

GAO

Supplement to a Report to the Congress  
and the Chairman, Defense Base Closure  
and Realignment Commission

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May 1995

MILITARY BASES

Letters and Requests  
Received on Proposed  
Closures and  
Realignments







United States  
General Accounting Office  
Washington, D.C. 20548

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**Comptroller General  
of the United States**

B-261174

May 9, 1995

To the President of the Senate and the  
Speaker of the House of Representatives

The Honorable Alan J. Dixon  
Chairman, Defense Base Closure and  
Realignment Commission

This is a supplement to our report entitled Military Bases: Analysis of DOD's  
1995 Process and Recommendations for Closure and Realignment  
(GAO/NSIAD-95-133, Apr. 14, 1995).

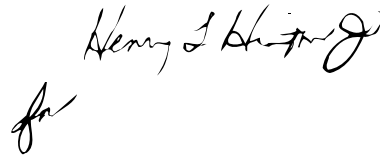
Many interested parties, including Members of Congress, have sent us correspondence on base closures. Several of these letters were from multiple requesters and included attachments of data, analyses, and/or evaluations.

In some instances, the letters and material provided useful leads. In other cases, the material added support to issues we were actively pursuing. We could not follow up on many of the issues or points because of the limited time available to us. However, we believe that the letters and materials may be helpful to the Commission as it considers the proposed closures and realignments. Consequently, we are providing all of the letters and materials to the Commission for consideration. Appendix I contains copies of the letters and some of the materials we received.

We are sending copies of this supplement to the Chairmen, Senate Committee on Appropriations, Subcommittee on Defense; Senate Committee on Armed Services; House Committee on Appropriations, Subcommittee on National Security; House Committee on National Security; individual Members of Congress; the Secretaries of Defense, the Army, the Navy, and the Air Force; and the Directors of the Defense Logistics Agency and the Defense Investigative Service. We will make copies available to others on request.

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This supplement was prepared under the direction of David R. Warren, Director of Defense Management and NASA Issues, who may be reached on (202) 512-8412 if you or your staff have any questions concerning its contents.

A handwritten signature in cursive script, appearing to read "Henry I. Blunt".

Charles A. Bowsher  
Comptroller General  
of the United States

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# Letters and Other Material Received on Proposed Base Closures and Realignment

**HAROLD C. FORD**  
9TH DISTRICT, TENNESSEE

COMMITTEES:  
WAYS AND MEANS  
SUBCOMMITTEE ON HUMAN RESOURCES



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**Congress of the United States**  
**House Of Representatives**  
Washington, DC 20515-4209

February 28, 1995

Mr. Charles A. Bowsher  
Comptroller General of the  
United States  
General Accounting Office  
441 G Street, NW  
Room 7100  
Washington, D.C. 20548

Dear Mr. Bowsher:

We are jointly writing you this letter to request the General Accounting Office provide a detailed analysis and investigation of the Secretary of Defense's recommendation to disestablish the Defense Distribution Depot Memphis (DDMT).

If approved by the Base Closure and Realignment Commission, the closure of Defense Distribution Depot Memphis will have a devastating impact on the Memphis community. The depot currently employs approximately 1,300 people. Its economic impact is approximately \$140 million and it increases to \$500 million when an economic multiplier is used.

Historically, the depot has played an essential role in important military missions, including Operation Desert Shield/Desert Storm and subsequent humanitarian relief missions in hot spots around the globe.

Mr. Bowsher, the Defense Distribution Depot Memphis is critical not only to the community but to the ability of the Department of Defense to provide critical support in times of war and peace. Therefore the criteria and methodology used by the Defense Logistics Agency must be sound.

To that end, we are asking that you please provide answers to the following questions:

Did the Office of the Secretary of Defense exercise strong oversight over the Defense Logistics Agency during the process? If not, why? If so, what type of oversight did it provide?

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Letters and Other Material Received on  
Proposed Base Closures and Realignments

Mr. Charles A. Bowsher  
Page Two

Please analyze the method the DLA used to determine military value ranking to the DDMT? Was this method sound and accurate?

Please analyze the method the DLA used to determine DDMT's ability to meet current and future mission requirements.

If the DLA deviated from the COBRA model, what other criteria were used?

Did the DLA take into consideration the unique functions, such as transportation capability performed at the Defense Distribution Depot Memphis?

Did the DLA accurately estimate the one-time cost to implement the closure of Defense Distribution Depot Memphis?

Throughput capacity and workload was given by DLA as one of the primary reasons DDMT was recommended for closure. Did DLA intentionally reduce the workload and throughput capacity of DDMT with the intention of recommending closure?

Thank you very much for your assistance in this matter.

Sincerely,

Harold Ford

Ed Bryant

Pete Foy

Don Damm

Paul Hoffman

Blanche Liner

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Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments

**Congress of the United States  
House of Representatives  
Washington, D.C. 20515-1703**

Mike Ward  
Member of Congress  
Third District Kentucky

March 7, 1995

Charles B. Mattingly  
Chief of Staff

The Honorable Charles Bowsher  
Comptroller General of the United States  
General Accounting Office  
441 G Street, NW, Room 7125  
Washington, D.C. 20548

Dear Mr. Bowsher:

We have received reports that the Naval Sea Systems Command (NAVSEA) Inspector General has requested the Naval Audit Service to investigate both the process and the accuracy of data submitted by, and for, the Naval Ordnance Station, Louisville in response to BRAC 95 scenario data calls. We are advised that this NAVSEA Inspector General investigation is assigned Case Number 1493C.


The investigation was apparently initiated following a complaint to the Inspector General regarding the handling of scenario data call responses pertaining to the Naval Ordnance Station, Louisville.

We request that your agency review this investigation, as well as all scenario data call responses submitted with regard to the Naval Ordnance Station, Louisville. We particularly request that you determine whether modifications to data responses, and the direction of scenario data call responses by higher authorities, were handled in accordance with appropriate policy guidance to assure the accuracy of certified data which was presented to the Secretary of the Navy and the Navy's Base Structures Evaluation Committee (BSEC).

The Department of the Navy BRAC 95 Analyses and Recommendations, dated March, 1995, indicates that the COBRA analysis produced a configuration model "best solution" which did not include closure of the Naval Ordnance Station, Louisville. We are concerned by reports that initial Naval Ordnance Station, Louisville scenario data call responses were altered, or in other cases directed by higher authorities, in ways which led to inaccurate data. This data may have substantially understated the cost to relocate work now performed at the Naval Ordnance Station.

In addition, the Individual Category COBRA Results reported in the March, 1995 Recommendations are considerably lower (more than 70 percent) and inconsistent with previously reported results from BRAC 91 and BRAC 93 studies.

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Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments

Letter to The Honorable Charles Bowsher  
March 7, 1995  
Page 2

The March, 1995 Recommendations apparently combine Naval Ordnance Station, Louisville cost calculations with those of NAWC, Indianapolis (see the attached data sheet regarding "Tech Centers/Laboratories"). This appears inconsistent with Department of the Navy and BRAC policy that each facility be considered on a site-specific basis. We are concerned that this may have been done to make it more difficult to identify the cost of closing Naval Ordnance Station, Louisville.

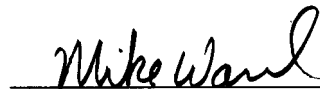
Because of time constraints on the Defense Base Closure and Realignment Commission, we request that you act expeditiously to review this investigation, and to review the scenario data call responses regarding the Louisville facility and the handling of those responses by Department of the Navy officials as the data went through the chain of command. Please report your findings to us by April 1, 1995 or as soon thereafter as feasible.

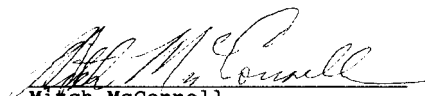
Thank you for your prompt attention to this urgent matter.

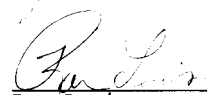
Sincerely,

  
Wendell Ford

  
Lee Hamilton

  
Mike Ward

  
Mitch McConnell

  
Ron Lewis

Enclosure

**Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments**

HAROLD E. FORD  
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**Congress of the United States  
House Of Representatives  
Washington, DC 20515-4209**

March 7, 1995

Mr. Charles A. Bowsher  
Comptroller General of the  
United States  
General Accounting Office  
441 G Street, NW  
Room 7100  
Washington, D.C. 20548

Dear Mr. Bowsher:


I am writing this letter to request the General Accounting Office provide a comparative analysis of the impact the closing of each of the distribution depots that the Defense Logistics Agency considered for closure, would have on minorities.

I am requesting that this analysis contain the breakdown of employees at each depot, by race, age and gender, as well as a detailed analysis of the impact on minorities in the communities directly affected by the possible closures.

In their report, the DLA estimates that only .6% of the Memphis area's economic base will be negatively impacted. I contend that the economic impact of removing 1,300 jobs, over 70% of which are held by minorities, from the heart of the city with the highest unemployment rate in the State of Tennessee, will be far greater than .6%. The jobs eliminated by the closure of DDMT translates to approximately, 1,040 African-American depot employees unemployed; and the economic impact of this closure on minorities was never investigated.

As I am sure you are aware, time is of the essence in this matter, so I would appreciate this information as soon as possible. Thank you for your assistance.

Sincerely,

  
HAROLD FORD  
Member of Congress

**Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments**

EDWARD J. MARKEY  
7TH DISTRICT, MASSACHUSETTS  
  
COMMITTEES:  
COMMERCE  
RANKING MEMBER  
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**Congress of the United States  
House of Representatives  
Washington, DC 20515-2107**

March 20, 1995

Mr. Rich Roscoe  
Office of Congressional Relations, Room 7125  
General Accounting Office  
441 G Street, NW  
Washington, DC 20548

Dear Mr. Roscoe:

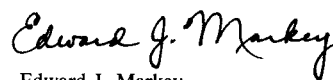
I am enclosing materials on the U.S. Army Research, Development, and Engineering Center in Natick, Massachusetts. As you probably know, the Defense Department has recommended that the Natick Center, which recently was named the headquarters for a new Soldiers Systems Command, receive additional personnel as part of the 1995 BRAC process.

I strongly agree with the Defense Department's analysis of Natick's key role in developing advanced technologies which our soldiers will need on the battlefields of the 21st century. I hope this information is useful as GAO evaluates the 1995 BRAC process.

If you have any questions about the materials, please contact Mr. Mark Bayer of my staff at (202) 225-2836.

Thank you.

Sincerely,



Edward J. Markey  
Member of Congress

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Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments

HAROLD E. FORD  
5TH DISTRICT, TENNESSEE  
  
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**Congress of the United States**  
**House Of Representatives**  
Washington, DC 20515-4209

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March 22, 1995

The Honorable Charles Bowsher  
Comptroller General  
General Accounting Office  
441 G Street, NW  
Washington, D.C. 20548

Dear Mr. Bowsher:

As you move forward with your analysis of the Department of Defense recommendations on BRAC 1995, several questions have come to my attention regarding the DoD/DLA process for scoring military value on the Defense Distribution Depot Memphis. They relate to the intended role of the military value analysis and COBRA as tools to rank bases versus the actual scoring of the bases under the DLA process.

I would appreciate your review of these issues as you prepare the GAO report for the Base Closure and Realignment Commission. My questions are as follows:

1. The purpose of the military value analysis is to determine the relative value of the installations themselves within a category, not the value of the missions or activities on the installation. In its analysis, the DLA created measures of merit as components of its military value criteria. One measure of merit was "mission scope." Why does the DLA military value analysis incorporate "mission scope" in its installation analysis?

It appears that the category which DLA has selected is meaningless for use as a comparative tool since these installations are evaluated on a series of different missions. Alternatively, does it make sense to score an installation's military value on the scope of the mission, which is portable and which has been changed by DLA since the last BRAC analysis?

2. The COBRA model employs the concept of "Base X" as a device to account for the movement of residual installation mission, personnel, and equipment to a base as yet to be identified. The Base X concept helps to improve the model's relevance by helping to account for small amounts of these costs difficult to specify in terms of a real location.



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Letters and Other Material Received on  
Proposed Base Closures and Realignments

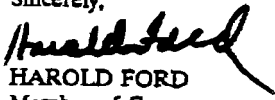
The Honorable Charles Bowsher  
page two

The COBRA model run for the closure of Defense Distribution Depot Memphis assumes the realignment of 50 percent plus to Base X, which means that DLA does not have a destination for that mission. This assumption calls into question the relevance and accuracy of the COBRA model as employed by the DLA in this case.

3. I would like to understand why, although the maximum surge capacity of the Defense Distribution Depot Memphis was reported in the data call as 46,000 throughput items, the DLA final analysis rates the capacity as only 23,000.

Thank you for your attention to these issues.

Sincerely,

  
HAROLD FORD  
Member of Congress

HF:mjs



## Federal Managers Association

CHAPTER 208  
DEFENSE INDUSTRIAL SUPPLY CENTER  
700 ROBBINS AVENUE  
PHILADELPHIA, PA. 19111

Mr. Barry Holman  
General Accounting Office

Dear Mr. Holman:

Representing the Defense Industrial Supply Center Federal Managers Association, it was a pleasure speaking to you Tuesday, 22 March 95. Having read your report GAO/NSIAD-95-60 Cost Growth and Other Factors Affect Closure and Privatization, combined with our experience with your analysis in BRAC 93, we felt that your objective, analytical assessment of the DLA proposal would provide a much needed sanity check to their recommendation.

Similar to the findings in subject report, we believe the current DLA BRAC analysis is suspect for a variety of reasons.

The justification to close DISC is not clear while the implementation scenario grossly understates the cost and readiness impact of such an action. In BRAC 93 DLA concluded that mass migration of items was too risky and imprudent (see attached), yet two years later the implementation scenario recommends moving approximately 2.4 million items among DLA Centers. Add to that volume of movement a Consumable Item Transfer (CIT II) of approximately 280K items from the Military Services to DLA, we would find ourselves with a logistics transfer of almost 2.7 million stock numbers (See attached chart). Moving items is not simply an electronic process. Physical labor is required of the loading activity to package historical hard copy data, technical drawings and ancillary records. The receiving activities will also incur costs to re-establish the management records and build technical expertise. Continued human communication and interaction between functional experts in all disciplines, will still be required even after the transfer. This continued dialogue is a mandatory element to come up to full operational capability. This post transfer effort we believe, is not included in the cost estimates.

Based on actual service ICP cost data, the cost of migrating items using the total number of items placed in motion under the plan, could exceed \$313 (excluding Consumable Item Transfer from services). This migration process cost does not include the negative impact on material availability and readiness incurred in such a mass migration even if it is spread out over several years. Our previous history with CIT Phase I and migrating Federal Stock Classes 1560/1680 to Defense General shows a degradation in service support.

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Proposed Base Closures and Realignment

We concur with DLA's 1993 position that this is simply a bad idea!

Another cost discrepancy apparently overlooked is the fact that under this plan DLA will maintain the Defense Personnel Supply Center compound for a period of 2 years to offset military construction costs to move DPSC to the DISC facility as decided in BRAC 93. The cost of keeping DPSC open for an additional 2 years seems not to have been included in the cost evaluation. The estimated cost of extending the facility over this period is approximately \$154M (FY-94 dollars).

The major factor in the DOD decision for closure and realignment is military value. The primary criteria for evaluating such decisions is what impact they have on operational readiness of DoD's total force. Based on BRAC disclosure documents, DLA ran their proposed realignment model on three separate occasions: 5 Dec 94, 29 Dec 94 and 5 Jan 95. In the DLA spreadsheet analysis of military value (attached) some interesting observations are evident.

In the 5 Dec 94 computation, DISC scored second to DCSC in total points. In the 29 Dec 94 computation, once again DISC scored second but with significant changes to the scores of DGSC, the largest being a 29 point increase in the category of additional mission but without taking into consideration additional personnel. The 5 January computation saw a substantial increase in scores for both DGSC and DCSC but a scoring decrease to DISC. The big change occurred in the area of base operating costs and personnel costs. Under the revised computations, DISC's score, however, decreased from 171 to 162 points. This change resulted in a 25 point deficit placing DISC with the lowest military value rating.

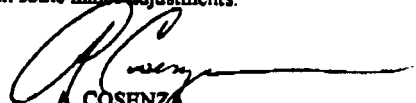
Aside from the point changes, however, significant dollar changes were also obvious. As an example, DGSC's total operational costs decreased \$94M between 15 Dec and 30 Dec. The cause was not explained. An interesting audit trail exists which documents at least seven letters and phone calls to DGSC requesting additional data to reach this final conclusion. DISC, on the other hand, was apparently never provided the same opportunity. In looking at the comparative center data now, DISC questions the calculation of the % of non-DoD paid equivalents. How did the other centers come up with their numbers? DISC may have misinterpreted what was being asked. There is also an indication that the number of people forecasted to accept an additional 1.068 million items to DGSC is grossly understated.

Another major area not addressed is comparative center performance relative to readiness. Although DISC manages the largest percentage of weapons systems items, provides the single largest source of supply for major industrial customers, provides the highest level of support to those military sensitive items and gains weapons management synergy by being collocated with a Navy secondary spares manager (ASO), none of these elements appears in the computation of military value. Some relevant data is enclosed. This appears to be in direct conflict with DoD readiness criteria cited above. This synergy

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Proposed Base Closures and Realignments

between DISC and ASO was highlighted in BRAC 93 and is pivotal in our customer support. For example we currently have joint contracts in place with ASO covering more than 200 items and \$30M dollars. Proximity and a similar weapons orientation between ASO and DISC has accrued savings in both readiness and investment dollars and is prominently cited in attachment of the BRAC 95 Navy analysis yet omitted from DLA considerations. This type of synergy between a Service ICP and a DLA ICP does not occur between a DLA ICP and a Distribution Depot. The real logistics savings are in integrated acquisition and planning between ICP's. In fact, both DLA's Corporate Strategic Plan and performance plan emphasize a decrease in depot inventory and cost due to Buy Response Vice Inventory efforts, obviating any special synergy between ICP and Depot,

Overall, there appears to be numerous discrepancies that are evident in the analysis, both quantitative and qualitative. Under military value criteria the bottom line to any BRAC movement is the impact to total force readiness. The scenario created by DLA is highly susceptible to negative readiness impacts. DLA itself recognized this in BRAC 93 and wisely chose to avoid this radical movement of items. The net result of risking this potential support impact is a suspect MILCON savings and 408 jobs that are taken as benefit to this scenario. It is unclear however, how these 408 savings occur since the majority come from Columbus and may be commingled with BRAC 93 savings of the DCSC/DESC merger. We hope you can add a rational, objective assessment to a recommendation which in our opinion was a poor business solution to an economic problem which can be solved with a much less destabilizing process not the least of which is sustaining the BRAC 93 scenario with some minor adjustments.

  
A. COSENZA  
Federal Managers Association

Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignment

TED STEVENS, ALASKA  
THAD COCHRAN, MISSISSIPPI  
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CONNIE MACE, FLORIDA  
CONRAD BURNS, MONTANA  
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TOM HARKIN, IOWA  
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J. KEITH KENNEDY, STAFF DIRECTOR  
JAMES H. ENGLISH, MINORITY STAFF DIRECTOR

United States Senate

COMMITTEE ON APPROPRIATIONS

WASHINGTON, DC 20510-6025

March 29, 1995

Mr. Charles A. Bowsher  
Comptroller General of the U.S.  
Room 7125  
441 G Street, N.W.  
Washington, D.C. 20548

Dear Mr. Bowsher:

As part of your review of the Department of Defense's 1995 recommendations to the Base Closure and Realignment Commission (BRAC), I ask that you evaluate the Army's proposed realignment of Fort Greely, Alaska.

During a recent visit to the Fort Greely/Delta Junction Alaska area, it came to my attention that the Department of the Army significantly understated the costs associated with the proposed realignment of Fort Greely and restationing of organizations and personnel to Fort Wainwright, Alaska.

I appreciate your assistance in ensuring that an accurate and complete assessment of the total costs, savings and return on investment of this proposal is known. Ms. Sid Ashworth of my staff is available to provide further information on this issue.

I look forward to working with you on this matter.

With best wishes,

Cordially,



TED STEVENS

**Appendix I**  
**Letters and Other Material Received on**  
**Proposed Base Closures and Realignment**

ROBERT A. BORSKI  
3D DISTRICT, PENNSYLVANIA

COMMITTEES:  
TRANSPORTATION  
AND INFRASTRUCTURE  
RANKING DEMOCRAT—SUBCOMMITTEE ON  
WATER RESOURCES AND ENVIRONMENT

STEERING COMMITTEE

REGIONAL WHIP

**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515**

March 30, 1995

Mr. Charles A. Bowsher  
Comptroller General of the United States  
General Accounting Office  
441 G Street, NW  
Washington, DC 20548

Dear Mr. Comptroller:

I am writing to bring to your attention several issues relating to the Defense Logistics Agency's (DLA) recommendation to disestablish the Defense Industrial Supply Center (DISC) located in Philadelphia. I believe these issues must be addressed by the General Accounting Office (GAO) in its April 15 report to Congress analyzing the 1995 base closure recommendations.

As you may know, the DLA has recommended the "disestablishment" of DISC as a part of its 1995 base closure recommendations. After numerous meetings with DISC employees and the DLA base closure executive group (BRACEG), I believe DLA's recommendation is suspect for the following reasons:

Military Value

- \* DLA did not adequately assess the risk to military readiness associated with the large amount of items transferred.
- \* Inventory Control Point (ICP) performance and its impact on readiness is not included in the military value analysis.
- \* The multi-service ICP synergy that exists between DISC and the Navy's Aviation Supply Office (ASO) was not included in the military value analysis. Additional compound synergy is also achieved by DISC partnering with the Defense Printing Service (DPS) in pioneering development of critical procurement applications.
- \* DLA instead overemphasized a non-essential synergy between ICPs and distribution depots.
- \* The DLA did not adequately assess the value and available capacity of the ASO compound in its "installation military value analysis."
- \* Unexplained discrepancies exist among three separate computations of the military value of the ICPs.

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**Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments**

March 30, 1995  
Page 2

Costs

- \* The significant cost of transferring items was not included in the COBRA analysis.
- \* The cost of delaying the BRAC93 realignment of the Defense Personnel Support Center (DPSC) to the ASO compound was not included in the COBRA analysis.
- \* DLA used a flawed methodology to determine the amount of positions that would be eliminated under each scenario.

The bottom line is that DLA is risking the loss of a critical, highly-skilled workforce -- all for savings which are highly suspect.

I have provided a full explanation of each of these major flaws in DLA's recommendation to disestablish DISC. I hope you can add a rational, objective assessment to a recommendation which in my opinion is highly flawed. I believe DLA can achieve higher efficiencies by building on the recommendations accepted by the Base Closure Commission in BRAC93.

Thank you for your expeditious consideration of this extremely important matter. Please do not hesitate to contact me for any additional information.

Sincerely,



ROBERT A. BORSKI  
Member of Congress

RAB/mdv  
Enclosure

cc: Mr. Barry Holman  
General Accounting Office

**Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments**

ROBERT A. BORSKI  
30 DISTRICT, PENNSYLVANIA

COMMITTEES:  
TRANSPORTATION  
AND INFRASTRUCTURE  
RANKING DEMOCRAT--SUBCOMMITTEE ON  
WATER RESOURCES AND ENVIRONMENT

STEERING COMMITTEE

REGIONAL WHIP

**Congress of the United States  
House of Representatives  
Washington, DC 20515**

April 4, 1995

Mr. Charles A. Bowsher  
Comptroller General of the United States  
General Accounting Office  
441 G Street, NW  
Washington, DC 20548


Dear Mr. Comptroller:

I am writing to bring to your attention several issues relating to the Navy's recommendation to close the Naval Air Technical Services Facility (NATSF) located in Philadelphia. I believe these issues must be addressed by the General Accounting Office (GAO) in its April 15 report to Congress analyzing the 1995 base closure recommendations.

I have enclosed a list of several questions that should be answered before any action can be taken with respect to NATSF. While I realize you are operating under severe time constraints, I would greatly appreciate your efforts to investigate these matters to the fullest extent possible.

As always, I am available to discuss these matters further. Please do not hesitate to contact me.

Sincerely,

  
ROBERT A. BORSKI  
Member of Congress

RAB/mdv  
Enclosure

cc: Honorable Alan Dixon  
Defense Base Closure and Realignment Commission

WASHINGTON OFFICE:  
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**Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignment**

Questions for the General Accounting Office to investigate relating to the proposed closure of the Naval Air Technical Services Facility under the 1995 BRAC recommendation

1. Three scenarios were presented to the Navy BSEC team by Naval Air Systems Command concerning NATSF they all related to its closure and absorption in one of three existing Navy facilities: NADEP North Island, SPCC Mechanicsburg and Naval Air Systems Command Patuxent River Md. Why was there no scenario for staying in place as the Aviation Supply Office was to remain open? This fact was noted by the BSEC when they voted to close NATSF in their minutes of 10 January 95.
2. How credible can the figures submitted by Naval Air Systems Command be for the three scenarios when they all show the same number of people will relocate in moves of 100, 200 and 2700 miles? Actual numbers of employees accepting relocation in the BRAC process is reported to be in the 12-16% range. Why is a much higher percentage, 64.7% (or 112 out of 173 employees), used here?
3. Related to question 2 how can all three scenarios have the same one-time unique moving costs of \$110,000.00 for breakdown, packing, reinstallation and troubleshooting of the JEDMICS at each of three different sites? Why are moving costs the same for three possible moves of varying distances?
4. NATSF as the Naval Air Systems Command logistics element manager for technical manuals expends any work days in travel status at headquarters in Arlington, Va. Most of this travel can be conducted in one day with the largest expense being a Metroliner round-trip ticket between Philadelphia and Washington. This will not change dramatically when NAVAIR headquarters moves to Patuxent River, Md. in 1997 except to become cheaper due to need for only a rental car. If NATSF is relocated to San Diego travel expenses will increase precipitously. Many of the current one day trips will become at least three days in duration when travel time is factored in. This, of course, will have a deleterious impact on NATSF's productivity. Why was this not addressed in the decision to relocate NATSF and the associated costs?
5. In the cover sheet to the proposed North Island scenario it states that "Aviation Supply Office...a customer that consumes only 13% of [NATSF's] workload." This is contrary to all information available at NATSF which shows that ASO receives over 40% of support provided to their customers.
6. NATSF is currently a beta site for the new JEDMICS (Joint Engineering Data Management Information Systems) the state-of-the-art system for handling engineering drawings. The Navy has no plan to place a JEDMICS terminal at ASO reasoning that the JEDMICS site at NATSF would service their neighbor across the street. If NATSF is moved to San Diego this will not be possible. Why aren't the costs associated with buying a JEDMICS site for ASO addressed in the real costs of a NATSF move?
7. NATSF data management department is currently closely related to the Defense Printing Service office on the ASO compound in the creation of a paperless stock system to supply users with technical manuals as needed. This system is TMPODS (Technical Manual Print on Demand System). How will TMPODS be kept operational if NATSF is not co-located with DPS? What will be the effect on fleet maintenance readiness if there are extensive delays in obtaining technical manuals?
8. With the decline in new aircraft procurements by the Department of the Navy foreign military sales (FMS) cases are of increasing importance to both the Department of Defense and to the American economy. Currently NATSF is co-located with the Navy International Logistics Control Office (NAVILCO) with their large number of foreign liaison officers which allows for immediate attention to foreign customers' data needs. How will this important function be handled when the immediate access of NATSF manager and NAVILCO case manager is no longer available?
9. In 1992 Naval Air Systems Command conducted a study of their Expense Operating Budget field activities and concluded that two of these, NATSF and NAESU, should be merged on the ASO compound. What happened to this study and why was it not implemented?

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**Appendix I**  
**Letters and Other Material Received on**  
**Proposed Base Closures and Realignments**

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10. NATSF produces the work unit code manuals for the Navy's aircraft uses the data base maintained by Aviation Supply Office on provisioning data. How will the integrity of this synergy be maintained when these two activities are no longer across the street from each other?

11. The closure of NATSF and its incorporation into NADEP North Island is proposed under the heading of the Navy's consolidation of its technical centers. While "technical" is NATSF's middle name; there are no scientists or engineers employed in a working capacity there. All NATSF's activities are related to logistics and fleet support and so are much closer in nature to the supply function performed by ASO. Why is NATSF classified as a technical center in this BRAC when it is clear from its Military Value Data Call, pgs. 8-10, that its employees do not fit that definition?

12. During the 1993 BRAC there was guidance that unique operations should be left open. NATSF is unique in the Department of Defense in that there exists no other agency whose mission centers completely around the management of technical manuals and engineering drawings. The success of this mission is found in the 95% availability rates for NAVAIR manuals in response to user demand. The BRAC commission in 1993 found this argument compelling. How well can this management function be maintained when NATSF is absorbed into an agency whose primary function is overhaul of aircraft? Why is this unique function being destroyed?

Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments

ROBERT A. BORSKI  
3D DISTRICT, PENNSYLVANIA

COMMITTEES:  
TRANSPORTATION  
AND INFRASTRUCTURE  
RANKING DEMOCRAT—SUBCOMMITTEE ON  
WATER RESOURCES AND ENVIRONMENT

STEERING COMMITTEE

REGIONAL WHIP

Congress of the United States  
House of Representatives  
Washington, DC 20515

April 5, 1995

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(215) 426-4616

Mr. Charles A. Bowsher  
Comptroller General of the United States  
General Accounting Office  
441 G Street, NW  
Washington, DC 20548

Dear Mr. Comptroller:

I am writing to bring to your attention several issues relating to the Navy's recommendation to close the Naval Aviation Engineering Service Unit (NAESU) Headquarters located in Philadelphia and relocate the activity to NADEP North Island. I believe these issues must be addressed by the General Accounting Office (GAO) in its April 15 report to Congress analyzing the 1995 base closure recommendations.

I have been working with representatives of NAESU to analyze the Navy's recommendation. We believe the recommendation is flawed for the following reasons:

- \* While the recommendation claims NAESU Headquarters in Philadelphia is a technical center, it failed to score NAESU for technical functions.
- \* The recommendation incorrectly claims NAESU Headquarters performs similar functions to NADEP North Island.
- \* The Navy failed to consider absorbing NAESU functions within ASO, even though it has already spent \$712,000 of BRAC 91 funds to move NAESU to the ASO compound. Absorbing NAESU within ASO would be more beneficial to the fleet and the taxpayer, saving \$8 million more than the relocating NAESU to NADEP North Island.
- \* The recommendation incorrectly assumes that a majority of NAESU's current workforce will move to NADEP North Island. In fact, 93 percent will not make the move. The loss of this critical expertise will significantly impair fleet readiness.
- \* The recommendation states that 14 people from NAESU's California Detachments/Regional Offices will be able to fill the Headquarters billets, without giving an explanation of how this can be achieved. The individuals working in this office are military, clerical and technical personnel with no training or experience in the headquarters functions of ETS management and contracting.

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**Appendix I**  
**Letters and Other Material Received on**  
**Proposed Base Closures and Realignment**

April 5, 1995  
Page 2

While I realize you are operating under severe time constraints, I would greatly appreciate your efforts to investigate these matters to the fullest extent possible.

As always, I am available to discuss these matters further. Please do not hesitate to contact me.

Sincerely,



ROBERT A. BORSKI  
Member of Congress

RAB/mdv

cc: Honorable Alan Dixon  
Defense Base Closure and Realignment Commission

**Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments**

**DEFENSE REALIGNMENT ADVISORS**

THE HOMER BUILDING  
SUITE 410 SOUTH  
601 THIRTEENTH STREET, N.W.  
WASHINGTON, D.C. 20005  
(202) 879-9460

6 April 1995

Mr. Barry Holman  
U.S. General Accounting Office  
NSIAD/Assistant Director - Military Ops. & Capabilities Issues  
441 G St., NW  
Washington, D.C. 20548

**RE: DESCOM methodology for Army maintenance depot downsizing**

Dear Mr. Holman:

Reference is made to our meeting of 5 April 1995, at GAO.

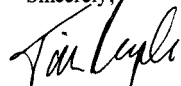
Enclosed please find the methodology used by the Army's Depot Systems Command for "downsizing" its maintenance capacity. Anniston Army Depot was used as the model. As you can see from the briefing, the DESCOM intent paralleled that of the Air Force -- to retain all of the depots, but to streamline them for efficiency.

In his 12 April 1994 testimony to the House Armed Services Committee, General Salomon, Commander of the Army Materiel Command, drew attention to the increasing backlog of depot maintenance and the readiness costs associated with that backlog. He also elaborated on his concept of how to "downsize" the Army depot base -- indicating AMC's intent to retain all of its depots. Copies of both the prepared and actual testimony are enclosed for your review. As the Army's top logistician, General Salomon's recommendations make good sense. It appears that at some point in the process, the Army's top leaders overrode the considered advice and recommendations of its senior logistician.

Also enclosed is a depot comparison briefing slide developed with certified data from both Army and DLA collocated depots. The study considered the depots as a single "depot complex", rather than splitting the depots into separate elements for comparison purposes.

We appreciate your continued efforts in this regard. Please call me if you have any questions, or if I can provide any additional information.

Sincerely,



TIMOTHY R. RUPLI  
President

enclosures

A DIVISION OF R. DUFFY WALL & ASSOCIATES, INC.

**Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments**

MARK O. HATFIELD, OREGON, CHAIRMAN

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ROBERT F. BENNETT, UTAH	

J. KEITH KENNEDY, STAFF DIRECTOR  
JAMES H. ENGLISH, MINORITY STAFF DIRECTOR

**United States Senate**  
COMMITTEE ON APPROPRIATIONS  
WASHINGTON, DC 20510-6025

April 7, 1995

Mr. Charles A. Bowsher  
Comptroller General of the U.S.  
Room 7125  
441 G Street, N.W.  
Washington, D.C. 20548

Dear Mr. Bowsher:

As a part of your review of the Department of Defense's 1995 recommendations to the Base Closure and Realignment Commission (BRAC), I ask that you evaluate the Air Force's proposed realignment of Malmstrom Air Force Base, Montana.

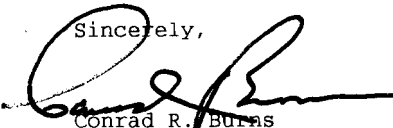
During the recent BRAC hearing in Great Falls, it was stated that the savings from realigning Malmstrom AFB would be generated from the savings in lease costs at MacDill AFB. It appears that these savings would occur regardless of where the KC-135s originate. The attached document discusses this issue.

I appreciate your assistance in ensuring that an accurate and complete assessment of the total costs, savings and return on investment of this proposal is known. Mr. Jim Morhard of my staff is available to provide further information on this issue.

I look forward to working with you on this matter.

With best wishes,

Sincerely,

  
Conrad R. Burns  
Chairman of the  
Military Construction  
Subcommittee

**Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments**

JAMES V. HANSEN  
1ST DISTRICT, UTAH

COMMITTEES:  
NATIONAL SECURITY  
RESOURCES  
SELECT COMMITTEE ON  
INTELLIGENCE  
WASHINGTON OFFICE:  
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(202) 225-0453

**Congress of the United States  
House of Representatives  
Washington, DC 20515-4401**

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435 EAST TABERNAACLE  
SUITE 301  
ST. GEORGE, UT 84770  
(801) 628-1071

April 7, 1995

The Honorable Charles Bowsher  
Comptroller General of the United States  
General Accounting Office  
441 G Street NW  
Washington, DC 20548

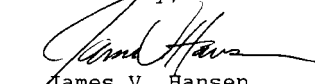
Dear Mr. Bowsher,

I am writing to you to request your assistance in a matter of great interest to myself and the people of Utah.

During the 1993 BRAC, a decision was made to consolidate tactical missile work at Letterkenny Army Depot (LEAD). In its 1995 recommendations for base closure, the Department of Defense recommends closing LEAD. While I cannot comment on the merits of this recommendation, I am concerned about the future of consolidation in the tactical missile workload. I believe consolidation and cross-servicing of depot-level maintenance provides considerable cost savings to the American taxpayer, as well as significant efficiencies to the Department of Defense. I would appreciate your response to the questions I have provided in the attached recommendation. I believe continued consolidation of this workload at the Ogden Air Logistics Center can provide tremendous economic advantages and should be considered.

Your assistance in this matter, and the professional work done by your staff, is greatly appreciated.

Sincerely,

  
James V. Hansen  
Member of Congress

JVH:bj

Attachment (1)

**Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments**

**Hudson Institute**

J.W. Wheeler  
Private Sector Chair,  
City of Indianapolis NAWC Task Force  
Hudson Institute  
P.O. Box 26-919  
Indianapolis, IN 46226

April 9, 1995

Mr. David R. Warren  
Director, Defense Management and NASA Issues

Mr. Barry W. Holman  
Assistant Director, National Security and  
International Affairs Division

Mr. Richard P Roscoe  
Office of Congressional Relations  
U.S. General Accounting Office  
441 G. St. NW, Room 7025  
Washington, DC 20548

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317-545-9639  
(FAX)

INDIANAPOLIS  
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MONTREAL  
BRUSSELS

Dear Sirs:

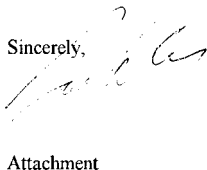
Thank you for joining us in the conference call from Congressman Burton's office. Your comments were most helpful in our deliberations.

Enclosed is the promised paper that outlines the major concerns that we have with both the Military Value and the COBRA analyses upon which the closure decision was based for Naval Air Warfare Center -- Aircraft Division, Indianapolis (NAWCADI). As we discussed on the telephone, our initial review had found serious flaws in the scoring of our site in the Military Value analysis, as well as several important discrepancies between the data call submissions and the values used in the final COBRA closure scenario. What we did not expect to find was several fundamental flaws in the analysis.

We realize that you are under serious deadline pressures, but the errors found are so serious as to require your attention. The team members who helped put this assessment together are available to discuss our concerns and re-estimates at any time. My direct line at Hudson Institute is (317) 549-4135. Under the time constraints, please feel free to contact me at home, (317) 841-0651. You can also contact Larry Gigerich in Mayor Goldsmith's office at (317) 327-3637.

Thanking you in advance, I remain

Sincerely,



Attachment

SHAPING THE FUTURE



---

**Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments**

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**Congress of the United States**  
Washington, DC 20515

April 10, 1995

Mr. Barry W. Holman, Assistant Director  
National Security and International Affairs Division  
U.S. General Accounting Office  
441 G Street, N.W.  
Washington, D.C. 20548

Dear Mr. Holman:

We are taking this opportunity to express our serious concerns with the process, data integrity and final recommendations of the U.S. Navy that led to the proposed realignment in missions at Naval Air Warfare Center Aircraft Division Lakehurst and the possible closure of the Naval Air Engineering Station in Lakehurst, New Jersey. We strongly urge you to include these data inaccuracies and flawed procedures in the General Accounting Office's April 15, 1995 report to the Base Closure and Realignment Commission (BRAC).

While we are pleased that the Navy abandoned its initial scenario to completely close Lakehurst and has conceded that it cannot safely and cost-effectively move the critical missions of the catapult testing and launch recovery system at Lakehurst, we remain perplexed by the Navy's decision to strip and move operations which support and work synergistically with these two core functions. To divide, splice and relocate interrelated aspects of Lakehurst's mission jeopardizes the operations, productivity and performance of our fleet.

Well-documented information provided to us indicates the data used in reaching the decision to partially close the base was at best flawed and at worst manipulated by the Navy's Base Structure Evaluation Committee (BSEC). We have raised these issues with the Secretary of the Navy and are awaiting an Inspector General's report. To date, the ongoing investigation has done little to alleviate our concerns. Indeed the Navy's initial response to our inquiry raises more questions than it answers.

Our evidence, shared openly with the Navy and made available to the General Accounting Office, clearly demonstrates two areas of significant irregularities in the Navy's process in regard to the Lakehurst scenario. First, the Navy's BSEC repeatedly reduced, or ignored the *certified data* submitted by the Commander, Naval Air Systems Command (NAVAIR). Second, the Navy's BSEC knowingly eliminated and denied the necessity of including the costs of relocating Lakehurst's tenants as a result of the closure action.

**Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments**

Mr. Barry W. Holman  
April 10, 1995  
Page Two

We recognize the Navy BSEC's authority to challenge the data provided by its most senior military commanders, in the effort to determine the most correct estimate for each proposed closure or realignment action. However, we believe the BSEC exercised poor judgment and overstepped its authority by drastically reducing (in some cases zeroizing) the data without factual justification. For your convenience, we have included excerpts from a comparison of the data reported by the Navy BSEC and the actual certified data provided by NAVAIR for the Lakehurst scenario:

<u>Estimated Costs for Lakehurst Scenario #123:</u>	<u>Reported by Navy BSEC:</u>	<u>Certified by NAVAIR:</u>
▶ One-Time Cost estimate:	\$ 96,943,000	\$ 162,274,000
▶ Annual Recurring Costs:	\$ 4,622,000	\$ 12,630,000
▶ Return on Investment:	2002 (3 Years)	2029 (30 Years)

Regarding our second concern, it is best to simply quote the Navy's BSEC during its deliberations of December 19, 1994:

*"Since it is not DoN's responsibility to build new facilities for these personnel, the BSEC directed that MILCON (for Lakehurst's tenants) be eliminated."*

We believe that assessment is wrong and that costs to move tenant personnel should be a part of the total costs to realign Navy Lakehurst. These military tenants include the Army Airborne Engineering Evaluation Support Branch (AAEESB); the Defense Logistics Agency's Defense Reutilization and Marketing Office (DRMO); and the Naval Mobile Construction Battalion Twenty One (NMCB-21). Even the costs for relocating its one-of-a-kind training devices, as well as the costs for necessary construction for the Navy's own Naval Air Technical Training Center (NATTC) were eliminated. The actual estimates for the Lakehurst scenario are provided below:

<u>One-Time Costs for Lakehurst Scenario #123:</u>	<u>Reported by Navy BSEC:</u>	<u>Certified by Tenant:</u>
▶ Army's Office of the Chief of Staff for AAEESB:	\$ 0	\$ 11,525,000
▶ Chief of Naval Education & Training for NATTC:	\$ 199,000	\$ 33,210,000
▶ Defense Logistics Agency for DRMO:	\$ 0	\$ 16,925,500
▶ Commander, NMCB-21:	\$ 0	\$ 867,250

Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments

Mr. Barry W. Holman  
April 10, 1995  
Page Three

We believe that the process used by the Navy's BSEC is flawed and has violated the intent of the Navy's public policy on fair and open procedures. We are concerned that the process may have been misused to justify a predetermined decision to bolster operations at NAS Patuxent River and to save the Naval Aviation Depot (NADEP) at Jacksonville, Florida. We quote the BSEC from its January 13, 1995 deliberations:

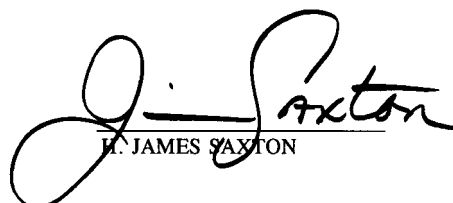
*"NADEP Jacksonville was identified as a receiving site that enabled the closure of a major technical center."*

Note the BSEC's projected savings in the realignment scenario for Lakehurst estimates annual savings of \$37,200,000. This savings is nearly identical to the real savings of \$37,300,000 which would be achieved if a proposal by the Joint Cross-Service Group to close NADEP Jacksonville and create a Regional Maintenance Activity were adopted by the BRAC.

These inconsistencies and numerical anomalies cast serious doubts on the Navy's process for determining military value, initial costs, and potential return on investment in the closure and realignment scenarios for Navy Lakehurst. We believe that the process followed throughout the Lakehurst scenarios was compromised and the final decisions, based on incorrect assumptions and erroneous data, are flawed. Again, we strongly encourage the GAO to include these data inaccuracies and flawed procedures in its April report and would appreciate any additional insights you may provide as we present this case to the BRAC Commission.

Sincerely,

  
CHRISTOPHER H. SMITH

  
H. JAMES SAXTON

  
BILL BRADLEY

  
FRANK LAUTENBERG

Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments

United States Senate

WASHINGTON, DC 20510

April 10, 1995

The Honorable Charles A. Bowsher  
Comptroller General  
United States General Accounting Office  
441 G Street, N.W.  
Washington, D.C. 20548

Dear Mr. Bowsher:

We are writing regarding the detailed analysis of the Department of Defense (DOD) 1995 base closure and realignment recommendations that the General Accounting Office (GAO) is required to submit (under Section 2903 (d) of Public Law 101-510, as amended) to the Congress and to the Defense Base Closure and Realignment Commission by April 15, 1995. We would like to reiterate to you our concern over the Defense Logistics Agency's (DLA) recommendation to close the Defense Distribution Depot Memphis, Tennessee (DDMT).

In the DOD 1995 Annual Report (page 146), Secretary William Perry states that there "are three guiding principles to the Department's BRAC process: improve military effectiveness, save money by reducing overhead, and conduct a fair and objective selection process." The Policy Guidance the secretary issued on January 7, 1994, also states that the Service and Defense Agency BRAC studies "must be based on analyses of the base structure by like categories of bases using: objective measures for the selection criteria, where possible..." It is clear to us and to the Memphis and DDMT communities that the process DLA used to reach the decision to close DDMT did not follow the secretary's instructions to be fair and objective while comparing like categories of bases.

An example of our concern is the Installation Military Value Analysis, where DLA defined Mission Scope as being largely dependent on portable functions and tenant activities. Four aspects of this decision disturb us. First, this practice resulted in an under-valuing of DDMT's permanent physical assets and such factors as operating costs.

Second, it seems to us that DLA established a BRAC study process which evaluated its depots based on the number of tenant functions located at each installation. In effect, DLA judged its facilities based not on the underlying military value of the installations themselves, but on how good of a host they were.

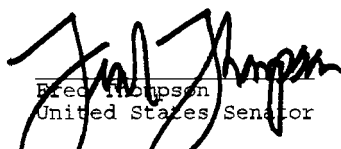
Third, the practice violated the DOD direction to objectively compare installations in like categories. Finally, the portability of the measured functions and tenant activities meant that DLA could influence the BRAC study outcome by using unilateral, non-BRAC actions.

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We trust that your April 15 report will not only address the issue of whether DLA's recommendations are consistent with its own BRAC guidelines, but whether DLA's BRAC guidelines themselves were appropriate reflections of the letter and spirit of P.L. 101-510 and the DOD Policy Memoranda establishing the overall procedures and responsibilities for selecting realignment and closure candidates.

We appreciate your attention to our concern and look forward to receiving your analysis of DLA's BRAC recommendations and decision making process.

Sincerely,

  
Fred Thompson  
United States Senator

  
Bill Frist  
United States Senator

**Appendix I  
Letters and Other Material Received on  
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**Congress of the United States  
House of Representatives  
Washington, DC 20515**

April 11, 1995

The Honorable Charles A. Bowsher  
Comptroller General of the United States  
General Accounting Office  
441 G Street, N.W.  
Washington, DC 20548

Dear Mr. Bowsher:

We are writing to urge that the General Accounting Office (GAO) review the manner in which the U.S. Army prepared its recommendation to disestablish the Aviation and Troop Command (ATCOM) as part of the 1995 base closure process, and discuss the results of this review in your report to the Defense Base Closure and Realignment (BRAC) Commission

Established in 1991, ATCOM has sole responsibility for the research, development, engineering and logistical support for the Army's airborne systems and for field and troop support equipment. As the Army Public Affairs office noted in April 1994, ATCOM "is the only command in the Army that affects every soldier, every day." It operates from leased space at the St. Louis Federal Center, a facility owned by the General Services Administration.

As you know, the Army has recommended that ATCOM be disestablished and that its aviation functions be transferred to Redstone Arsenal; its soldier systems functions be transferred to Natick Research, Development and Engineering Center (RDEC); its communications and electronics functions be transferred to Fort Monmouth; and its automotive functions be transferred to Detroit Arsenal. We believe that this proposal is severely flawed based on our findings that in recommending ATCOM for closure, the Army:

- (1) failed to comply with the base closure law's requirement that all closure recommendations be based on the final selection criteria;
- (2) overestimated the cost savings to the government, which are much lower than represented;
- (3) failed to comply with the objectives of its own Stationing Strategy; and,
- (4) failed to consider more cost-effective alternatives.

These findings have led us to conclude that the Army deviated substantially from final criteria 1, 2, 3, 4 and 5 in recommending that ATCOM be closed.

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Proposed Base Closures and Realignment**

We understand that by April 15 you must submit to the BRAC Commission an analysis of the Defense Department's recommendations and selection process. We would like to take this opportunity to present our findings regarding ATCOM that are of particular relevance to your analysis. We urge you to include these findings in your report to the BRAC Commission due to the serious errors made by the Army in recommending that ATCOM be closed.

**FAILURE TO COMPLY WITH THE BASE CLOSURE LAW**

As you know, the base closure law requires that the Defense Department make recommendations to close or realign military installations, including leased facilities, "on the basis of the force structure plan and the final criteria." In keeping with this requirement, the Defense Department delineated eight final criteria and instructed each Service to give priority consideration to the first four, which measure military value.

We have found that the Army failed to consider any of the military value criteria when selecting leased facilities for closure, despite the law's requirement that these facilities be evaluated in the same manner as other military installations. The Army's Management Control Plan for the 1995 base closure process indicates that the Army evaluated installations on the basis of the military value criteria during its "Installation Assessment" phase. It states that during this phase, "each category of installations is compared using a set of attributes," and that "each attribute is linked to one of the four DOD selection criteria that measure Military Value." This was the only phase of the Army's base closure selection process in which the first four criteria were used as the basis for developing closure recommendations.

The Army's Management Control Plan clearly shows that leased facilities were excluded from this phase of the process. These facilities were reviewed by the Army only after all other facilities had been evaluated on the basis of the first four criteria and had received military value rankings (see Attachment A).

In response to a question by the BRAC Commission regarding this apparent failure to analyze leased facilities based on the military value criteria, the Army stated that it "concluded that leased facilities in general, not necessarily the operations they house, have low military value." We question the validity of this statement, since we have found no evidence of such a determination having been made during the Army's base closure selection process. Furthermore, this statement could conceivably apply to facilities housing operations in every category of installations. In assigning weights to the final criteria, the Army gave Criteria 2 -- the availability and condition of land and facilities -- only 225 out of 1000 points. At the same time, the Army gave Criteria 1 -- mission requirements and operational readiness -- 450 out of 1000 points. It is evident, therefore, that the Army determined that facilities have low military value relative to the operations they house regardless of the installation category in which they were evaluated.

In the same response to the BRAC Commission, the Army stated that "the Army's leaders considered the military value of ATCOM in its deliberations." However, the minutes of the Army's deliberative meetings indicate that no such consideration occurred. In fact, the briefing slide proposing the closure of ATCOM that was presented to the Army's leaders on 20 December

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1994 contained no military value rating by which to determine whether closure was appropriate. In contrast, the briefing slides for facilities in other installation categories did include military value ratings by which to determine whether closure was appropriate (see Attachment B). It appears from the Army's own documents, therefore, that its leadership based the decision to close ATCOM not on the basis of the eight final criteria as required by the law, but solely on the basis of a cost/savings analysis (which itself was flawed -- see below).

We believe the Army also violated the base closure law by attempting to realign the Systems Integration and Management Activity (SIMA) as part of its recommendation to close ATCOM. As you know, the base closure law applies to installations having at least 300 authorized civilian personnel. SIMA employs approximately 409 civilian personnel and is located in leased space in downtown St. Louis. It is functionally distinct from ATCOM and geographically distinct from the St. Louis Federal Center. Despite these facts, the Army included the transfer of SIMA to Redstone Arsenal within its proposal to disestablish ATCOM. The Army failed to perform an independent analysis of SIMA, including any consideration of the military value or other selection criteria in recommending that it be transferred. These errors constitute a violation of the base closure law.

In light of the above, it is evident that the Army did not simply deviate substantially from the four military value criteria in recommending ATCOM and other leased facilities for closure. It deviated entirely from these criteria by excluding leased facilities from its military value analysis of installations.

The Army's analysis of leased facilities for the 1995 base closure process differed from the manner in which these facilities were considered in 1993. During that base closure round, the Army considered leased facilities within categories associated with their individual missions, which enabled each to be evaluated on the basis of the military value criteria. It appears that the Army considered leased facilities differently in 1995 in order to address the 1993 BRAC Commission's suggestion that the Services include a separate category for leased facilities during the 1995 process. While the Army succeeded in addressing this suggestion, it clearly violated the requirements of the base closure law by failing to evaluate leased facilities on the basis of the military value criteria. It should be noted that the Army was the only Service to make this error; both the Navy and the Air Force performed military value analyses of their leased facilities.

**OVERESTIMATION OF COST SAVINGS TO THE GOVERNMENT**

We have found that in recommending that ATCOM be closed, the Army greatly overestimated the savings associated with this proposal. It made this error in large part by ignoring the GAO's determination that overall costs to the government must be considered in order to obtain an accurate understanding of the financial implications of an installation closure.

As you know, in prior base closure rounds the GAO recommended that the Defense Department consider the governmentwide costs and savings associated with base closure recommendations. The GAO stated in its report on the 1993 base closure process that



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DOD counts the reductions in rent as savings even when the buildings are federally owned facilities. In some cases, the moves require construction of new DOD facilities and the rental savings are used to offset and justify the construction costs. In actuality, this may not represent an overall savings to the government.

In preparing its analysis of installations for possible closure, the Army concurred with GAO's views as they pertain to leased facilities. The Army Basing Study's BRAC 95 COBRA Input Procedures and Assumptions states that

Lease costs present a specific case where the COBRA model is not designed to provide accurate modelling of the actual cost incurred by the government... Only by terminating the lease contract does the government receive a savings.

Despite this acknowledgment, the Army defied the GAO's determination when calculating the costs and savings associated with the closure of ATCOM. As noted above, ATCOM operates from leased space at the St. Louis Federal Center, which is owned by the General Services Administration (GSA). Consequently, the Army's departure from this space will not result in savings to the government because the GSA will continue to own the facility.

We were disturbed to learn that when challenged with the fact that departure from the St. Louis Federal Center would not generate the savings claimed, the Army continued to ignore the reality of the situation. In response to a question by the 1995 BRAC Commission about the efficiencies gained by moving ATCOM, the Army stated that "it is evident the restructuring of ATCOM provides both a financially and operationally sound opportunity to relocate from lease space to government-owned facilities." ATCOM is already in government-owned facilities; therefore, the Army's estimate of \$7.6 million in annual savings generated by vacating leased space at the St. Louis Federal Center cannot be considered a net savings to the government. Furthermore, the GSA has reported that ATCOM's closure would impose additional costs on the government.

We believe that the Army's interest in vacating ATCOM's leased space, taken in the context of the costs associated with moving ATCOM's functions to other facilities, is financially indefensible. The Army's own data indicates that the transfer of ATCOM's functions to the bases scheduled to receive them will result in higher overhead costs than currently paid at the St. Louis Federal Center. As Attachment C shows, the transfer of ATCOM's functions to the proposed receiving bases would increase the Army's annual overhead costs by 46 percent -- from \$7.6 million to \$11.1 million.

To these recurring overhead costs must be added the one-time costs associated with moving ATCOM's functions and necessary personnel to the proposed receiving bases. The Army itself estimates moving costs to be \$61 million and military construction costs to total \$59 million. These expenditures, combined with other one-time costs of approximately \$24 million, would result in total one-time costs of \$144 million solely to move ATCOM's activities and accommodate them at other installations. It is inconceivable to us that the Army would be willing to spend \$144 million, plus \$3.5 million annually in additional overhead costs, simply to vacate a GSA-owned facility in St. Louis.

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While acknowledging these costs, the Army has justified the closure of ATCOM by asserting that it would generate \$47 million in savings annually due to the elimination of 1,022 civilian personnel.

We have found that the Army's personnel reduction expectations are seriously exaggerated. First of all, prior to the Defense Department's 1995 base closure announcement, ATCOM had in place plans to reduce civilian personnel by at least 445 positions through fiscal year 1999, in keeping with the Army's own projections of future personnel levels. Consequently, the Army's expectation that 1,022 personnel would be eliminated by this closure must be reduced by the number of positions that would have been eliminated regardless of any base closure actions. Secondly, the Army failed to account for the transfer of any support personnel from ATCOM to the proposed receiving bases. ATCOM officials have calculated that, based on Army guidance regarding the consolidation of units, 287 support positions must be added to the number of personnel expected to transfer with ATCOM's functions to the receiving bases.

In light of the above, the total number of civilian positions the Army can legitimately claim to eliminate by closing ATCOM is 290. These cuts would generate \$ 13 million in savings annually -- 72 percent lower than the civilian personnel savings expected by the Army. These reduced savings, combined with \$144 million in one-time costs and \$11 million in recurring costs, would not result in a return on investment for at least half a century.

Alternatively, retaining ATCOM would allow the government to save \$144 million in one-time costs and \$11 million in annual overhead costs associated with performing ATCOM's functions at other bases. It would also generate at least \$20 million in savings annually through ATCOM's 1995-99 downsizing efforts and generate an immediate return on investment.

The Army understood the inadvisability of closing ATCOM during the last base closure round. In 1993, the Army acted on a recommendation by the 1991 BRAC Commission and evaluated the possibility of moving ATCOM's functions to Army-owned facilities. In its report to the 1993 BRAC Commission, the Army stated that "the high relocation costs make realignment or closure impractical and prohibitively expensive." We believe the information presented above confirms that this statement remains true today.


\* \* \* \* \*


We hope you will give the above information full consideration as you prepare your report on the Defense Department's base closure recommendations and selection process. Based on our analysis, it appears that by failing to consider ATCOM and other leased facilities on the basis of the four military value criteria and by overestimating the savings associated with ATCOM's closure, the Army deviated substantially from final criteria 1, 2, 3, 4 and 5. We believe that these facts merit discussion in the GAO report to the BRAC Commission and the removal of ATCOM from the Defense Department's base closure and realignment list.


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**Letters and Other Material Received on**  
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We appreciate your attention to this matter, which is of critical importance to our nation's defense capabilities and the citizens of the St. Louis area.


Sincerely,

  
Richard A. Gephardt  
Member of Congress

  
William Clay  
Member of Congress

  
Harold L. Volkmer  
Member of Congress

  
Christopher S. Bond  
U.S. Senator

  
John Ashcroft  
U.S. Senator

Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments

United States Senate

WASHINGTON, DC 20510

April 11, 1995

The Honorable Charles A. Bowsher  
Comptroller General of the United States  
General Accounting Office  
441 G Street, NW  
Washington, D.C. 20548

Dear Mr. Bowsher:

We are writing to request that the General Accounting Office review several issues relating to the realignment of Onizuka Air Station as part of the 1995 Base Realignment and Closure (BRAC) process.

As you know, Onizuka Air Station was recommended for major realignment by the Secretary of Defense, with much of its workload and personnel transferring to Falcon Air Force Base in Colorado. We question the military and fiscal justification for this realignment and believe it could have negative implications on U.S. national security, particularly with regard to the nation's satellite control network. In addition, the proposed realignment of Onizuka Air Station will have an adverse economic impact on California (a state disproportionately hard hit by military base closures), causing the loss of several thousand military, civilian and contractor jobs in the region.

As part of GAO's analysis into BRAC 95, we would like you to review the following issues relating to the recommended realignment of Onizuka Air Station:

1. Apparently, as a result of suggestions following BRAC 93, the Air Force adopted a mathematical approach for evaluating bases in BRAC 95. However, despite the objective "green/yellow/red" grades assigned to various categories for different bases, the final rating of bases was made via a subjective tiering process. In this process, each member of the Air Force Base Closure Executive Group voted on the tiering of a particularly base. This subjective ballot process makes the analytical and objective analysis more difficult to audit the outcome of the decision process. What evidence is available to determine that the Air Force closure and realignment process selected bases in an accurate and fair manner? What is the GAO basis for making this determination?

2. Despite the continued presence of Air Force and tenant activities and personnel at Onizuka Air Station following any BRAC action, the Air Force cost estimates predict an annual saving of more than \$10 million in Real Property Maintenance Activities (RPMA) and Base Operating Support (BOS) costs. Are these high savings estimates accurate?

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The Honorable Charles A. Bowsher  
April 11, 1995  
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3. According to the base questionnaire for Onizuka Air Station, there is a 75 percent decrease in mission requirements expected over the next ten years. This statement greatly impacted Onizuka Air Station's rating in the "satellite control operations" subcategory and may have impacted the base's overall tiering status. What is the basis for such a reduction in mission requirements? Does this statement reflect Air Force or other tenant activities? If reflective of other tenant and not Air Force activities, is it fair to penalize Onizuka Air Station in the "satellite control operations" subcategory?

4. The Air Force claims that only one satellite control node is needed and there is excess capacity in the satellite control bases category. However, the analysis of excess mission capacity is not revealed in any detail in any of the BRAC documents. We believe that national security may dictate that two nodes are needed to ensure that there are back-up and redundant capabilities in the event of war, natural disaster, sabotage, etc. Apparently, there have been instances in the past -- such as the "backhoe" incident -- where satellite control and/or communication functions have been disrupted at Falcon AFB. Did the GAO review the Air Force's analysis that only one satellite control node is required? What are the implications to U.S. national security of Onizuka Air Station's realignment?

5. The base questionnaires state that figures on operational capacities and core requirements for the satellite control bases are maintained separately and are classified. Was this classified material given appropriate weight in the "green/yellow/red" analysis and the final tiering process? Was this classified material taken into consideration in making the determination that there are no unique facilities at Onizuka Air Station?

6. According to responses provided to Senator Feinstein, there were discussions between the Air Force and tenants at Onizuka Air Station concerning the BRAC 95 process and future mission projections. However, these discussions were held on a working level and no record of this communication was kept. Why were no records kept of integral discussions impacting the BRAC 95 process and the decision to recommend Onizuka Air Station for realignment? Can GAO investigate this matter and determine if these discussions were held in accordance with BRAC policy and guidelines?

7. The base questionnaire for Onizuka Air Station states that the base has sufficient capacity to accomplish all core operations for both satellite control nodes. The base questionnaire for Falcon AFB states that the base does not have

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The Honorable Charles A. Bowsher  
April 11, 1995  
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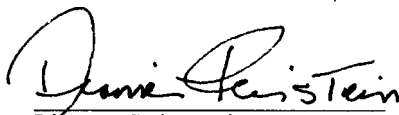
sufficient capacity to accomplish all core operations for both satellite control nodes. Nevertheless, the Air Force recommended realigning Onizuka Air Station and transferring much of its workload to Falcon AFB. What is the justification for these statements? What is the estimated cost of upgrading Falcon AFB to accommodate the task now performed by Onizuka Air Station?


8. Under the Air Force's BRAC process, the one time cost to close Falcon AFB and move its functions to Onizuka Air Station are estimated at \$575 million. However, we understand that most of these costs relate to one facility, the National Test Facility. Did the Air Force consider a scenario of realigning Falcon AFB, leaving the National Test Facility as a stand-alone facility, thereby reducing substantially the one-time implementation cost? If so, what were the results? If not, why?

9. The Onizuka Air Station base questionnaire states that there are no unique or one-of-a-kind Air Force facilities at the base. However, officials at Onizuka Air Station have compiled a list of numerous unique facilities, equipment and missions at the base. Why is there a discrepancy between the base questionnaire for Onizuka Air Station and the information supplied by the base regarding unique facilities? Did the base questionnaire take into account unique non-Air Force facilities that are an integral part of Onizuka Air Station's mission?

Thank you, in advance, for reviewing these important issues. As the BRAC 95 process is already underway and the Onizuka Air Station base visit and regional hearing are at the end of the month, we would appreciate your prompt attention to this time-sensitive matter.

Sincerely,

  
Dianne Feinstein  
United States Senator

  
Barbara Boxer  
United States Senator

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Letters and Other Material Received on  
Proposed Base Closures and Realignments**

**Congress of the United States  
House of Representatives  
Washington, DC 20515**

April 12, 1995

The Honorable Charles A. Bowsher, Comptroller General  
U.S. General Accounting Office  
441 G Street, NW  
Washington, D.C. 20548

Dear Comptroller Bowsher:

As part of your analysis of the selection process used by the Department of Defense in preparing recommendations to restructure our nation's military bases, we request that you consider the following questions relating to the realignment of the 750th Space Group from Onizuka Air Force Station and the 129th Rescue Group from Moffett Federal Airfield in California.

**750th Space Group, Onizuka Air Force Station**

1. The Base Closure and Realignment Commission (BRAC) process is designed to provide open and independent review of the decision process within the Military Services and the Department of Defense to ensure DOD recommendations are both fair and accurate. For the 1995 decision round, the Air Force implemented a mathematical approach for determining the relative grades of base restructuring options. This was done to improve the decisionmaking process by establishing clear, objective criteria under which different options would be graded. Despite the analytical process put in place by the Air Force, the final decision to select bases for closure and realignment appears to have been done by secret ballot within the BRAC Executive Group at the Pentagon. Such an action would reject the notion of objective decisionmaking and make the earlier transparent steps irrelevant and useless for auditing the outcome of the decisionmaking process. What evidence is available to determine that the closure and realignment process selected restructuring or closure options in an accurate and fair manner? What is GAO's basis for attempting to make this determination?
2. The Air Force analysis of excess mission capacity is not revealed in any detail in the documents provided to the BRAC Commission, yet we have reason to believe that the history of Falcon Air Force Base (AFB) would suggest there is a need for functional backup for our nation's military satellite control activities. Specifically, we believe that a recent incident with a "backhoe" tractor caused the Falcon system to fail for several hours making Onizuka the only control node available. Please review the excess capacity analysis conducted by the Air Force and provide us all information regarding the "backhoe" incident and any others which have induced system failures.
3. The Cost of Base Realignment Actions (COBRA) analyses performed by the Air Force predict an annual savings of over \$10 million dollars in Real Property Maintenance Account (RPMA) and Base Operation Support (BOS) costs. We believe GAO should review these very high savings estimates.

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4. Records provided to Congress indicate that between December 19, 1994 and February 21, 1995, the COBRA figures for the 750th's move to Falcon AFB were revised at least five times, each time producing figures improving the economic case for the move. For example, COBRA estimates for the "1-time total cost" for the move decreased from \$290.6 million on December 6, 1995 to \$124 million on February 21, 1995. What were the factors and variables which can account for such a decline in the time period discussed?
5. In response to the question of future workload, the Onizuka staff predicted a level workload requirement and responded to the Air Force questionnaires accordingly, yet the data provided to the BRAC Commission on this point indicates a reduction of 75 percent in Onizuka workload. What is the basis for such a reduction?
6. What is the estimated cost of upgrading Falcon AFB to accommodate all tasks now performed by Onizuka? Please answer in light of the Falcon questionnaire response indicating that "this installation does not have sufficient capacity to accomplish all core operations."
7. The Air Force analysis comparing Onizuka to Falcon makes no reference to a classified annex that was submitted with the questionnaire. Was this classified annex taken into consideration in making the determination that there are no unique facilities at Onizuka? Was the classified annex given appropriate weight in the "red, yellow, green" analysis and the final decisionmaking process?

**129th Rescue Group, Moffett Federal Airfield Air Guard Station**

1. The relocation of the 129th from Moffett Federal Airfield appears to be an unusual proposal to be included in the BRAC process inasmuch as the number of civilian employees falls under the BRAC threshold of 300 civilian employees. The usual BRAC analysis has not been conducted for these realignments, at least not according to the limited documentation available at the Commission. What is the basis for this realignment? Who initiated the action?
2. The study of the cost of the 129th's realignment has just recently been initiated by the Air Force and is not yet complete, so we believe that there is no foundation for the costs provided in the Air Force recommendations. We would like your analysis of the source of the reported cost figures as well as their accuracy.
3. The Base Closure Executive Group directed several adjustments to the Air Force site survey. The adjustments include deletions of \$6.4 million for the HQ/Flying SQD OPS; \$260,000 for a Vehicle Maintenance Canopy; \$1.4 million for Unit Supply Warehouse; and \$1.4 million for other buildings. These adjustments lower the initial cost of the realignment by half and appear arbitrary. This is particularly relevant inasmuch as there will be a shortage of 220,000 square feet of space at McClellan relative to the 129th's current occupancy at Moffett. Please provide your analysis of these adjustments and whether they were properly justified.

Comptroller Bowsher, we believe careful consideration of these questions is essential to ensuring GAO's informed reporting of the details about the current BRAC to the BRAC Commission. While the benefits of defense downsizing are important, we believe it is our responsibility to point out inconsistencies in the BRAC process which may circumvent fair and open procedures, increase the cost of military downsizing, and undermine our national defense.




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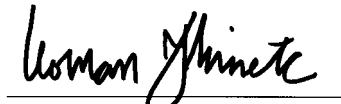
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We thank you for your attention to these matters and ask for responses to our inquiries be completed before April 17, 1995. If you have questions or require additional information, please contact John Flaherty (Rep. Eshoo) at 225-8104 or Frank Paganelli (Rep. Mineta) at 225-2632.

Sincerely,



Anna G. Eshoo, M.C.



Norman Y. Mineta, M.C.

AGE:las

Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments

DAVID L. HOBSON  
7TH DISTRICT, OHIO

WASHINGTON OFFICE  
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Washington, D.C. 20515

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CONGRESS OF THE UNITED STATES

HOUSE OF REPRESENTATIVES

April 14, 1995

APPROPRIATIONS COMMITTEE  
NATIONAL SECURITY  
VA, HUD, AND INDEPENDENT AGENCIES  
BUDGET COMMITTEE  
SPEAKER'S DESIGNEE  
STANDARDS OF OFFICIAL CONDUCT  
REPUBLICAN WHIP ORGANIZATION

faxed to Office of Congressional  
Affairs. 14 Ap 95

The Honorable Charles A. Bowsher  
Comptroller General  
U.S. General Accounting Office  
441 G Street, N.W.  
Washington, DC 20548

Dear Mr. Bowsher:

I am writing in regard to Military Bases: Analysis of DOD's 1995 Process and Recommendations for Closure and Realignment (GAO/NSIAD-95-133, April 1995). This GAO review is required by the Defense Base Closure and Realignment Act of 1990 (PL 101-510), as amended.

In the Air Force section, you comment in general on many deficiencies in the way the process was run by that branch of the Armed Services. However, at the bottom of page 58 you state "While we have some concerns about the Air Force's process, we found no information that would lead us to question 15 of the 23 decisions."

Although apparently one of the 15 decisions with which GAO found no problem, the Springfield-Beckley Air National Base **should** have been questioned by the GAO. The Air Force, itself, has already repudiated their estimates which you blithely reproduce--giving them a credibility they do not deserve--on page 65. In light of this, I want to know why GAO does not question the Springfield decision.

Please furnish me with copies of all of the data used by the GAO to draw this conclusion, and the times of any site visits to Springfield.

As a member of both the Appropriations Committee and the Budget Committee, I know the regard given GAO reports and also know that GAO officials would not want to leave an incorrect impression.

Thank you.

Sincerely,

  
DAVID L. HOBSON  
Member of Congress

DLH/kak

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**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515**

April 25, 1995

Mr. Barry W. Holman  
Assistant Director, National Security and  
International Affairs Division  
U.S. General Accounting Office  
441 G Street, NW  
Washington, DC 20548

Dear Mr. Holman:

The City of Indianapolis NAWC task force prepared an assessment of the Military Value and COBRA analyses performed by the Navy upon which the closure recommendation was based for the Naval Air Warfare Center, Indianapolis. The task force's review found serious scoring flaws in the military value analysis. It also found important discrepancies between the data call submissions and the values used in the final COBRA closure scenario, as well as several fundamental flaws in the analysis itself. A copy of the task force's assessment was provided to the GAO by the city.

We were quite disturbed that your report, issued April 14, did not discuss the major scoring errors in the military value assessment, and only briefly noted concerns about the accuracy of the COBRA analysis. During a March 30 meeting with Kevin Long, of Congressman Burton's staff, and a teleconference with several people on the city's task force, you, David Warren, Richard Roscoe, and another gentleman indicated that even though the GAO would not have completed an entire review of the serious scoring errors in the COBRA and military value scenarios run by the Navy on NAWC, Indy, that the GAO would follow up with a subsequent, in depth, review after your lengthy legally required report had been submitted to Congress. To date we have heard nothing, and it was our understanding that it was the GAO's intention to complete this review, or at the very least express concern to the BRAC commission about the questionable validity of the Navy's results.

We realize the GAO was under serious deadline pressures, but the errors found are so serious as to require special attention. It is imperative that you work closely with the BRAC staff to clear up these problems. Only a thorough review and correction of the flawed results will provide the BRAC commission with an accurate evaluation of

Appendix I  
Letters and Other Material Received on  
Proposed Base Closures and Realignments

Mr. Barry Holman  
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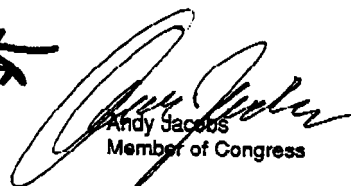
the importance of NAWC Indianapolis to the future of the Navy, and specifically to DOD acquisitions. The Indianapolis task force, which helped prepare the city's assessment, as well as our staffs are available to discuss our concerns and ready to provide any assistance you might need.

We appreciate your prompt attention to our request, as it is imperative that this situation be taken care of prior to the BRAC decision-making process next month.

Sincerely,



Dan Burton  
Member of Congress



Andy Jacobs  
Member of Congress



David McIntosh  
Member of Congress

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