

DCN: 1561

Steven M. Goldman
P O Box 32248
Columbus, Ohio 43232-0248

RECEIVED

June 2, 2005

06072005

Chairperson
Base Realignment and Closure Commission
2521 South Clark Street, Suite 600
Arlington, VA 22202

Re: HSA-JCSG-D-05-326 (Headquarters and Support Activities)

Paragraph IV. L "Collocate Defense/Military Department Adjudication Activities"

As a retired employee of the Defense Office of Hearings and Appeals (DOHA), Columbus, Ohio, I offer my opinion as to the DoD recommendation that the Adjudication Activities of the Department be co-located at Ft. Meade, Maryland. The proposed relocation of the DOHA and the Defense Industrial Security Clearance Office (DISCO) from Columbus, Ohio to Ft. Meade, Maryland, does not make sense.

The plan to collocate adjudication facilities falls outside the stereotype "base closure" scenario. The plan is actually a policy change which should be staffed among the Military Departments and Defense Agencies rather than directed through the BRAC process. Since the Department recommended the collocation, you'll have to decide as to whether the new policy is wise.

Overall, there is no need to collate the adjudication facilities. All of the DoD adjudication facilities now share the same data base which is accessible by customers around the world. The adjudication process is no longer dependent on being in the same building or on the same installation.

Each of the military adjudication facilities has their customer base. DOHA and its sister adjudicative activity, DISCO, process industrial applicants for security clearances only. Army, Navy, and Air Force, as well as the intelligence community processes clearances for their military members and government employees. Collocating adjudication activities makes as much sense as collocating promotion boards of the different Services.

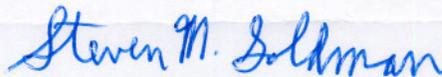
Finally, the DoD proposal cited concern about terrorism and the advantage of having all the adjudication activities at one military installation behind the fence line. However, another principal of force protection is "dispersion" and redundancy. Having adjudicative activities located at different locations is of strategic value if one of the activities is hit. As a young cadet in ROTC, I was told many times to "spread out" so as to reduce our vulnerability. With the common data base, each adjudication facility would be poised to pick up the duties of another in the event of a natural catastrophe or enemy attack.

DCN: 1561

If, after a detailed analysis you find that one or more of the adjudication facilities should be moved to Ft. Meade, Maryland, I recommend that you **do not** include collocating the DOHA Columbus and DISCO adjudication activities. Their Columbus location is excellent to provide the dispersion and redundancy needed in case the Ft. Meade location becomes untenable. If the fact that these two agencies are in "leased space" is problematic, they can move back behind the fence line at the Defense Supply Center Columbus, a Defense Logistics Agency (DLA) facility where they were located from 1965 to 2001 (about four miles away).

I urge you to look closely at this matter.

Sincerely,



Steven M. Goldman



DEPARTMENT OF THE ARMY
DEPUTY CHIEF OF STAFF, G-8
700 ARMY PENTAGON
WASHINGTON DC 20310-0700

MAY 10 2005

MEMORANDUM FOR SECRETARY OF DEFENSE

FROM: Chairman, Headquarters and Support Activities Joint Cross-Service Group

SUBJECT: 2005 Base Realignment and Closure Recommendations

References: (a) Defense Base Closure and Realignment Act of 1990, Section 2903
(c)(5)

(b) Secretary of Defense Memorandum, "Transformation Through Base
Realignment and Closure Memorandum" dated 15 November 2002

Enclosed is the Headquarters and Support Activities Joint Cross-Service Group (JCSG) Base Realignment and Closure (BRAC) Report for BRAC 2005, as required by Section 2903(c)(5) of the Defense Base Closure and Realignment Act of 1990, as amended. I certify that the information contained in this report is accurate and complete to the best of my knowledge and belief. I look forward to working with the Commission as our recommendations proceed through the BRAC process.

A handwritten signature in black ink, appearing to read "Donald C. Tison".

Donald C. Tison
Chairman
Headquarters and Support Activities
Joint Cross-Service Group

(5) Correctional Facilities.....	37
(6) DFAS.....	37
(7) Installation Management.....	38
c. Scenario Development.....	40
d. Force Structure Plan.....	42
e. Surge Requirements.....	43
IV. Recommendations and Justifications.....	44
a. Joint Basing.....	44
b. Defense Finance and Accounting Service.....	48
c. Consolidate Civilian Personnel Offices (CPOs) within each Military Department and the Defense Agencies.....	52
d. Consolidate Defense Information Systems Agency and Establish Joint C4ISR D&A Capability	56
e. Collocate Missile and Space Defense Agencies.....	59
f. Collocate Miscellaneous OSD, Defense Agency, and Field Activity Leased Locations.....	61
g. Consolidate Army Test and Evaluation Command (ATEC) Headquarters.....	64
h. Collocate Miscellaneous Army Leased Locations.....	66
i. Consolidate Media Organizations into a New Agency for Media and Publications.....	68
j. Relocate Miscellaneous Department of Navy Leased Locations.....	70
k. Relocate Army Headquarters and Field Operating Agencies.....	72
l. Collocate Defense/Military Department Adjudication Activities.....	76
m. Collocate Military Department Investigation Agencies with DoD Counterintelligence and Security Agency.....	79
n. Consolidate Defense Commissary Agency Eastern, Midwestern Regional, and Hopewell, VA Offices.....	82
o. Consolidate Transportation Command Components.....	84
p. Relocate Air Force Real Property Agency (AFRPA).....	86
q. Collocate Navy Education and Training Command and Navy Education and Training Professional Development & Technology Center.....	88
r. Collocate Miscellaneous Air Force Leased Locations and National Guard Headquarters Leased Locations.....	90
s. Create Joint Mobilization Sites.....	93
t. Consolidate Correctional Facilities into Joint Regional Correctional Facilities.....	95
u. Consolidate/Collocate Active and Reserve Personnel & Recruiting Centers for Army and Air Force.....	99

The aggregate economic impact of all recommended actions on these economic regions of influence was considered and is at Appendix B of Volume I.

Community Infrastructure Assessment: A review of community attributes indicates no issues regarding the ability of the infrastructure of the communities to support missions, forces, and personnel. There are no known community infrastructure impediments to implementation of all recommendations affecting the installations in this recommendation.

Environmental Impact: This recommendation is likely to impact Air Quality at Fort Meade. Additional emissions from an increase of personnel will require Air Conformity Analysis, and New Source Review analysis, and permitting. This recommendation has no impact on cultural, archeological, or tribal resources; dredging, land use constraints or sensitive resource areas; marine mammals, resources, or sanctuaries; noise, threatened and endangered species or critical habitat; waste management; water resources; or wetlands. This recommendation will require spending approximately \$0.09M for environmental compliance activities. This cost was included in the payback calculation. This recommendation does not otherwise impact the cost of environmental restoration, waste management, and environment compliance activities. The aggregate environmental impact of all recommended BRAC actions affecting the bases in this recommendation has been reviewed. There are no known environmental impediments to implementation of this recommendation.

Intelligence initiative. Additionally, this recommendation results in a significant improvement in military value due to a shift from predominately-leased space to a location on a military installation. The military value of adjudication activities current portfolio of locations ranges from 152-280 out of 334 entities evaluated by the Major Administration and Headquarters (MAH) military value model. Fort Meade, MD, ranks 94 out of 334.

Implementation will reduce the Department's reliance on leased space, which has historically higher overall costs than government-owned space and generally does not meet Anti-terrorism Force Protection standards as prescribed in UFC 04-010-01. The benefit of enhanced Force Protection afforded by a location within a military installation fence-line will provide immediate compliance with Force Protection Standards. MILDEP and Defense adjudication activities located currently at leased locations are not compliant with current Force Protection Standards. This recommendation eliminates 136,930 Gross Square Feet (GSF) of leased administrative space. This action provides a collocation of these activities, and reduces the number of locations from 13 to one.

Payback: The total estimated one-time cost to the Department of Defense to implement this recommendation is \$67.1M. The net of all costs and savings to the Department during the implementation period is a cost of \$47.5M. Annual recurring savings to the Department after implementation are \$5.7M, with a payback expected in 13 years. The net present value of the costs and savings to the Department over 20 years is a savings of \$11.3M.

Economic Impact on Communities: Assuming no economic recovery, this recommendation could result in a maximum potential reduction of two jobs (1 direct job and 1 indirect job) over the 2006-2011 period in the Phoenix-Mesa-Scottsdale, AZ Metropolitan Statistical Area, which is less than 0.1 percent of the economic area employment.

Assuming no economic recovery, this recommendation could result in a maximum potential reduction of two jobs (1 direct job and 1 indirect job) over the 2006-2011 period in the Cambridge-Newton-Framingham, MA Metropolitan Division, which is less than 0.1 percent of the economic area employment.

Assuming no economic recovery, this recommendation could result in a maximum potential reduction of 25 jobs (14 direct jobs and 11 indirect jobs) over the 2006-2011 period in the Los Angeles-Long Beach-Glendale, CA Metropolitan Division, which is less than 0.1 percent of the economic area employment.

Assuming no economic recovery, this recommendation could result in a maximum potential reduction of 411 jobs (236 direct jobs and 175 indirect jobs) over the 2006-2011 period in the Columbus, OH Metropolitan Statistical Area, which is less than 0.1 percent of the economic area employment.

Assuming no economic recovery, this recommendation could result in a maximum potential reduction of 867 jobs (501 direct jobs and 366 indirect jobs) over the 2006-2011 period in the Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Division, which is less than 0.1 percent of the economic area employment.