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## Governor Schwarzenegger Makes Recommendations on Proposed BRAC Criteria

Governor Arnold Schwarzenegger today provided comment to the U.S. Defense Department's Director of Base Realignment and Closure on proposed criteria for the Commission's work.

The letter and comments follow:

Governor Arnold Schwarzenegger

January 30, 2004

Mr. Peter Petochny  
Director, Base Realignment and Closure  
Office of the Deputy Undersecretary of Defense  
(Installations and Environment)  
The Pentagon - Room 3D814  
Washington, DC 20301-3300

RE: Department of Defense Draft Selection Criteria for Closing and Realigning  
Military Federal Register, Vol. 68, number 246 (December 23, 2003)

Dear Mr. Petochny,

My Administration has reviewed the Department of Defense Draft Selection Criteria for closing and realigning military installations inside the United States and is submitting the attached comments on behalf of the State of California.

California is unified in our goal of providing the best possible environment for the Department of Defense to prepare for and perform its vital mission of defending our nation. These proposed changes were crafted with the intent to improve the selection process and aid the department in determining the military value of defense installations and activities.

Before addressing each suggested criterion it is important to first highlight an issue that is not covered directly in the proposed criteria. The military departments may be

considering, as an alternative to closure, temporarily closing or "mothballing" a base. Local communities will be deprived of vital economic development and job creation opportunities if not provided the ability to transform a deactivated site. Additionally, a limited base closure will forestall necessary cleanup of potential contamination prior to transition to any future use.

The Department of Defense bears the cost to maintain and secure mothballed properties. These costs could include emergency services, litigation and environmental protection and cleanup expenses. The impact to the state of a mothballed property translates to loss of jobs and the elimination of the ability to attract new investments on the property. Furthermore, temporary deactivation does not generate any state and local revenues and would be a blight and eyesore on the surrounding communities.

I appreciate the opportunity to provide comments regarding the 2005 Base Realignment and Closure criteria. California's local, state and Congressional leaders remain committed to working closely together and with the Department to ensure that California remains a vital component of the nation's defense forces. I look forward to careful consideration of our diverse inventory of current operational assets and their capacity to absorb additional missions in the future.

Sincerely,

Arnold Schwarzenegger  
Governor of California

#### Comments on the 2005 Base Realignment and Closure Criteria

##### Proposed Criterion #1:

The current and future mission capabilities and the impact on operational readiness of the Department of Defense's total force, including the impact on joint war fighting, training, and readiness.

##### Proposed Amended Criterion #1:

The current and future mission capabilities; the capacity to accommodate new missions; the impact on operational and material readiness, including the development, testing or acquisition of new weapon systems and associated resident intellectual capital of the Department of Defense's total force, including the impact on joint war-fighting, training, and readiness.

##### Comments on Proposed Amended Criterion #1:

The Quadrennial Review's assessment of future conflicts and the force structure necessary to meet the nation's security requirements should be more directly considered in the analysis of military sites in the current round of closures. The nation's future war fighting requirements mandate the retention of military sites with the geographic capacity to accept future missions and their operating, research, design, testing and evaluation (RDT&E) requirements. These should be outlined specifically in the criteria to ensure a base's ability to accept necessary RDT&E missions.

Proposed Criterion #2:

The availability and condition of land, facilities, and associated airspace (including training areas suitable for maneuver by ground, naval, or air forces throughout a diversity of climate and terrain areas and staging areas for the use of the Armed Forces in homeland defense missions) at both existing and potential receiving locations.

Proposed Amended Criterion #2:

The long-term availability, condition, and strategic location of land, facilities, and associated land, air and sea space, at both existing and potential receiving locations, including:

- Test facilities and test areas able to accommodate individual and joint systems including weapons and platforms with long operational ranges;
- Land, sea and air training facilities suitable for maneuver by ground, sea and air forces throughout a diversity of climate and terrain areas and staging areas for use in military and homeland security missions;
- Proximity of other facilities with associated air, land and sea space, storage, maintenance and repair capability, offering access to major surface transportation infrastructure and routes to support testing long-range systems; and conducting major joint force exercises and experiments.

Comments on Proposed Amended Criterion #2:

California's inventory of military sites possesses the capacity for large-scale multi-force maneuvers. The state's diverse terrain and coastline provides opportunities for littoral as well as large land mass military training. Co-located RDT&E expertise completes a mosaic of land capacity and technical support and should be outlined in the criteria. Furthermore, regional synergies which exist amongst multiple bases enhance the future military value of the bases individually. Absent this full complement of proposed criteria, any base closure decisions could limit future force requirements.

Proposed Criterion #3:

The ability to accommodate contingency, mobilization, and future total force requirements at both existing and potential receiving locations to support operations and training.

Proposed Amended Criterion #3:

The ability to accommodate contingency, surge, mobilization, and future total force requirements at both existing and potential receiving locations to support operations, training, and homeland security missions, and to accommodate the development, testing, or acquisition of new weapon systems using associated resident intellectual capital.

Comments on Proposed Amended Criterion #3:

California recognizes the interrelationship of national defense and homeland security and believes the two must be considered simultaneously. Ultimately, the testing and evaluation areas, as well as staging and training areas, for homeland security technologies are most efficiently located on existing military sites. The criteria should directly reflect this relationship.

Proposed Criterion #4:

The cost of operations and the manpower implications.

Amended Proposed Criterion #4:

The costs and savings to the Department of Defense of operations and the manpower implications of any proposed closure or realignment as determined by a standard method of measuring costs, savings, and impacts to be applied uniformly by all the services and the Department of Defense, which shall include:

- The cost to replace lost resident intellectual capital resulting from a base realignment impacting the Defense Department workforce and the local contracting infrastructure;
- The cost of environmental restoration, waste management, and cleanup, including the costs associated with an accelerated schedule of cleanup for reuse when contrasted with longer term, scheduled costs of environmental cleanup on a military site which remains open and operating.

Comments on Proposed Criterion #4:

The cost analysis of each site should include recognition of net savings resulting from a potential closure. In order to accurately compute the net savings, the cost of replacing lost resident intellectual capital must be considered.

Following the relocation of a major facility, some private-sector expertise will not move to the new locale, choosing instead to remain due to family constraints and other considerations. In many instances these experts are not fungible or easily replaced. That cost should be measured against any estimated savings.

Additionally, environmental cleanup and mitigation costs cannot be avoided on either operating or closed facilities. At an operating facility, the timetable and amortization schedule for cleanup is within the control of the Defense Department and modifiable to meet the needs of the services at any given point in time. However, when a base is closed, the discretion to clean the site is narrowed and a timetable is defined in legislation. Funding for cleanup is not appropriated from operating and maintenance accounts, but from a separate cleanup account which has been under-funded historically.

Major operating bases with environmental cleanup requirements can address these issues at their discretion, without interrupting the operational cycle. Smaller bases with equivalent missions may not have the same latitude. The comparison of estimated cleanup versus operational costs is crucial to equitably assess net operational expenses.

By elevating these two issues - the replacement cost of resident intellectual capital and the comparison of cleanup costs of bases with equivalent operations but differing cleanup requirements if closed - bases will be more able to meet future defense needs.

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