

DCN 7526

BRAC Commission

August 10, 2005

AUG 17 2005

The Honorable Anthony Principi, Chair
Base Closure & Realignment Commission
2521 South Clark Street, Suite 600
Arlington, VA 22202

Received

Dear Mr. Principi,

The Weapons Center at China Lake is critical to our national security and the operation of our military worldwide. Adding jobs to this installation, not only benefits the military, it will provide economic stimulation to Ridgecrest, a community that has shown its ability to support added families and jobs.

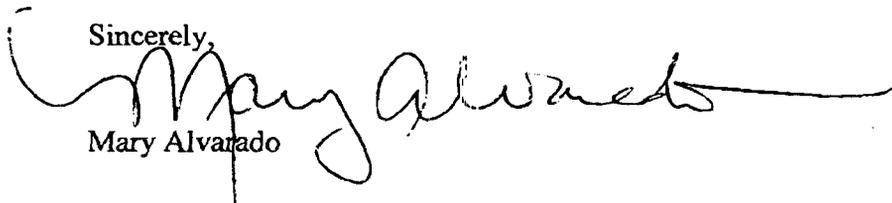
The cost savings and operational effectiveness of utilizing The Weapons Center at China Lake should be considered by the Department of Defense in this decision. The Air Force and Army both recognize the importance of co-locating program managers and technical experts at the same facility.

We already are a Navy town that supports our base and its users from our own services and allies. I urge your approval of the Secretary's recommendations regarding China Lake.

I wish to express my personal support for the BRAC recommendations made by the Secretary of Defense to create a Naval Integrated Weapons and Armaments RDAT & E Center at China Lake and to realign the Sensors, Electronic Warfare and Electronics RDAT & E from Point Mugu to China Lake. These forward looking recommendations fully support the Secretary's goals to position the country's base infrastructure to meet our armed forces transformation needs for the 21st century.

We are ready willing and able to support the influx of people to our great community by making the necessary long term infrastructure and plans to support new arrivals.

Sincerely,


Mary Alvarado

August 10, 2005

The honorable Anthony Principi, Chair
Base Closure and Realignment Commission
2521 South Clark Street, Suite 600
Arlington, VA 22202

Dear Mr. Principi,

I am writing to you to express my personal opinion on the BRAC. I personally support to the fullest extent that Ridgecrest, CA is ready for community growth produced by the relocation of the sensors, electronics warfare and electronics RDA T + E from Point Mugu to China Lake.

I was born and raised here and absolutely love this community and everything about this town. Our community supports our base and has already made the necessary long term plans to support any new arrivals.

I am very excited about this small town growing and thriving. I urge your approval and support to allow the BRAC to move to China Lake.

Thank You,
Heather Parsons

August 9, 2005

The Honorable Anthony Principi, Chair
Base Closure and Realignment Commission
2521 South Clark Street, Suite 600
Arlington, VA 22202

Dear Mr. Principi:

I would like to express my complete support for the BRAC recommendations made by the Sec. of Defense to create a Naval Integrated Weapons and Armaments RDATE Center at China Lake and to relocate the Sensors, Electronics Warfare & Electronics RDATE from Point Mugu to China Lake.

Our Community of Ridgecrest, California is already the host for the Naval Air Weapons Station. We are a Navy town that supports our base and its users from our own services and our allies. In anticipation of growth we have already made the necessary long term infrastructure and plans to support any arrivals.

We look forward and welcome the arrival of uniformed and civilian employees and support contractors. I urge your approval of the Secretary's recommendations regarding China Lake.

Thank You,
Tyla Moore

DCN 7520



BRAC Commission

AUG 11 2005

Received

**Congresswoman Allyson Y. Schwartz
423 Cannon House Office Building
Washington, D.C. 20515
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Fax: (215) 517-6575

7219 Frankford Avenue
Philadelphia, PA 19135
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**TO: Chairman Principi
2005 Defense Base Closure and Realignment Commission
(703) 699-2735**

DATE: August 11, 2005

NUMBER OF PAGES, INCLUDING COVER: 3

NOTE: If there any problems, please contact (202) 225-6111.

Congress of the United States
Washington, DC 20515

BRAC Commission

AUG 11 2005

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August 11, 2005

Chairman Anthony Principi
2005 Defense Base Closure and Realignment Commission
2521 South Clark Street, Suite 600
Arlington, Virginia 22202

Dear Chairman Principi:

As the BRAC Commission begins its final deliberations regarding the realignment and closure recommendations made by the Department of Defense (DOD), we would like to re-emphasize the value of Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove as a strategic homeland security asset.

It has been reported that Northern Command is in the process of developing war plans for guarding against and responding to terrorist attacks in the United States. According to Northcom, this unprecedented action is necessary because DOD is well equipped and situated to respond to a biological, chemical or nuclear attack in any of the 50 states. We believe this further highlights the importance of NAS JRB Willow Grove to Pennsylvania and the entire Northeast region.

The Northeast region of the United States is a major economic hub in the U.S., as it is densely populated and home to transportation and telecommunications infrastructure that is vital to domestic and international trade. However, DOD continues to relocate critical military assets outside of the Northeast. The recommended closure of NAS JRB Willow Grove is the most recent DOD action that would significantly weaken the Department's ability to play a role in the protection of this vital region.

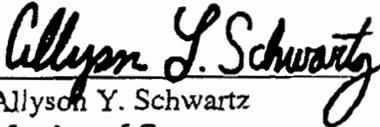
NAS JRB Willow Grove's 8,000 foot runway is in close proximity to all of the major metropolitan areas in the Northeast, as well as the National Capital Region, and the 162 acre base could easily serve as a staging area for emergency response teams and supplies. Additionally, all of the armed services are represented on the base, and they have previous valuable joint operations experience with the Coast Guard, FEMA, PEMA, and the FAA. This jointness, both within the military and among various government entities, will be absolutely essential in the event of another catastrophic attack on our homeland.

BRAC Commission

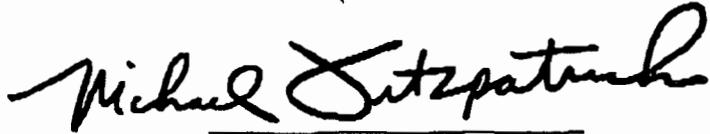
We appreciate the task you and the other BRAC Commissioners have before you in the coming weeks, and are grateful for the time and consideration you have dedicated to NAS JRB Willow Grove. We are confident that, in the end, you will share our conviction that this base is too valuable to be closed.

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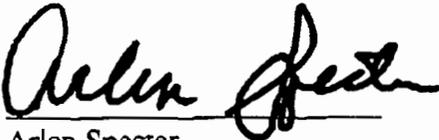
Sincerely,



Allyson Y. Schwartz
Member of Congress



Michael Fitzpatrick
Member of Congress



Arlen Specter
United States Senator



Rick Santorum
United States Senator



Robert A. Brady
Member of Congress



Jim Gerlach
Member of Congress



Charles Dent
Member of Congress

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19TH DISTRICT, TEXAS

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Congress of the United States
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August 8, 2005

BRAC Commission

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Thank you for consideration in this matter. Please feel free to contact me should you have any questions.

Sincerely,

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Randy Neugebauer

C: The Honorable James H. Bilbray
The Honorable Philip Coyle
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BRAC Commission

August 8, 2005

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Base Closure and Realignment Commission
2521 Clark Street, Suite 600
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Thank you for consideration in this matter. Please feel free to contact me should you have any questions.

Sincerely,

N

Randy Neugebauer

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Congress of the United States House of Representatives

August 8, 2005

The Honorable Anthony J. Principi
Chairman
Base Closure and Realignment Commission
2521 Clark Street, Suite 600
Arlington VA 22202

Dear Chairman Principi:

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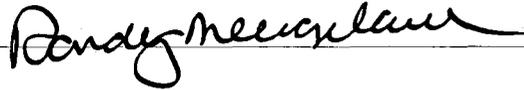
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Randy Neugebauer

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Congress of the United States

House of Representatives

August 8, 2005

The Honorable Anthony J. Principi
Chairman
Base Closure and Realignment Commission
2521 Clark Street, Suite 600
Arlington VA 22202

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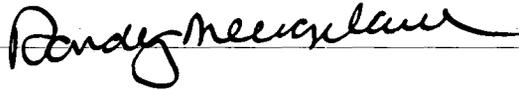
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Dear Chairman Principi:

The purpose of this letter is to respond to DCN 5789, a letter dated 29 July 2005 from the South Dakota delegation, which contains new “weather factors” and selective application of natural phenomena data in the discussion on the consolidation of the B-1 Bomber fleet at Dyess Air Force Base (AFB). I have reviewed this data and have found the information to be statistically insignificant. In addition, I believe the issue is outside the BRAC criteria and consideration of it would create an exception to the policy of “treating all installations the same.” Nonetheless, I would like the opportunity to refute the allegations made by the South Dakota Congressional Delegation.

As you know, Military Value is the overriding factor for BRAC consideration. As acknowledged by the Commission, it is important to keep an “even playing field” for all the communities. For that reason, DoD and the AF calculated MCI scores using the same criteria for all bases. Military Value scores were calculated using DoD-certified data and pertinent weather was taken into account. (AF MCI question 1271.00)

According to DoD-certified Military Value MCI scores, Dyess ranks # 20 and Ellsworth ranks # 39 in bomber MCI. Moreover, on the issue of good flying weather, (question 1271), both bases received 100% of available points. In addition, in the calculation of the MCI, DoD-certified data was also collected for other weather phenomenon such as crosswind, VFR vs. IFR, icing, etc. (Ref. questions #139, #1271, #1272) In all, the available data shows no appreciable difference between Dyess and Ellsworth. (Ellsworth responded “N/A” to Question #139—Weather Conditions, so icing cannot be compared using DoD-certified data).

The important question is not the probability ratio of certain weather occurrences at the bases as stated in DCN 5789; rather it is whether the probability of natural disasters at an installation is relevant to BRAC decisions. DCN 5789 compares the probability of tornado occurrence at Dyess and Ellsworth; however, at the same time it concedes that, “neither base has had a tornado pass directly over it in the 50+ year lifetime of the bases.”

The same document also concedes, "The chance of a violent tornado intercepting either base perimeter while on the ground will be a small fraction of these percentages."

The data used for projections is in reference to the number of tornados within 25 NM of a point (1,962 square miles) during a 1,000-year time frame. It is important to note that the comparison of chances of occurrence at one base versus another does not calculate the probability of occurrence.

In simple terms, according to information from the sources referenced in DCN 5789, the projected odds of a base the size of Dyess or Ellsworth (approximately 10 sq. miles) being struck by an F-4 tornado is once every 10,000 years. Applying this same analysis, and using historical data on F-2 or greater tornados in Jones and Taylor counties, Texas, indicates that the possibility of an F-2 or greater tornado hitting a specific location the size of Dyess or Ellsworth is once every 3.7 million years.

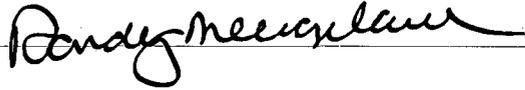
In addition, if the comparison of probability of natural disasters is to be a factor in the BRAC process, then the rules should apply to all installations. Hurricanes in coastal areas, earthquakes on the West Coast, and other bases in the heart of "tornado alley" should all be looked at for major realignment. As a simple example, using the same methodology and sources that the South Dakota delegation used, Tinker AFB should not have the E-3 AWACs and E-6 TACAMO, and Offutt AFB should not have RC-135 Rivet Joint and E-4 NEACP aircraft "in one basket". The data shows that Tinker has five times the probability of a tornado and twice the probability of hail, than Dyess. Offutt has twice the chance of hail and almost four times the chance of damaging thunderstorms or winds in comparison to Dyess.

Another perplexing issue is the use of non-DoD-certified data. There are obvious inconsistencies and/or inaccuracies in the data. DCN 5789 acknowledges inconsistencies and possible "multiple counting" of the same occurrence. For example, the referenced NOAA data does not list the McConnell AFB tornado in Wichita County that occurred on 26 April 1991, but does account for 26 different tornados in Kansas that day. In addition, this data may also have inconsistent underreporting since there are zero reports of ice and snow storms in Meade County, South Dakota, where Ellsworth is located, since 1935. Yet the average snowfall for the county is 38 inches and incidents such as the "Holy Week Blizzard" of 19 April 2000 that dumped 1 to 3 feet of snow in the region are not included.

The new information submitted by the South Dakota Delegation in DCN 5789 should be disregarded because: (1) the data does not fit any of the eight BRAC criteria, (2) it is not based on DoD-certified data, (3) the data has inconsistencies, (4) it does not treat all DoD installations the same, and (5) the probability of a tornado striking the base is not statistically significant.

Thank you for consideration in this matter. Please feel free to contact me should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy Neugebauer", written over a horizontal line.

Randy Neugebauer

C: The Honorable James H. Bilbray
The Honorable Philip Coyle
Admiral Harold W. Gehman, Jr., (USN, Ret)
The Honorable James V. Hansen
General James T. Hill (USA, Ret)
The Honorable Lloyd W. "Fig" Newton (USAF, Ret)
The Honorable Samuel K. Skinner
Brigadier General Sue E. Turner (USAF, Ret)

AUG 12 2005

Received



CHARLES E. SMITH COMMERCIAL REALTY

2345 CRYSTAL DRIVE ■ CRYSTAL CITY ■ ARLINGTON, VIRGINIA 22202 ■ 703-769-8200

August 12, 2005

Charles Battaglia
Executive Director
Defense Base Closure and Realignment Commission
2521 S. Clark St., Ste. 600
Arlington, VA 22202

Re: Consolidation of Defense Information Systems Agency and Military Medical Commands

Dear Mr. Battaglia:

It was a pleasure to meet you last week, however briefly in the hall outside your office, after having a highly engaging meeting with Mr. Tim Abrell and Mr. Ethan Saxon of your staff. I wanted to take a moment to follow up on our brief discussion with regard to the consolidation of the Defense Information Systems Agency and the various Military Medical Commands from their current leased spaces and onto government-owned property.

As you can imagine, as the property owners of much of the leased space in question, we have grave concerns with the Department's recommendations, but as a long-time vendor and supporter of the Department, we understand and support the Department of Defense's need to right-size its foot print and transform to meet the security needs of our nation.

However, much of our specific concern surrounds the Department's justification of the wholesale vacation of leased space, which is based on the desire to:

- a) ensure that agency personnel are housed in a building that complies with the new antiterrorism/force protection (AT/FP) standards;
- b) achieve costs savings; and,
- c) consolidate the various agency offices into one site.

We appreciate the opportunity we have been given to comment on each of these rationales and respectfully request the Commission give careful scrutiny and consideration to each of these issues. I wanted to take this opportunity to fully develop for you our concerns, as illustrated by the Defense Information Systems Agency and the various Military Medical Commands.

The overall DoD decision to vacate leased space is justified on two false assumptions, namely 1) that currently-leased space cannot be made compliant with force protection standards and 2) that currently-leased space is less cost effective. In fact, many current DOD leased space facilities can be made compliant with the Department's new AT/FP standards, and a number of buildings are either currently compliant or could become so with relatively minimal cost and disruption.

The Skyline campus, for example, which is located along the I-395 corridor, currently houses the majority of personnel assigned to the Defense Information Systems Agency, the Tricare Management Activity and offices of both the Army and Air Force surgeons general.

Our own initial calculations indicate that a five building, 1.8 million rentable square foot Skyline complex could be made AT/FP compliant for a cost of less than \$50M, or approximately \$25.00/GSF, notably lower than the DoD's own average cost of \$28.28/GSF. Additionally, this compliance could be achieved within 18-24 months, much sooner than DoD's own proposals which would not relocate many of its personnel to AF/FP-compliant facilities until 2011.

Further, the Department assumes as an inflexible rule that leased space is a more costly method of housing personnel. The Department, however, did not engage in an individualized review of leased facilities, as it admitted in a response to an inquiry from Mr. Frank Cirillo:

“The HSA JCSG did not gather information via the BRAC certified data gathering processes regarding the costs of leased space in FY2004 dollars and lease termination dates...” [OSC BRAC Clearinghouse Memorandum dated 28 July 2005 in response to Frank Cirillo request, DCN 6240.]

When actual lease costs are examined, it becomes evident that the Department grossly overestimated the cost of leased space. First, the Department failed to use lease figures for the relevant geographic submarket. Second, the Department failed to consider actual lease costs paid by major government tenants. Third, the Department underestimated the actual costs to replicate facilities on government property. Finally, to justify the economies of proposed moves, including, for example, the DISA move to Fort Meade, the Department included figures for costs and savings that are not related to the proposed moves or bundled unrelated DoD components together in one recommendation to generate a cost-saving scenario.

In an effort to provide the Commission with as accurate data as possible, as the owners and builders of the facilities in question, we have provided to your staff what we believe is a far more accurate estimation of the costs to replicate the DISA facilities at Fort Meade. When this new data is applied to the COBRA model, the payback period for the recommendation rises to considerably beyond the 20-year standard benchmark and approaches a 40 year payback. Moreover, when a separate COBRA analysis was performed on consolidating the Air Force and Navy's medical staff to the Skyline campus alongside their colleagues in the Army and the Tricare Management Agency, the payback period for the transition drops from 5 years for a possible relocation to Bethesda down to 2 years for consolidation at the Skyline campus.

We believe that if consolidation is the primary driver for these recommendations, then consideration of a range of consolidation options is appropriate. We respectfully submit that the Skyline campus could facilitate consolidation of both DISA and the various Military Medical Components in a shorter timeframe and at a substantially lower cost than DoD's proposed relocation.

The current site at the Skyline campus has substantial benefits. Aside from both security and infrastructure cost concerns, we note that both DISA and the medical agencies are some of the many agencies which benefit greatly from a close proximity to their primary customer, the Pentagon. The fact that Skyline is only four miles from the Pentagon and is linked by regular shuttle bus service results in operational benefits and cost savings. Surprisingly, no evidence seems to indicate that DoD considered the consolidation of these agencies to an area within close proximity to the Pentagon, including the Skyline campus.

With particular note regarding DISA, one vital fact for Commission consideration is that the primary building which houses DISA and its research and development elements (Seven Skyline Place) is a new building, built specifically to Department of Defense specifications for DISA and opened in late 2001. **The military value of this building can not be more strongly stated, as the building was designed, constructed and outfitted to the exact specifications of the Department.** Among many special design elements incorporated into the construction is a 52,000 square foot complex of underground and windowless facilities for research and development activity.

Taken together, the consolidation of the various DISA and medical components to the Skyline campus, where both are primarily located, is both a more cost effective and timely solution.

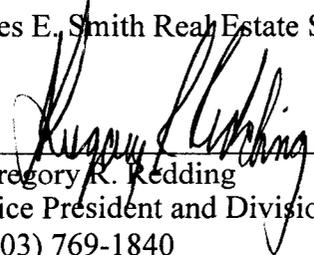
We also would like to inform the Commission that the entirety of DISA and the medical agencies would not fill the Skyline campus. The expenditure of \$50M which would bring a 1.8 million rentable square foot complex into security compliance would also provide the Commission the opportunity to consolidate other agencies to the Skyline campus, all the while saving money, personnel losses and benefiting from close proximity to the Pentagon.

Finally, while we understand it is not the Commission's role to negotiate rental space on behalf of the Department of Defense, it should be noted that these costs for security compliance could be addressed to the benefit of DoD as part of a long-term leasing commitment from the Department to remain at the Skyline campus, further supporting the cost benefits of consolidation to the Skyline campus.

Please do not hesitate to contact me if we can be of any further assistance, or provide any further information to the Commission in the coming days and weeks.

Sincerely,

Charles E. Smith Real Estate Services L.P.

By: 

Gregory R. Redding
Vice President and Division Counsel
(703) 769-1840

cc: Tim Abrell
Ethan Saxon

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AUG 12 2005

Received



CHARLES E. SMITH COMMERCIAL REALTY

2345 CRYSTAL DRIVE ■ CRYSTAL CITY ■ ARLINGTON, VIRGINIA 22202 ■ 703-769-8200

August 12, 2005

The Honorable Anthony J. Principi
Chairman, Defense Base Closure and Realignment Commission
2521 S. Clark St., Ste. 600
Arlington, VA 22202

Re: Consolidation of Military Medical Commands

Dear Chairman Principi:

Please accept this letter as formal community input on the proposed consolidation and relocation of the various offices of the military medical commands and the TriCare Management Agency (TMA). TMA, the Office of the Army Surgeon General and many offices of the Air Force Surgeon General are currently located in several leased facilities in the Northern Virginia area, primarily the Skyline City complex along the I-395 corridor. The Office of the Navy Surgeon General is located at space known as the Potomac Annex along the Potomac River in the District of Columbia. The remaining offices of the Air Force Surgeon General are located at Bolling AFB. The Department of Defense proposed relocating both the Air Force and Navy's Surgeons General to new facilities on the campus of the National Naval Medical Center at Bethesda, MD. As you are well aware, the Commission then acted to add the remaining medical components for consideration.

At the hearing held by the Commission on August 10 on this matter, witnesses urged the Commission not to co-locate all of the various medical components inasmuch as the Department itself did not recommend such co-location and the Department is itself still studying whether a major reorganization of the medical components would be desirable. DOD determined that there was no military value in moving the Skyline-based medical components to another site through the BRAC process. We would urge the Commission to defer to the Department's judgment on this matter and decline to recommend any change in the current location of TMA, Army Surgeon General and Air Force Surgeon General components currently located at Skyline.

In fact, the Undersecretary of Defense for Acquisition, Technology and Logistics and Chair of the Department's Infrastructure Steering Group, Michael Wynne, testified before the Commission on July 18 that DoD could not identify operational synergy that would be created simply by co-locating commands. Co-location of the medical components currently based in Skyline at a military base would be premature, and very costly, amounting to over \$100 million dollars in outlay by DoD based on estimates being considered by the Commission.

In the event, however, that the Commission does conclude that it desirable to co-locate the medical components, including TMA, the Army Surgeon General and Air Force Surgeon General units currently at Skyline, then we respectfully request that the Commission give serious consideration to consolidation of the various medical components to the Skyline City complex. We believe this alternative provides a much more cost effective solution, as well as a solution providing both the necessary security compliances and proximity efficiencies.

As a prelude to addressing a Skyline consolidation alternative, we would ask the Commission review what we believe to be a fundamental flaw in DoD's analysis of all leased space options. DoD began its analysis of all Department components in leased space with the fundamental predetermined goal of vacating leased space. (The medical components at the Skyline complex were one of the few exceptions, as the Commission noted, and acted upon.) As a result, the military value analysis of leased space was designed by the Department to achieve that preconceived outcome. For example, while DoD-owned installations in Northern Virginia (Arlington, Fairfax County, and Alexandria) received high scores for proximity to educational resources and transportation infrastructure, leased installations in those same communities received scores of zero on these same criteria, despite the same proximity, simply because the installation was in leased space. The Department designed the military value scoring to reach the objective of vacating leased space, rather than evaluating, on an equal footing as the law requires, the military value of DoD installations irregardless of whether that installation was in leased space or on a military base.

Having dismissed the military value of leased space as a class, in general the Department sought to further justify its recommendations based on the desire to:

- a) ensure that agency personnel are housed in a building that complies with the new antiterrorism/force protection (AT/FP) standards;
- b) achieve costs savings; and,
- c) consolidate the various components to one location.

With respect to DoD's concerns with leased space in general, we would like to comment on each of these DoD rationales and respectfully request the Commission give careful scrutiny and consideration to each of these issues. We would also like to point out that the Department cited no mission based reason that some elements of the medical commands should be consolidated to Bethesda, when in fact the primary customer of these headquarters activities are not patients, but rather the Secretary of Defense and other policy professionals located at the Pentagon.

The first two rationales, and in turn the overall DoD imperative to vacate leased space, are based on two false assumptions, namely 1) that currently-leased space cannot be made compliant with DoD's force protection standards and 2) that leased space is not cost effective. While it is relevant to note that DoD did not, in fact, apply these standards to the Army Surgeon General or the TMA, for the purpose of Commission consideration we believe it is important to note that, in fact:

- Many current DoD leased space facilities can be made compliant with the Department's new AT/FP standards, and a number of buildings are either currently compliant or could become so with relatively minimal cost and disruption.

- The Skyline City complex, located along Leesburg Pike, is just such an example. A five-building complex at Skyline can be brought into full compliance with DoD's force protection standards in just 18-24 months. Moreover, the four buildings that house most of TMA and the Army Surgeon General can be made AT/FP compliant at a cost of approximately \$34 million. The cost to provide new facilities will be almost \$100 million, over three times the cost of upgrading the existing building to DoD force protection standards.
- A campus for DOD at Skyline could be created with the TRICARE Management Activity, the U.S. Army Surgeon General and DISA, also located at Skyline, as its anchors. That campus, consisting of the DISA facility at Seven Skyline Place, and four other buildings (Four, Five and Six Skyline Place and One Skyline Tower) which house the TMA, Army Surgeon General and some offices of the Air Force Surgeon General could over time, provide the Federal Government with 1.8 million rentable square feet that would be AT/FP compliant.
- The parking garages for Skyline Buildings Four, Five, Six and the Tower would become secured facilities to meet the DOD force protection standards (the parking garage for Seven Skyline Place (housing DISA) is already a secured parking garage under DOD control). In doing so, employees of these DOD organizations could be provided with parking in designated areas within the secured garage facility, on terms that would be worked out with DOD and GSA. While generally GSA will not pay for employee parking as a component of rent, both GSA and DOD have entered into operating agreements with lessors to secure control of parking garages and the cost to employees for parking becomes an element of the operating agreement. In conjunction with a long-term commitment by GSA and DOD to lease office space in these buildings at Skyline, we would entertain proposals for free or discounted parking rates for DOD employees in those buildings.
- Leased space can be very cost effective as compared to construction of new facilities on military bases or other Government-owned sites.
 - First, the Department assumed as an inflexible rule that leased space is a more costly method of housing personnel. The Department, however, did not engage in an individualized review of leased facilities, as it admitted in a response to an inquiry from Mr. Frank Cirillo:

“The HSA JCSG did not gather information via the BRAC certified data gathering processes regarding the costs of leased space in FY2004 dollars and lease termination dates...” [OSC BRAC Clearinghouse Memorandum dated 28 July 2005 in response to Frank Cirillo request, DCN 6240.]
 - Second, in the COBRA analyses being used for the Commission's review of the medical components, the Department compounded that error, or elected not to examine its assumption, when it elected not to at least gather proper leased space average costs. As a result, DoD grossly overestimated the cost of leased space when it ran its COBRA analyses of the cost/benefit of its proposed realignment/closure actions. DoD used an average lease cost of \$31.14 per RSF, which was the rate COSTAR (which is a real estate trade publication which aggregates office statistics in metropolitan areas) reported as the Washington, DC, area average quoted rate for

Class A office space. Based on that \$31.14 per RSF figure, DoD generated the \$37.29 per GSF lease cost used in all of its analysis of Northern Virginia lease space recommendations. This is a faulty design, as:

- The Department should at least have used the COSTAR data for the relevant geographic submarket (which, it should be noted, is listed on the same page, in the same COSTAR publication). The figure for the I-395 submarket, which includes Skyline, is \$24.98 per RSF, a full \$6.16 per RSF less than DOD assumed.
- Second, the Department failed to consider actual lease costs paid by major government tenants. For example, large GSA leases awarded in mid-2004, the time period used by DoD for its lease cost assumptions, were at rates over \$5 per RSF less than DOD assumed it would have to pay (See Attachment A).
- Third, the Department grossly underestimated the actual costs to replicate facilities on government property. Based on our experience building a brand new Class A building for the Defense Information Systems Agency in 2001, we estimate that the cost to build administrative space for DoD on a military base, adjusted for use of surface parking, Davis Bacon wages and construction variables on military bases, will be \$210 per GSF, considerably higher than DoD's own estimates.

In an effort to provide the Commission with as accurate data as possible in its evaluation of the costs of co-locating the medical components at this time, we have provided to your staff what we believe is an accurate estimation of the costs to take advantage of the benefits, proximity, and current occupancy of the Skyline City campus and consolidate the remaining medical components alongside the TMA and Army Surgeon General (See Attachment B). You will note that the payback period, including costs to bring the facility in to AT/FP compliance drops from 5 years (per DoD's recommendation to consolidate just the DC-based medical commands to Bethesda) to 3 years to consolidate all medical components at Skyline; and offers the considerable benefit of locating all of the various medical components together on one campus. This is an advantage that DoD's recommendation does not offer.

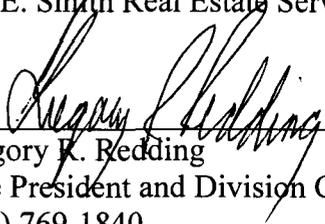
Aside from both security and infrastructure cost concerns, we note the medical commands are some of the many agencies which benefits greatly from a close proximity to its primary customer, the Pentagon. The fact that Skyline is only four miles from the Pentagon and is linked by regular shuttle bus service results in operational benefits and cost savings. Surprisingly, no evidence seems to indicate that DoD considered the consolidation of the medical communities' various components to an area within close proximity to the Pentagon, including the Skyline complex.

We believe that if cost savings and operational efficiencies are primary drivers for the BRAC process, then consideration of a range of consolidation options is appropriate. We respectfully submit that the Skyline City complex could accommodate the entire medical community consolidation, and do so in a shorter timeframe and at a substantially lower cost than DoD's proposed relocation of only parts of the community.

Taken together, the consolidation of the various medical components to the Skyline campus is both more cost effective and timely. While we believe that the Commission should defer to DoD's decision not to move the TMA, Army Surgeon General and Air Force Surgeon General components out of Skyline. However, should the Commission elect to co-locate Virginia-based components with those now located in the District of Columbia, we would urge the Commission to direct that this co-location occur at the Skyline campus.

Sincerely,

Charles E. Smith Real Estate Services L.P.

By: 
Gregory K. Redding
Vice President and Division Counsel
(703) 769-1840

Attachments

cc: Charles Battaglia
Tim Abrell
Ethan Saxon

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Attachment A

RECENT GOVERNMENT LEASE TRANSACTIONS ESTABLISH TRUE MEASURE OF MARKET RENTS

	One Potomac Yard GS-11B-01718	Two Potomac Yard GS-11B-01719	2200 Crystal Drive GS-11B-01712
GSA Lease Number	GS-11B-01718	GS-11B-01719	GS-11B-01712
Date Lease Awarded by GSA	6-May-04	6-May-04	12-Apr-04
Tenant	Environmental Protection Agency	Environmental Protection Agency	Federal Supply Service
Rentable Square Feet	309,179	95,938	278,101
Term	10 years	10 years	10 years
Lease Commencement	May, 2006	May, 2006	January, 2006
Face Rent per RSF for Lease Term	\$32.08 per RSF	\$32.74 per RSF	\$28.77 per RSF
Less Concessions That Inflate Face Rent and Not Required by DOD			
Value of Free Rent per year	\$1.60 per RSF (6 months free)	\$1.64 per RSF (6 months free)	\$0.48 per RSF (2 months free)
Value of Improvement Allowance per Year	\$3.60 per RSF (\$11,138,737)	\$3.68 per RSF (\$3,526,650)	\$3.37 per RSF (\$9,383,500)
Value of Leasing Commission per Year Paid to GSA Broker per Year	\$0.61 per RSF	\$0.62 per RSF	\$0.86 per RSF
Yields Average Base Rent:	\$26.27 per RSF	\$26.80 per RSF	\$24.06 per RSF
Weighted Average Base Rate for Three Leases Above:			\$25.44 per RSF
Plus Paint and Carpet allowance for renewal: (\$5 over 10 years)			\$0.50 per RSF
Total Weighted Average Base Rate for a DOD Renewal Based on Three Leases Above:			\$25.94 per RSF
BRAC materials cite the number as:		(1)	\$31.14
based on COSTAR "Quoted Rate" for DC metro area - "asking rate"			
Using this number led to a "Lease Cost Avoidance" cost of :		(1)	\$37.29
"Lease Cost Avoidance" cost number should be:		(1)	\$31.03
<p>(1) The \$31.14 per RSF in the COSTAR report converted to the \$37.29 per GSF used in the COBRA models by applying the 10% RSF/GSF conversion factor and adding in the GSA, WHS and AT/FP fees cited in the COBRA models. The \$25.94 per RSF derived above converts to \$31.03 per GSF, which is \$7.26 per GSF less than DOD used in the COBRA models. Certain COBRA runs prepared and submitted by Charles E. Smith use a \$30.96 per GSF figure, only slightly different than the \$31.03 per GSF figure cited above.</p>			

**Executive Summary of Revised COBRA Analysis
HSA0115 Excursion Collocation 7% Cut Without DARPA (Scenario 1)**

Case:	Run1.1 Case \$210/SF as MilCon cost
Results:	6 year payback period (increased from 5 yr before)
Data Changes:	<p>#1 - Input Screen 7 – change MilCon cost for ‘General Admin Building’ to \$79,044,000 (376,400 GSF)</p> <p>#2 - Input Screen 7 – change MilCon cost for ‘General Admin Building’ to \$7,460,000 (35,524 GSF)</p>
Change Justification:	<p>#1 – This change is due to using \$210/GSF to calculate the MilCon cost for the building. That is: $376,400 * 210 = 79,044,000^1$</p> <p>#2 – This change is due to using \$210/GSF to calculate the MilCon cost for the building. That is: $(35,524 * 210) = 7,460,000$</p>

¹ Based on our experience building brand new Class A building for DISA in 2001, we estimate that the cost to build administrative space for DoD on a military base, adjusted for surface parking, Davis Bacon wages and construction variables on military bases, will be \$210 per GSF.

**Executive Summary of Revised COBRA Analysis
HSA0115 Excursion Collocation 7% Cut Without DARPA (Scenario 1)**

Case:	Run1.2 Consolidate to Skyline Campus
Results:	3 year payback period (reduced from 5 yr before)
Data Changes:	<p>#1 - Input Screen 3 – Change realignment from POTOMAC ANNEX to NNMC of (off/enl/civ) 155/46/165 to realignment from POTOMAC ANNEX to Skyline Campus</p> <p>#2 - Input Screen 3 – Change realignment from Bolling AFB to NNMC of (off/enl/civ) 110/28/31 to realignment from Bolling AFB to Skyline Campus</p> <p>#3 – Input Screen 1 – Take out NNMC from scenario</p> <p>#4 – Input Screen 5 – Change one time unique cost (AT/FP cost) from 0 to \$10,298,000 for 2010.</p> <p>#5 – Input Screen 5 – Change misc. recurring cost for 2010 and 2011 from 0 to \$12,753,000</p>
Change Justification:	<p>#1 & #2 – All personnel movement is redirected to Skyline</p> <p>#3 – Take out all cost and savings associated with NNMC at Bethesda</p> <p>#4 – One time unique cost (AT/FP cost) is calculated as $(376,400 + 35,524) * \\$25/SF = 10,298,100$. (376,400 & 35,524 are the GSF of two proposed new buildings at NNMC)</p> <p>#5 – This is the lease cost calculated at $\\$30.96/SF$. $(376,400 + 35,524) * \\$30.96/SF = 12,753,167$</p>

AUG 12 2005

Received



CHARLES E. SMITH COMMERCIAL REALTY

2345 CRYSTAL DRIVE ■ CRYSTAL CITY ■ ARLINGTON, VIRGINIA 22202 ■ 703-769-8200

August 12, 2005

The Honorable Anthony J. Principi
Chairman, Defense Base Closure and Realignment Commission
2521 S. Clark St., Ste. 600
Arlington, VA 22202

Re: Consolidation of Defense Information Systems Agency

Dear Chairman Principi:

Please accept this letter as formal community input on the proposed consolidation and relocation of the Defense Information Systems Agency (DISA). DISA is currently located in several leased facilities in the Northern Virginia area, primarily the Skyline City complex along the I-395 corridor. The Department of Defense has proposed vacating these facilities and building a new facility to house the consolidated agency at Fort Meade, MD.

DoD began its analysis of DISA and all other Department components in leased space with the fundamental predetermined goal of vacating leased space. As a result, the military value analysis of leased space was designed by the Department to achieve that preconceived outcome. For example, while DoD-owned installations in Northern Virginia (Arlington, Fairfax County, and Alexandria) received high scores for proximity to educational resources and transportation infrastructure, leased installations in those same communities received scores of zero on these same criteria, despite the same proximity, simply because the installation was in leased space. The Department designed the military value scoring to reach the objective of vacating leased space, rather than evaluating, on an equal footing as the law requires, the military value of DoD installations irregardless of whether that installation was in leased space or on a military base.

Having dismissed the military value of leased space as a class, the Department sought to further justify its recommendation for DISA based on the desire to:

- a) ensure that agency personnel are housed in a building that complies with the new antiterrorism/force protection (AT/FP) standards;
- b) achieve costs savings; and,
- c) consolidate the various DISA offices into one site.

We would like to comment on each of these DoD rationales and respectfully request the Commission give careful scrutiny and consideration to each of these issues. We would also like to point out that the Department cited no mission based reason that DISA should be located at Ft. Meade rather than at a consolidated site in Northern Virginia.

The first two rationales, and in turn the overall DoD imperative to vacate leased space, are based on two false assumptions, namely 1) that currently-leased space cannot be made compliant with DoD's force protection standards and 2) that leased space is not cost effective. In fact:

- Many current DoD leased space facilities can be made compliant with the Department's new AT/FP standards, and a number of buildings are either currently compliant or could become so with relatively minimal cost and disruption.
 - The largest leased location for DISA personnel, Seven Skyline Place, located at 5275 Leesburg Pike, is just such an example. This building can be brought into full compliance with DoD's force protection standards in just 18-24 months, much sooner than DoD's own proposal which would not relocate DISA personnel to AT/FP-compliant space until 2011. Moreover, Seven Skyline Place can be made AT/FP compliant at a cost of approximately \$16 million. The cost to replicate that building at Ft. Meade will be almost \$120 million, seven and one-half times the cost of upgrading the existing building to DoD force protection standards.
 - A campus for DOD at Skyline could be created with DISA and the TRICARE Management Activity and the U.S. Army Surgeon General as its anchors. That campus, consisting of the DISA facility at Seven Skyline Place, and four other buildings (Four, Five and Six Skyline Place and One Skyline Tower) could over time, provide the Federal Government with 1.8 million rentable square feet that would be AT/FP compliant for a cost of approximately \$25.00/GSF (less than \$50M for the entire complex), notably lower than the DoD's own average cost to achieve compliance of \$28.28/GSF.
 - The parking garages for Skyline Buildings Four, Five, Six and the Tower would become secured facilities to meet the DOD force protection standards (the parking garage for Seven Skyline Place (housing DISA) is already a secured parking garage under DOD control). In doing so, employees of these DOD organizations could be provided with parking in designated areas within the secured garage facility, on terms that would be worked out with DOD and GSA. While generally GSA will not pay for employee parking as a component of rent, both GSA and DOD have entered into operating agreements with lessors to secure control of parking garages and the cost to employees for parking becomes an element of the operating agreement. In conjunction with a long-term commitment by GSA and DOD to lease office space in these buildings at Skyline, we would entertain proposals for free or discounted parking rates for DOD employees in those buildings.
 - The mere fact that office buildings are built behind a fence line on a military base does not, by definition, mean that such buildings are AT/FP compliant. For example, a large number of administrative buildings, barracks and family housing are inside the fence at Ft Meyer, but only a few feet from Route 50. DoD made no individualized analysis of the cost of AT/FP compliance for new facilities to be built on bases – depending on their site, DoD may well face the same \$28.28/GSF cost for a base facility as it might for leased space. However, DoD assumed no military base facility would incur the cost of any AT/FP compliance, while assuming that all current leased space could not comply and all new leased space would require costly upgrades. Both assumptions are blatantly false.

- Leased space can be very cost effective as compared to construction of new facilities on military bases or other Government-owned sites.
 - First, the Department assumed as an inflexible rule that leased space is a more costly method of housing personnel. The Department, however, did not engage in an individualized review of leased facilities, as it admitted in a response to an inquiry from Mr. Frank Cirillo:

“The HSA JCSG did not gather information via the BRAC certified data gathering processes regarding the costs of leased space in FY2004 dollars and lease termination dates...” [OSC BRAC Clearinghouse Memorandum dated 28 July 2005 in response to Frank Cirillo request, DCN 6240.]
 - Second, the Department compounded that error, or elected not to examine its assumption, when it elected not to at least gather proper leased space average costs. As a result, DoD grossly overestimated the cost of leased space when it ran its COBRA analyses of the cost/benefit of its proposed realignment/closure actions. DoD used an average lease cost of \$31.14 per RSF, which was the rate COSTAR (which is a real estate trade publication which aggregates office statistics in metropolitan areas) reported as the Washington, DC, area average quoted rate for Class A office space. Based on that \$31.14 per RSF figure, DoD generated the \$37.29 per GSF lease cost used in all of its analysis of Northern Virginia lease space recommendations. This is a faulty design, as:
 - The Department should at least have used the COSTAR data for the relevant geographic submarket (which, it should be noted, is listed on the same page, in the same COSTAR publication). The figure for the I-395 submarket, which includes Skyline, is \$24.98 per RSF, a full \$6.16 per RSF less than DOD assumed.
 - Second, the Department failed to consider actual lease costs paid by major government tenants. For example, large GSA leases awarded in mid-2004, the time period used by DoD for its lease cost assumptions, were at rates at least \$5 per RSF less than DOD assumed it would have to pay. (See Attachment A)
 - Additionally, the Department grossly underestimated the actual costs to replicate facilities on government property. The cost to build 840,000 GSF of administrative space at Ft. Meade will be \$60 million more than DoD assumed. Our individualized estimate, based on our actual experience and the actual construction drawings we used when this company built Seven Skyline Place for DISA in 2001, is far more accurate than the generalized, non-specific MilCon figure used by DoD in its COBRA runs for DISA.
 - Finally, to justify the economies of the proposed DISA move to Fort Meade, the Department included in its COBRA run cost savings that are not related to the proposed move of DISA to Ft. Meade, and underestimated the personnel costs associated with relocating to a site that is well beyond the reasonable commuting distance for many DISA employees, most of whom live in Virginia south of the current DISA locations.

In an effort to provide the Commission with as accurate data as possible, as the owners and builders of the facilities in question, we have provided to your staff what we believe is a far more accurate estimation of the costs to replicate the DISA facilities at Fort Meade (See Attachment B). When this new data is applied to the COBRA model, the payback period for the recommended move to Ft. Meade rises considerably beyond the 20-year standard benchmark and approaches a 40 year payback (See Attachment C).

Aside from both security and infrastructure cost concerns, we note DISA is one of the many agencies which benefits greatly from a close proximity to its primary customer, the Pentagon. The fact that DISA is only four miles from the Pentagon and is linked by regular shuttle bus service results in operational

benefits and cost savings. Surprisingly, no evidence seems to indicate that DoD considered the consolidation of DISA's various opponents to an area within close proximity to the Pentagon, including the Skyline complex.

We believe that if consolidation of DISA is the primary driver for this recommendation, then consideration of a range of consolidation options is appropriate. We respectfully submit that the Skyline complex could accommodate DISA consolidation in a shorter timeframe and at a substantially lower cost than DoD's proposed relocation.

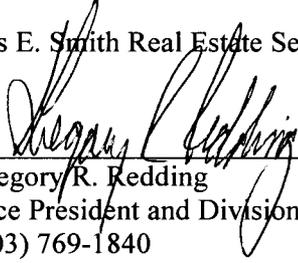
One vital fact for Commission consideration is that consolidation at Skyline would enable DoD to retain the advantages of the current DISA location. Seven Skyline Place (the primary building housing DISA and its research and development elements) is a new building, built specifically to Department of Defense specifications for DISA and opened in late 2001. **The military value of this building cannot be more strongly stated, as the building was designed, constructed and outfitted to the exact specifications of the Department.** Among many special design elements incorporated into the construction is a 52,000 square foot complex of underground and windowless facilities for secure research and development activity.

Taken together, the consolidation of the various DISA components to the Skyline campus is both a more cost effective and timely solution. We respectfully request that, should the Commission sustain the consolidation of the Defense Information Systems Agency, the final recommendation directs this consolidation to occur at the Skyline campus.

Finally, we would like to inform the Commission that the entirety of DISA would not fill the Skyline campus. The expenditure of less than \$50M would bring the entire 1.8 million rentable square feet throughout the five buildings into AT/FP compliance and would also provide the Commission the opportunity to consolidate other agencies to the Skyline campus, such as the various medical commands, much of which (278,000 RSF) is also currently located at the Skyline complex, and which also benefit from close proximity to the Pentagon. The Commission should further understand that these costs for security compliance could be addressed to the benefit of DoD as part of a long-term leasing commitment from the Department to remain at the Skyline campus, thereby avoiding even the upfront costs for the improvements.

Sincerely,

Charles E. Smith Real Estate Services L.P.

By: 

Gregory R. Redding
Vice President and Division Counsel
(703) 769-1840

Attachments

- cc: Charles Battaglia
- Tim Abrell
- Ethan Saxon

Attachment A

RECENT GOVERNMENT LEASE TRANSACTIONS ESTABLISH TRUE MEASURE OF MARKET RENTS			
	<u>One Potomac Yard</u>	<u>Two Potomac Yard</u>	<u>2200 Crystal Drive</u>
GSA Lease Number	GS-11B-01718	GS-11B-01719	GS-11B-01712
Date Lease Awarded by GSA	6-May-04	6-May-04	12-Apr-04
Tenant	Environmental Protection Agency	Environmental Protection Agency	Federal Supply Service
Rentable Square Feet	309,179	95,938	278,101
Term	10 years	10 years	10 years
Lease Commencement	May, 2006	May, 2006	January, 2006
Face Rent per RSF for Lease Term	\$32.08 per RSF	\$32.74 per RSF	\$28.77 per RSF
Less Concessions That Inflate Face Rent and Not Required by DOD			
Value of Free Rent per year	\$1.60 per RSF (6 months free)	\$1.64 per RSF (6 months free)	\$0.48 per RSF (2 months free)
Value of Improvement Allowance per Year	\$3.60 per RSF (\$11,138,737)	\$3.68 per RSF (\$3,526,650)	\$3.37 per RSF (\$9,383,500)
Value of Leasing Commission per Year Paid to GSA Broker per Year	\$0.61 per RSF	\$0.62 per RSF	\$0.86 per RSF
Yields Average Base Rent:	\$26.27 per RSF	\$26.80 per RSF	\$24.06 per RSF
Weighted Average Base Rate for Three Leases Above:			\$25.44 per RSF
Plus Paint and Carpet allowance for renewal: (\$5 over 10 years)			\$0.50 per RSF
Total Weighted Average Base Rate for a DOD Renewal Based on Three Leases Above:			\$25.94 per RSF
BRAC materials cite the number as:			(1) \$31.14
based on COSTAR "Quoted Rate" for DC metro area - "asking rate"			
Using this number led to a "Lease Cost Avoidance" cost of :			(1) \$37.29
"Lease Cost Avoidance" cost number should be:			(1) \$31.03
<p>(1) The \$31.14 per RSF in the COSTAR report converted to the \$37.29 per GSF used in the COBRA models by applying the 10% RSF/GSF conversion factor and adding in the GSA, WHS and AT/FP fees cited in the COBRA models. The \$25.94 per RSF derived above converts to \$31.03 per GSF, which is \$7.26 per GSF less than DOD used in the COBRA models. Certain COBRA runs prepared and submitted by Charles E. Smith use a \$30.96 per GSF figure, only slightly different than the \$31.03 per GSF figure cited above.</p>			

Attachment B

Cost Estimate to Replicate DISA Square Footage at Fort Meade, MD in FY2005 Dollars					
Description				Cost	Notes
Base Building Construction Costs				\$63,930,000	James G. Davis Construction Estimate of 6/30/05 rounded to nearest \$1,000, Assumes 2005 dollars
Add for working on a military base				\$3,197,000	Per Davis Estimate
Add for Davis Bacon wage rates				\$6,393,000	Per Davis Estimate
Tenant Improvement Construction Costs				\$24,729,000	James G. Davis Construction Estimate of 7/01/05 rounded to nearest \$1,000, Assumes 2005 dollars
Add for working on a military base				\$1,731,000	Per Davis Estimate
Add for Davis Bacon wage rates				\$2,967,000	Per Davis Estimate
Subtotal				\$102,947,000	
Other Construction Cost Modifications					
Delete Structured Parking	309	Spaces	\$25,000	(\$7,725,000)	Assumes 309 of the 582 provided at Seven Skyline are deleted
Add Surface Parking	1,060	Spaces	\$4,500	\$4,770,000	Assumes a surface parking ratio of 3.0 per 1,000 GSF (typical Suburban parking ratio for this type of building)
Total Construction Costs for Seven Skyline Place				\$99,992,000	
Seven Skyline Place Breakout					
	GSF				
Data Center Component	57,200	\$500.00		\$28,600,000	
Administrative Component	387,200	\$184.00		\$71,392,000	
Replication at Fort Meade					
	GSF				
Data Center Component	57,200	\$500.00		\$28,600,000	
Soft Costs		12%		\$3,432,000	
Contingency		7%		\$2,242,000	
Subtotal Data Center Component				\$34,274,000	
Administrative Component	840,000	\$184.00		\$154,560,000	
Soft Costs		12%		\$18,547,000	
Contingency		7%		\$12,117,000	
Subtotal Administrative Component				\$183,160,000	
Total Replication Costs at Fort Meade				\$217,434,000	
COBRA Report Comparison					
Milcon Spending					
General Administrative Building				\$144,931,000	
RDT&E Building				\$12,497,000	
Total Milcon to replicate DISA at Fort Meade				\$157,428,000	
Administrative Building Underfunded Amount				(\$38,229,000)	
% Underfunded				26.4%	
RDT&E Building Underfunded Amount				(\$21,777,000)	
% Underfunded				174.3%	
Total Underfunded Amount				(\$60,006,000)	
Total % Underfunded				38.1%	

Executive Summary

An independent analysis of the COBRA Model run used by the Department of Defense to support the BRAC recommendation to consolidate DISA at Ft. Meade was made. The data used by the DOD BRAC analysts was downloaded from the www.brac.gov library and run to replicate the results obtained by DOD and now being reviewed by the Commission. The DOD COBRA run shows a payback period of just two years; our independent analysis shows that the payback period will be well over 20 years, and could be as much as 47 years, once accurate cost and savings data is used.

Cost Effectiveness of Proposed Move to Ft. Meade

Our analysis of DOD's COBRA model run raises the following issues:

- The DOD COBRA model includes costs and savings that are not related to the move to Ft. Meade; it is questionable whether these should be part of the economic justification for the move.
- The DOD COBRA model includes projected future lease costs for Northern Virginia that is based on an average "quoted" rental rate for Class A office space for the entire Washington D.C. metro area; the actual data for the Skyline submarket in Northern Virginia where DISA's leased space is currently located is available in the same source document used by DOD to obtain the DC metro area average and the submarket average should be used.
- The DOD COBRA model includes costs to construct needed new facilities at Ft. Meade which appear to be seriously understated; a more accurate estimate from the developer and construction firm that built the primary leased facility occupied by DISA (in the Skyline complex) would add \$60 million to the cost used by DOD and support for that finding is provided.
- The DOD COBRA model run does not include costs associated with the recruiting and training of the people who will replace the civilians who do not move; there are numerous studies that address this issue and provide historical costs for this overlooked aspect of the move.

Based on this assessment our analysts made five additional COBRA runs. Our objective is to provide the actual payback period when all the costs and only **actual** savings are used. Our independent analysis addresses the cost and savings associated with the proposed move to Ft. Meade. It did not include cost avoidance for what would occur if there was no move. The results of these five analysis show that the payback period for a relocation to Ft. Meade grows dramatically, and ultimately well past 20 years, when accurate data for actual costs and savings is introduced into the COBRA runs.

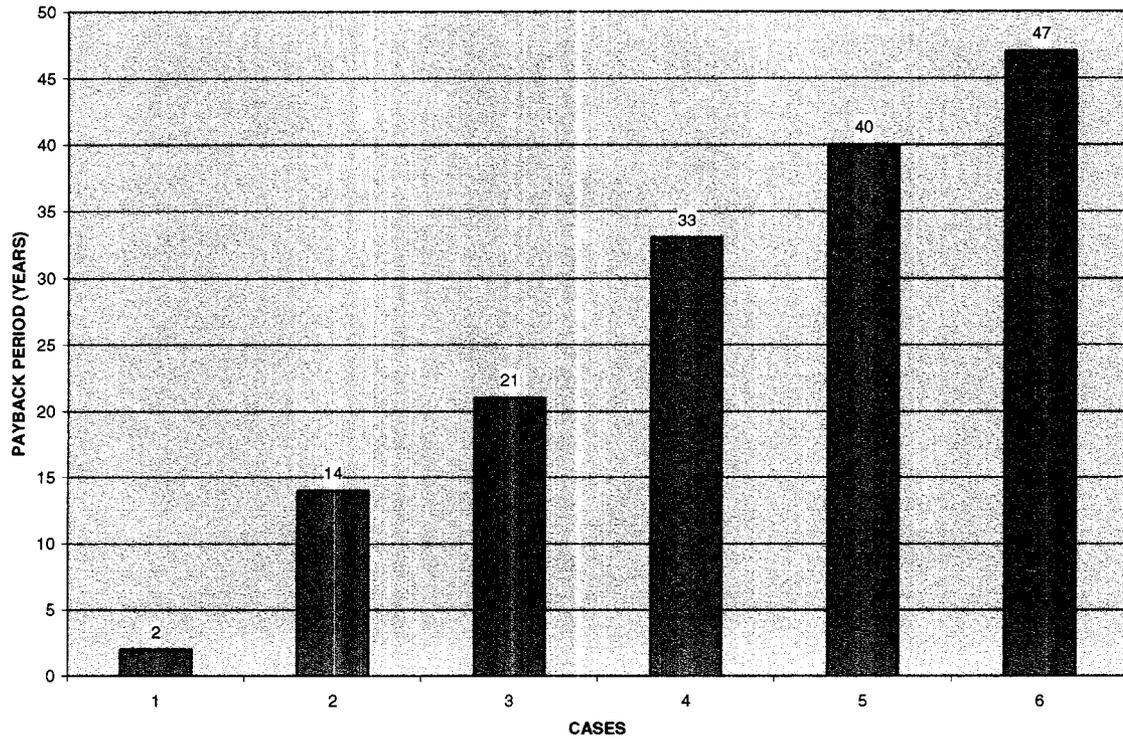
The original DOD BRAC base case, and the five runs we made, all numbered below, address the issues in the sequence presented above with the following results:

- 1) DOD's base case shows payback period of 2 years.

- 2) Removing the cost and savings associated with contractor reductions, position cuts and cost avoidance that are not related to the move resulted in an adjusted payback period of 14 years.
- 3) Using the previous run 2) and then adjusting for the actual lease costs for the Skyline submarket in Northern Virginia resulted in an adjusted payback period of 21 years.
- 4) Using the previous run 3) and then adding the aforementioned \$60,000,000 to the Military Construction costs at Ft. Meade resulted in an adjusted payback of 33 years.
- 5) Using the previous run 4) and then adding in recruiting and training costs for the number of people the BRAC data indicated will not move resulted in an adjusted payback period of 40 years.
- 6) Finally, using the previous run 5) and then adjusting for a more realistic and higher number of people who will not move with DISA to Ft. Meade (but still less than half what has occurred historically), resulted in an adjusted payback period of 47 years.

The chart on the next page summarizes the results of these five new runs.

SUMMARY OF RESULTS
PAYBACK PERIOD FOR MOVE TO FT. MEADE GROWS TO 47 YEARS AS
ACCURATE COST AND SAVINGS DATA IS ADDED TO COBRA MODEL
IN SEQUENTIAL RUNS



1. **BRAC base case resulting from DOD's COBRA run.**
2. **Remove savings and costs not associated with move.**
3. **Use appropriate lease costs for current locations.**
4. **Use more realistic Military Construction costs (+\$60M).**
5. **Add in recruiting and training cost for civilians not moving (BRAC SFF of 15.77%).**
6. **Increase recruiting and training cost for civilians not moving to 30%.**

Case:	Run1_V2 BRAC Base Case
Results:	2 year payback period
Data Changes:	na
Change Justification:	na

Case:	Run1.1_V2.1 BRAC Base Case with costs and savings not related to the move taken out
Results:	14 year payback period
Data Changes:	<p>#1 - Input Screen 5 – Slidell, LA – Misc. Recurring Savings \$11,141,000 changed to \$0 for years 2007 through 2011</p> <p>#2 - Input Screen 5 – Roslyn/Ballston - Misc. Recurring Savings \$36,886,000 changed to \$23,866,000 for year 2011</p> <p>#3 - Input Screen 5 – Roslyn/Ballston – One Time Unique Savings \$235,000 changed to \$0 for year 2010 and \$17,879,580 changed to \$0 for year 2011</p> <p>#4 - Input Screen 5 – Alexandria – One Time Unique Savings \$614,300 changed to \$0 for year 2011</p> <p>#5 – Input Screen 6 – Slidell, LA – 2010 Position Eliminations (1 Officer and 102 Civilians) set to 0</p> <p>#6 – Input Screen 6 – NAVSUPACT – 2010 Position Eliminations (1 Officer and 1 Civilians) set to 0</p> <p>#7 – Input Screen 6 – Roslyn/Ballston – 2011 Position Eliminations (26 Officer, 10 Enlisted and 67 Civilians) set to 0</p>
Change Justification:	<p>#1 – 48 contractors at \$200,000 per year will be released regardless of whether or not DISA is consolidated at Ft. Meade; therefore this savings (\$9,600,000) is not related to the move. Lease savings (\$1,641,000/year) will occur regardless of the move to Ft. Meade</p> <p>#2 – 65 contractors at \$200,000 per year will be released regardless of whether or not DISA is consolidated at Ft. Meade; therefore this savings (\$13,000,000) is not related to the move.</p> <p>#3 & #4 – Our analysis is addressing the actual cost of the move to Ft. Meade, not the “net” cost for the move versus staying where they are. Therefore, cost avoidance at the current facilities should they stay is not part of the analysis. Options presented in Phase II of our analysis include these One Time Unique costs for staying in some of the current facilities, so a direct comparison will be proper.</p> <p>#5, #6 & #7 – Position eliminations will occur whether they stay in the current facilities or move to Ft. Meade; therefore the savings from these eliminations do not impact the economic considerations with respect to the move.</p>

Case:	Run1.2_V2.2 Run1.1_V2.1 with appropriate lease costs for current facilities
Results:	21 year payback period
Data Changes:	#1 – Input Screen 5 – Roslyn/Ballston - Misc. Recurring Savings \$23,886,000 changed to \$19,266,000. #2 – Input Screen 5 – Alexandria - Misc. Recurring Savings \$810,100 changed to \$558,000.
Change Justification:	#1 & #2 – CoStar has the costs for leases in the specific area in which the current facilities are located; these lease costs are more appropriate. The cost per GSF with all the additional charges is \$30.96, vice the BRAC estimate of \$37.29..

Case:	Run1.3_V2.3 Run1.2_V2.2 with a more appropriate estimate of Military Construction at Ft. Meade
Results:	33 year payback period
Data Changes:	#1 – Input Screen 7 – Ft. Meade - Misc. Default Total Cost for Facility 6100 (General Administration Building) set to \$194,931,000, a \$50,000,000 increase. ##1 – Input Screen 7 – Ft. Meade - Misc. Default Total Cost for Facility 3101 (General RDT&E Laboratory) set to \$22,497,000, a \$10,000,000 increase.
Change Justification:	#1 & #2 – Estimates from the construction company that built one of the current facilities leased by DISA knows the DISA requirements quite well and was able to make an accurate estimate for the 892,000 GSF that is needed at Ft. Meade. The additional \$60,000,000 was arbitrarily distributed between the two facilities

Case:	Run1.4_V2.4 Run1.3_V2.3 with the addition of recruiting and training costs for the replacements for the 15.77% of civilians the COBRA Standard Factor File (SFF) assumes will not move (8.1% early retirements, 1.67% regular retirements, and 6% refusing to move)
Results:	40 year payback period
Data Changes:	#1 – Input Screen 5 – Ft. Meade – One Time Unique Cost for 2010 and 2011 of \$16,244,600
Change Justification:	<p>#1 The total number of positions moving to Ft. Meade are 2081. There is a significant body of literature that shows that the cost to recruit and train replacements can be as high as 200% of their annual salary. The SFF, with the location cost factor, shows the average civilian salary to be \$66,000. The following is the calculation for the total cost, which is evenly divided between 2010 and 2011:</p> <p>2081 x .1577 x (\$66,000 x 1.5) = \$32,489,200</p> <p>Note: the conservative estimate of 150% was used to ensure this cost is not overstated</p>

There are extensive studies available in the body of pertinent literature that analyze and describe recruitment, training, and lost productivity costs when an employee must be hired to backfill the “leaver,” i.e., the employee who must be replaced. For example:

- “Private Sector Downsizing: Implications for DoD” by Michael L. Marshall and J. Eric Hazell (published in *The Acquisition Review Quarterly*, Spring 2000) listed several parameters that apply to replacing personnel, including advertising and marketing; recruitment, hiring, and training; overtime to personnel taking up the slack; productivity losses; and lost training for departed workers. The article concludes, “Regardless of the exact number of businesses, there is widespread agreement that *turnover costs are somewhere between high and Olympian.*”
- “The Business Cost and Impact of Employee Turnover” by William Bliss of Bliss & Associates (2000) concludes that the cost of employee turnover is at least 150% of the leaver’s annual salary. Also the “The Cost of Teacher Turnover” (Google
- A Price Water-House Saratoga Institute workforce replacement model cited in “It’s Costly to Lose Good Employees” by J. Fitz-enz (1997) estimates that the total cost of turnover ranges from 100 to 200% of the leaver’s pay and benefits.
- A workforce replacement study conducted by Kwasha Lipton (referenced in *The Acquisition Review Quarterly* Spring 2000) concludes that replacing exempt workers costs 150% of the leaver’s salary, and for non-exempt workers, it costs 175% of the leaver’s salary.

Case:	Run1.5_V2.5 Run1.3_V2.3 with the addition of recruiting and training costs for the replacements for an estimated 30% of the civilians who will not move (9% early retirements, 9% regular retirements, and 12% refusing to move)
Results:	47 year payback period
Data Changes:	#1 – Input Screen 5 – Ft. Meade – One Time Unique Cost for 2010 and 2011 of \$30,902,850
Change Justification:	#1 The same calculation is used to estimate the total cost. The COBRA SFF data appears to be very low. Historically the percentage of civilians not moving in situations similar to had been as high as 70%. In addition, a survey recently done at Ft. Monmouth to determine how many of their civilians would move to Aberdeen, MD showed that 70% would not move. Therefore, the 30% estimate is, most likely, very conservative. The fact that many DISA civilians live in Northern Virginia, not far from Ft. Belvoir where there will be many new civil service positions, makes it very unlikely that many people will accept the move or long commute.

BRAC Commission
BRAC Commission

AUG 12 2005

Received
Received



CHARLES E. SMITH COMMERCIAL REALTY

2345 CRYSTAL DRIVE ■ CRYSTAL CITY ■ ARLINGTON, VIRGINIA 22202 ■ 703-769-8200

August 12, 2005

The Honorable Anthony J. Principi
Chairman, Defense Base Closure and Realignment Commission
2521 S. Clark St., Ste. 600
Arlington, VA 22202

Re: Miscellaneous OSD, Defense Agency, and Field Activity Leased Locations

Dear Chairman Principi:

During a recent meeting with Mr. Tim Abrell and Mr. Ethan Saxon of your staff, we addressed the recommendations of the Headquarters and Support Activities Joint Cross-Service Group. These recommendations would relocate a vast array of disparate DoD organizations, including Army, Air Force, and other organizations of the OSD and WHS to new permanent facilities at Ft. Belvoir, Virginia. This recommendation package is an assemblage of completely unrelated DoD components with no mission reason for co-location at Ft. Belvoir (and none was even put forth by DoD). This package of recommendations appears to have been designed to mask the construction of new 'Excess Capacity' for DoD and obscure the lack of a cost justification for any of the other recommended moves.

At our meeting with your staff we brought up a number of issues, including the lack of a military mission rationale stated by the JCSG for these moves, the erroneous assumptions made regarding the inability of leased space to meet security standards, the gross-overestimation of leased space costs, and the gross underestimation of the cost of building new facilities on bases. We have raised these issues in other letters to you today and will address those issues only briefly at the end of this letter.

The most glaring issue identified in this set of recommendations, and raised in our meeting, is the seemingly ironic recommendation by the Department of Defense to build new permanent facilities at Fort Belvoir to house personnel currently located in temporary leased space identified by the HSA JCSG as the "Pentagon Renovation temporary space". As stated in the COBRA model relied upon by the HAS JCSG for this recommendation, the purpose of this leased space is to "house personnel who are displaced by the renovation work in the Pentagon; the numbers of personnel and the Activities to which they belong change depending on what work is being undertaken in the Pentagon." The HSA JCSG assumptions further state "The number of personnel resident in the Pentagon Renovation space was estimated by the HSA JCSG because the actual numbers are variable due to the nature of this space."

The import of the Department of Defense's recommendation is that it is seeking to build new, permanent facilities to meet an office space need which is, by definition, only temporary. In addition, the logic of relocating personnel who are essentially assigned to the Pentagon to a new location nearly 20 miles away is difficult to grasp.

When we discussed this issue with Mr. Abrell and Mr. Saxon, they indicated that the Department of Defense made it clear to them that the Pentagon Temporary space, or PENREN, was not included in the BRAC recommendation packages. Upon further review, however, this assertion about PENREN is not accurate, as made clear in the quoted language from the COBRA assumptions noted above.

We would also ask you to review the Headquarters and Support Activities JSCG recommendation entitled "Collocate Miscellaneous ODS, Defense Agency, and Field Activity Leased Locations." Two elements of this recommendation package specifically pertain to Pentagon renovation temporary space; i.e., the fourth and eighth elements of the recommendation:

"Close 1500 Wilson Boulevard and Presidential Towers, leased locations in Arlington, VA, by relocating offices accommodating Pentagon Renovation temporary space to Fort Belvoir, VA."

"Realign Rosslyn Plaza North, a leased installation in Arlington, VA, by relocating offices accommodating Pentagon Renovations temporary space, Washington Headquarters Services and the Defense Human Resources Activity to Fort Belvoir, VA."

It is counter intuitive to use limited financial resources to build new facilities for a use which is only temporary. We believe that BRAC is not intended to fund the construction of future 'Excess Capacity'.

Including these three leased facilities into that recommendation package could have been intended by DOD to enhance the cost and savings analysis in support of the other recommendations in that same package. In an effort to explore this latter hypothesis, we commissioned an additional series of COBRA analyses which isolated and removed the Pentagon Renovation space elements of the recommendation. Our experts then reevaluated the payback period for the remainder of the recommendation package.

The results demonstrate that removal of the Pentagon Renovation space, with no other changes to DoD's data, results in an increase in the payback period from 9 years to 25 years (using DoD's own COBRA model). This change resulted from only removing the Pentagon Renovation space from the recommendation, and does not represent any further challenges to DoD's inputs or algorithm (See Attachment A).

This result clearly undermines the cost effectiveness argument for the entire package of Miscellaneous OSD, Defense Agency, and Field Activity Leased Locations recommendations. If the Pentagon Renovation leased spaces are pulled from the recommendations then the balance of the recommendations cannot stand on their own.

We know from DoD's own admission in an OSD BRAC Clearinghouse Memorandum that "The HSA JSCG did not gather information via the BRAC certified data gathering processes regarding the costs of leased space in FY2004 dollars and lease termination dates..." (28 July 2005 response to Mr. Frank Cirillo, DCN 6240). Clearly additional elements of DoD's data are certainly subject to further analysis.

Our evaluation of numerous COBRA estimations that are based on DoD's use of \$37.29/GSF for lease costs have found that this standard figure grossly overstates the actual costs of leased space. DoD used an estimate of \$31.14 per RSF for leased costs from a real estate industry report on average 'quoted' rates for Class A office space in the Washington metro area that has no relevance to actual market rates. This is akin to using the manufacturer's recommended sticker price to measure the market price for a new car. If DoD had examined actual GSA leases awarded in Northern Virginia for large government agencies taking Class A space in mid-2004 (See Attachment B), it would have learned that the true market rate that DOD could expect to pay in current leased space is only \$25.94 per RSF. That would undermine even further DoD's cost savings argument for moving these locations to Ft. Belvoir.

Finally, based on our experience building a brand new Class A building for DISA in 2001, we estimate that the cost to build administrative space for DoD on a military base, adjusted for surface parking, Davis Bacon wages and construction variables on military bases, will be \$210 per GSF.

A more detailed evaluation of the COBRA analysis using this information would likely result in an even longer payback than the 25 years obtained just by taking out the Pentagon Renovation temporary space.

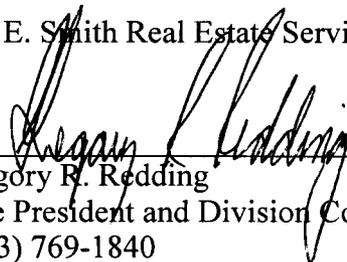
We urge the Commission to give careful scrutiny to the recommendation to build new permanent facilities to fulfill temporary needs. Flexibility is one of the characteristics of leased space, which cannot ever be matched by government owned facilities. Pentagon renovation space is a prime example of when such flexibility is in the best interests of the Department and the taxpayer.

We further urge the Commission to give careful scrutiny to the true cost effectiveness of the balance of the recommendations in this package, which we believe do not support relocation to Ft. Belvoir given the 25 year payback just by taking out the Pentagon Renovation temporary space.

We respectfully request that the Commission endorse current policy and DoD authority to locate agencies within leased space facilities when such an arrangement is best solution for the requirement.

Sincerely,

Charles E. Smith Real Estate Services L.P.

By: 
Gregory R. Redding
Vice President and Division Counsel
(703) 769-1840

Attachments

cc: Charles Battaglia
Tim Abrell
Ethan Saxon

**Executive Summary of Revised COBRA Analysis
HSA 0053R (OSD 4th EST to Belvoir & NNMCC) Without Temporary Space at 1500
Wilson Blvd, Presidential Tower and Rosslyn North**

Case:	Run1.1 Case Without PENEN
Results:	25 year payback period (increased from 9 yr before)
Data Changes:	<p>#1 - Input Screen 5 – Change Alexandria / I-395 Area misc. recurring savings, one-time unique savings and one-time unique cost by 26.24%</p> <p>#1 - Input Screen 5 – Change Rosslyn – Ballston misc. recurring savings, one-time unique savings and one-time unique cost 60%</p>
Change Justification:	<p>#1 – The amount of reduction is proportional to the temporary space in the total GSF. Detail calculations are shown below. Overall, 26.24% reductions in savings & costs due to removed temporary space.</p> <p>#1 – The amount of reduction is proportional to the temporary space in the total GSF. Detail calculations are shown below. Overall, 60% reduction in savings & costs due to removed temporary space</p>

Attachment B

RECENT GOVERNMENT LEASE TRANSACTIONS ESTABLISH TRUE MEASURE OF MARKET RENTS			
	One Potomac Yard	Two Potomac Yard	2200 Crystal Drive
GSA Lease Number	GS-11B-01718	GS-11B-01719	GS-11B-01712
Date Lease Awarded by GSA	6-May-04	6-May-04	12-Apr-04
Tenant	Environmental Protection Agency	Environmental Protection Agency	Federal Supply Service
Rentable Square Feet	309,179	95,938	278,101
Term	10 years	10 years	10 years
Lease Commencement	May, 2006	May, 2006	January, 2006
Face Rent per RSF for Lease Term	\$32.08 per RSF	\$32.74 per RSF	\$28.77 per RSF
Less Concessions That Inflate Face Rent and Not Required by DOD			
Value of Free Rent per year	\$1.60 per RSF (6 months free)	\$1.64 per RSF (6 months free)	\$0.48 per RSF (2 months free)
Value of Improvement Allowance per Year	\$3.60 per RSF (\$11,138,737)	\$3.68 per RSF (\$3,526,650)	\$3.37 per RSF (\$9,383,500)
Value of Leasing Commission per Year Paid to GSA Broker per Year	\$0.61 per RSF	\$0.62 per RSF	\$0.86 per RSF
Yields Average Base Rent:	\$26.27 per RSF	\$26.80 per RSF	\$24.06 per RSF
Weighted Average Base Rate for Three Leases Above:			\$25.44 per RSF
Plus Paint and Carpet allowance for renewal: (\$5 over 10 years)			\$0.50 per RSF
Total Weighted Average Base Rate for a DOD Renewal Based on Three Leases Above:			\$25.94 per RSF
BRAC materials cite the number as:		(1)	\$31.14
based on COSTAR "Quoted Rate" for DC metro area - "asking rate"			
Using this number led to a "Lease Cost Avoidance" cost of :		(1)	\$37.29
"Lease Cost Avoidance" cost number should be:		(1)	\$31.03
<p>(1) The \$31.14 per RSF in the COSTAR report converted to the \$37.29 per GSF used in the COBRA models by applying the 10% RSF/GSF conversion factor and adding in the GSA, WHS and AT/FP fees cited in the COBRA models. The \$25.94 per RSF derived above converts to \$31.03 per GSF, which is \$7.26 per GSF less than DOD used in the COBRA models. Certain COBRA runs prepared and submitted by Charles E. Smith use a \$30.96 per GSF figure, only slightly different than the \$31.03 per GSF figure cited above.</p>			

KANAWHA COUNTY COMMISSION

Post Office Box 3627
Charleston, West Virginia 25336



Telephone (304) 357-0101
Fax (304) 357-0788

Henry C. Shores
Commissioner

W. Kent Carper
Commissioner

David J. "Dave" Hardy
Commissioner

Fax Cover Sheet

P.O. Box 3627
Charleston, WV 25336
(304) 357-0101
(304) 357-0788

Send to: Mr. Brad McRee	From: W. Kent Carper
Attention: -same-	Date: August 17, 2005
Office location: Base Closure and Realignment Commission, Office of Review and Analysis	Office location: Kanawha County Commission
(703) 699-2735	Phone number: 304 357-0101

Urgent Reply ASAP Please comment Please review For your information

Total pages, including cover 20

Mr. McRee: I am forwarding via FAX the following documents:

- **18 May 2005 CWVRAA meeting records**
- **9 June 2005 letter from Yeager Airport Director, Rick Atkinson, to Major General Allen E. Tackett**
- **10 June 2005 letter from Yeager Airport Director, Rick Atkinson to Major General Allen E. Tackett**
- **10 June 2005 letter from Yeager Airport Director, Rick Atkinson to Major General Allen E. Tackett**



KANAWHA COUNTY COMMISSION

Post Office Box 3627
Charleston, West Virginia 25336



Telephone (304) 357-0101
Fax (304) 357-0788

Henry C. Shores
Commissioner

W. Kent Carper
Commissioner

David J. "Dave" Hardy
Commissioner

August 16, 2005

**Mr. Brad McRee, Analyst
Defense Base Realignment and Closure Commission
2521 S. Clark St., Suite 600
Arlington, VA 22202**

Dear Mr. McRee:

I would like thank you for meeting with the representatives of the Central West Virginia Regional Airport Authority (CWVRAA) on August 12, 2005 regarding the consideration of matters involving the 130th Airlift Wing of the West Virginia Air National Guard, a joint-use facility with Yeager Airport (CRW) located in Charleston, West Virginia.

It is my understanding that you have expressed interest about the documentation demonstrative of the commitment and dedication of our local government and the airport authority's board of directors intent to the transfer of Yeager Airport's cross runway 15-33 to the 130th AGS for additional ramp space or as an assault strip. The WV Air National Guard will be able to use the crosswind at any time for additional aircraft parking due to surge conditions.

My answer is an unequivocal, yes. My fellow commissioners and I concur in its entirety, the actions taken by the board of directors of the CWVRAA on May 18, 2005, whereas I proposed first, the formation of a Grass Roots Group, along with subsequent funding and to "lease" the WVANG additional parking space for \$1.00 (per year). This motion was made and unanimously approved. I have enclosed a certified copy of the meeting records to quantify my concurrence, along with my fellow Commissioners, Henry C. Shores, and David J. Hardy.



Mr. Brad McRee, Analyst
August 16, 2005
Page 2

We appreciate your consideration of these matters during the upcoming deliberations of the BRAC Commission. We also thank you for your service and your thorough and thoughtful review of the Defense Department's recommendations as they pertain to the 130th AGS located at Yeager Airport, Charleston, West Virginia

Very truly yours,

A handwritten signature in black ink, appearing to read "W. Kent Carper", with a long horizontal flourish extending to the right.

W. Kent Carper, Commissioner
Kanawha County Commission

**MINUTES OF THE EMERGENCY MEETING
OF THE BOARD OF MEMBERS
OF THE
CENTRAL WEST VIRGINIA REGIONAL AIRPORT AUTHORITY**

May 18, 2005

An emergency meeting of the Board of Members of the Central West Virginia Regional Airport Authority was held in the Public Use Conference Room of the Airport Director's Office, Yeager Airport, Charleston, West Virginia on May 18, 2005, beginning at 11:00 a.m., pursuant to proper notice to the public and to the news media.

Board Members present: R. Edison Hill, Henry Shores, Charles Jones, Harold Carter, Priscilla M. Haden, Karen Haddad, and Charles "Chip" McDowell, representing the Kanawha County Commission; James E. Foster, representing the City of Charleston; Gregory A. Tucker, representing the Nicholas County Commission; and Lawrence Barrett (via phone), representing the Lincoln County Commission.

Board Members absent: H. B. Wehrle, III and Samuel M. Bowling, representative of the Kanawha County Commission; Norman W. Shumate, III, representative of the City of Charleston; Phillip Stowers, representative of the Putnam County Commission; and Joe E. Cooke, representative of the Boone County Commission.

Also present: Chuck Bailey of Bailey and Wyant, PLLC, legal counsel; Richard A. Atkinson, III, Airport Director; Timothy C. Murnahan, Assistant Airport Director; David Sweeney, Assistant Airport Director; Brian Belcher, Airport Marketing Director; Brenda J. Thomas, Airport Executive Secretary; Bill Forbes, Airport Construction Chairman; Carroll Hutton, Airport General Aviation Chairman; Daniel P. Haught; Susie Dunn, Kanawha County Commission; John Caudill; Terry Hill, Yeager Airport; Nick Keller, Yeager Airport Intern; Major John Dulin, 130th Airlift Wing, WVANG; Retired Colonel Bill Peters, 130th Airlift Wing, WVANG; Mike Plante and Beth White, Plante & Associates; Jennifer Smith; Wanda Carney from West Virginians Want To Know; Larry McKay, reporter for WQBE; Rick Steelhammer, reporter for the Charleston Gazette; Allison Barker, news reporter for the Associated Press; and News Reporters for Channel 13, Channel 3, Fox Network, and Channel 3.

The Chairman, Mr. Hill, called the meeting to order and introductions were made.

The purpose of the meeting was to consider actions relative to the Airport Master Plan in relation to expansion of the West Virginia Air National Guard Base and funding to support efforts to retain the 130th Airlift Wing, WVANG.

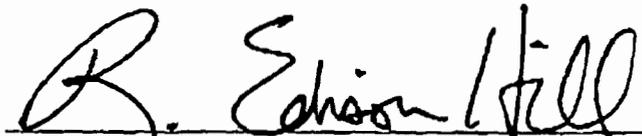
The Chairman recognized the President of the Kanawha County Commission, W. Kent Carper. Commissioner Carper urged the Airport Authority to donate \$25,000, the Kanawha County Commission \$25,000, and the Charleston Area Alliance Group \$25,000 to form a Grassroots Group, "Keep 'Em Flying," that would be opposed to the realignment proposal for the 130th Airlift Wing WVANG and to lease the WVANG additional parking space at a cost of \$1.00. Commissioner Carper would hope to use the funds to obtain a state-matching grant. Mr. Shores moved to accept the recommendation, seconded by Mr. Carter, which was unanimously approved. The money donated by Yeager Airport would be taken out of the excess parking revenue fund. Commissioner Hardy pledged the support of the Kanawha County Commission and stated he would work hard to encourage the Charleston Area Alliance to support this group. Mayor Danny Jones also said the City of Charleston would help.

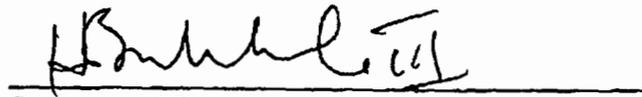
The Grass Roots Committee would be headed by Col. Peters and would look at the BRAC regulations and form merit-based arguments against moving the airplanes.

Mr. Atkinson reported if the C-130's were removed from Yeager Airport, there would be the possibility of losing 24-hour service at Air Traffic Control.

The Budget for the Grass Roots Committee would be presented at the May 25, Board Meeting.

There being no further business to be discussed, the meeting adjourned.


Chairman


Secretary/Treasurer

Central West Virginia Regional Airport Authority

John D. Rockefeller IV Terminal

100 Airport Road, Suite 175 • Charleston, WV 25311-1080

Phone: 304-344-8033

Fax: 304-344-8034

E-Mail: fly@yeagerairport.com

www.yeagerairport.com



June 9, 2005

Major General Allen E. Tackett
Army National Guard
1703 Coonskin Drive
Charleston, WV 25311-1085

SUBJECT: Runway 15/33 and Taxiway "C"

In the event of natural emergencies or surges of military activity, the 130th Airlift Wing, West Virginia Air National Guard may need to use additional real estate at Yeager Airport, Kanawha County, West Virginia.

During those times of natural emergencies or surges of military activity, Yeager Airport will close runway 15/33 and taxiway "C" to civilian access and civilian use. During those times of natural emergencies or surges of military activity, Yeager Airport will permit the 130th Airlift Wing, West Virginia Air National Guard exclusive use of runway 15/33 and taxiway "C" for military purposes.

Upon notice to the Yeager Airport Manager from the 130th Airlift Wing Commander, Yeager Airport will implement the closure of runway 15/33 and taxiway "C" to civilian use and permit the 130th Airlift Wing, West Virginia Air National Guard exclusive use of runway 15/33 and taxiway "C" for military purposes. Yeager Airport trusts the discretion of the 130th Airlift Wing Commander to only request the closure of runway 15/33 and taxiway "C" for appropriate reasons and lengths of time.

Sincerely,

Richard A. Atkinson, III
Airport Director

Central West Virginia Regional Airport Authority

John D. Rockefeller IV Terminal
100 Airport Road, Suite 175 • Charleston, WV 25311-1090
Phone: 304-344-8033 Fax: 304-344-8034
E-Mail: fly@yeagerairport.com www.yeagerairport.com



June 10, 2005

Major General Allen Tackett
West Virginia National Guard
1703 Coonskin Drive
Charleston, WV 25311-1085

Dear General Tackett:

Colonel Tim Fyre, Wing Commander of the 130th, has informed me of the need of the 130th to have access to an assault tactical landing strip in close proximity to the base. I am pleased to offer the conversion of the crosswind runway, RW 15/33 for use as a tactical landing strip. I understand the runway must be laid out in a 3,500 foot by 60-foot configuration. This can be easily accomplished on the present 4,750 foot by 150-foot configuration.

If you have any questions on this matter, please feel free to contact me at 304-344-8033.

Sincerely,

Richard Atkinson, III
Airport Director

Central West Virginia Regional Airport Authority

John D. Rockefeller IV Terminal
100 Airport Road, Suite 175 • Charleston, WV 25311-1080
Phone: 304-344-8033 Fax: 304-344-8034
E-Mail: fly@yeagerairport.com www.yeagerairport.com

**Yeager Airport**

June 10, 2005

Major General Allen Tackett
West Virginia National Guard
1703 Coonskin Drive
Charleston, WV 25311-1085

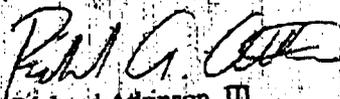
Dear General Tackett:

I am pleased to formally inform you the Central WV Regional Airport Authority, at a special meeting held on May 18, 2005, voted to close the crosswind runway, RW 15/33, and allow the WV National Guard to lease a portion of the closed runway for a dollar per year if the space is needed by the 130th Airlift Wing to expand the aircraft parking ramp.

I have enclosed a copy of the Minutes from that meeting for your information.

If you have any questions on this matter, please feel free to contact me at 304-344-8033.

Sincerely,



Richard Atkinson, III
Airport Director

Enclosure

(b) **SELECTION CRITERIA.**—(1) The Secretary shall, by no later than December 31, 1990, publish in the *Federal Register* and transmit to the congressional defense committees the criteria proposed to be used by the Department of Defense in making recommendations for the closure or realignment of military installations inside the United States under this part. The Secretary shall provide an opportunity for public comment on the proposed criteria for a period of at least 30 days and shall include notice of that opportunity in the publication required under the preceding sentence.

(2)(A) The Secretary shall, by no later than February 15, 1991, publish in the *Federal Register* and transmit to the congressional defense committees the final criteria to be used in making recommendations for the closure or realignment of military installations inside the United States under this part. Except as provided in subparagraph (B), such criteria shall be the final criteria to be used, making such recommendations unless disapproved by a joint resolution of Congress enacted on or before March 15, 1991.

(B) The Secretary may amend such criteria, but such amendments may not become effective until they have been published in the *Federal Register*, opened to public comment for at least 30 days, and then transmitted to the congressional defense committees in final form by no later than January 15 of the year concerned. Such amended criteria shall be the final criteria to be used, along with the force-structure plan referred to in subsection (a), in making such recommendations unless disapproved by a joint resolution of Congress enacted on or before February 15 of the year concerned.

(c) **DOD RECOMMENDATIONS.**—(1) The Secretary may, by no later than April 15, 1991, March 15, 1993, and March 1, 1995, publish in the *Federal Register* and transmit to the congressional defense committees and to the Commission a list of the military installations inside the United States that the Secretary recommends for closure or realignment on the basis of the force-structure plan and the final criteria referred to in subsection (b)(2) that are applicable to the year concerned.

(2) The Secretary shall include, with the list of recommendations published and transmitted pursuant to paragraph (1), a summary of the selection process that resulted in the recommendation for each installation, including a justification for each recommendation. The Secretary shall transmit the matters referred to in the preceding sentence not later than 7 days after the date of the transmittal to the congressional defense committees and the Commission of the list referred to in paragraph (1).

(3)(A) In considering military installations for closure or realignment, the Secretary shall consider all military installations inside the United States equally without regard to whether the installation has been previously considered or proposed for closure or realignment by the Department.

(B) In considering military installations for closure or realignment, the Secretary may not take into account for any purpose any advance conversion planning undertaken by an affected community with respect to the anticipated closure or realignment of an installation.

(C) For purposes of subparagraph (B), in the case of a community anticipating the economic effects of a closure or realignment of a military installation, advance conversion planning--

(i) shall include community adjustment and economic diversification planning undertaken by the community before an anticipated selection of a military installation in or near the community for closure or realignment; and

(ii) may include the development of contingency redevelopment plans, plans for economic development and diversification, and plans for the joint use (including civilian and military use, public and private use, civilian dual use, and civilian shared use) of the property or facilities of the installation after the anticipated closure or realignment.

(4) In addition to making all information used by the Secretary to prepare the recommendations under this subsection available to Congress (including any committee or member of Congress), the Secretary shall also make such information available to the Commission and the Comptroller General of the United States.

(5)(A) Each person referred to in subparagraph (B), when submitting information to the Secretary of Defense or the Commission concerning the closure or realignment of a military installation, shall certify that such information is accurate and complete to the best of that persons knowledge and belief.

(B) Subparagraph (A) applies to the following persons:

(i) The Secretaries of the military departments.

(ii) The heads of the Defense Agencies.

(iii) Each person who is in a position the duties of which include personal and substantial involvement in the preparation and submission of information and recommendations concerning the closure or realignment of military installations, as designated in regulations which the Secretary of Defense shall prescribe, regulations which the Secretary of each military department shall prescribe for personnel within that military department, or regulations which the head of each Defense Agency shall prescribe for personnel within that Defense Agency.

(6) Any information provided to the Commission by a person described in paragraph (5)(B) shall also be submitted to the Senate and the House of Representatives to be made available to the Members of the House concerned in accordance with the rules of that House. The information shall be submitted to the Senate and House of Representatives within 24 hours after the submission of the information to the Commission.

(d) REVIEW AND RECOMMENDATIONS BY THE COMMISSION.--(1) After receiving the recommendations from the Secretary pursuant to subsection (c) for any year, the Commission shall conduct public hearings on the recommendations. All testimony before the Commission at a public hearing conducted under this paragraph shall be presented under oath. [*The preceding sentence shall apply with respect to all public hearings conducted by the Defense Base Closure and Realignment Commission after November 30, 1993.*]

(2)(A) The Commission shall, by no later than July 1 of each year in which the Secretary transmits recommendations to it pursuant to subsection (c), transmit to the President a report containing the Commission's findings and conclusions based on a review and analysis of the recommendations made by the Secretary, together with the Commission's recommendations for closures and realignments of military installations inside the United States.

(B) Subject to subparagraph (C), in making its recommendations, the Commission may make changes in any of the recommendations made by the Secretary if the Commission

TRENT LOTT
MISSISSIPPI

FINANCE

COMMERCE, SCIENCE, AND TRANSPORTATION

RULES

SELECT COMMITTEE ON INTELLIGENCE

United States Senate

SUITE 487, RUSSELL SENATE OFFICE BUILDING
WASHINGTON, DC 20510-2403

August 10, 2005

245 EAST CAPITOL STREET
SUITE 226
JACKSON, MS 39201

3100 SOUTH PASCAGOULA STREET
PASCAGOULA, MS 39567

2012 15TH STREET
SUITE 451
GULFPORT, MS 39501

911 JACKSON AVENUE
SUITE 127
OXFORD, MS 38655

BRAC Commission

AUG 17 2005

Received

The Honorable Anthony Principi
Chairman
Defense Base Closure and Realignment Commission
2521 S. Clark St., Suite 600
Arlington, VA 22202

Dear Chairman Principi:

Thank you for your service as Chairman of the Defense Base Closure and Realignment Commission, and for affording the Mississippi delegation an opportunity to testify at the regional hearing in New Orleans regarding the critical importance of military installations in our State. As highlighted during that hearing, the Department of Defense (DoD) substantially deviated from the BRAC law when developing their recommendations regarding Keesler Medical Center, the 186th Air Refueling Wing, Naval Station Pascagoula, and the Navy Human Resources Service Center.

With particular regard to Naval Station Pascagoula, this letter forwards additional new information and data for consideration by the Commission. As noted by the attached memorandum, DoD's analysis deviated from the BRAC law in at least two fundamental respects. First, the Department clearly relied on transformational factors and priorities other than section 2913(f) selection criteria. Secondly, DoD substantially deviated from section 2913(e) by failing to fully evaluate the cost implications of assigning realigned missions from Naval Station Pascagoula to other installations. Further, DoD failed to evaluate the cost implications of assigning future and homeland defense missions to installations other than Naval Station Pascagoula.

I would greatly appreciate consideration of this new information and data by the Commission. The prospective abandonment of a permanent Naval presence in the Gulf is extremely troubling given the nature and extent of critical energy resources and defense infrastructure in the region. Naval Station Pascagoula is a virtually new, state-of-the-art base that is uniquely sized and located to best support current, future, surge, and homeland defense missions in the Gulf of Mexico. With kind regards, I am,

Sincerely yours,



Trent Lott

Memorandum Regarding Substantial Deviation from BRAC Law of Department of Defense
Recommendation to Close Naval Station Pascagoula

Executive Summary

The Department of Defense (DoD) proposes to close Naval Station Pascagoula, and relocate its ships, personnel, and support equipment to Naval Station Mayport, FL. Closure of Naval Station Pascagoula, coupled with the prospective closure of Naval Station Ingleside, will completely eliminate the permanent presence of Navy surface ships in the Gulf of Mexico.

Abandonment of a permanent presence in the Gulf is particularly troubling given the nature and extent of high-value infrastructure in the region. Specifically, the Gulf waters and coast include over 90% of US offshore oil and gas production, 30% of our gas and oil reserves, 50% of our busiest ports, and critical defense infrastructure that builds and supports more than 50% of our Naval Fleet.

DoD's recommendation regarding closure of Naval Station Pascagoula significantly deviates from the BRAC law in at least two fundamental respects. First, the Department relied on transformational factors and priorities other than section 2913(f) selection criteria. Specifically, no analysis was performed regarding the implications of abandoning "Strategically Dispersed Homeports," a current mission requirement that was codified in 1986. Additionally, the data-call for the 2005 BRAC round was substantially similar to the data-call utilized for 1995 BRAC round, clearly favoring "blue water" operations and Fleet concentration in lieu of the Navy's "future mission" priorities of coastal and littoral operations. Finally, there is no evidence that the Department's assessment considered "homeland defense" requirements articulated by the North American Aerospace Defense Command and United States Northern Command.

Secondly, DoD substantially deviated from section 2913(e) of the BRAC law by failing to evaluate the cost and merit of employing Pascagoula Naval Station to support current and future missions in the Gulf of Mexico, including homeland defense. In addition, it is not evident that the Navy considered the cost of upgrading and/or constructing new infrastructure at Key West or Pensacola to facilitate a continued Gulf Coast presence. Further, the Department failed to evaluate the merit and cost of realigning "homeland defense" type ships to Naval Station Pascagoula, particularly the Littoral Combat Ship (LCS) – a ship that was specifically designed to address emerging threats in coastal waters, such as the Gulf of Mexico. Also, DoD failed to assess the value and efficiency of surge capability afforded by robust berthing, industrial, and training capability of Ingalls shipyard which builds over 50% of the Navy's ships and is located a mere 100 yards from Naval Station Pascagoula.

As only 1 of 2 highly efficient "Smart Bases," Naval Station Pascagoula is a virtually new, state-of-the-art base that is optimally sized and located to support the current, future, and homeland defense mission in the Gulf of Mexico. Naval Station Pascagoula is the only facility on the Gulf Coast that effectively leverages proximate infrastructure in the community, industry, and other military installations to provide a full range of mission and family services with no additional overhead cost to the Navy.

Memorandum Regarding Substantial Deviation from BRAC Law of Department of Defense
Recommendation to Close Naval Station Pascagoula

Introduction

The Department of Defense's (DoD) recommendation regarding closure of Pascagoula Naval Station is in contravention of the BRAC statute, and should not be ratified. The Department's analysis inappropriately relied on transformational factors and priorities other than section 2913(f) selection criteria, failing to consider current missions, future missions, and homeland defense missions. Specifically, the 2005 Navy's data call was substantially similar that that utilized for the 1995 BRAC assessment, reflecting an unreasonable bias towards eliminating all homeports in the Gulf of Mexico by consolidating surface/subsurface operations in Fleet concentration areas. However, unlike the 1995 BRAC round, the Navy's bias towards fleet concentration was not mitigated in their 2005 analysis by the Strategic Dispersal Homeport Program which mandates that Naval homeports be dispersed from main fleet concentration areas, implementing the militarily sound principles of dispersal, battlegroup integrity, and increasing the naval presence in the geographic flanks.

Further, DoD contravened section 2913(e) of the BRAC law by failing to evaluate the cost efficiency of Pascagoula Naval Station at supporting and delivering littoral and homeland defense capability in the Gulf of Mexico. In addition, DoD failed to evaluate the value, efficiency, synergy, and surge capability afforded by robust berthing, industrial, and training capability of Ingalls shipyard which is immediately proximate to the Naval Station.

I. The Recommendation

Close Naval Station Pascagoula, MS. Relocate its ships along with dedicated personnel, equipment, and support to Naval Station Mayport, FL; Relocate the ship intermediate repair function to Shore Intermediate Maintenance Activity Mayport, Florida. The justification for this recommendation is:

Reduce excess berthing capacity while allowing for consolidation of surface ships in a Fleet concentration area. Sufficient capacity and Fleet dispersal is maintained with East Coast surface Fleet homeports of Naval Station Norfolk and Naval Station Mayport, FL. Gulf Coast presence can be achieved as needed with available Navy ports and Naval Air Station Key West, FL and Naval Air Station Pensacola, FL.

II. DoD's Recommendation Regarding Naval Station Pascagoula Substantially Deviates from Requirements of the BRAC Law

1. DoD relied on transformational factors and priorities other than section 2913(f) selection criteria.

The military value criteria of section 2913(f) requires that the Department consider: (1) The current and future mission capabilities and the impact on operational readiness of the total force; and (2) The availability and condition of land, facilities, and associated airspace (including training areas suitable for maneuver by ground, naval, or air forces throughout a

diversity of climate and terrain areas and staging areas for the use of the Armed Forces in homeland defense missions) at both existing and potential receiving locations.

- a. The Navy did not perform any analysis regarding the cost/benefit analysis of abandoning the “Strategic Dispersal Homeport Program,” a current mission requirement that was codified in 1986, and was supported in subsequent budgets for Naval Station Pascagoula as recent as the President’s Budget request for 2005.

The Navy and Congress significantly debated the “Strategic Dispersal Homeport Program” between 1982 and 1985, and the Congress approved the program in 1986 in the Fiscal Year 1987 National Defense Authorization Act and respective Appropriations Act for that year. The Navy’s rationale for the program, revalidated when the Navy and Congress reconsidered the Program in 1991, was as follows:

- i. Avoid Overcrowding - Dispersing the ships to the 13 selected sites was necessary to avoid overcrowding at the Navy’s homeports as the Navy grew towards the 600-ship goal (CRS Report IB90077).

While there is a relationship between size of the Navy and the infrastructure that supports it, the decline in the quantity of ships from that era (approximately 600) to today’s projected level of 325 – 375 does not necessarily mean that overcrowding is not an issue. Rather, since the Navy continued to support military construction at dispersed homeports as recent as Fiscal Year 2005, it is arguable that fleet concentration areas have the space but not the right or sufficient infrastructure to support ships that would be relocated from the dispersed homeports.

- ii. Reduce Vulnerability to Pearl Harbor-like Attack – This argument focused on the threat of torpedo or cruise missile attacks from new, quieter Soviet submarines operating near U.S. ports, or a mining campaign by either those submarines or Soviet-bloc merchant ships (CRS Report IB90077).

While it is arguable that the Soviet threat has been significantly reduced, it is clear that a robust submarine threat from China is emerging. In addition, worldwide proliferation of highly capable and stealthy diesel submarines exacerbates the vulnerability of critical assets in the Gulf of Mexico.

In this regard, the Commission is strongly encouraged to receive a classified threat and vulnerability assessment of Fleet concentration areas to better understand the emerging threats from traditional and asymmetric opponents.

- iii. Move Closer to Operating Areas – Dispersing ships would move some of the Navy’s surface ships closer to operating areas in the northern North Atlantic, the North and Northwest Pacific, and the Caribbean. To the extent that the focus of US defense policy shifts away from the scenario of a war with the Soviets, and toward non-Soviet, non-NATO military contingencies, the importance of being closer to the Northern North Atlantic and the North and Northwest Pacific would appear to be reduced, while the importance of being close to the Caribbean would appear to be strengthened. (CRS Report IB90077).

Movement of Pascagoula based ships to Norfolk and Mayport clearly relocates critical Navy assets away from the Caribbean. But even more troubling is that DoD's BRAC recommendations move ships significantly further away from the newest and highest priority operating area - homeland defense in the Gulf of Mexico.

- iv. Improve Training and Recruiting – Dispersing ships would give the Navy better access to more diverse training environments (CRS Report IB90077).

Since implementing the Strategic Dispersal Homeport Program in 1986, the Navy has predominately consolidated training at Great Lakes Training Center and Fleet Concentration Areas. However, the Navy has not consolidated all training.

Specifically, Ingalls shipyard in Pascagoula still performs specialized and familiarization training for most surface combatants and all amphibious ships. In addition, specialized training is provided by the 2nd Air Force at Keesler Air Force Base and Naval Education and Training Command (NETC) at Pensacola. Riverine training and small boat maintenance training is also conducted proximate to Pascagoula by Special Operations Command and Naval Small Craft Training School located in the Stennis Space Center Buffer Zone.

- v. Expand Infrastructure and Preserve Industrial Base – Dispersing surface ships would enhance the Navy's overall readiness for a major war by expanding its infrastructure and preserving the Navy's supporting industrial base (CRS Report IB90077).

Naval Station Pascagoula is immediately proximate (across the channel) from Ingalls shipyard where 50% of surface combatants and all Navy amphibious ships are designed and constructed. The Naval base is uniquely situated to leverage and preserve this core national industrial capability and further reduce operating costs by relying on the hundreds of subcontractors proximate to Ingalls that support in-service ships.

As recently demonstrated during the repair of USS COLE, there is a natural synergy between the Naval Station's Ship Intermediate Maintenance Activity and Ingalls with regard to maintenance and repair of in-service ships. The ships homeported at the Naval Station, particularly the "Smart Ship" USS TICONDEROGA, leveraged the latest technology from Ingalls to reduce manning and decrease ship operating costs.

To be clear – this memorandum does not dispute that the BRAC Law affords flexibility to consider closure of homeports. To be certain, Section 2911 of the FY1991 defense authorization bill as reported by the House-Senate conference committee (H.R. 4739) inserts "homeport facility for any ship," in to 10 U.S.C. 2687(e) (1), making it clear that ship home ports are included under 10 U.S.C. 2687, which outlines procedures and conditions for carrying out military base closures and realignments (*Congressional Record*, daily ed., Oct 23, 1990).

Rather, it is asserted that the Navy contravened the military value criteria of section 2913(f) by omitting any analysis regarding abandonment of the Strategic Dispersal

Homeport Program, and the impact of eliminating strategically dispersed homeports on the operational readiness of the total force.

- b. The Navy's military value criteria for the 2005 BRAC round is substantially similar to the military value criteria utilized for the 1995 BRAC round, and does not appropriately consider "future mission capabilities."

Navy Infrastructure Evaluation Group (IEG) minutes of 25 March 2004 reflect deliberations regarding the establishment of criteria and weighting for the surface/subsurface operations review. The 5 "surface/subsurface attributes" approved by the group included operational infrastructure, operational training, port characteristics, environmental encroachment and personnel support.

Upon examination of *Attachment (1)*, it is evident that the data call regarding the surface/subsurface attributes are highly biased towards facility size, proximity to capabilities uniquely found in Fleet concentration areas, and nuclear ship/submarine berthing, operation, and maintenance. Specifically, 52% of "Operational Infrastructure" questions are biased against smaller installations; 42% of "Operational Training" questions indicate a similar bias; and 30% of questions regarding "Port Characteristics" also reflect this bias.

The Navy's military criteria ignore future mission capabilities of the Littoral Combat Ship (LCS), solely relying on the "Cruiser Equivalent" as the principal metric. As noted by *Attachment (2)*, the primary factors for consideration include linear feet of berthing, pier and slip width, shore power, and hotel/support services. By using these criteria, the Navy disadvantages Naval Station Pascagoula by ignoring the base's cost and mission efficiency of supporting smaller future ships such as the LCS and future frigates.

By example, a primary enabler of LCS is the Fire Scout Unmanned Aerial Vehicle. Pascagoula Naval Station received no credit for being proximate to the Fire Scout assembly plant, which will support maintenance, repair and training for the vehicles. Nor did the Naval Station receive credit for being proximate to multiple LCS subcontractors that are located in Pascagoula (e.g., Lockheed, Raytheon, Bofors).

- c. The Navy's military value criteria utilized for the 2005 BRAC round does not appropriately consider "homeland defense missions."

The only reference to "homeland defense" in the Navy's data call is the question (*Attachment (1)*), question SEA -15), "Does your activity perform any of the following missions? (y/n) – Homeland Defense? (y/n)"

On its face, question SEA-15 only reflects the declaration of "Homeland Defense" missions that are currently performed, and makes no attempt to consider or value prospective homeland defense mission requirements.

Further, there is no evidence that the Navy's data call for surface/subsurface operations, or subsequent deliberations by the Navy IEG ever reflected specific homeland defense

and homeland security recommendations articulated by the North American Aerospace Defense Command (NORAD) and United States Northern Command (NORTHCOM) in their letter of 29 Oct 2004 (*Attachment (3)*).

In particular, the NORTHCOM/NORAD letter urges that:

“DoD BRAC recommendations should consider homeland defense and homeland security requirements identified in the emerging DoD Strategy for Homeland Defense and Civil Support. We want to ensure that impacts to our missions and possible unintended consequences to our capability are taken into account in any BRAC adjustments.”

Specific NORAD/NORTHCOM recommendations of 29 Oct 2004 that affect current and prospective missions of Naval Station Pascagoula include:

- i. Providing a secure operating environment for focused strategic, asymmetric, counterterrorism, counterintelligence and law enforcement sensitive intelligence and information fusion efforts in support of homeland defense, maritime analysis, and civil support operations. The “Joint Fires Network Unit” (also known as LSS and DCGS-N) located at Naval Station Pascagoula performs this function.
- ii. Department of Homeland Security’s provision of homeland security. The USCG presence at the Naval Station directly supports this mission.
- iii. Quick reaction force, rapid reaction force, and JTF-CS responses. This is a mission that LCS could execute from Naval Station Pascagoula to protect high value shipping lanes, ports, oil/gas reserves, and oil production in the gulf. Currently, USCG has asserted that they can only protect 12 of over 4000 oil platforms in the Gulf of Mexico for a period of 8 days.
- iv. Homeland defense-related intelligence, surveillance, and reconnaissance, to include over the horizon radar sites. The “Joint Fires Network Unit” located at Naval Station Pascagoula performs this function.

With regard to further definition of the prospective homeland defense mission in the Gulf, *Attachment (4)*, presents the unclassified testimony of FBI Special Agent Jarboe before the US House of Representatives, Subcommittee on National Security, Veterans Affairs and International Relations. Of particular note, Agent Jarboe states:

“The high volume of maritime traffic in the large ports, both commercial and noncommercial, provide ample cover for the movement of illicit goods. Eleven of the top 15 ports in trade volume in the United States and 6 of the top 10 ports in volume of foreign trade are located on the Gulf of Mexico. It is a concern that terrorist organizations could take advantage of well-established, well-known criminal patterns to further their own objectives, such as concealing money laundering operations, transport and distribution of explosives and/or hazardous materials, or illegal entry into the United States.”

Agent Jarboe's comments are very unique in that they unclassified; the Commission is strongly encouraged to receive a classified assessment regarding emergent threats, vulnerability, and prospective response in the Gulf of Mexico.

By *Attachment (5)*, pertinent statistics are presented regarding the diversity and extent of vulnerable assets in the Gulf of Mexico, for which the homeland defense mission requirements are still under development. Of particular note, the Gulf contains 4021 energy production platforms, accounting for 93% of US offshore oil production and approximately 98% of US gas production. Further, as noted previously, the Gulf Coast includes the Nation's busiest ports, and even one terrorist attack would seriously injure our nation's economy.

2. DoD contravened section 2913(e) of the BRAC law by failing to evaluate the cost efficiency of Pascagoula Naval Station of supporting future missions in the Gulf of Mexico, including homeland defense.
 - a. The Navy erred in not evaluating any scenarios that considered the merit and cost of supporting future missions at the Pascagoula Naval Station in lieu of Key West and Pensacola.

The Infrastructure Steering Group briefing of 8 October 2004, "Department of the Navy Strategy/Initial Scenarios," includes only 1 scenario: (1) Close NAVSTA Pascagoula and relocate ships to NAVSTA Norfolk or NAVSTA Mayport; consolidate shore intermediate maintenance activity with SIMA Norfolk or SIMA Mayport.

The justification for this recommendation is that money would be saved by closing the installation (largely from elimination of military and civilian billets); NAS Key West and Pensacola allow for presence in the Gulf (assuming NAVSTA Ingleside is closed); and Mayport better supports ships' mission in support of JIATF south Operations.

There is no evidence that the Navy considered the cost efficiency of realigning current and future missions to Naval Station Pascagoula – 1 of only 2 "Smart Bases." In addition, it is not evident that the Navy considered the facilities cost of upgrading and/or building-new infrastructure at Key West or Pensacola to allow for continuation of a Gulf Coast presence.

By the Navy's own data, Naval Air Station Key West has no capability to handle ordnance pierside. Further, ship support capability at Naval Air Station Pensacola is extremely limited due to the age and condition of pier facilities, and limited pier services.

- b. The Navy erred in not evaluating the merit and cost of continuing and growing presence at Naval Station Pascagoula to address homeland defense requirements in the Gulf of Mexico, particularly with regard to homeporting LCS.

It is troubling that the Navy has performed no analysis regarding the cost/benefit of its de facto decision to base LCS Flight 1 ships at Little Creek, as compared to other locations, including Naval Station Pascagoula.

LCS was specifically designed to perform a full range of littoral homeland defense missions to address emerging threats in coastal waters, such as the Gulf of Mexico. Emphasizing this point, Assistant Secretary of the Navy (Research, Development, and Acquisition) John Young recently noted in an interview with *Defense Daily*, published August 9, 2005:

“The LCS was pushed forward rapidly because it is needed to meet threats in coastal waters, where much of the fighting in the 21st century will occur.”

“The three chief LCS missions are hunting enemy submarines, detecting and neutralizing underwater mines, and intercepting and destroying tiny “swarm” boats piloted by terrorists.”

As the 1997 Smart Base demonstrator, it is arguable that Naval Station Pascagoula is tailor made to homeport an LCS squadron. The base is highly efficient, reflecting state of the art and optimally-sized facilities for ships and crew, with minimal manning. In addition, the Naval Station reflects the “city base” concept, effectively leveraging existing infrastructure in the community, industry, and other military installations to provide a full range of mission and family services with no additional overhead cost to the Navy.

- c. The Navy erred in not evaluating the merit and cost of enclaving the “Joint Fires Network Unit,” and only proposes to relocate the system to the Mayport Area.

As an element of Navy Force Net, the Joint Fires Network was specifically located at Naval Station Pascagoula to provide a secure operating environment for focused strategic, asymmetric, counterterrorism, counterintelligence and information fusion efforts in support of homeland defense, maritime analysis, and civil support operations.

The Navy’s analysis did not consider that the Joint Fires Network was purposefully located and centered on the Gulf Coast to support missions of Navy, USCG, and other agencies in the Gulf of Mexico. Further, the Navy did not assess the cost of conducting this critical mission in the Gulf of Mexico from an unspecified location in Mayport, FL.

The Commission should be aware that the Maritime Domain Awareness Asymmetric Warfare Initiative, to be conducted 15-19 August 2005, was designed to demonstrate and refine system capabilities at Pascagoula. Participants include the Navy, Coast Guard, NORTHCOM, FBI, other federal agencies, first responders, and the Mississippi Civil Support Team.

The Commission is strongly urged to receive a classified briefing regarding the Joint Fires Network, including the associated investment for highly secure facilities.

3. DoD contravened section 2913(e) of the BRAC law by failing to assess the value and efficiency of surge capability afforded by robust berthing, industrial, and training capability of Ingalls shipyard which is immediately proximate to the Naval Station.
 - a. The Navy erred in failing to evaluate the cost, merit, and strategic surge value of being located across the channel from Northrop Grumman Ship Systems – Ingalls Shipyard.

Notwithstanding Northrop Grumman – Newport News shipyard, Ingalls is the larger of the 2 remaining shipyards in the United States that builds complex surface ships for the U.S. Navy. In the aggregate, Ingalls has the industrial and waterfront capability to simultaneously build and berth over 15 large surface ships.

In calendar year 2000, Ingalls, with weapons offload and other support provided by Naval Station Pascagoula, repaired the USS COLE, following the US Navy’s policy to repair significantly damaged ships at the ship’s original building-yard. Ingalls possesses the only US Navy certified drydock in the Gulf of Mexico, and is only 1 of 2 docks east of the Mississippi that can drydock a large deck amphibious ship (LHD or LHA, 900 feet in length, 42000+ tons).

Ingalls offers robust surge capability for the Navy to berth all types of surface ships, excluding aircraft carriers. And, in view of Ingalls former role as builder of nuclear submarines, it is arguable that submarines could at least be berthed at Ingalls if surge requirements warranted.

It is not evident that the Navy assessed the value and efficiency of using Ingalls as proximate surge capability for Naval Station Pascagoula. To the contrary, the military value criteria (*Attachment (1)*), SEA 1 through SEA 9, give preference for CVN capable facilities, nuclear capable shipyards, homeporting of SSBNs, and pierside capability resident only at the Naval Station.

In the aggregate, the Navy afforded little or no military value for world class berthing, docking, repair, training, and maintenance capability that is a mere 100 yards from Naval Station Pascagoula.

III. Conclusion

The nation requires a permanent Naval presence in the Gulf of Mexico to protect over 90% of US offshore oil and gas production, 30% of our gas and oil reserves, more than 50% of our busiest ports, and critical defense infrastructure that builds and supports more than 50% of our Naval Fleet.

Naval Station Pascagoula is the Navy’s “Smart Base,” the most highly efficient, appropriately sized, cost effective, and geographically proximate base from which the Navy should execute current missions, future missions, and homeland defense in the Gulf of Mexico.

DoD substantially deviated from the BRAC statute in developing the recommendation to close Naval Station Pascagoula by its failure to consider and analyze the implications of abandoning the Strategic Dispersal Homeport Program, future LCS missions in the Gulf of Mexico, and Homeland Defense missions articulated by NORAD and NORTHCOM.

DoD substantially deviated from the BRAC statute by failing to fully assess the cost of maintaining a permanent surface ship presence in the Gulf from remote locations at Mayport and Norfolk.

DoD substantially deviated from the BRAC statute by failing to fully assess the cost of maintaining a permanent surface ship presence in the Gulf of Mexico from Naval Air Station Pensacola and Naval Air Station Key West.

DoD substantially deviated from the BRAC statute by failing to fully to fully assess the cost and readiness implications of losing synergy and robust surge capability afforded by the proximity of the Naval Station to Ingalls shipyard.

In the aggregate, these substantial deviations from the BRAC statute are sufficient and compelling, and serve as a valid basis upon which the BRAC Commission may set-aside DoD's recommendation to close Naval Station Pascagoula.

Surface / Subsurface Operations
Military Value Evaluation Questions

Attribute: Operational Infrastructure

Component: Ship Berthing

~~SEA-1. Relative ability to berth multiple naval combatants.~~

SEA-1. What is the maximum combined CG Equivalent (CGE) capacity for your activity's piers / wharves? (CGEs)

Source: *Capacity Data Call*

Based on largest combined CGE value received from field, analyst will apply a function for zero credit to a maximum credit corresponding to this value.

~~SEA-2. Relative number of CVNs that can be berthed in cold iron status.~~

SEA-2. How many CVNs can you berth at your activity in cold iron status? (Count)

Source: *Capacity Data Call*

Based on largest CVN berthing value received from field, analyst will apply a function for zero credit to a maximum credit corresponding to this value.

~~SEA-3. Infrastructure supports homeporting of SSBNs.~~

SEA-3. Does the installation have the ability to homeport SSBNs to include the ability to meet weapons stowage, transportation, maintenance, and handling requirements?

Source: *Data Call II*

Binary value

~~SEA-4. Relative condition of the piers~~

SEA-4. What is the combined total linear feet of berthing for your piers / wharves in the following categories:

Adequate Linear Feet	Substandard Linear Feet	Inadequate Linear Feet

Source: *Capacity Data Call*

Based on largest Adequate and Substandard (with .5 factor) Linear Feet value received from field, analyst will apply a function for zero credit to a maximum credit corresponding to this value.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Operational Infrastructure

Component: *Ship Berthing (continued)*

SEA-5. Relative value of pier modernization.

SEA-5. What is the combined total linear feet of berthing for your piers / wharves which completed construction on or after 1 Jan 1990? (Amplification: Construction includes major overhauls which significantly advanced the functionality of the piers commensurate with modern pier construction.)

Source: Data Call II

Based on largest value received from field, analyst will apply a function for zero credit to a maximum credit corresponding to this value.

SEA-6. Relative value of pier Internet Protocol (IP) infrastructure.

SEA-6. What is the combined total linear feet of berthing for your piers / wharves which are configured with Internet Protocol (IP) connectivity?

Based on largest value received from field, analyst will apply a function for zero credit to a maximum credit corresponding to this value.

Source: Data Call II

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Operational Infrastructure

Component: *Ship Maintenance Capability*

~~SEA-7a-b. Relative value of the on-base IM facility in terms of capability and capacity.~~

SEA-7a. (0.6) What is the Maximum Capacity Index for Ship Maintenance for your on-base IM facilities (DLH) divided by the maximum combined CG Equivalent (CGE) capacity for your activity's piers / wharves.

Source: Capacity Data Call (2 values)

Ratio of DLH to CGE to normalize capacity to ships berthing ability. Analyst will apply function for zero to maximum credit.

SEA-7b. (0.2) Is your nearest IM facility nuclear capable? (y/n)

Source: Capacity Data Call

Binary value.

SEA-7c. (0.2) What is the Maximum Capacity Index for Ship Maintenance for your on-base IM facilities (DLH).

Source: Capacity Data Call (2 values)

Analyst will apply function for zero to maximum credit.

~~SEA-8a-b. Relative value of the available drydocks in the harbor complex.~~

SEA-8a. (0.25) How many NAVSEA certified floating drydocks are in your natural harbor complex? (Count)

Source: Data Call II

Based on largest value received from field, analyst will apply a function for zero credit to a maximum credit corresponding to this value.

SEA-8b. (0.75) How many NAVSEA certified graving drydocks are in your natural harbor complex? (Count)

Source: Data Call II

Based on largest value received from field, analyst will apply a function for zero credit to a maximum credit corresponding to this value.

~~SEA-9. Relative value of proximity to the nearest nuclear capable shipyard.~~

SEA-9. What is the distance (safe navigation route) from your pier / wharf complex to the nearest nuclear capable shipyard? (Distance: nautical miles)

Source: Data Call II

Based responses received, analyst will apply a function for zero credit to a maximum credit corresponding to this value.

Surface / Subsurface Operations-Military Value Evaluation Questions

SEA-10. Degaussing range available in the natural harbor complex.

SEA-10. Is there a degaussing range in the natural harbor complex? (y/n)

Source: Data Call II

Binary value.

Attribute: Operational Infrastructure

Component: Ship Maintenance Capability (continued)

SEA-11. Deperming facility available in the natural harbor complex.

SEA-11. Is there a deperming facility in the natural harbor complex? (y/n)

Source: Data Call II

Binary value.

SEA-12. Relative pier-side capable crane lift availability.

SEA-12. What is the maximum lift tonnage for any individual pier-side capable crane at your activity? (Tonnage)

Source: Capacity Data Call

Based on maximum tonnage received by the field , analyst will apply a function for zero credit to a maximum credit corresponding to this value.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: *Operational Infrastructure*

Component: *Specialized Security / Emergency Services*

~~SEA-13. Relative value of specialized security / emergency services capabilities:~~

SEA-13. Does the activity have specialized security / emergency service capabilities: (y/n)

Capability	Yes/No
Nuclear Weapons Security Requirements of Berthed SSBNs (0.25)	
Nuclear Weapons Handling (y/n) (0.25)	
Nuclear Weapons Radiological Accident Response (y/n) (0.25)	
Nuclear Reactor Radiological Accident Response (y/n) (0.25)	

Source: Data Call II

Binary values.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: **Operational Infrastructure**

Component: **Unique or Specialized Capabilities / Missions**

SEA-14. Relative value of unique capabilities or missions:

SEA-14. List and describe any unique capabilities or missions performed by your activity. Unique is defined as a capability or mission performed at no other location.

Capability/Mission	Description

Source: Data Call II

Based upon responses received, IEG will evaluate and assign credit.

SEA-15. Relative value of specialized capabilities or missions:

SEA-15. Does your activity perform any of the following missions?: (y/n)

Capability/Mission	Yes/No	Explanation/Description
Homeland Defense		
Strategic Deterrence Missions		
Special Warfare		
Surveillance / Drug Interdiction		
Mine Warfare		
Landing Craft Capability (displacement or non-displacement)		

Source: Data Call II

Based upon responses received, IEG will evaluate and assign credit.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Operational Infrastructure

Component: *Weapons Handling Capability*

~~SEA-16. Relative value of ordnance handling pier capacity for your waterfront piers/wharves.~~

SEA-16. What is the combined maximum ordnance handling pier capacity for your waterfront piers / wharves?
(Count) (Amplification: Maximum number of ships that can be moored to conduct ordnance handling evolutions at
the combined pier / wharf complex.)

Source: Capacity Data Call

Based on responses received, analyst will apply a function for zero credit to maximum credit.

~~SEA-17. Relative value of on-base ordnance storage capability and capacity.~~

SEA-17. What is the total of current and appropriated ordnance capacity (tons) divided by the maximum combined
CG Equivalent (CGE) capacity for your activity's piers / wharves?

Source: Capacity Data Call

*Ratio of tons over CG Equivalents. Based on responses received, analyst will apply a function for zero
credit to maximum credit.*

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Operational Infrastructure

Component: Operational Staff Facilities

SEA-18. Relative capacity of adequate administrative space

SEA-18. What is the total square footage of adequate administrative space at your activity divided by the maximum combined CG equivalent? (SQ FT)

Source: Capacity Data Call

Ratio of SQ FT to CG Equivalents. Based on responses received, analyst will apply a function for zero credit to a maximum credit corresponding to this value.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Operational Training

Component: Training Facilities

SEA-19. Relative value of proximity to the nearest shipboard firefighting training facility.

SEA-19. What is the distance to the nearest shipboard firefighting training facility? (Distance: miles)

Source: *Data Call II*

Based on responses received, analyst will apply a function for zero to maximum credit.

SEA-20. Relative value of proximity to the nearest damage control training facility.

SEA-20. What is the distance to the nearest damage control training facility? (Distance: miles)

Source: *Data Call II*

Based on responses received, analyst will apply a function for zero to maximum credit.

SEA-21. Relative value of proximity to the nearest submarine training facility.

SEA-21. What is the distance to the nearest submarine training facility? (Distance: miles)

Source: *Data Call II*

Based on responses received, analyst will apply a function for zero to maximum credit.

SEA-22. Relative value of unique training capabilities.

SEA-22. List any unique operational training facilities at your activity (defined as facility which exists at no other location).

Facility Title (text)	Specific Location (text)	Training Objective (text)

Source: *Capacity Data Call*

Based upon responses received, IEG will evaluate and assign credit.

SEA-23. Relative value of proximity to the nearest ship handling training facility.

SEA-23. What is the distance to the nearest ship handling training facility? (Distance: miles)

Source: *Data Call II*

Based on responses received, analyst will apply a function for zero to maximum credit.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Operational Training

Component: Training Facilities (continued)

SEA-24: Relative value of throughput for all local "C", "F", and other "pipeline" training schools.

SEA-24. What is the annual throughput for all "C", "F", and other pipeline training schools located within 50 miles of your activity?

Source: Capacity Data Call

Based on responses received, analyst will apply a function for zero credit to a maximum credit.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Operational Training

Component: OPAREAs / Ranges

SEA-25. Relative value of proximity to the nearest anti-air warfare range.

SEA-25. What is the transit distance (safe navigation route) to the nearest anti-air warfare range? (Distance: nautical miles)

Source: Data Call II

Based on responses received, analyst will apply a function for zero to maximum credit.

SEA-26. Relative value of proximity to the nearest naval gunnery qualification range.

SEA-26. What is the transit distance (safe navigation route) to the nearest naval gunnery qualification range? (Distance: nautical miles)

Source: Data Call II

Based on responses received, analyst will apply a function for zero to maximum credit.

SEA-27. Relative value of proximity to the nearest submarine operating area.

SEA-27. What is the transit distance (safe navigation route) to the nearest submarine operating area? (Distance: nautical miles)

Source: Data Call II

Based on responses received, analyst will apply a function for zero to maximum credit.

SEA-28. Relative value of proximity to the nearest mine warfare training area.

SEA-28. What is the transit distance (safe navigation route) to the nearest mine warfare training area? (Distance: nautical miles)

Source: Data Call II

Based on responses received, analyst will apply a function for zero to maximum credit.

SEA-29. Relative value of proximity to the nearest submarine training range.

SEA-29. What is the transit distance (safe navigation route) to the nearest submarine training range? (Distance: nautical miles)

Source: Data Call II

Based on responses received, analyst will apply a function for zero to maximum credit.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Operational Training

Component: *Small Arms Training*

~~SEA-30. Relative capability of the small arms range.~~

SEA-30. What is the maximum throughput of your activity's small arms range divided by the maximum combined CG Equivalent? (qualifications/year/CGE's)

Source: Capacity Data Call

Ratio of qualifications/year to CG Equivalents. Based on responses received, analyst will apply a function for zero credit to a maximum credit corresponding to this value.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Port Characteristics

Component: Operational Location

SEA-31: Relative value of the transit distance (safe navigation route) to sea.

SEA-31. What is the channel distance (safe navigation route) to sea? (Distance: nautical miles)

Source: Capacity Data Call

Based on responses received, analyst will apply a function for zero to maximum credit.

SEA-32: Relative value of the transit distance (safe navigation route) to the 50 fathom curve.

SEA-32. What is the transit distance (safe navigation route) to the 50 fathom curve? (Distance: nautical miles)

Source: Data Call II

Based on responses received, analyst will apply a function for zero to maximum credit.

SEA-33: Percent of the day the harbor channel allows CV/CVN transits.

SEA-33. What percent of the day (averaged for FY03) would your harbor channel allow CV/CVN transits? (%)

Source: Data Call II

Analyst will apply a function to answers from zero to 100 percent.

SEA-34a-b: Relative impact of local weather on operations.

SEA-34a. (0.8) In the table below, provide the percent of ship underways and arrivals delayed more than three hours due to weather.

	% Delay CY00	% Delay CY01	% Delay CY02	% Delay CY03
JAN				
FEB				
MAR				
APR				
MAY				
JUN				
JUL				
AUG				
SEP				
OCT				
NOV				
DEC				

Source: Data Call II

Based on responses received, analyst will apply a function for zero credit to a maximum credit.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Port Characteristics

Component: Operational Location (continued)

SEA-34b. (0.2) In the table below, provide the number of calendar days inport lost due to weather related emergency sorties.

	CY00	CY01	CY02	CY03
# of Days Lost				

Source: Data Call II

Based on maximum value received, analyst will apply a function for zero credit to a maximum credit corresponding to this value.

SEA-35: Relative value of proximity to the nearest weapons station

SEA-35. What is the transit distance (safe navigation route) to the nearest weapons station? (Distance: nautical miles)

Source: Data Call II

Based on responses received, analyst will apply a function for zero to maximum credit.

SEA-36: Relative value of proximity to the nearest Explosive Ordnance Detachment support

SEA-36. What is the distance to the nearest Explosive Ordnance Detachment support? (Distance: miles)

Source: Data Call II

Based on responses received, analyst will apply a function for zero to maximum credit.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: *Port Characteristics*

Component: *Strategic Location*

SEA-37: *Port location is of strategic military value.*

SEA-37. What is the geographic location of the installation?

Source: Capacity Data Call

IEG determines which locations are of strategic military value.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: *Port Characteristics*

Component: *Port Restrictions*

~~SEA-38: Relative impact of port/harbor restrictions on operations.~~

SEA-38. What percent of the week (averaged over FY03) was your harbor's operations limited due to dredging or other restrictions? (%)

Restriction	Percentage (%)
Dredging	
Other	

Source: Data Call II

Analyst will apply a function to answers from zero to 100 percent.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Port Characteristics

Component: Anti-Terrorism/Force Protection

SEA-39a-b. Relative value of buildings which meet structural criteria and/or perimeter standoff criteria?

SEA-39a. (0.4) What total square footage of your buildings comply with structural criteria (frame, walls, glazing, etc.) contained in DoD Minimum Antiterrorism Standards for Buildings (UFC 4-010-01)?

Source: Data Call II

Based on responses received, analyst will apply a function for zero credit to a maximum credit.

SEA-39b. (0.6) What total square footage of your buildings meet the minimum perimeter standoff distance distances as specified in DoD Minimum Antiterrorism Standards for Buildings (UFC 4-010-01)?

Source: Data Call II

Based on responses received, analyst will apply a function for zero credit to a maximum credit.

SEA-40. Adequate space available for Entry Control points to have vehicle search, holding areas, and rejection lanes.

SEA-40. Is adequate space available for all Entry Control Points (ECPs) to have vehicle search, holding areas, and rejection lanes as specified in UFC 4-010-01?

Source: Data Call II

Binary value.

SEA-41. Relative value of utility (government or commercial; electric or water) redundancy.

SEA-41. Is the installation supported by an electric or water utility (government or commercial) that is a single point source (no redundant capability)?

Source: Data Call II

Installation will receive 0.5 points for each listed utility that has redundancy.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Port Characteristics

Component: Locality Cost

SEA-42a-b. Relative value of the locality cost.

SEA-42a. (0.5) What is the GS Locality Pay percentage for your activity's geographical area? (%)

Source: Data Call II (Criterion 7)

Based on maximum value, analyst will apply a function for zero credit to a maximum credit corresponding to this value.

SEA-42b. (0.5) What is your host installation's Area Cost Factor (ACF) as described in the DoD Facilities Pricing Guide? (Number)

Source: Data Call II

Based on maximum value, analyst will apply a function for zero credit to a maximum credit corresponding to this value.

Attribute: Port Characteristics

Component: Supply and Storage

SEA-43. Relative value of proximity to the nearest Fleet and Industrial Supply Center.

SEA-43. What is the distance from your activity to the nearest Fleet and Industrial Supply Center? (Distance: miles)

Source: Data Call II

Based on responses received, analyst will apply a function for zero credit to a maximum credit.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Environment and Encroachment

Component: Dredging

ENV-1a-c. Relative value of known impediments to conducting dredging operations

ENV-1a. (1.0) Does your harbor/channel require dredging operations?

Source: Data Call II

Binary. If no, full credit is applied. If yes, ENV-1b-c. apply.

ENV-1b. (0.75) Is a dredge spoil site identified? If so what is the remaining capacity?

Source: Capacity Data Call

Based on percentage of capacity remaining, analyst will apply a function for zero credit to a maximum credit corresponding to this value.

ENV-1c. (0.25) Is dredging activity impacted because of the known or suspected presence of ordnance in the water?

Source: Capacity Data Call

Binary value.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Environment and Encroachment

Component: Land Constraints

ENV-2a-g. Relative value of land constraints at the installation and its outlying real property which restrict current operations.

ENV-2a. (0.2) Do electromagnetic radiation and/or emissions constrain operations?

Source: Capacity Data Call

Binary value. Credit is applied for a "no" response.

ENV-2b. (0.2) Are explosive safety waivers or exemptions in effect?

Source: Capacity Data Call

Binary value. Credit is applied for a "no" response.

ENV-2c. (0.2) Can existing Explosive Safety Quantity Distance (ESQD) arcs be expanded by 100 feet or more without encroaching on non-compatible areas and without requiring a special waiver?

Source: Capacity Data Call

Binary value.

ENV-2d. (0.1) Do any sites with high archeological potential, including sacred, Traditional Cultural Properties, or burial sites used by Native People, constrain current or future construction?

Source: Capacity Data Call

Binary value. Credit is applied for a "no" response.

ENV-2e. (0.1) Has the accommodation of the installation's missions been limited by existing or proposed activities of other military departments or other federal tribal state or local agencies being located on the installation, range or auxiliary field?

Source: Capacity Data Call

Binary value. Credit is applied for a "no" response.

ENV-2f. (0.1) Do wetlands result in restrictions on operations?

Source: Capacity Data Call

Binary value. Credit is applied for a "no" response.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Environment and Encroachment

Component: Land Constraints

ENV-2g. (0.1) Are there operational testing/training restrictions as a result of the presence of Threatened and Endangered Species (TES), candidate species, biological opinions or sensitive resource areas?

Source: Capacity Data Call

Binary credit. Credit is applied for a "no" response.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Environment and Encroachment

Component: Encroachment

ENV-3a-c. Relative value of external encroachments which restrict operations:

ENV-3a. (0.4) Have non-DoD parties (through developers, community organizations, etc.) formally requested transfer of DoD real property or proposed restrictions to operational procedures?

Source: Data Call II

Binary value. Credit is applied for a "no" response.

ENV-3b. (0.4) Are there hazardous waste contamination sites located off the installation that restrict or could restrict operations?

Source: Capacity Data Call

Binary value. Credit is applied for a "no" response.

ENV-3c. (0.2) Have noise abatement procedures been published for the installation, range or auxiliary field?

Source: Capacity Data Call

Binary value. Credit is applied for a "no" response.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Environment and Encroachment

Component: Environmental Costs

ENV-4: Relative value of the costs associated with conducting the installation's environmental program.

ENV-4. Excluding DERA funds, provide the average annual total cost of environmental fees, studies, permits, licenses, projects, etc., over the last 3 fiscal years (FY01-03). Provide the annual installation budget over this same period. Divide the environmental costs by the installation budget.

Source: Data Call II

Based on response received, analyst will apply a function for zero credit to a maximum credit.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: *Environment and Encroachment*

Component: *Waste Disposal*

ENV-5a-c *Relative value of the capacity to dispose of solid or hazardous waste*

ENV-5a. (0.4) Does the installation have a permitted hazardous waste Resource Conservation and Recovery (RCRA) Treatment, Storage or Disposal (TSD) facility? (0.2) If so, does the hazardous waste TSD facility permit allow acceptance of off-site waste? (0.2)

Source: Capacity Data Call

Two binary values.

ENV-5b. (0.4) If the installation has a permitted solid waste disposal facility, what is the remaining capacity?

Source: Capacity Data Call

Based upon maximum capacity remaining, analyst will apply a function for zero credit to a maximum credit corresponding to this value.

ENV-5c. (0.2) Does the installation have an interim or final RCRA Subpart X permit for operation of an open burning/open detonation facility? (0.1) If so, does the RCRA Subpart X permit allow acceptance of off-site waste (e.g. from other DoD facilities)? (0.1)

Source: Capacity Data Call

Two binary values.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Environment and Encroachment

Component: *Potable Water*

~~ENV-6a-b. Relative value of potable water resource constraints.~~

ENV-6a. (0.25) Can the existing water system/treatment facility provide 50% more water than current demand?

Source: Capacity Data Call

Binary value.

ENV-6b. (0.75) How many days during FY 1999-2003 were restrictions implemented that limited production or distribution?

Source: Capacity Data Call

Based on responses received, analyst will apply a function for zero credit to a maximum credit.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Environment and Encroachment

Component: Natural Resource Considerations

ENV-7a. c. Relative value of restrictions to in-water operations or testing/training activities conducted at the installation or at ranges that the installation manages due to environmental laws/regulations

ENV-7a. (0.4) Do current Endangered Species/Marine Mammal Protection Act restrictions affect shore or in-water operations or testing/training activities conducted at the installation or at a range that the installation manages?

Source: Capacity Data Call

Binary value. Credit is applied for a "no" response.

ENV-7b. (0.4) Does the existence of marine sanctuaries restrict operations, testing or training activities conducted on the installation or on ranges the installation manages?

Source: Capacity Data Call

Binary value. Credit is applied for a "no" response.

ENV-7c. (0.2) Has the presence of coral reefs, marine mammals, Essential Fish Habitat, Marine Protected Areas or other sensitive marine zones resulted in restrictions on operations, testing or training activities?

Source: Capacity Data Call

Binary value. Credit is applied for a "no" response.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Environment and Encroachment

Component: Air Quality

~~ENV-8a-g. Relative value of air quality control issues due to current or proposed regulations.~~

ENV-8a. (0.2) Have operations, testing or training been restricted as a result of air quality requirements?

Source: Capacity Data Call

Binary value. Credit is applied for a "no" response.

ENV-8b. (0.2) Has the installation been required to implement emission reduction procedures through special actions?

Source: Capacity Data Call

Binary value. Credit is applied for a "no" response.

ENV-8c. (0.1) Are there critical air quality regions within 100 statute miles of the installation that restrict operations?

Source: Capacity Data Call

Binary value. Credit is applied for a "no" response.

ENV-8d. (0.2) Is the installation, range, or auxiliary field located in an area currently designated non-attainment or maintenance for any criteria pollutant?

Source: Capacity Data Call

Binary value. Credit is applied for a "no" response.

ENV-8e. (0.1) Is the installation, range, or auxiliary field located in an area proposed to be designated non-attainment for the new 8-Hour ozone or the PM2.5 standard?

Source: Capacity Data Call

Binary value. Credit is applied for a "no" response.

ENV-8f. (0.1) Are emission credits owned by the installation or available for purchase in the area?

Source: Capacity Data Call

Binary value.

ENV-8g. (0.1) Do the Clean Air Act (CAA) operating permits have any unused capacity?

Source: Capacity Data Call

Binary value.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Personnel Support

Component: *Medical*

PS-1. Located within the medical catchment area of an in-patient military medical treatment facility.

PS-1. Is your activity within the medical catchment area of an in-patient military medical treatment facility?
(yes/no)

Source: Data Call II

Binary.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Personnel Support

Component: Housing

PS-2. Relative value of family housing availability, affordability and proximity.

PS-2a (0.25) What is the community rental vacancy rate?

Source: Data Call II (Criteria 7 question)

Based on responses received, analyst will apply a function for zero to maximum credit.

PS-2b. (0.25) What is the BAH (E-5 with dependents) for the locality as of 1 Jan 2004?

Source: Data Call II (Criteria 7 question)

Based on responses received, analyst will apply a function for zero to maximum credit.

PS-2c. (0.25) What was the average wait time (in months) for family housing, including Public Private Venture (PPV) units, at your installation as of 30 September 2003?

Avg Wait Time = $\frac{(\text{List}_1 \text{ Wait Time} \times \text{List}_1 \text{ Units}) + (\text{List}_2 \text{ Wait Time} \times \text{List}_2 \text{ Units}) + \dots}{\text{Total Housing Units}}$

Source: Data Call II

Based on responses received, analyst will apply a function for zero to maximum credit.

PS-2d. (0.25) What is the average commute time for those living off base (source: Census Bureau)? (Time: minutes)

Source: Data Call II

Based on responses received, analyst will apply a function for zero to maximum credit.

PS-3. Relative availability of unaccompanied and transient housing.

PS-3a. (0.25) What is the total number of adequate Bachelor Quarters (combined officer and enlisted; both current and budgeted) at your installation divided by the total military population as of 30 Sep 2003?

Source: Capacity Data Call

Ratio of number of rooms per active duty population. Based on responses received, analyst will apply a function for zero to maximum credit.

PS-3b. (0.75) What was the total number of non availabilities issued over the past five years (1999-2003) divided by the total number of transient rooms as of 30 Sept. 2003 at your installation?

Source: Capacity Data Call

Ratio of number of non-availabilities per total number of transient rooms. Based on responses received, analyst will apply a function for zero to maximum credit.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Personnel Support

Component: Non-Military Education

PS-4: Relative value of dependent primary and secondary education opportunities in the local community.

PS-4a. (0.4) What was the average SAT/ACT score for high school students in your community last testing year? (numeric)

Source: Data Call II (Criterion 7)

Based on responses received, analyst will apply a function for zero credit to a maximum credit.

PS-4b. (0.3) What is your community's student/teacher ratio? (Amplification: Local Community is defined as the Military Housing Area (MHA)).

Source: Data Call II (Criterion 7)

Based on responses received, analyst will apply a function for zero credit to a maximum credit.

PS-4c. (0.3) What percent of classroom teachers in your community (MHA) are certified in their subject/core area? (%)

Source: Data Call II (Criterion 7)

Analyst will apply a function to answers from zero to 100 percent.

PS-5: Relative availability of dependent and member post-secondary education in the local community.

PS-5a. (0.4) Does your state offer in-state tuition for higher education for military members/military family members? (yes/no)

Source: Data Call II (Criterion 7)

Binary value.

PS-5b. (0.2) How many vocational/technical schools are available off base in your community (MHA)? (count)

Source: Data Call II (Criterion 7)

Based on responses received, analyst will apply a function for zero credit to a maximum credit.

PS-5c. (0.4) How many undergraduate or graduate colleges/universities are available off-base in your community (MHA)? (count)

Source: Data Call II (Criterion 7)

Based on responses received, analyst will apply a function for zero credit to a maximum credit.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Personnel Support

Component: Employment

PS-6. Relative opportunity for dependent/off-duty employment.

PS-6a. (0.5) What was the average number of persons unemployed as a percent of the civilian labor force, seasonally adjusted from 1995-2003? (%)

Source: Data Call II (Criterion 7)

Based on responses received, analyst will apply a function for zero credit to a maximum credit.

PS-6b. (0.5) What was the percentage change in job growth from 1995-2003? (%)

Source: Data Call II (Criterion 7)

Based on responses received, analyst will apply a function for zero credit to a maximum credit.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Personnel Support

Component: Fleet and Family Services

PS-7: Relative availability of base services

PS-7. Which Support Services facilities are located at your installation? (y/n)

<u>FACILITY</u>	<u>Available (yes/no)</u>	<u>Value</u>
Exchange		0.3
Commissary		0.3
Package Store		0.1
Family Service Center		0.1
Chapel		0.1
FSC Classroom/Auditorium		0.1

Source: *Capacity Data Call*

Binary values.

PS-8a-c: Relative availability of child care support

PS-8a. (0.5) What is the average wait to enroll (in days) for on-base child care? (Count: days)

Source: *Data Call II*

Based on responses received, analyst will apply a function for zero credit to a maximum credit.

PS-8b. (0.5) How many licensed and/or accredited child care centers do you have in your community (MHA)?

Source: *Data Call II (Criterion 7)*

Based on responses received, analyst will apply a function for zero credit to a maximum credit.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Personnel Support

Component: MWR

PS-9. Relative availability of MWR facilities

PS-9. Which MWR facilities are located at your installation? (y/n)

FACILITY	Available (yes/no)	Value
Gymnasium		0.1
Fitness Center		0.1
Pool (indoor)		0.1
Pool (outdoor)		0.1
Golf Course		0.1
Youth Center		0.1
Enlisted Club		0.1
Officer Club		0.1
Softball Fld		0.02
Swimming Ponds		0.02
Library		0.01
Theater		0.01
ITT		0.01
Museum/Memorial		0.01
Wood Hobby		0.01
Bowling		0.01
Beach		0.01
Tennis CT		0.01
Volleyball CT (outdoor)		0.01
Basketball CT (outdoor)		0.01
Racquetball CT		0.01
Driving Range		0.01
Marina		0.01
Stables		0.01
Football Fld		0.01
Soccer Fld		0.01

Source: Data Call II

Binary value.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Personnel Support

Component: Follow-on Tour Opportunities

PS-10. Relative opportunity for follow-on tour in the homeport

PS-10. For the top five sea intensive ratings in the principle warfare community your base supports, provide the following: (Text: Counts)

Rating	# of Sea Billets in Local Area	#of Shore Billets in Local Area

Source: Data Call II

Based on responses received, analyst will apply a function for zero credit to a maximum credit.

Surface / Subsurface Operations-Military Value Evaluation Questions

Attribute: Personnel Support

Component: Metropolitan Area Characteristics

PS-11: Relative proximity to a population center/city that has a population greater than 100,000.

PS-11. What is the distance in miles to the nearest population center/city that has a population greater than 100,000?

Source: Data Call II (Criterion 7)

Based on responses received, analyst will apply a function for zero credit to a maximum credit.

PS-12: Relative proximity to the nearest commercial airport that offers regularly scheduled service by a major airline carrier.

PS-12. What is the distance in miles to the nearest commercial airport that offers regularly scheduled service by a major airline carrier?

Source: Data Call II (Criterion 7)

Based on responses received, analyst will apply a function for zero credit to a maximum credit.

PS-13: Relative local crime rate.

PS-13. What is the FBI Crime Index for your activity's location (MHA)? (source: FBI Crime Index 2002; <http://www.fbi.gov/ucr/ucr.htm>) (Numeric)

Source: Data Call II (Criterion 7)

Based on responses received, analyst will apply a function for zero credit to a maximum credit.



Surface/Subsurface Ops

- **Principle Metric – The Cruiser Equivalent (CG-E)**
 - “The pier space, power, dredge depth and other resource requirements to berth a CG-47 class ship.”
 - **Primary Ship Berthing Factors**
 - Linear Feet of Berthing
 - Pier and Slip Width
 - Other hotel/support services (Steam, Potable Water, CHT, etc.)
 - Normalized by the use of the Cruiser Equivalent (CG-E)
 - **Other Factors**
 - Normal Pier Loading and Max Capacity
 - Maintenance Support (IMAs, Drydocks)
 - Ordnance Handling
 - Non-Availability due to Pier Maintenance/Slip Dredging
 - **Need to determine percent inport paradigm based on ship type**
 - Based on historical loading?
 - Impact of Fleet Response Plan?



**NORTH AMERICAN AEROSPACE DEFENSE COMMAND
AND
UNITED STATES NORTHERN COMMAND**



General Ralph E. Eberhart
Commander, NORAD and USNORTHCOM
250 Vandenberg Street, Suite B016
Peterson AFB CO 80914-3801

OCT 29 2004

General Richard B. Myers
Chairman, Joint Chiefs of Staff
9999 Joint Chiefs of Staff Pentagon
Washington DC 20318-9999

Dear Dick

We believe that DoD BRAC recommendations should consider homeland defense and homeland security requirements identified in the emerging DoD Strategy for Homeland Defense and Civil Support. We want to ensure that impacts to our missions and possible unintended consequences to our capabilities are taken into account in any BRAC adjustments. An initial list of NORAD-USNORTHCOM considerations is attached in order to help identify BRAC changes that may be problematic.

We request the opportunity to work with the DoD BRAC team to ensure that homeland defense and homeland security missions receive appropriate attention in BRAC-recommended adjustments and scenario development. We would also like to provide a Commander's assessment of the final BRAC proposal prior to SECDEF decision.

Thank you for your consideration of these requests. We look forward to working with you and the Services to reconfigure our current infrastructure in order to maximize warfighting capability and efficiency without generating undue risk to our operations in defense of the homeland.

Sincerely

RALPH E. EBERHART
General, USAF

Attachment:
Point Paper, BRAC Considerations for NORAD and USNORTHCOM

POINT PAPER

ON

BRAC CONSIDERATIONS FOR NORAD AND USNORTHCOM

- The following considerations reflect an initial analysis of NORAD and USNORTHCOM critical capabilities to assist the BRAC process in making informed recommendations.
- NORAD and USNORTHCOM are prepared to work with the appropriate BRAC teams to develop more defined metrics
- NORAD and USNORTHCOM require installations that support:
 - Air patrols in support of Operation Noble Eagle (N/J3)
 - Ground-based midcourse missile defense, to include missile interceptor assets and associated radar locations (NC/J3)
 - Maritime homeland defense to include maritime patrol aircraft--affects on collocated US Coast Guard Stations must be considered (NC/J3 and NC/J5)
 - Aerospace warning, aerospace control, aerospace defense, Integrated Tactical Warning/Attack Assessment (ITW/AA), and integrated air defense of the National Capital Region (N/J3 and N-NC/J6)
 - CBRNE consequence management response forces, including the deployment of the Joint Task Force Civil Support (JTF-CS) initial entry force (NC/J3, N-NC/J4 and JTF-CS)
 - Homeland defense-related intelligence, surveillance, and reconnaissance, to include over the horizon radar sites (N-NC/J2)
 - Quick reaction force, rapid reaction force, and JTF-CS responses (NC/J3 and N-NC/J4)
 - The deployment of Standing Joint Forces Headquarters-North for operations in the USNORTHCOM AOR (N-NC/J4 and SJFHQ-N)
 - Continuity of operations, and support provision of homeland defense command and control functions (N-NC/J2, NC/J3 and N-NC/J6)
 - Key C4ISR communications nodes, gateways, teleport/step sites (N-NC/J6)
 - Sites which are part of the Global Information Group-Bandwidth Expansion program or which provide redundant communications connectivity (N-NC/J6)

-
- Joint national training capability aligned with OSD's training transformation initiative (N-NC/J1 and N-NC/J7)
 - Department of Homeland Security's provision of homeland security (NC/J3)
 - Future basing for an epidemiological analysis and event detection center for the purpose of integrated early warning (N-NC/SG)
 - CBRN detection, identification, analysis, and health risk mitigation capabilities to include medical and environmental surveillance, clinical diagnosis, psychological preparedness, and mass prophylaxis distribution (N-NC/SG)
 - Providing definitive medical treatment, medical command and control on a regional basis, proximity to ground and air evacuation assets, proximity to strategically capable air and sea ports, and a federal coordinating center (N-NC/SG)
 - Designated defense health sector critical infrastructure (N-NC/SG)
 - Providing a secure operating environment for focused strategic, asymmetric, counterterrorism, counterintelligence and law enforcement sensitive intelligence and information fusion efforts in support of homeland defense, maritime analysis, and civil support operations (N-NC/J2)
 - Civil support, to include responsive effective logistics to support Federal Emergency Management Agency (FEMA) Territory Logistics Centers and FEMA mobilization centers (N-NC/J4)

Congressional Testimony

**Testimony of James F. Jarboe, Special Agent in Charge, Tampa Division, FBI
Before the U.S. House of Representatives, Subcommittee on National Security, Veterans Affairs and
International Relations
August 5, 2002**

"Homeland Security: Facilitating and Securing Seaports"

Good afternoon Chairman Shays, and members of the subcommittee. I am pleased to have the opportunity to appear before you to discuss seaport security. Ever present in everyone's mind are the threats of terrorist violence against US interests "anywhere in the world" that have been issued by international terrorist Usama bin Laden, his organization Al-Qaeda, and sympathetic groups. The FBI and other components of the US Intelligence Community, as well as foreign intelligence services, are currently tracking a large volume of threats emanating from these sources. The Al-Qaeda network continually refines its operational capabilities by experimenting with variations on suicide bombing techniques to inflict mass casualties, including vehicle bombings against embassies, maritime attacks against naval vessels, and hijacking of commercial airliners. These attacks and capabilities illustrate the range of threats posed by extremists affiliated with international terrorist organizations like Al-Qaeda.

Intelligence bulletins have been issued in relation to the potential of a broad range of attack scenarios including acts involving weapons of mass destruction, plots to attack bridges and financial institutions and fuel refineries, plots to use small aircraft for suicide attacks, and possible interest in crop dusting capabilities, commercial drivers licenses with hazardous material endorsements, and an offensive SCUBA diver capability.

Domestic extremist groups continue to pose a threat. In fact, domestic terrorists have committed the majority of terrorist attacks in the United States. Between 1980 and 2000, the FBI recorded 335 incidents or suspected incidents of terrorism in this country. Of these, 247 were attributed to domestic terrorists, while 88 were determined to be international in nature. The domestic terrorist threat is divided into three general categories--left-wing, right-wing, and special interest (or single issue). Right-wing terrorism activity in Central Florida is diffuse and uncoordinated, thanks in part to the arrest of Donald Beauregard, the leader of the Southeastern States Alliance, by the FBI Joint Terrorism Task Force. Beauregard was involved in a conspiracy to commit acts of terror that included raids of National Guard Armories for the purpose of stealing weapons to further use in attempts to disable energy facilities, communication centers and law enforcement offices. Environmental extremists and anarchists could pose a threat to port security. Further, terrorists have an increasingly sophisticated array of weapons and capabilities available to them. Weapons of mass destruction (WMD)--explosive, chemical, biological, or radiological in nature--represent a real-world threat to ports. Information regarding these types of weapons is disseminated through such means as the World Wide Web.

The Tampa Division of the FBI encompasses 18 central Florida counties from the Gulf of Mexico to the Atlantic coast. Central Florida is a focal point for travelers and tourists within the State of Florida offering a complete range of transportation systems including major seaports. Central Florida encompasses several theme parks and beaches along Florida's central coast on both the Atlantic and Gulf coasts. Since Walt Disney World in Orlando is the number one tourist destination in the country, it impacts the total population of the entire region. Additionally, there were more than 40 million visitors in Orange County in 2000 and more than 15.7 million in the Tampa Bay area. The Tampa Bay area is a secondary focal point for travelers within the State of Florida offering a wide variety of tourist attractions and numerous large-capacity venues hosting international, professional, and collegiate sporting events. In addition, the associated supporting transportation systems have their own set of particular security concerns.

There are six commercial international airports within Central Florida located in Melbourne, Orlando, Tampa, St. Petersburg, Sarasota and Fort Myers. There is one non-international commercial airport in Naples. There are six major railway stations located in Orlando, Tampa, St. Petersburg, Sarasota, Fort Myers and Naples. The numerous rail lines traversing Central Florida predominantly carry freight versus passengers. The four seaports include the facilities at Tampa, Manatee, and Saint Petersburg on the Gulf and Port Canaveral on the Atlantic seaboard. The Port of Tampa is the largest seaport in Florida and the tenth largest in the nation. The consequence of the varied transportation networks within Florida is high volume truck, rail, and maritime traffic, an increased mobility of transient population, the flow of international commodities, and a parallel increase in being susceptible to criminal enterprise.

Trent Lott Memo 8/10/05
ATTACHMENT 4

The Port of Tampa is centrally located in downtown Tampa within 10 miles of MacDill Air Force Base. The Port of Tampa is the busiest port in Florida in terms of raw tonnage and stores approximately 50% of the extremely hazardous chemicals in the State of Florida. Of major significance is that the Port of Tampa is non-contiguous property, encompassing more than 2,500 acres of land. Generally, the port represents an appealing target of opportunity for would be terrorists. The port is immense, accessible from land, sea and air. The port is adjacent to a large population of civilians and vital regional and national infrastructure, including power facilities, water facilities, and Headquarters of United States Central Command and United States Special Operations Command at MacDill Air Force Base. The port contains such hazards as liquid propane gas, anhydrous ammonia, and chloride.

Central Florida also has some of the richest phosphate deposits in the world. The western counties are dependent on this phosphate-based industry. Fifty percent of the Florida's hazardous materials are stored within Hillsborough County and 25% within Polk County. Major storage of extremely hazardous substances (EHSs) and other chemicals are located in this industrialized area and are vulnerable to accidental, malicious, and acts-of-nature releases. In 1993, the United States EPA conducted chemical audits of the three anhydrous ammonia terminals located on Tampa Bay - CF Industries, located on Hooker's Point, Farmland Hydro, L.P. and IMC-Agrico, both located on Port Sutton Road on Port Sutton Channel. The audit revealed that the three terminals represent nearly 92.5 percent of Hillsborough County's total amount of anhydrous ammonia (NH3) inventories.

Individually, each of the three ammonia terminals pose a risk to the surrounding community and the effect of three facilities, in close proximity with such massive quantities, pose even greater risk. A 1998 survey showed that these three facilities had outstanding safety records. Safety standards have undergone continual improvement with each passing year.

In addition, many hazardous materials shipments originate in the Port of Tampa and move through Hillsborough County and beyond. A large volume of hazardous material travels through the area via railroads, highways, waterways, and pipelines on a daily basis. In particular, ammonia is transported by tank truck, rail car, and pipeline to fertilizer plants in Polk County. Chlorine is primarily transported by tank trucks and barges to waste water treatment plants. Residents throughout the county are vulnerable to the release- intentional or accidental, of transported hazardous materials.

South Florida, in particular, is ideally located to serve as the US gateway to and from the Americas. The nearness of the US Gulf Coast to Latin America makes it an obvious entry point for maritime traffic. Most of the cargo headed to ports in the Gulf originates from source and transit nations in Latin America, especially Mexico, Venezuela and Colombia. In addition, an extensive network of rail and truck lines allow for fast and efficient delivery of all types of goods, both legitimate and illegitimate, to markets throughout the US and Canada.

The coast of the Gulf of Mexico has hundreds of miles of relatively open shoreline that separate the major ports - Houston, Texas; New Orleans, Louisiana; and Tampa, Florida. While these major ports have a major presence of law enforcement and security, the open shoreline and smaller ports leaves the Florida coast open to a variety of criminal activity.

The high volume of maritime traffic in the large ports, both commercial and noncommercial, provide ample cover for the movement of illicit goods. Eleven of the top 15 ports in trade volume in the United States and 6 of the top 10 ports in volume of foreign trade are located on the Gulf of Mexico. It is a concern that terrorist organizations could take advantage of well-established, well-known criminal patterns to further their own objectives, such as concealing money laundering operations, transport and distribution of explosives and/or hazardous materials, or illegal entry into the United States. Specifically, bulk and containerized cargo freighters, fishing vessels, recreational boats and tugs, and cruise ships, all of which operate from Florida coasts, each provide unique potential for exploitation by terrorists as well as other criminal organizations.

Large bulk and containerized cargo pose a smuggling risk in the major ports of the Eastern and Gulf coasts. Most container traffic along the Gulf Coast consists of perishable goods like fruits and vegetables. Although Tampa and Port Manatee's container traffic is considerably less than the ports of Houston, New Orleans and Gulfport, Mississippi, Tampa is ranked fifth among Gulf ports receiving significant quantities of non-liquid bulk imports. Non-liquid bulk imports into the Port of Tampa are led by shipments of sand and gravel from Mexico, Canada and the Bahamas; sulfur from Mexico and Chile; and cement and concrete from Colombia, Venezuela and Europe.

The fishing industry represents a major presence along Florida's coastline. Fishing vessels at the numerous fishing ports of all sizes constitute a secondary risk in the region. The Gulf of Mexico is home to one of the largest fishing fleets in the United States. Moreover, the region contains 5 of the top 10 U. S. fishing ports in terms of total catch. More than 18,000 commercially documented fishing vessels operate from numerous bayous inlets, rivers and bays along the Gulf Coast. Many of these vessels travel back and forth throughout the Gulf between fishing ports, large and small, following the seasonal migrations of fish as permitted by fishing regulations. The transient nature of the industry and the abundance of vessels provide ample occasion for boats engaged in smuggling activity to blend in, either transporting drugs (or explosives), directly from overseas or participating in transfers offshore.

Recreational boating and tugs and barges operating near the border are additional risks. Although there are over 750,000 private vessels registered in the state of Florida, these small private vessels generally receive less law enforcement attention. The numerous recreational vessels and sailboats travel freely along the southern Gulf Coast of Florida. Foreign tugs usually transfer barges to local tugs, giving the impression that a barge entering a Gulf port is local.

The primary home of the cruise ship industry in the United States is South Florida. Port Canaveral is among the nation's top five cruise ports in terms of revenue and on the Gulf Coast. Vessels depart from Port Canaveral and the Port of Tampa for destinations throughout the Caribbean and Central and South America.

To address the concerns expressed above, the law enforcement community together with private industry and multi-disciplinary agencies such as fire/rescue, HAZMAT operations, and Florida Emergency Management has made concerted efforts in educating, training, practicing, and preparing for contingency scenarios. Through combined actions of a host of agencies preventive measures have been carefully considered and implemented. Not the least of these has been the development of several anti-terrorism task forces and specifically focused working groups and intelligence exchange forums. Participants in the working groups have been carefully selected by each represented agency for their subject matter knowledge and experience, and jurisdictional roles.

The Tampa FBI Joint Terrorism Task Force is not a recent development but was formed in the mid-90s. Over the past several years, they have developed an aggressive outreach program comprised of four distinctive components of the terrorism preparedness program. It is important to note that the FBI Joint Terrorism Task Force and Special Agent/WMD coordinators in the Tampa Division are experienced and knowledgeable focal points for all terrorism and WMD investigative matters. In addition to contingency plan development (1), the program includes training seminars (2), tabletop and field exercises (3), and threat assessments (4). From January 1999 through September 2000, Tampa Division has provided terrorism training for many first responders from all safety and law enforcement disciplines. Agents have conducted approximately 60 WMD and terrorism presentations and participated in 17 tabletop and full-field exercises. Furthermore, threat assessments have been researched and prepared for 12 special counter-terrorism preparedness events, such as the NHL Hockey All-Star Game at the Tampa Ice Palace (near the Port); Super Bowl XXXV including the Gasparilla Pirate's Parade/Super Bowl Sunday pre-game events along Bayshore Boulevard; the USS LASSEN ship commissioning ceremony, and US Central Command and US Special Operations Command change of command ceremonies at the Marriott Waterside.

Specifically, in June 99, the State of Florida Division of Emergency Management hosted a statewide WMD Terrorism Summit through a grant from the Federal Emergency Management Agency (FEMA) at which FBI Special Agents gave presentations on the threat potential to Central Florida. The purpose of this Summit was to solicit input from first responders prior to drafting a statewide terrorism response strategy. This forum was an excellent opportunity to connect with Federal agency counterparts on both crisis management and consequence management. Since attending the Summit, FBI Special Agents have assisted in writing and reviewing WMD Incident Response Plans for numerous agencies and large capacity entertainment complexes, ensuring consistent response and coordination with the FBIHQ WMD Incident Contingency Plan. Furthermore, the FBI Special Agent/WMD Coordinators have made specific efforts to establish productive liaison with the emergency management community at the state and county level by visiting county Emergency Operations Centers (EOC) and including the Directors of each in working groups and training programs. Florida EOCs are pro-active in planning for response to incidents of the use of WMD by preparing annexes to their frequently implemented hurricane response plans.

Of particular note in the exercise arena, in March 2000, the FBI Joint Terrorism Task Force coordinated a major 17-agency countywide field exercise involving a terrorist takeover of an anhydrous ammonia industrial facility at

the Port of Tampa. This scenario was chosen to incorporate a response from sea and air assets as well as traditional law enforcement and fire rescue/emergency teams. The exercise was preceded by a one-day seminar for mid-level crisis managers and supervisors. Evaluations of the exercise were incorporated in later threat assessments, contingency plans, and grant requests.

Law enforcement personnel from throughout the greater Tampa Bay area participate in several formal terrorism working groups that address both domestic and international terrorism matters and WMD response issues. The FBI regularly participates in the State of Florida Regional Domestic Security Task Force (RDSTF), the Central Florida Statewide Terrorism Intelligence Networking Group (STING), the Florida Intelligence Unit (FIU), the Tampa Bay Area Intelligence Unit (TBAIU), the MacDill Air Force Base Counter Intelligence/Counter Terrorism Working Group, the Tampa Bay Harbor Safety Committee, the Tampa Bay Metropolitan Medical Response System Steering Committee and the Port Security Working Group. These forums are composed of a broad spectrum of law enforcement investigators and intelligence analysts, military intelligence and command personnel, and also include professionals from the security departments of major private enterprises such as electric power companies, railways, and industry representatives when appropriate. The joint approach to intelligence sharing, investigation and crisis management has served Central Florida extremely well. Thanks to recent efforts undertaken by the Florida Department of Law Enforcement, FBI intelligence analysts now have access to a statewide terrorism database called THREATNET. The establishment of this database will be key to coordinating pertinent elements of pending investigations, for example patterns of activity, vehicle tags, subject names and aliases, as well as common meeting areas.

The Tampa Bay Port Security Working Group, led by the US Coast Guard, was established in April 2000 as a result of the Interagency Commission on Crime in US Seaports and has five sub-committees that report on a bi-monthly basis. The FBI regularly participates in the Port Security Working Group meetings and heads the Terrorism Sub-Committee. The FBI's role in these committees is to provide threat analyses and to disseminate intelligence that affects safe operation of the port facilities. Somewhat unique to this forum is the integration of private industry and Fire/Hazmat chiefs of both City of Tampa and Hillsborough County as members of the FBI JTTF. Input provided by the emergency management and fire/safety sectors of our community is essential to successful preparedness.

The FBI has encouraged state, county, and local response community leaders to conduct an appropriate needs and vulnerability self-assessment to determine which federal domestic training courses and programs would be of value. The State of Florida conducted a statewide vulnerability assessment of seaports. Although this assessment was funded by the State Office of Drug Control and primarily focused on drug countermeasures, it also assessed port access, credentialing, and security. Issues raised through this assessment are being addressed through the Port Security Working Group. The interagency cooperation is evident in the daily coordination between management staff, investigators, and intelligence personnel of each agency on issues where we have common interests.

Gulf of Mexico Caucus

ALABAMA · FLORIDA · LOUISIANA · MISSISSIPPI · TEXAS

Chairwoman: Rep. Katherine Harris (R - 13th Florida)



GULF OF MEXICO CAUCUS *BACKGROUND*

Mission Statement

The Gulf of Mexico has earned the nickname the "Mediterranean of the Americas" due to its strategic importance to the Western Hemisphere. The waters of the Gulf possess a wealth of critical natural resources, while providing vital commercial and transportation links between the nations of North America, Latin America, and the Caribbean. Moreover, as one of the most prosperous regions in the world, the eleven U.S. and Mexican states that border the Gulf confront numerous opportunities and challenges – such as economic development, homeland security, and environmental protection -- which arise uniquely as a consequence of their shared water boundary.

The Gulf of Mexico Caucus strives to heighten awareness of this collective destiny and its impact upon America's future while influencing the major public policy debates that continue in Congress and across the nation regarding fair trade, foreign aid, immigration, port security, environmental stewardship, and energy independence. Specifically, the Caucus disseminates research and crafts legislation, while engaging elected officials, constituents, businesses, and community leaders in a unified effort to promote prosperity and security throughout the Gulf region.

The Caucus focuses its endeavors in three core areas:

- ***Economic Development:*** The Caucus endeavors to improve the socioeconomic conditions in the five U.S. Gulf states through transportation and infrastructural improvements, the promotion of tourism, faster, cleaner, and cheaper cargo transportation, and the expansion of U.S. exports.
- ***Homeland Security:*** The Caucus seeks to enhance the protection of America's southern border, placing a particular spotlight upon port security.

- **Environmental Protection:** The agenda of the Caucus places a premium upon the conservation of the Gulf's precious natural resources, shorelines, and estuaries.

I. Economic Development

A. Feeding the Nation

1. Harvesting the Sea: The Gulf of Mexico's estuaries constitute one of the most productive natural systems on earth. These estuaries produce more food per acre than the most prolific Midwestern farmland. The National Marine Fisheries Service reported a yield of **more than 1.8 billion pounds** of fish and shellfish in the five U.S. Gulf states worth **over \$991.3 million** in 2000, as compared to a one billion pound harvest in the Pacific states (excluding Alaska), which generated less than half that income.

Four of the top five fishing ports in the United States (as measured by weight) are located in the five Gulf states.

- The Gulf's commercial fisheries produced ***1.8 billion pounds of fish and shellfish*** in 2000, with a dockside value of ***\$991.4 million***. Gulf landings of shrimp led the nation in 2000 (288 million pounds worth \$656 million), which accounted for approximately ***80 percent of the national total***.
- The Gulf produced the largest volume of oysters in 2000 (20.7 million pounds valued at \$44 million), which amounted to ***60 percent of the national total***.
- Gulf recreational fishing garners almost ***30 percent*** of U.S. saltwater fishing expenditures;
- ***23 percent*** of all U.S. saltwater recreational jobs are located in the five Gulf states.

Breakdown by state:

- **Alabama** – over 30.59 million pounds of fish and shellfish worth more than \$64.0 million.
- **Florida** – over 75.4 million pounds of fish and shellfish worth more than \$156.1 million.
- **Louisiana** – over 1.4 billion pounds of fish and shellfish worth more than \$418.9 million.
- **Mississippi** – over 217.7 million pounds of fish and shellfish worth more than \$58.7 million.
- **Texas** – over 110 million pounds of fish and shellfish worth more than \$293.6 million.

2. Agriculture: According to the U.S. Department of Agriculture's statistics, agricultural production (crops, livestock, and associated products) in Alabama, Florida, Louisiana, Mississippi, and Texas totaled nearly \$28 billion in 1997.

Breakdown by state:

- **Alabama** -- \$ 3.098 billion
- **Florida** -- \$ 6.004 billion
- **Louisiana** -- \$ 2.031 billion
- **Mississippi** -- \$ 3.127 billion
- **Texas** -- \$ 13.766 billion

B. Meeting America's Energy Demand

The Minerals Management Service (MMS) found that in September 2001, 119 exploration wells were under construction in Gulf waters, 47 of which were being drilled in water depths that exceeded 1,000 feet. MMS also reported that in 2001:

- The Gulf contained 4,021 producing platforms and 156 active operators;
- The Gulf accounted for 93 percent of U.S. Offshore oil production and approximately 98 percent of U.S. gas production;
- The Gulf's deepwater oil production had increased by almost 1,200 percent from 1985 to 2001 while the Gulf's deepwater gas production had improved by about 2,850 percent during that same period; and
- More than 21,000 producing company jobs existed as a direct result of oil and gas activities in the Gulf's outer continental shelf.

C. Gulf Ports – The On-Ramps of a Trade Superhighway

- **Seven of the nation's top 10 ports and two of the world's top seven ports** (as measured by tonnage or cargo value) are located in the Gulf of Mexico.
- The Port of Houston is **ranked first** in the United States in foreign waterborne commerce, second in total tonnage, and sixth in the World.
- The Greater Baton Rouge Port is Gulf of Mexico's farthest inland deep-water port.

D. The Gulf of Mexico Region – A Popular Place to Live and Play: Tourism and Quality of Life

- Census Bureau estimates show a 14.5 percent population increase in the five U.S. Gulf states between 1990 and 1999 (from a combined total of 40.8 million in 1990 to an estimated 46.7 million in 1999).
- The Gulf of Mexico supports a tourist industry that encompasses thousands of businesses and tens of thousands of jobs, worth over \$20 billion annually.
- During 2000, destinations in the Florida, Alabama, Mississippi, and Louisiana welcomed more than 25 million visitors and handled more than 1.1 million qualified inquires. These visitors spent as estimated \$16 billion.
- The Gulf of Mexico serves as an ideal location for water sports such as skiing, boating, jet skiing – and, of course, swimming and tanning.

II. Homeland Security

The Gulf Coast possesses 7 of the 12 busiest ports in the United States – thus, one terrorist attack or devastating natural disaster affecting a Gulf port would seriously injure our nation’s economy. Accordingly, enhancing port security constitutes an indispensable component of our homeland security strategy. Moreover, as we justifiably focus upon the integrity of our land border, we must not forget that the Gulf’s water border comprises two-thirds of the southern U.S. boundary.

In order to protect our homeland and ensure the continued vitality of our economy, we must direct our nation’s attention to the Gulf’s security needs -- while constantly balancing this imperative with our economy’s reliance upon the dependable, free flow of shipping and other commerce.

A. Key Facts about U.S. Ports

- U.S. ports create more than 13 million domestic jobs, many of which are located in the five Gulf states.
- U.S. ports serve as the point of entry or exit for 95% of our nation’s overseas international trade.
- U.S. ports also accept 25% percent of our nation’s domestic trade.
- Each year, U.S. ports handle 9 million containers, 9,500 container ships, 140 million passengers, and 12 million registered recreational boats.
- U.S. ports generate \$800 billion a year for our nation’s economy.

B. Disaster Preparedness and Response

During the summer and fall of 2004, the U.S. Gulf Coast endured a series of hurricanes that wrought misery and destruction on a scope that was unprecedented in U.S. history. In addition to the tragic loss of life they caused, these storms destroyed homes, livelihoods, and vital infrastructure.

Hurricanes, flooding and other natural disasters strike the Gulf region every year. Yet, many of the federal agencies responsible for manning the front lines of recovery remain at odds with state and local governments regarding how to ensure that money, supplies, and other critical resources reach the people who need them the most. The Gulf of Mexico Caucus can – and must -- lead a reform movement which will adjust how disaster relief grants are awarded, allocated, and distributed.

C. First Responders

As they constitute our first line of defense against the ravages of terrorism and natural disaster, first responders receive millions of dollars per year in homeland security grants. The Gulf of Mexico Caucus remains dedicated to helping these heroes obtain the resources they need and deserve. In particular, the Caucus focuses upon ensuring that the Gulf region’s first responders

receive the full attention of Congress. Moreover, from fire training academies in Louisiana to bio-terror research centers in Florida, the Caucus seeks to transform the Gulf region into the model for homeland security training and initiatives. The discovery, development, and implementation of pilot projects can play a critical role in enhancing the Gulf region's security while bolstering the excellence of its higher education and research institutions.

III. Environmental Protection

The population explosion along the U.S. Gulf Coast continues to raise public health concerns – both on land and in the water. Coastal counties are experiencing the second fastest rate of growth in the United States, but basic services such as wastewater treatment remain inadequate in many areas.

- More than **50 percent** of the Gulf's shellfish growing waters are under harvest restrictions due to water quality concerns.

A. Habitat Loss

Important habitats and their functions have declined.

- **50 percent** of Gulf inland and coastal wetlands have been lost.
- Up to **80 percent** of Gulf sea grasses have been decimated in some areas.
- The Gulf provides diverse habitats that support **thousands** of species of coastal and marine wildlife.
- About **98 percent** of Gulf fish species depend upon wetlands during some stage of their life cycle.

B. Environmental Damage

Among other sources, fertilizers, human sewage, animal waste, landscape changes, and fossil fuels result in the presence of too many nutrients in the Gulf of Mexico.

The incidence of harmful algal blooms has increased from 200 in the 1970s to 700 in the 1990s. Since 1991, these algal blooms have cost Gulf state economies nearly \$300 million, primarily due to fish kills, public health problems, and lost tourism revenue.

More of the Gulf's estuaries are experiencing or are likely to experience excessive nutrients and low dissolved oxygen levels, which directly impacts the health of fisheries.

The largest area of low-dissolved oxygen in the western Atlantic occurs on the Texas-Louisiana continental shelf region, which stems from the Mississippi River's nitrogen pollution and man-made physical changes, as well as from the natural layering of salt and fresh water as the Mississippi River enters the Gulf.

C. Invasive Species:

Non-indigenous plants and animals can wreak havoc upon the Gulf's environment. In 1991 alone, U.S. ports received an estimated **79 million metric tons of ballast water from foreign ports** (the equivalent of 2.4 million gallons per hour), which has provided a significant pathway for the introduction of invasive species.

- A recent report estimates that invasive species on land and in water cause more than \$137 billion in economic damages in the United States each year.
- More than 4000 species of invertebrates, algae and fishes are transported in ballast tanks every day.

IV. General Background on the Gulf Region

A. Basic Overview

The five U.S. Gulf states – Alabama, Florida, Louisiana, Mississippi and Texas – boast a total population of 50 million and a combined Gross State Product of \$1.6 trillion. This region possesses 10 United States Senators, five governors, and 75 members of the United States House of Representatives.

All five states of the Gulf region share common interests as well as similar opportunities and challenges. As regional and international trade progress, the homeland security, trade, economic development, and environmental protection issues will multiply in scope and complexity. Yet, without a concerted political effort, the federal government's habit of neglecting the Gulf region in the allocation of funding and other resources appears likely to continue.

By coordinating the efforts of members of Congress with other organizations and individuals who possess a stake in critical region's future, the Gulf of Mexico Caucus will exert significant political influence – leveraging unity to produce greater prosperity and security. The Gulf of Mexico Caucus will achieve its goals by hosting workshops, field events, and media opportunities.

B. Quick Facts on the Five U.S. Gulf States

- **Seven** of the United States' 12 busiest ports are located in the five U.S. Gulf states.
- **56%** of the United States' imported oil passes through this region.
- Total population of more than **50 million**.
- Combined Gross State Product of **\$1.6 trillion**.
- Gulf Coast ports are served by the Gulf Intra-coastal Waterway, which extends **1,200 miles** from Brownsville, Texas to Carrabelle, Florida. Approximately 80 million tons of cargo is transported via the Waterway each year.

C. Historic and Ecological Notes

- The Gulf of Mexico wetlands are famous for their large populations of wildlife – which includes shorebirds, colonial nesting birds, and *75 percent* of the migratory waterfowl traversing the United States.
- More than *400 species* of shells can be found in the Gulf of Mexico. Gulf beaches are recognized as the best shelling beaches in North America.
- The Gulf Islands National Seashore is a wild 150-mile stretch of barrier islands and coastal mainland in Mississippi and Florida. The warm waters of the Gulf of Mexico nourish 11 separate units, which include bayou, salt marsh, live oak and southern magnolia forests, as well as snow-white beaches.
- The Mobile-Tensaw Delta comprises one of the largest watersheds in the world, which begins in Tennessee and ends at Alabama's Gulf coast.
- The Gulf of Mexico Coast line boasts a unique array of flora and fauna, which provides a habitat for endangered species such as the Perdido beach mouse, the cotton rat, the white-topped pitcher plant, the red-cockaded woodpecker, the piney woods rooster, and the Louisiana nutria.
- The world's longest man-made beach (26 miles long) is located on the Mississippi Gulf Coast.
- The Mississippi River deposits more than 3.3 million gallons of water into the Gulf of Mexico every second.
- The Gulf of Mexico possesses the largest population of bottle nose dolphins in the world, the largest concentration of which live in the Mississippi Sound.
- Indian mounds, which exist on the campus of Louisiana State University in Baton Rouge, were built 450 years before the first Egyptian pyramid.
- Historic Spanish Point in Osprey, Florida was settled over 4,000 years ago and included tools artifacts and burials mounds from early humans.
- The Friendship Oak on the Mississippi Gulf Coast is more than 500 years old. Legend holds that those individuals who stand beneath its shade "remain friends through all their lifetime no matter where fate may take them in after years."
- In 1703, Mardi Gras was first celebrated in the French colony of Mobile. Years later this pre-Lenten carnival moved to New Orleans, which often receives credit for its origination.
- The name "Mississippi" means "father of waters." The name "Biloxi" means "first people."

- The Lake Pontchartrain Causeway Bridge (24 miles long) is the second longest continuous over-water bridge in the world.
- The city of New Orleans exists 10 to 15 feet below sea level. Huge levees protect the city from the waters of the mighty Mississippi.
- On a 1699 expedition, Pierre le Moyne and his brother, Jean Baptiste le Moyne, discovered an area on high bluffs along the Mississippi River. In their diaries, they record evidence of a pole at this location, which was stained with the blood of fish and animals, and which served as the dividing line between two Native American tribes - the Bayougoula and the Houmas. The blood-stained pole gave the town of Baton Rouge its name, which means "red stick" in French.
- America's largest rocket propulsion testing complex, which tests all space shuttle main engines, is located at the John C. Stennis Space Center on the Mississippi Gulf Coast. With NASA as the lead agency, this federal city hosts 30 additional agencies engaged in space, environmental programs, and national defense.

The Gulf of Mexico Caucus builds "Unity, Prosperity and Security" for the five U.S. states that border the Gulf of Mexico by promoting a collective approach by political, business, and community leaders in addressing homeland security, trade, economic development, environmental protection, and related issues

AUG 15 2005

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August 12, 2005

Honorable Anthony J. Principi, Chairman
2005 Defense Base Realignment and Closure Commission
2521 S. Clark St., Suite 600
Arlington, VA 22202

Re: Implications of Buster Welch, et al. v. USAF, et al. to the Closure Recommended by BRAC of Ellsworth AFB, South Dakota

Dear Chairman Principi:

The Defense Base Realignment and Closure Commission is aware of the successful challenge to the Realistic Bomber Training Initiative (RBTI) associated with Dyess AFB, Texas. That challenge was undertaken by separate groups of ranchers, landowners and others in two separate cases. I represent a group of plaintiffs who live principally near or under the Lancer, MOA of the RBTI. A few are impacted by the flights along IR-178 as are all of the Davis Mountain Trans Pecos Heritage Association (DMTPHA) plaintiffs represented by Mr. Murray Feldman and with whom your staff has had significant contacts.

My clients formed an organization called the Heritage Environmental Protect Association (HEPA) to review and comment upon the RBTI modifications proposed for the airspace. Through me, HEPA ultimately filed an action entitled, Buster Welch, et al. v. United States Air Force, et al., Civil Action No. 5:00CV0392-C, USDC Texas, Northern District, Lubbock Division. The parties in both cases participated in the scoping meetings where literally hundreds of people made comments at each location in West Texas and New Mexico.

As Mr. Feldman explained to your staff, eventually the two cases were heard simultaneously by U.S. District Court Judge Cummings, but they were never consolidated. The HEPA plaintiffs challenged on some similar grounds and several different issues, the most notable of which was our emphasis on the several noise issues. In both cases, Judge Cummings' rulings ignored a faulty Administrative Record on the subject. In the end, Judge Cummings separately issued two lengthy decisions for the cases in favor of the United States Air Force.

Honorable Anthony J. Principi
August 12, 2005
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HEPA filed a separate appeal to the Fifth Circuit Court of Appeals. For purposes of efficiency and judicial economy, the HEPA and DMTPHA plaintiffs did agree to consolidated briefing and oral argument on appeal. Previously, we had joined DMTPHA as a petitioner-intervenor to challenge separately the FAA's decision approving the RBTI airspace modifications based on a faulty NEPA analysis. As you know, the Fifth Circuit vacated both decisions issued by Judge Cummings, the Air Force's record of decision (ROD) on the final EIS, and the FAA's non-rulemaking decision document (ROD equivalent) approving the RBTI airspace modifications. The Court remanded the final EIS to the Air Force to prepare a supplemental EIS (SEIS) to evaluate the impact of wake vortex and to assess the impact of the RBTI on civil and commercial aviation.

Mr. Feldman has evaluated the wake vortex issues for your staff. I just wish to emphasize that the Fifth Circuit did not limit the evaluation to impacts on buildings and structures. In its order, the Court said simply the Air Force must evaluate the impact of wake vortex. Consequently, we strongly believe that means evaluation on buildings and structures of course, but also on livestock management, wildlife, recreational hunting, general recreation, and on direct overflight of humans. If the Air Force properly evaluates the spectrum of issues, then the SEIS will not be issued for some considerable time.

The evaluation of the impact on civil and commercial aviation is equally important as Lubbock International Airport has to modify its flight routes to the southeast to accommodate the Lancer MOA. Those modifications extend commercial flying times. Therefore, the Air Force must reconsider the impact to Lubbock, as well as the civil aviation employed by ranchers and others in the SEIS.

Lubbock was not consulted during the first NEPA scoping. The city considered litigating against the Air Force, but after the fact (issuance of the ROD), the Air Force met with Lubbock officials and made a deal to control airspace from the Lubbock airport with new equipment. Yet significant airspace remains closed to commercial traffic for long periods and this will only be exacerbated by the Ellsworth B-1s using the same airspace. After a proper SEIS evaluation, the Air Force and FAA may conclude that the impact to Lubbock is severe enough to modify substantially the lancer MOA.

Finally, the Fifth Circuit ordered Judge Cummings to set the RBTI operating conditions pending the completion of the SEIS. Mr. Feldman has explained that the Air Force is not operating below 12,000' MSL in the Lancer MOA, and nothing below 500' AGL along IR-178. These were offered voluntarily by the Air Force. Please note that we continue to be puzzled how the Air Force can continue to train in unapproved airspace. Consequently, Judge Cummings' operating conditions are appealable by both groups of plaintiffs and an appeal is being considered as the judge completely ignored the wake vortex evaluations prepared by the experts.

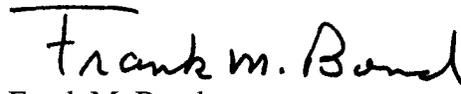
Honorable Anthony J. Principi
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The Air Force may be disingenuous to the BRAC by not revealing that the Air Force needs to do a NEPA evaluation on the cumulative impact of the B-1s shifted from Ellsworth to Dyess. Because of the number and size of aircraft, we believe the Air Force will need to do a full EIS. It is not enough to do an environmental assessment (EA) as the cumulative impact will be magnified substantially and the number of training flights may exceed the authorized sortie numbers. Now is the time to do a full cumulative impact analysis while the SEIS is being prepared because the move of the B-1 wing from Ellsworth is foreseeable. To do a mere EA later is the piecemeal approach abhorred by NEPA.

The report that Ellsworth B-1s are being moved to Dyess was not good news to my clients. They already believe they live in a war zone. The Ellsworth B-1 wing exacerbates the real impact on these people. And it seems clear to us that, for the most part, the B-1s will not fly from Dyess to train in the already approved airspace near Ellsworth AFB.

Please contact me if I can answer questions or provide you with more explanation of the HEPA plaintiffs' position on the RBTI.

Sincerely yours,


Frank M. Bond

FMB/gdg

cc: HEPA Litigation Committee
Mr. Murray Feldman, Counsel for Davis
Mountains Trans-Pecos Heritage Assoc.



JOHN BOOZMAN
3RD DISTRICT, ARKANSAS

Dear Deidre,

I want to thank you very much for your consideration in dealing with my staff, community, + base in regard to the BRAC process. I was impressed with the organization + professionalism of the San Antonio hearing. Thanks for being very responsive at a time that was unbelievably busy for you.

HOUSE OF REPRESENTATIVES

Sincerely,
John Boozman



JOHN BOOZMAN
3RD DISTRICT, ARKANSAS

Dear Ken,

Thanks so much for meeting with the 188th at the BRAC Commission. On behalf of myself, the community, and 188th it is greatly appreciated.

HOUSE OF REPRESENTATIVES

Thank You
John Boozman



JOHN BOOZMAN
3RD DISTRICT, ARKANSAS

Dear Colleen,

Thanks so much for meeting with Fort Smith + the 188th at the BRAC commission. It is greatly appreciated by myself, the community, and the 188th.

Thanks Again
John Boozman

HOUSE OF REPRESENTATIVES



JOHN BOOZMAN
3RD DISTRICT, ARKANSAS

Dear Brad,

Thanks so much for meeting with Fort Smith + the 188th at the BRAC commission and for attending the hearing + the site visit. I really enjoyed getting to visit with you. Thanks again for all your help.

John Boozman

HOUSE OF REPRESENTATIVES



JOHN BOOZMAN
3RD DISTRICT, ARKANSAS

Dear Christine,

I want to thank you for
all of your help in setting up
meetings for the 188th at the
Brac Commission as well as
the regional hearing + Chairman
Principi's visit. You + your
staff have done a great job. Thanks

HOUSE OF REPRESENTATIVES

Asst. John Boozman



NEW HAMPSHIRE AFL-CIO

EXECUTIVE VICE PRESIDENT
John V. Amrol

PRESIDENT
Mark S. MacKenzie

SECRETARY/TREASURER
William A. Stetson

PRESIDENT EMERITUS
Harland W. Eaton

SECRETARY-TREASURER
EMERITUS
Saverio M. Giambalvo
James D. Casey

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E-MAIL: solidarity@nhafcio.org
WEBSITE: www.nhafcio.org

Commissioner Anthony J. Principi
BRAC Commission
2521 South Clark Street, Suite 600
Arlington, VA 222002

BRAC Commission

AUG 08 2005

Received

Dear Chairman Principi,

I write to you to urge you to support keeping the Portsmouth Naval Shipyard operating and thriving as it has for the past 200 years. Not only does the economic future of the Portsmouth Naval Shipyard lie in your hands but the well being of thousands of working families throughout Maine and New Hampshire.

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Sincerely,

Mark S. MacKenzie



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John V. Amrol

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SECRETARY/TREASURER
William A. Stetson

BRAC Commission

AUG 08 2005

Received

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Commissioner James V. Hansen
BRAC Commission
2521 South Clark Street, Suite 600
Arlington, VA 22202

Dear Commissioner Hansen,

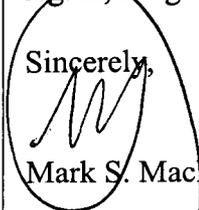
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Commissioner Lloyd Newton
BRAC Commission
2521 South Clark Street, Suite 600
Arlington, VA 222002

BRAC Commission

AUG 08 2005

Received

Dear Commissioner Newton,

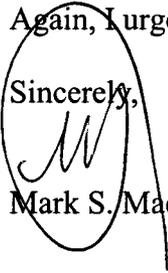
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Commissioner Phillip Coyle
BRAC Commission
2521 South Clark Street, Suite 600
Arlington, VA 22202

Dear Commissioner Coyle,

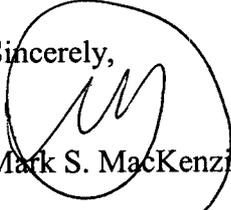
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Commissioner Harold W. Gehman Jr.
BRAC Commission
2521 South Clark Street, Suite 600
Arlington, VA 222002

Dear Commissioner Gehman Jr.,

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Commissioner Samuel Knox Skinner
BRAC Commission
2521 South Clark Street, Suite 600
Arlington, VA 22202

Dear Commissioner Skinner,

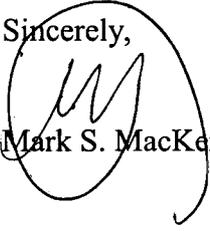
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Mark S. MacKenzie



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Commissioner James T. Hill
BRAC Commission
2521 South Clark Street, Suite 600
Arlington, VA 22202

Dear Commissioner Hill,

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Mark S. MacKenzie



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Commissioner James H. Bilbray
BRAC Commission
2521 South Clark Street, Suite 600
Arlington, VA 22202

Dear Commissioner Bilbray,

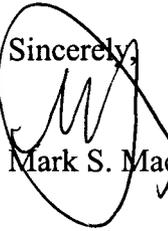
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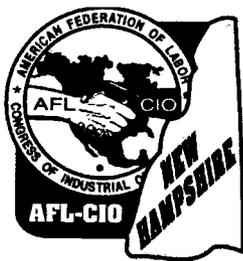
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Commissioner Sue Ellen Turner
BRAC Commission
2521 South Clark Street, Suite 600
Arlington, VA 22202

Dear Commissioner Turner,

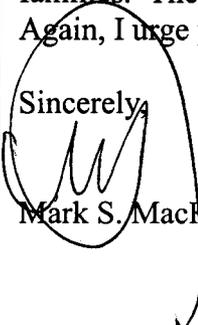
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Sincerely,


Mark S. MacKenzie



CapeCod[®]
CHAMBER OF COMMERCE

August 5, 2005

BRAC Commission

AUG 08 2005

Received

BRAC
2521 South Clark St. Suite 600
Arlington, VA 22202

Dear Commissioners:

The Cape Cod Chamber of Commerce wants to go on the record about the future of Otis Air National Guard presence at Mass. Military Reservation. It is our position that every means possible to preserve the 102nd Air Wing at the base should be taken. We stand shoulder to shoulder with the other organizations and individuals who are working daily to that end.

The mission of the 102nd Air Wing in its role of protecting the security of our homeland should be reason enough to maintain its deployment at Otis. However, the support the 102nd gives to the Cape Cod Coast Guard Air Station is also integral to our Cape Cod way of life, securing the life of those at sea in times of peril. Additionally, the infrastructure upon which other military units and the Barnstable House of Correction rely are intricately tied into the Fighter Wing's presence.

The Cape Cod Chamber of Commerce was an active member of the Community Working Group, which participated in a multi-year process of developing a master plan for the Mass. Military Reservation. After years of consensus building and negotiation with the military, the community now embraces our relationship with the MMR. We believe in its mission.

Sincerely,



Wendy K. Northcross, CCE
Chief Executive Officer



August 4, 2005

BRAC Commission

AUG 08 2005

Received

Rory Cooper
Director of State & Community Affairs
2005 Defense BRAC Commission
2521 S. Clark Street, Suite 600
Arlington, VA 22202

Dear Mr. Cooper:

This is a short note to thank you for speaking before the Community & Economic Development Steering Committee at the National Association of Counties 2005 Annual Conference. It was helpful and important for Steering Committee Members to hear the latest information regarding the BRAC process as well as the schedule for Commission members. As you know, the current BRAC round will impact communities across the country and it was helpful for county leaders to hear directly from Commission staff.

Once again, thank you for your attendance and presentation before the NACo Community & Economic Development Steering Committee. Your efforts were appreciated by both Steering Committee members and NACo's leadership.

Best Regards,


Cassandra Matthews
Associate Legislative Director



GEORGE P. SAKELLARIS
PRESIDENT & CEO

August 3, 2005

BRAC Commission

AUG 08 2005

Received

Honorable Anthony J. Principi
Chairman
Base Realignment and Closure Commission
2521 South Clark Street
Suite 600
Arlington, VA 22202

Dear Chairman Principi:

Ameresco has had a business partnership with Fort Monmouth since 2003 and has been a Patriots Alliance Member since last year. I want to personally extend Ameresco's support to the efforts that are taking place to have Fort Monmouth removed from the DOD's 2005 BRAC list.

As the President and CEO of Ameresco I wanted to highlight the scope and financial impact the first phase of Fort Monmouth's Energy Savings Performance Contract will have as well as the progress that has been made on Phase II of the Landfill Gas to Energy project. These projects represent a joint effort between Ameresco, Fort Monmouth Directorate of Public Works, the Defense Energy Support Center and the Department of Energy.

To date Ameresco's investment is \$25,000,000, achieving for Fort Monmouth an annual savings of nearly \$1.6 million and realizes a 20 Year Present Value Savings of \$33,572,348. In addition, six installation plan parking lot pavement repair projects are being completed as part of this project, saving \$900,000 in installation O&M funding. The most obvious benefits of the first phase of this project are as follows:

- Improves overall condition of real property and reduces utility, operating and maintenance costs.
- Allows Fort Monmouth to improve Facilities with little or no initial investment and maximizes the value of Army assets.
- Increases mission workforce productivity by providing on demand year round heating and cooling resulting in a high quality office environment.

Since September 2003, Ameresco has been working diligently with the above listed agencies in an effort to incorporate a landfill gas-fired cogeneration plant as a second phase of the Energy Savings Performance Contract. The project will install a 15 Megawatt Landfill Gas Powered Co-Generation Plant to provide electricity and heating for Fort Monmouth facilities. Ameresco will invest \$53 million in the project anticipating a 20 Year Present Value Savings of more than \$151 million from the reduced cost of electricity. Phase II is currently in the Initial Proposal stage, the benefits of which will be:

- Utilization of methane gas from Monmouth County Landfill will provide electric power for the entire Fort Monmouth Installation at a fixed rate of \$.04/KWH for 23 years.
- Utilization of methane as a "Green Energy" fuel source for electricity generation will reduce fossil fuel consumption by 75% from FY 2004 consumption
- Phase II provides Fort Monmouth with Energy Security. Fort Monmouth will own dedicated generation and distribution of electricity within Fort Monmouth's installation boundaries to ensure Mission accomplishment by minimizing any effects of blackouts due to utility grid failure.

- Affords Fort Monmouth the ability to sell Jersey Central Power and Light, Co “Green” Energy in an effort to meet their “Green” Energy Goals.

As a result of the existing and proposed efforts, Fort Monmouth is being transformed into one of the most energy efficient and low cost operating installations in the nation.

We urge the removal of Fort Monmouth from the BRAC list. Doing so will permit the facility to continue to reap the benefits of the energy efficiency program currently underway while avoiding the additional costs of moving the functions of the fort to another location, thereby saving the taxpayers billions of dollars over the next 50 years.

Sincerely,



George P. Sakellaris
President & CEO

Cc: The Honorable James H. Bilbray
The Honorable Philip Coyle
Admiral Harold W. Gehman, Jr.
The Honorable James V. Hansen
General James T. Hill
General Lloyd W. Newton
The Honorable Samuel K. Skinner
Brigadier General Sue E. Turner



GEORGE P. SAKELLARIS
PRESIDENT & CEO

August 3, 2005

Honorable Anthony J. Principi
Chairman
Base Realignment and Closure Commission
2521 South Clark Street
Suite 600
Arlington, VA 22202

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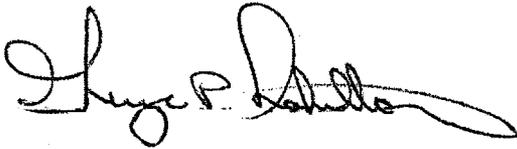
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President & CEO

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The Honorable Samuel K. Skinner
Brigadier General Sue E. Turner



GEORGE P. SAKELLARIS
PRESIDENT & CEO

August 3, 2005

Honorable Anthony J. Principi
Chairman
Base Realignment and Closure Commission
2521 South Clark Street
Suite 600
Arlington, VA 22202

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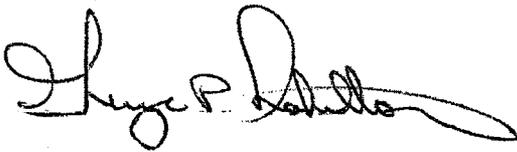
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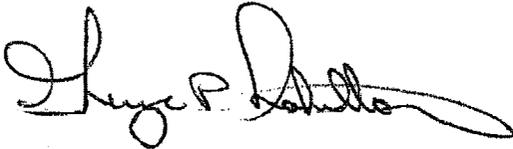
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WILDFIRE PREVENTION
PRE-ATTACK PLANNING
FUELS MANAGEMENT



INCIDENT MANAGEMENT TEAMS
SUPPRESSION COOPERATION
INTERAGENCY DISPATCHING

5665 Morgan Mill Road, Carson City, Nevada 89701
Phone (775) 885-6137 Fax (775) 885-6147
e-mail: sierrafront@nanosecond.com

BRAC Commission

AUG 01 2015

Received

Ronna Hubbard
Coordinator

July 22, 2005

Director Agencies

Base Closure and Realignment Commission
2521 S Clark St Suite 600
Arlington, VA 22202

Bureau of Indian Affairs
Western Nevada Agency

Bureau of Land Management
Carson City District

California Department of Forestry

Carson City Fire Department

Central Lyon County
Fire Protection District

East Fork
Fire Protection District

Mammoth Lakes
Fire Protection District

Nevada Division of Forestry

North Lake Tahoe
Fire Protection District

North Tahoe
Fire Protection District

Reno Fire Department

Sparks Fire Department

Storey County Fire Department

Tahoe Douglas
Fire Protection District

U.S. Forest Service
Humboldt-Toiyabe National Forest
Tahoe National Forest
Lake Tahoe Basin Management
Unit

Dear Honorable Commission Members,

On behalf of the Sierra Front Wildfire Cooperators, we would like to voice our request to maintain the current fleet of C-130 Nevada Air National Guard resources in Reno, Nevada. The Sierra Front Wildfire Cooperators was formed after Northwestern Nevada and Eastern California suffered great loss from wildfires in the early 1980's. Our goal is to coordinate efforts to prevent and manage wildfires in the Northern Nevada and California areas. We have been very successful in our task over the last twenty years.

The number one reason we believe we are successful is because of the cooperation during a wildfire event. We are sure you are aware that we do not staff, or possess, enough resources to completely manage a major incident without help from cooperating agencies. We believe that the C-130's in Reno are a key resource for our local wildfire emergencies. We have had great success working with your staff directly to help suppress wildfires with the use of some of your technology in forward looking infrared systems and potential future wildfire suppression support systems.

Your current staff is always ready, willing and able to support us as part of the fire community. Please consider this an essential part of our local firefighting effort. We realize that you are faced with a serious situation, however, please remember our request to maintain the resources of your aircraft in Reno for the safety of the surrounding communities. We would be pleased to answer any of your questions on this important matter.

Sincerely,

Rod Collins
Chairperson



BRAC Commission

5250 Neil Road • Suite 302 • Reno, NV 89502

775-827-0184 • Fax 775-827-0190

AUG 08 2005

Received

July 28, 2005

The Honorable Anthony Principi, Chairman
2005 Defense Base Closure and Realignment Commission
2521 S. Clark St., Ste. 600
Arlington, VA 22202

RE: 152nd Airlift Wing of the Nevada Air National Guard

Dear Chairman Principi:

On behalf of the Nevada Hospital Association, we are writing to you today to address our concern over the base realignment and closure recommendation to realign the C-130s assigned to the 152nd Airlift Wing of the Nevada Air National Guard. As an organization existing solely to support the health care system serving Nevada's communities it is imperative that we inform you of the serious impact this will place on the lives of the citizens of this State.

Every state, including Nevada, has a unique environment and concerns based on the threats, social culture, geographic and demographic nature of their region. In Nevada the C-130s, which have been recommended for realignment, are a critical part of our ability to respond in a timely manner to any emergency whether it be city, county, state or federal. The Nevada Air National Guard C-130s are a critical asset within our State Emergency Response Plan. The transport of the Strategic National Stockpile, disaster medical facilities, and the movement of medical personnel depend directly upon the proximity and ready availability of these aircraft.

As you know, Nevada is the fastest growing state in the nation and southern Nevada has been identified as one of the most significant regions in the country impacted by terrorist threats. McCarran International Airport in Las Vegas is the sixth busiest airport in North America and serves over 51.5 million passengers yearly. The importance of the C-130s in providing homeland defense capabilities ensures the safety and economic stability to the tourist industry in Nevada.

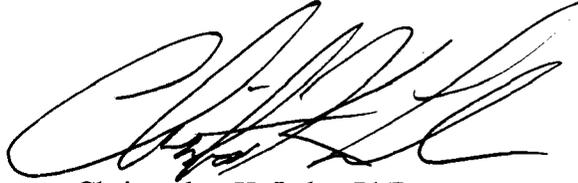
The Nevada National Guard is a community-based force that ensures the citizens of Nevada continued support against the global war on terror. The number one priority of our national security strategy is to secure and defend our homeland. It is no more imperative to the Nation than it is to our State. We at the Nevada Hospital Association feel that the relocation of the C-

130s will jeopardize that important goal. We request your reconsideration of the C-130 relocation presently before the Base Realignment and Closure Commission.

Sincerely,



Bill M. Welch
President/CEO



Christopher K. Lake, PhD
Director of Hospital Preparedness

cc: Colleen Turner, Senior BRAC Analyst
Kenny C. Guinn, Governor of Nevada
BG Cindy Kirkland, Nevada Adjutant General, Nevada National Guard
Major General Giles Vanderhoof, Nevada Homeland Security Director



5250 Neil Road • Suite 302 • Reno, NV 89502
775-827-0184 • Fax 775-827-0190

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RE: 152nd Airlift Wing of the Nevada Air National Guard

Dear Chairman Principi:

On behalf of the Nevada Hospital Association, we are writing to you today to address our concern over the base realignment and closure recommendation to realign the C-130s assigned to the 152nd Airlift Wing of the Nevada Air National Guard. As an organization existing solely to support the health care system serving Nevada's communities it is imperative that we inform you of the serious impact this will place on the lives of the citizens of this State.

Every state, including Nevada, has a unique environment and concerns based on the threats, social culture, geographic and demographic nature of their region. In Nevada the C-130s, which have been recommended for realignment, are a critical part of our ability to respond in a timely manner to any emergency whether it be city, county, state or federal. The Nevada Air National Guard C-130s are a critical asset within our State Emergency Response Plan. The transport of the Strategic National Stockpile, disaster medical facilities, and the movement of medical personnel depend directly upon the proximity and ready availability of these aircraft.

As you know, Nevada is the fastest growing state in the nation and southern Nevada has been identified as one of the most significant regions in the country impacted by terrorist threats. McCarran International Airport in Las Vegas is the sixth busiest airport in North America and serves over 51.5 million passengers yearly. The importance of the C-130s in providing homeland defense capabilities ensures the safety and economic stability to the tourist industry in Nevada.

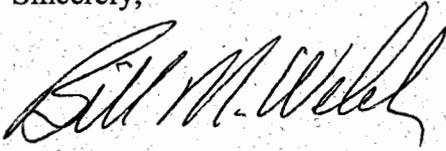
The Nevada National Guard is a community-based force that ensures the citizens of Nevada continued support against the global war on terror. The number one priority of our national security strategy is to secure and defend our homeland. It is no more imperative to the Nation than it is to our State. We at the Nevada Hospital Association feel that the relocation of the C-

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130s will jeopardize that important goal. We request your reconsideration of the C-130 relocation presently before the Base Realignment and Closure Commission.

Sincerely,



Bill M. Welch
President/CEO



Christopher K. Lake, PhD
Director of Hospital Preparedness

cc: Colleen Turner, Senior BRAC Analyst
Kenny C. Guinn, Governor of Nevada
BG Cindy Kirkland, Nevada Adjutant General, Nevada National Guard
Major General Giles Vanderhoof, Nevada Homeland Security Director