevada's unique mission capabilities:
 - Reno-Tahoe IAP/AGS aircraft are DoD's only dual-mission combat C-130s providing Scathe View and airlift/airdrop capabilities. Scathe View is an intelligence collection and dissemination system mounted on specially-equipped C-130s and used extensively in its combat application for force protection in the Global War on Terrorism.
 - The Air Force has validated the requirement for Scathe View technology and demonstrated its value, but only the Nevada Air National Guard's budget pays for and mans the operations. As there are no other units funded to take the Scathe View platform and no other trained airborne imagery analysts in the entire U.S. Air Force, relocating the Reno C-130s and subsequently losing this capability will have far-reaching effects on our nation's ability to defend ourselves and our ability to successfully provide superior intelligence in the Global War on Terrorism.

- The BRAC report did not address Nevada's C-130 role in the National Guard State Partnership Program with Turkmenistan, a key emerging state in Southwest Asia bordering Iran and Afghanistan. (See page 7a) While U.S. Central Command Air Forces have been unable to facilitate exchanges with the nation, Turkmen President, Saparmurat Niyazov, told the U.S. State Department that Nevada Air National Guard C-130s are the only U.S. military aircraft authorized to routinely operate in Turkmenistan. The Reno-Tahoe IAP/AGS C-130s assist the Turkmen state border service in securing this geographically important region. This capability loss would substantially damage U.S. relationships in this strategic region.

- The BRAC report did not even address Reno-Tahoe IAP/AGS unrivaled training environments:
 - Nearly 90 percent of Nevada is federally owned and used daily for joint military training.¹⁰
 - Ten joint-use drop and landing zones within a fifty-mile radius, and eight additional drop zones within 150 miles, with terrain greatly resembling Iraqi and Afghan topography.¹¹ (See page 7b)
 - Within a 150-mile radius there are eight major training complexes. The proximity of these extensive complexes is an exceptional advantage to joint warfare training using the Reno-based C-130s.¹² (See page 7c)

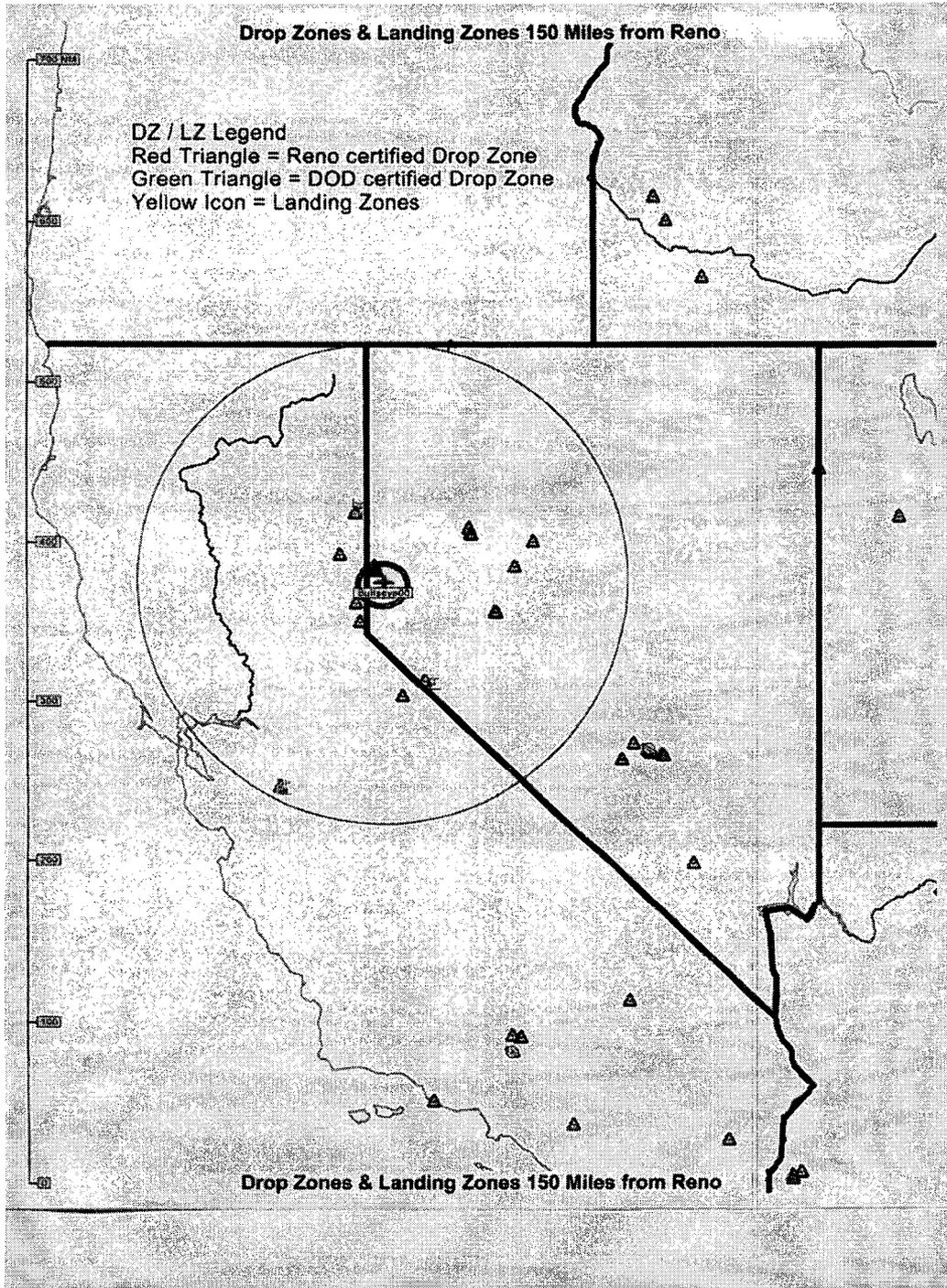
10. Bureau of Land Management

11. USAF Air Mobility Command Zone Availability Report

12. FalconView Airspace Overlay

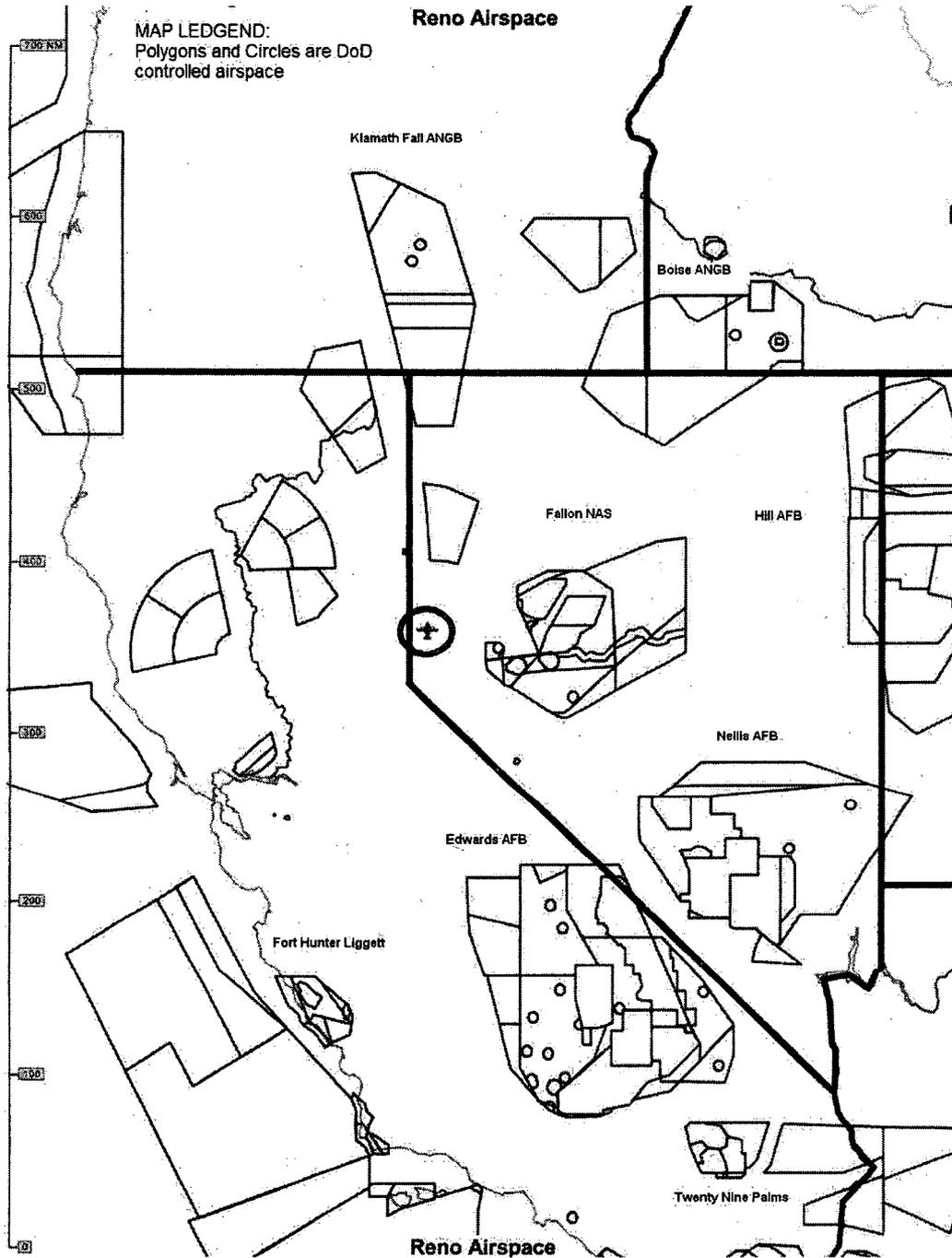


Reno-Taho Drop Zone and Landing Zone Map



Reno-Tahoe IA

Special Use Military Airspace (Ranges) and Military Operating Areas (MOAs)



- The Reno-Tahoe IAP/AGS routinely trains jointly with the majority of the west coast DoD military organizations and provides support to all U.S. armed forces as well as Allied nations' military forces training in this superior training environment.¹³
- The Reno-Tahoe IAP/AGS acts as a future mission test and evaluation location for future reconnaissance and intelligence missions associated with Scathe View, Senior Scout, Predator aircraft, and other unmanned aerial vehicles.
- The 152nd Aerial Port Flight provides critical joint support for Sierra Army Depot (Herlong, Calif.), a major logistics base about 50 miles from Reno. Relocating the aerial port flight means 100 percent of the depot's airlift requirements would have to be supported by a unit hundreds of miles away.
 - In 2004, the 152nd Aerial Port Flight performed a six month, 24/7 surge operation at Herlong processing and moving vital war support equipment housed there. While the surge is over, the depot still requires support on a monthly basis and is slated to expand¹⁴ its Department of Homeland Security emergency management agency resources, configured loads, reusable war fighting stocks, and a medical stockpile for 26 active duty mobile hospitals. This expansion represents a nearly 50% increase in the depot's operations. If the Reno unit is realigned, the depot's ongoing requirement would task units from more than five hours away to support their function. Due to Herlong's location, those units would have to be housed in Reno. Taking housing and per diem into consideration, the cost to bring in a unit other than Reno is prohibitive.

13. Joint Airborne Air Transportability Training After-Action Report
14. Sierra Army Depot

EXECUTIVE SUMMARY

Homeland Security/Defense Issues

BRAC Recommendation: Realign Reno-Tahoe International Airport Air Guard Station, NV. Distribute the eight C-130H aircraft of the 152d Airlift Wing (ANG) to the 189th Airlift Wing (ANG), Little Rock Air Force Base, AR. Flying related Expeditionary Combat Support (ECS) moves to Channel Islands Air Guard Station, CA (aerial port), and Fresno Air Guard Station, CA (fire fighters). The remaining ECS elements and the Distributed Common Ground System (DCGS) remain in place.

BRAC Justification: This recommendation distributes C-130 force structure to a higher military value base. Because of limitations to land and ramp space, Reno was unable to expand beyond 10 C-130s. This recommendation realigns Reno's (101) C-130s to the Air National Guard at Little Rock Air Force Base (17), where a larger, more effective squadron size is possible. This larger squadron at Little Rock AR also creates the opportunity for an association between active duty and the Air National Guard, optimizing aircraft utilization.

FACT

Response Fact: The National Security Strategy lists homeland defense as our nation's number one priority.¹⁵ BRAC calculations did not address Nevada's unique requirements and location for homeland defense. Eliminating the C-130s from this state absolutely cripples its ability to respond to any large-scale emergency.

Due to the fact that Nevada is a geographically large state (see page 10a) with annual flooding, large-scale wildfires, major fault lines, the largest dam in the nation and a tourist destination unlike any other in the world, the Nevada Air National Guard's support of these diverse characteristics is paramount.

15. United States National Security Strategy, 2002

Response in Detail

- If BRAC recommendations are implemented, only one C-130 tactical airlift unit west of the Rocky Mountains will remain.¹⁶ This area represents nearly 23 percent of the Continental United States.¹⁷
- Nevada's Homeland Security/Defense assets requiring airlift support include:
 - The Reno-Tahoe IAP/AGS based C-130s are written into the Nevada Emergency Response Plan, the Joint Emergency Operations Plan, and the Emergency Mutual Assistance Compact with 48 other states.
 - Nevada Weapons of Mass Destruction Civil Support Team and teams from three other states
 - World-class Urban Search and Rescue Team
 - 152nd Medical Group Emergency Medical System personnel
 - Nevada National Guard's quick reaction forces: 4-hour response time
 - Nevada National Guard's rapid reaction forces: 24-hour response time
 - Support to the Centers for Disease Control (CDC) Strategic National Stockpile. According to the CDC, during a crisis, this emergency medical stockpile will only be delivered to one location in each U.S. state.¹⁸ Each state must then provide logistic support to deliver it to stricken areas. Delivery times are always crucial when this stockpile is requested.
- Nevada is the fastest growing state and has been for the last ten years. Southern Nevada is identified as one of the most significant areas requiring homeland defense.¹⁹ McCarran International Airport in Las Vegas was listed the 6th busiest airport in North America in 2004 and 11th busiest in the world, with 51.5 million passengers each year.²⁰
- Given the size and distances in the State of Nevada (see page 10a), the loss of the Reno-based C-130 aircraft shatters the ability of the state to respond with critical personnel and equipment in support of Homeland Security/Defense missions.
 - Nevada contains more than 109,826 square miles of territory, nearly twice the size of all six New England states and the distance between metropolitan areas is 485 miles.¹⁷ This could represent a nine hour delay in providing support.

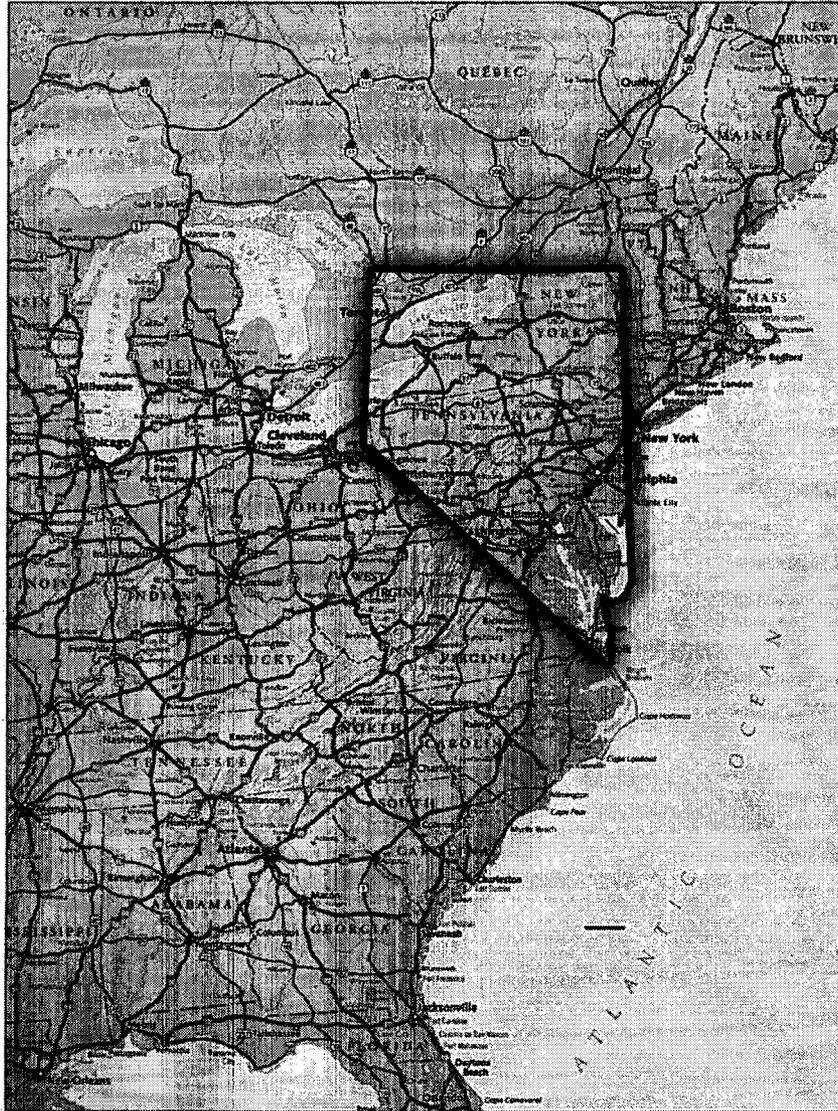
16. BRAC Report

17. U.S. Geologic Survey

18. U.S. Dept. of Health and Human Services

19. 2004 FBI Threat Assessment

20. McCarran International Airport



ACTUAL LAND SIZE OF NEVADA

- The state of Nevada is part of Federal Emergency Management Agency's region nine. This consists of California, Nevada, and Arizona. Nevada C-130s are currently tasked to support Civil Support Teams from these three states as well as Emergency Medical System personnel assigned to this region.
- The National Guard is uniquely suited to perform homeland security. The slow process of requesting active duty support for homeland security versus the rapid response of state assigned Guard units emphasizes the need for local community-based C-130 Air National Guard units for the security of this state and the large Federal Emergency Management Agency region in which we reside.
- The capabilities required for homeland defense are the same capabilities needed in forward areas. Homeland defense operations are inherently multi-agency, multi-jurisdictional efforts.
- "Secure and defend our homeland here and abroad is mission number one," is a National Guard principle."

EXECUTIVE SUMMARY

Loss of Fire Fighting Support Capability

BRAC Recommendation: Realign Reno-Tahoe International Airport Air Guard Station, NV. Distribute the eight C-130H aircraft of the 152d Airlift Wing (ANG) to the 189th Airlift Wing (ANG), Little Rock Air Force Base, AR. Flying related Expeditionary Combat Support (ECS) moves to Channel Islands Air Guard Station, CA (aerial port), and Fresno Air Guard Station, CA (fire fighters). The remaining ECS elements and the Distributed Common Ground System (DCGS) remain in place.

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FACT

Response Fact: The BRAC list gave no consideration to the Nevada Air National Guard's Scathe View-enhanced fire support capabilities or its ability to respond to the western states' extensive fire fighting requirements. The realignment of the Nevada Air National Guard also includes the reassignment of the 152nd Civil Engineer Squadron fire personnel who are all wildfire qualified. Eliminating these capabilities from Nevada will put lives and homes in grave danger.

Loss of Fire Fighting Support Capability

Response in Detail

- The Reno-based C-130 Scathe View-modified aircraft is a high-value asset in fire fighting due to its many cameras and infrared sensors enabling it to see through smoke day and night. Moving the modified aircraft from Reno would mean a complete loss of this state capability.
- Scathe View missions have recently been flown in support of large fires in California, Idaho, and Nevada. During the day Scathe View aircraft provide real-time fire-assessment data. At night Scathe View aircraft provide data to the fire command, allowing it to survey fire movement and develop an accurate action plan.
- Reno has been identified as a prime candidate for the Mobile Airborne Fire Fighting System (MAFFS)²² because of its unique proximity to the largest national forest in the contiguous United States (Humboldt-Toiyabe at 6.3 million acres). A MAFFS regional support center is slated to open 10 miles away from Reno-Tahoe IAP/AGS.
 - Scathe View will leverage MAFFS, giving the ability to drop slurry through smoke directly on hotspots, fire lines and most importantly, endangered firefighters.
- During the last five years, the state of Nevada lost 1.5 million acres to wildfires.²³ As part of the state mission, the Reno-Tahoe IAP/AGS fire personnel and Scathe View aircraft are credited with protecting lives and homes with these modified C-130s.
- The 152nd Civil Engineer fire department, in addition to supporting 152nd Airlift Wing air operations, is tasked to support Travis Air Force Base C-17 aircraft operations at Amedee Army Airfield. Travis has proposed a long-term contract for this specific support. The wing's fire fighting organization is the only agency that allocates time, personnel, and equipment to support flying operations at this facility. If the wing's fire fighting capability is realigned, Travis' C-17 assault training operations will be severely curtailed.
- Twenty-five percent of the 152nd Civil Engineer Squadron fire fighters are State of Nevada employees, whose job loss positions were not identified in the BRAC process.

22. National Guard Bureau Operations Plans Office
23. Nevada Division of Forestry

EXECUTIVE SUMMARY

Recruiting

BRAC Recommendation: Realign Reno-Tahoe International Airport Air Guard Station, NV. Distribute the eight C-130H aircraft of the 152d Airlift Wing (ANG) to the 189th Airlift Wing (ANG), Little Rock Air Force Base, AR. Flying related Expeditionary Combat Support (ECS) moves to Channel Islands Air Guard Station, CA (aerial port), and Fresno Air Guard Station, CA (fire fighters). The remaining ECS elements and the Distributed Common Ground System (DCGS) remain in place.

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FACT

Response Fact: Nevada continues to outpace the nation's population growth. With one of the best recruiting rates in the Air National Guard, the unit has proven it can easily meet all future manning requirements with the marketability the C-130s bring. The majority of young enlisted recruits indicate interest in working on or around the aircraft at Reno-Tahoe IAP/AGS.²⁴ Loss of the flying portion of this unit will negatively impact the recruiting and retention success and inclusion on BRAC list alone has already cost new recruits and experienced airmen.²⁴

24. 152nd Airlift Wing Recruiting

Response in Detail

- The Nevada Air National Guard has the manning to meet all current mission requirements as well as the ability to recruit to either 12 or 16 primary aircraft assigned.
- The Air National Guard failed to meet its first half FY 2005 recruiting goals by 21 percent.²⁵ conversely the Nevada Air National Guard is the only C-130 Guard unit west of the Mississippi to meet the 97 percent recruiting threshold set by the National Guard Bureau.
- Reno has not only been able to maintain, but increase its manning level during the last several years. With a current population of over 385,000 and a five-year growth rate of 13 percent, Reno is projected to reach 442,000 residents by the year 2015.²⁶
- While the BRAC Report actually shows a plus-up of military personnel in southern Nevada, the additions are not indicated as Air National Guard positions. Even if there is a plan to grow the Nevada Air Guard's presence in southern Nevada, Las Vegas is 485 miles away from Reno-Tahoe IAP/AGS and in individual conversations with those set to lose their Reno positions, 91 percent said they would not relocate to southern Nevada.
- A direct correlation has already been made between the elimination of a flying mission and Nevada Air National Guard's ability to maintain its manning. Within the first three weeks of the BRAC announcement, three members left the unit and several potential recruits expressed concern over whether they would have jobs in two years and have since declined to enlist.

25. U.S. Department of Defense News Release dated June 10, 2005

26. Economic Development Authority of Western Nevada, 2005

Fundamental Differences Between Guard and Active Duty

Inappropriate Methodology: BRAC gave no consideration for Air Guard entities that are inherently different from active duty missions and cost structures.

Response Facts:

- Active Duty – The mission of the active duty Air Force is to defend the United States and to protect its interests through air and space power.
- National Guard – As per the Constitution of the United States, the Guard has equal obligations to the country and to the state in which it resides. Each state's governor is the commander-in-chief unless the Guard is called to federal active duty service. For the vast majority of day to day missions, the Guard's obligations lie with the state's homeland security, support to state entities, and assistance in times of crisis, at which time, all expendable supplies, fuel, flight hours, and personnel costs are reimbursed to the federal government.
- The Guard provides the Department of Defense fully-trained units capable of going to war at a moment's notice for 1/3 the personnel costs of an active duty unit and substantially lower operating costs. Those savings originate with community basing structures allowing the Guard to share operating facilities with local airports and ranges with other DoD entities. Additionally, no costs are incurred for housing, hospitals and other infrastructure found on active duty bases.

Errors in BRAC Methodology

Erroneous Analysis: In the Secretary of Defense's BRAC selection process, the Air Force analysis was shaped by three underlying rules: military value, both quantitative and qualitative, was the primary factor; all installations were treated equally; and installation military value was determined on a base's current mission, but also on its capacity to support other core missions.²⁷

Response Fact: The preceding pages have illustrated why the Reno-Tahoe IAP/AGS's military value was quantitatively gathered in a subjective manner, that our current and future missions were not taken into consideration, and that the "equal treatment" of installations was inherently flawed.

27. Base Closure and Realignment Report, vol. 1, part 2 and 2, detailed recommendations, May 2005, Reno-Tahoe IAP/AGS, NV BRAC 2005 Recommendations, Air Force page 2.

Substantial Deviation from BRAC Criteria by BCEG

Deviation: Contradictory Data Used for Selection Criteria by Base Closure Executive Group

Response Facts:

- The BRAC Report states, "No base of lesser military value by Mission Capable Index (MCI) is allowed to host force structure by Mission Design Series (MDS) until higher military value bases are at capacity limits defined by user input."²⁸
- As a result of this unit's invalid military value rating, the BCEG failed to follow their above noted imperative and inconsistently applied the rule of utilizing military value to make BRAC recommendations.
- Throughout the BRAC selection process, Reno's current and future mission capability was never addressed, though current and future mission capability is the number one priority according to the BRAC Final Selection Criteria.²⁸
- The BRAC Report identified patterns that emerged for their recommendations, "Air Force flying units will be restructured into a smaller number of fully equipped squadrons to increase operational effectiveness and efficiency. In the process, aircraft of like configuration, (i.e. block) will be based together."²⁹ Moving the eight uniquely specialized aircraft to the 189th Airlift Wing at Little Rock Air Force Base to be used as generic C-130 trainers directly contradicts this statement.
- Contradictory Personnel Loss Numbers
 - The BRAC Report lists three different numbers in three locations regarding displaced Reno-Tahoe IAP/AGS personnel.
 - In volume 1, part 2 of 2, the recommendation shows a loss of 148 full-time positions and 430 drill positions.
 - In volume 1, part 1 of 2, the recommendations shows a loss of 124 civilian and 23 military positions.
 - In volume 5, part 1 of 2 shows a reduction of 263 jobs (147 direct jobs and 116 indirect jobs).
 - Our examination of the 152nd's unit manning document shows the loss of 453 positions from operations, maintenance, aerial port flight, and the civil engineer fire department. It does not include functions whose training ability will be lost with loss of the aircraft. The fuels section with 18 airmen is a prime example. The BRAC Report does not address these positions so affected.
- Equal Treatment of Active Duty and Reserve Component installations
 - Many BRAC data call questions (1.91, 1.92, 1.101, 1.102, 1.103, 1.138, 1.139, 1.141, 1.142, 14.87 through 14.137) prevented numerous Air Guard locations from answering if they did not have an undergraduate or graduate training program in place or did not locally own ranges or facilities. Active duty locations frequently have those training programs in place and own those ranges or facilities. Few Air Guard locations have those training programs and most of Nevada's ranges are federally owned, though still available every day to the Reno-Tahoe IAP/AGS.

28. Base Closure and Realignment Report, vol. 1, part 2 and 2, detailed recommendations, May 2005, Reno-Tahoe IAP/AGS, NV BRAC 2005 Recommendations, page C-15.

29. Department of the Air Force Analysis and Recommendations for BRAC 2005, vol. 5, part 1 and 2, May 2005, page 149

- BRAC Report identified Reno-Tahoe IAP/AGS as only having two runways. In fact, Reno IAP has six runways: 16R, 16L, 34R, 34L, 25, and 07. The BRAC question number nine failed to elicit complete information on the number of runways at installations.
- Numerous questions elicited “N/A” or no responses. One such question³⁰ regarding air operations departure delays gives Reno Tahoe IAP/AGS an “N/A” for a response. The criterion to receive full credit, 100 points, is “zero percentage delayed.” Did Reno Tahoe IAP/AGS receive any credit when the answer recorded was “N/A”? In the BRAC Report, Section 3, Vol. 1, Part 2 of 2, Air Force Section 3, page 3, the BCEG Scenario Development states the Air Force cueing tool was used in the data calculations. The BCEG removed “first look” results that the cueing tool was unable to recognize. Did this include “N/A” responses? The actual fact is Reno should have received 100 points for this question. The data released does not reveal what value this installation received in this area.
 - Below are some of the other areas that give us concern regarding the undervaluation of this installation:
 - undercounted drop zones, uncounted landing zones
 - undercounted navigational aids
 - extremely favorable flying weather conditions
 - zero electromagnetic interference/restrictions at Reno-Tahoe IAP/AGS
 - favorable geögraphy
 - community basing
- The BRAC Report failed to take into account the Reno-Tahoe IAP/AGS’ transformational mission: Scathe View and Senior Scout, It also failed to account for the use of the 152nd Airlift Wing as a test bed for numerous emerging intelligence assets, even though those missions and assets have been widely proclaimed as the future of the Air Force and the Air National Guard and evidenced by Lieutenant General Daniel James III, the director of the Air National Guard before the U.S. Senate Committee on Appropriations on April 7, 2004.

“The Air National Guard’s Intelligence, Surveillance, and Reconnaissance personnel and systems play an increasing important role in the defense of our nation.”

“Due to a significant increase in AF mission requirements, the ANG continues to expand its intelligence collection and capability. Other developing AF capabilities entrusted to the ANG include... the C-130 Scathe View tactical imagery collection system. Scathe View provides a near-real-time imaging capability to support humanitarian relief and non-combatant evacuation operations. To support signal intelligence collection requirements, the ANG continues to aggressively upgrade the SENIOR SCOUT platform. SENIOR SCOUT remains the primary collection asset to support the nation’s war on drugs and the Global War on Terrorism in the southern hemisphere.”

“The ANG is transforming its force structure to meet escalating intelligence, surveillance and reconnaissance mission requirements and ever-increasing demand for Air Guard capabilities.”

Scathe View since November 2003 has been used in Operation Iraqi Freedom and Operation Enduring Freedom as a close-air-support asset and is among the top five priorities requested by the CENTCOM combatant commander.

30. Department of the Air Force Analysis and Recommendations BRAC 2005, vol. 5, part 2 of 2, May 2005, question 1242, column five, Percentage Delayed for ATC

- This was also evidenced through testimony of Lieutenant General H. Steven Blum, the chief of the National Guard Bureau in his testimony before the U.S. House Armed Services Committee subcommittee on Total Force on March 31, 2004.

“Additionally, the Air National Guard’s continued acquisition of the AN/APN-241 Low Power Color Radar, continued installation of the Night Vision Imaging System, and the Air National Guard-driven development of Scathe View to include various technological spin-offs having application in a myriad of civilian and military efforts. Other Air Guard programs include the AN/AAQ-24 (V) Directional Infrared Countermeasures System, propeller upgrades like the Electronic Propeller Control System and NP2000 eight-bladed propeller, and a second generation, upgraded Modular Airborne Fire Fighting System.”

Of the eight above-listed aircraft enhancements, seven are current and future upgrades specifically for Reno-Tahoe IAP/AGS C-130 aircraft because of the close relationship between them and the co-located intelligence squadron. It will be years, if ever, that most other C-130s will have this superb equipment.

Procedural and Substantive Legal Issues in the BRAC Process and Recommendations

The BRAC recommendation to relocate the 152nd Airlift Wing violates both the specific language, as well as the intent, of the U.S. Constitution, several federal statutes, and the direction of the U.S. Supreme Court. By focusing on federal active duty needs, and ignoring the state role of the National Guard, the Department of Defense failed to acknowledge and recognize the unique, hybrid nature of the National Guard.

The United States Constitution and federal statutes

The National Guard is a hybrid federal and state organization, and has been since the inception of the country. The United States Constitution states, at Article I, Section 8 (known as the "militia clause"), that the federal Congress will provide for organizing, arming, and disciplining, the militia, but specifically reserves "...to the state's respectively, the appointment of officers, and the authority of training the Militia according to the discipline prescribed by Congress." In recognition of this constitutional basis that the militia (now National Guard) is a hybrid Federal-State entity, the federal Congress has passed several statutes to ensure that the Guard is treated in a constitutional fashion, and to ensure that the National Guard can carry out its dual roles of serving as a reserve component of the federal military and as the militia of each state.

One statute recognizes the authority of the Governor on the specific issue of the relocation of Guard units. Title 10 USC 18238 states:

A unit of the Army National Guard of the United States or the Air National Guard of the United States may not be relocated or withdrawn under this chapter without the consent of the Governor of the state or, in the case of the District of Columbia, Commanding General of the National Guard of the District of Columbia.

This plainly worded statute clearly requires that a Governor provide his or her prior consent before relocating a unit of the Air National Guard and would prevent, and in this instance, the relocation of the 152nd Airlift Wing from the State of Nevada. The Governor of Nevada, Kenny Guinn, has expressed his concern about this in a letter to Secretary Rumsfeld, a copy of which is located at the beginning of this package.

Another federal statute was violated in the BRAC recommendation process. 10 USC Section 10501(b) requires that the National Guard Bureau serve as a "channel of communication" between the Department of the Army and the Department of the Air Force and the several states on matters pertaining to the National Guard. This statute recognizes the dual responsibilities of each state's Guard and is designed to ensure that the interests of each state would be adequately considered and protected. NGB failed to fulfill this statutory responsibility, in that no information on the BRAC process was provided to the Governors of the states (or to The Adjutants General of any states) by the Department of Defense during the BRAC recommendation process. This prohibited the states and Governors from being actively involved in the DoD recommendation, contrary to 10 USC 10501(b).

The United State Supreme Court

The U. S. Supreme Court, in the case of *Perpich v. Department of Defense*, 496 U.S. 334, 110 S.Ct. 2418 (1990), also recognized the dual role of the National Guard and the legal right and responsibility of the Governor.

Perpich recognized the Governor's right to veto certain federal training missions if those federal training missions interfered with the state Guard's capacity to respond to local emergencies. Sections (b) and (d) of 10 USC 12301 prohibit the Secretary of Defense from ordering "units and members of the Army National Guard of the United States or the Air National Guard of the United States" to active duty "without the consent of the governor of the State...". The Montgomery Amendment {now codified at 10 USC 12301(f)} was passed by Congress to allow state Guard soldiers and airmen to train overseas without obtaining the consent of the Governor. The Montgomery Amendment states:

The consent of a Governor described in subsections (b) and (d) may not be withheld (in whole or in part) with regard to active duty outside the United States, its territories, and its possessions, because of any objection to the location, purpose, type, or schedule of such active duty.

While the U.S. Supreme Court upheld the Montgomery Amendment in the *Perpich* case, the Court recognized that the Amendment only deprived the Governor of certain veto powers, while the Governor retained the rest. The Court upheld this Amendment because of its narrow application, and the fact that depriving the Governor of these specific veto powers would not affect the Governor's ability to respond to local emergencies. The Supreme Court stated that a Governor retains the veto power if federal training missions substantially impact the Governor's ability to respond to local emergencies. The U. S. Supreme Court stated:

The Minnesota Unit, which includes about 13,000 members, is affected only slightly when a few dozen, or at most a few hundred, soldiers are ordered into active service for brief periods of time. Neither the state's basic training responsibility, nor its ability to rely on its guard and state emergency situations is significantly affected. Indeed, if the federal training mission were to interfere with the state Guard's capacity to respond to local emergencies, the Montgomery Amendment would permit the Governor to veto the proposed mission.

Perpich at 351 (emphasis added)

The Supreme Court has clearly stated that a state Guard must be left with the capacity to respond to local emergencies. In this case, the complete removal of any air lift capacity for the State of Nevada has a drastic effect on the Governor's ability to respond to local emergencies (as argued elsewhere in this document). Thus, the BRAC's recommendation to relocate the only Air Guard wing in Nevada violates the *Perpich* case.

Policy Considerations

This particular BRAC recommendation also violates the 1973 Total Force Policy issued during Secretary of Defense Melvin Laird's term. That Total Force Policy was designed to involve a large portion of the American public by mobilizing the National Guard from its thousands of locations throughout the United States when needed. The Total Force Policy required that all

active and reserve military organizations of the United States be treated as a single integrated force. The benefit of the Total Force Policy approach is to permit elected officials to have a better sense of public support or opposition to any major military operation. The Total Force Policy follows the intentions of the founding fathers for a small standing army complemented by citizen-soldiers. Again, the recommendation of BRAC that removes the entire airlift capacity of an entire state violates the Total Force Policy, a policy which has never been retracted.

Summary

The DoD recommendation to eliminate all Air National Guard aircraft from the State of Nevada is contrary to the historical role of the National Guard as a hybrid state/federal entity. The DoD failed to involve the State of Nevada in the process of making its recommendation (as is expected by 10 USC 10501), and this failure led to the DoD ignoring the Constitutional and statutory role of the state. The requirement of obtaining the consent of the Governor (as required by 10 USC 18238) was by-passed. By removing all Air Guard airlift capacity from the State of Nevada, the DoD recommendation inhibits the Governor of the State of Nevada from carrying out his responsibility to respond to local emergencies (contrary to the direction of the U.S. Supreme Court as revealed in the *Perpich* case).

Finally, Congress has recognized the importance of maintaining the strength of the National Guard. 32 USC 102 states, in part:

In accordance with the traditional military policy of the United States, it is essential that the strength and organization of the Army National Guard and the Air National Guard as an integral part of the first line defenses of the United States be maintained and assured at all times.

The DoD recommendation to eliminate all Air National Guard aircraft from the State of Nevada clearly affects the strength and ability of the Nevada Air National Guard to be an integral part of the first line defenses of the United States.

**State of Nevada Alternate Air National Guard
BRAC Recommendation**

Increase the 152nd Airlift Wing's assigned aircraft by at least four to support growing transformational missions and valuable homeland defense responsibilities.