

INDUSTRIAL JOINT CROSS SERVICE GROUP

August 8, 2005

MEMORANDUM FOR FRANK CIRILLO, DIRECTOR REVIEW AND ANALYSIS

Subject: Military Munitions Response Program, OSD BRAC Clearinghouse # C0694

The following is in response to your e-mail inquiry of July 26, 2005, where you asked the following:

The Department provided Environmental Restoration cost data and to some extent provided Military Munitions Response Program (MMRP) cost data for each facility recommended for closure. The Department considered MMRP cost as restoration cost and therefore they were not included in the COBRA model. It appears the Department would not have closed the ranges if the facility had remained open. Please explain the rationale for not including the cost to close operational or active ranges, a cost the Department would not have incurred, as one-time cost in the COBRA model.

Response: Yes, the Department categorized all MMRP cleanup activities as restoration costs since the MMRP is part of the larger Defense Environmental Restoration Program. The eventual cleanup of operational ranges, after closure, would also be considered a restoration cost (if these sites are designated MMRP sites) and per OSD guidance restoration costs were not included in the COBRA model since restoration of these tracts of land would occur regardless of whether the base is closed or remains active. In addition, the costs to address the future restoration of operational ranges after closure, have a very high degree of uncertainty since many operational ranges have not been assessed and restoration costs are highly dependent on the future reuse of the land. This uncertainty is reflected in the wide range of costs for operational range cleanup as shown in the Summary of Scenario Environmental Impacts. Finally, it is not accurate to state that the Department would not have closed operational ranges if the installation had remained active, since the Department has closed ranges in the past and performed needed restoration at installations that are still active.

Should additional information be required, feel free to contact me at 703-560-4317 or e-mail jberry@gallows.vacoxmail.com


Jay Berry
Executive Secretary