

Chapter 3

Analytical Process

Background

Planning Guidance

The Secretary of Defense's memorandum of November 15, 2002, *Transformation Through Base Realignment and Closure*, initiated the Department's BRAC process. The Secretary emphasized the need to eliminate excess physical capacity and transform the Department by rationalizing infrastructure with the defense strategy. This direction, along with later Department of Defense policy guidance, established policies, procedures, and authorities for selecting bases for realignment or closure. All U.S. installations, as defined by law, were considered equally. Copies of the Department's policy memoranda are provided in Appendix E.

Changes From Earlier BRAC Rounds

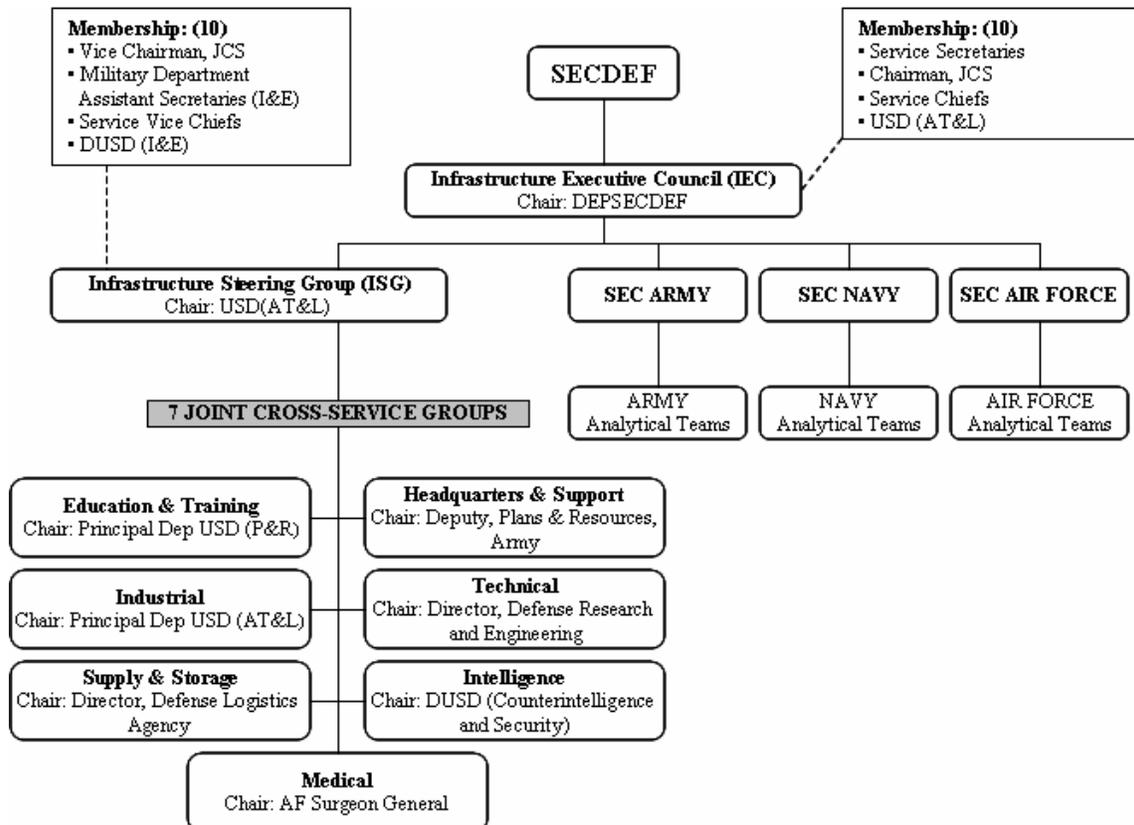
The BRAC 2005 process differed in a number of ways from procedures established in earlier BRAC rounds. These changes reflect congressional requirements established in BRAC legislation as well as alterations in the Department's analytical process designed to ensure the most comprehensive review of DoD's infrastructure. Significant legislative changes include the following:

- The Secretary of Defense was required to provide, with the Fiscal Year 2005 budget justification documents, a detailed report regarding the need for BRAC 2005.
- The force structure plan must include a 20-year threat assessment rather than the 6-year threat assessment required in previous BRAC rounds.
- Authority to proceed with BRAC 2005 was contingent on the Secretary of Defense's certification that further base closures and realignments are needed and that such actions would result in annual net savings for each of the Military Departments beginning not later than Fiscal Year 2011. (The Secretary forwarded his certification to Congress in March 2004.)
- Military value must be the primary consideration in making realignment and closure recommendations and factors related to other criteria must be addressed. (In prior rounds the Department made military value the primary consideration as a matter of policy.)
- The Commission will have one additional member, totaling nine.
- The Commission may *add* an installation to the Secretary of Defense's list of recommended closures and realignments only if:
 - Seven of the nine Commissioners support the addition,

- At least two Commissioners visit the added installation, and
- The Commission provides the Secretary 15 days to explain why an installation was not included in a BRAC recommendation.
- The Commission shall invite the Secretary of Defense to testify at a public hearing, or a closed hearing if classified information is involved, on any of the Commission’s proposed changes to the Secretary’s recommendations.
- Key dates, such as the nomination of members for the Defense Base Closure and Realignment Commission, were adjusted.
- Regarding implementation and reuse of an installation, DoD is authorized no-cost conveyances but is directed to seek fair market value, as determined by the Secretary of Defense.
- The Secretary of Defense may implement a closure through privatization in place only if that method of realignment or closure is specifically authorized in the Commission’s recommendations and is the most cost-effective method of implementation.

BRAC 2005 Organizational Structure

The Secretary of Defense’s November 15, 2002, memorandum, *Transformation Through Base Realignment and Closure*, established a separate governing structure to oversee and operate the Department’s BRAC 2005 process. The following chart illustrates this structure.



BRAC Management Structure

The Infrastructure Executive Council (IEC), chaired by the Deputy Secretary of Defense, and composed of the Secretaries of the Military Departments and their Chiefs of Service, the Chairman of the Joint Chiefs of Staff, and the Under Secretary of Defense (Acquisition, Technology & Logistics) (USD (AT&L)), was the policy-making and oversight body for the entire BRAC 2005 process. This group ultimately shaped a coherent package of recommendations to present to the Secretary of Defense for his review and approval. The IEC met more than 20 times during the BRAC process.

The subordinate Infrastructure Steering Group (ISG), chaired by the USD(AT&L) and composed of the Vice Chairman of the Joint Chiefs of Staff, the Military Department Assistant Secretaries for Installations and Environment, the Service Vice Chiefs, and the Deputy Under Secretary of Defense (Installations & Environment), oversaw the joint cross-service analyses of common business-oriented functions and ensured the integration of that process with the Military Departments' analysis of all other functions. The ISG met more than 60 times during the BRAC process, setting milestones and resolving issues as the analyses unfolded.

Joint Cross-Service Groups

To facilitate a robust joint analysis during BRAC 2005, the Secretary of Defense chartered seven joint cross-service groups (JCSGs) to make realignment and closure recommendations related to common business-oriented support functions. The JCSGs, each of which had representatives from the Military Services, the Office of the Secretary of Defense, and the Joint Staff, were chartered as analytical proponents with exclusive authority to make recommendations related to assigned support functions. Each performed a broad, comprehensive review of these functions. The final BRAC 2005 package illustrates that these JCSGs generated a significant portion of the overall recommendations. By contrast, during the BRAC 1995 round, joint analytical groups simply developed alternatives for consideration by the Military Departments. Few of these suggestions were included in the Secretary's 1995 recommendations.

The seven joint cross-service groups established for BRAC 2005 were:

- Education and Training (E&T),
- Headquarters and Support Activities (H&SA),
- Industrial (IND),
- Intelligence (INTEL),
- Medical (MED),
- Supply and Storage (S&S), and
- Technical (TECH).

A summary of each JCSG's analytical process, along with its recommendations, is presented in Part 2 of this volume. Detailed JCSG reports are provided in Volumes VI-XII.

The Military Departments

The Military Departments analyzed the remaining Service-unique or operational functions. A summary of each Military Department's analytical process, along with its recommendations, is in Part 2 of this volume. Detailed Military Department reports are provided in Volumes III-V.

Special Joint Teams

During the BRAC analytical effort, the Department formed several teams to facilitate a common approach among analytical proponents. A Joint Action Scenario Team (JAST), chaired by the Army, was established to develop and manage the process for conducting joint analyses of Military Department-to-Military Department joint basing or joint use opportunities and scenarios that were outside the purview of the JCSGs. This advisory group tracked suggestions for the joint basing of operational forces and assisted Military Department analytical groups in assessing these opportunities.

The Department also established four Joint Process Action Teams (JPATs). Each JPAT (named for the selection criterion on which it worked) was tasked to develop procedures, analytical tools, and databases to facilitate a common analytical approach to the four nonmilitary value selection criteria. JPAT 5 focused on the Cost of Base Realignment Actions (COBRA) model and was chaired by the Army. JPAT 6, Economic Impact, was chaired by the Office of the Secretary of Defense; JPAT 7, Community Infrastructure Impact, was chaired by the Air Force; and JPAT 8, Environmental Impact, was chaired by the Navy. The work of each JPAT is discussed later in this chapter.

Government Accountability Office, Inspector General, and Other Groups

The Government Accountability Office (GAO), the DoD Inspector General, and the audit agencies of the Military Departments played a key role in monitoring each phase of the BRAC analytical process. The GAO had full access to the Department's non-deliberative meetings, briefings, proceedings, and analytical work. The Department provided the GAO the minutes of deliberative meetings once they were signed. This degree of access should assist the GAO in rendering its independent assessment of the Department's BRAC process, as required by Public Law 101-510, as amended.

In the latter stages of the BRAC analysis, the Department engaged a small group of executive-level former government officials. Called the "Red Team," this group was asked to provide an independent assessment of candidate recommendations. The team included:

- The Honorable Hansford T. Johnson, General, USAF Retired, former Assistant Secretary and Acting Secretary of the Navy and member of the 1993 BRAC Commission;
- The Honorable Robert B. Pirie, Jr., former Assistant Secretary, Under Secretary, and Acting Secretary of the Navy and former Assistant Secretary of Defense; and

- General Leon E. Salomon, USA Retired, former Commander of the U.S. Army Materiel Command.

The Red Team met with each Military Department and JCSG. It reviewed candidate recommendations, report drafts, and supporting materials. The team's insights provided valuable feedback and suggestions for improving the quality of the candidate recommendation packages relative to the standard by which the Commission may alter the Secretary's recommendations.

Analytical Framework

Public Law 101-510, as amended, requires that the Department base its recommendations on its 20-year force structure plan, the inventory of installations and facilities provided to the Congress in March 2004, and the final BRAC selection criteria. The Department also established a set of overarching BRAC principles to guide the analytical process.

20-Year Force Structure Plan

The Defense Base Closure and Realignment Act of 1990, as amended, required the Department to develop a 20-year force structure plan as the basis for its BRAC analysis. This plan, provided previously to Congress, is based on an assessment of probable threats to national security during the 20-year period beginning with fiscal year 2005. It identifies the probable Military Department end-strength levels and the major military units needed to meet these threats, along with anticipated levels of funding available for national defense purposes during this period. The Military Departments and JCSGs used the force structure plan to guide their analyses and to develop candidate recommendations.

As part of the assessment of probable threats to national security, the National Defense Authorization Act for 2004 requires the Department to "determine the potential, prudent, [sic] surge requirements to meet those threats." The Military Departments and JCSGs incorporated surge assessments in multiple steps of their analyses. Each determined the surge capacities needed to support the Department's force structure plan, evaluated the capability of assigned installations and facilities to surge, and incorporated these capabilities in their capacity assessments. During the military value analysis, analytical proponents evaluated infrastructure supporting their functions within the framework provided by the BRAC selection criteria. Criteria 1, "current and future" mission capabilities, and criteria 3, "ability to accommodate contingency, mobilization, surge, and future total force requirements," capture the concept of surge. By appropriately weighting criteria attributes and metrics, Military Departments and JCSGs ensured that surge was appropriately reflected in military value analyses. Finally, during scenario analysis, proponents analyzed alternative infrastructure configurations within the context of the force structure plan and selection criteria. This analysis provided another opportunity to fully consider surge since it incorporated surge considerations made during the evaluation of capabilities necessary to support the force structure and capacity and military analyses. Policy Memorandum 7, Appendix E, provides additional information on the Department's approach to evaluating surge requirements

The classified force structure plan is Volume II of this report. An unclassified discussion of the force structure plan is included in Chapter 2 of this volume.

BRAC 2005 Selection Criteria

The BRAC 2005 statute directed the Department to provide draft selection criteria to the Congress and the public for a period of review and comment before final criteria could be adopted and applied in the BRAC analytical process. On December 23, 2003, the Secretary of Defense provided the Congress draft criteria and published them in the Federal Register for public comment. Following review of these comments, the Secretary published final criteria on February 12, 2004. The Congress later amended and codified these criteria in the National Defense Authorization Act for FY 2005. The final BRAC 2005 Selection Criteria follow:

Military Value

- (1) The current and future mission capabilities and the impact on operational readiness of the total force of the Department of Defense, including the impact on joint warfighting, training, and readiness.
- (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.
- (3) The ability to accommodate contingency, mobilization, surge, and future total force requirements at both existing and potential receiving locations to support operations and training.
- (4) The cost of operations and the manpower implications.

Other Considerations

- (5) The extent and timing of potential costs and savings, including the number of years, beginning with the date of completion of the closure or realignment, for the savings to exceed the costs.
- (6) The economic impact on existing communities in the vicinity of military installations.
- (7) The ability of the infrastructure of both the existing and potential receiving communities to support forces, missions, and personnel.
- (8) The environmental impact, including the impact of costs related to potential environmental restoration, waste management, and environmental compliance activities.

Installation Inventory

As required by Public Law 101-510, as amended, the Department submitted its inventory of military installations and facilities to the Congress in March 2004. The Department derived the inventory of owned facilities from the DoD's Facilities Assessment Database (FAD), a resource updated annually from the real property records of the Military Departments. The Department owns more than 520,000 facilities (buildings and structures), of which about 87 percent are in the United States and territories. These real property records provided the basis for determining facilities subject to BRAC analysis.

BRAC Principles

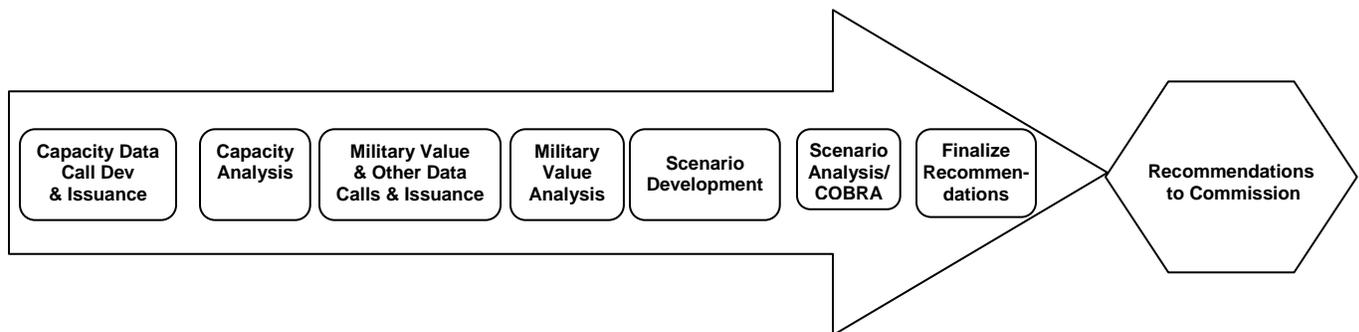
To assist in the development of scenarios for base realignment or closures, the Department established the following BRAC principles. Policy Memorandum 2, Appendix E, provides additional information on the development of these principles.

- **Recruit and Train.** The Department must attract, develop, and retain active, reserve, civilian, and contractor personnel who are highly skilled and educated and have access to effective, diverse, and sustainable training space to ensure current and future readiness, to support advances in technology, and to respond to anticipated developments in joint and Service doctrine and tactics.
- **Quality of Life.** The Department must provide a quality of life, including a quality of workplace, that supports recruitment, learning, and training and enhances retention.
- **Organize.** The Department needs its force structure organized, equipped, and located to match the demands of the National Military Strategy. These forces must be effectively and efficiently supported by properly aligned headquarters and other DoD organizations and take advantage of opportunities for joint basing.
- **Equip.** The Department needs to retain, or make available within the private sector, research, development, acquisition, test, and evaluation capabilities. These functions must efficiently and effectively place superior technology in the hands of the warfighter to meet current and future threats and facilitate knowledge-enabled and net-centric warfare.
- **Supply, Service, and Maintain.** The Department needs access to logistical and industrial infrastructure capabilities that are optimally integrated into a skilled and cost-efficient national industrial base that provides agile and responsive global support to operational forces.
- **Deploy & Employ (Operational).** The Department needs secure installations that are optimally located for mission accomplishment (including homeland defense); that support power projection, rapid deployment, and expeditionary force requirements for reach-back capability; that sustain the capability to mobilize and surge; and that ensure strategic redundancy.

- **Intelligence.** The Department needs intelligence capabilities to support the National Military Strategy by delivering predictive analyses, warning of impending crises, providing persistent surveillance of our most critical targets, and achieving horizontal integration of networks and databases.

Analytical Process

During the BRAC 2005 process, the Military Departments and JCSGs followed a series of related, but separate analyses. These basic steps were capacity analysis, military value analysis, scenario development, and scenario analysis. Using these analytical elements, each proponent tailored its procedures to analyze its assigned installations and activities. The chart below provides a summary of this process.



Key Aspects of Process

<u>CAPACITY</u>	<u>MILITARY VALUE</u>	<u>SCENARIO DEVELOPMENT</u>	<u>SCENARIO ANALYSIS</u>
Inventory	Selection Criteria 1 - 4	• 20-year force structure plan	• Selection Criterion 5 – Potential Costs & Savings (COBRA)
• What	• What's important	• Capacity Analysis	• Criteria 6, 7, 8 – Economic, Community, & Environmental Impacts
• Where	• How to measure	• Military Value Analysis	
• How Big	• How to weight	• Transformational ideas	
• Usage	• Rank order	• Guiding principles	
• Surge			

Capacity Analysis

To maximize warfighting capabilities and the efficiency of the current domestic infrastructure, each Military Department and JCSG began its analysis by determining the capacity of the installations and activities within its purview. The intent of this analysis was to develop a comprehensive inventory based upon certified data that included both physical capacity (buildings, runways, maneuver acres, etc.) and operational capacity (workload or throughput). Each proponent prepared a comprehensive capacity data call to meet its requirements. The groups' task was to determine which bases and sites performed each function, how the physical and operational capacity at those installations was being used, whether surge capabilities would

meet contingency needs, and the maximum potential capacity at each location. Once the data call questions were completed, they were forwarded to the field by the Military Departments and Defense Agencies. Each group evaluated capacity analysis responses to identify opportunities for efficiency and effectiveness.

Military Value Analysis (Criteria 1-4)

As required by statute, the military value of an installation or activity was the primary consideration in developing the Department's recommendations for base realignments and closures. The Department determined that military value had two components: a quantitative component and a qualitative component. The qualitative component is the exercise of military judgment and experience to ensure rational application of the criteria. This component is discussed further in the context of scenario analysis. The quantitative component, explained in greater detail below, assigns attributes, metrics, and weights to the selection criteria to arrive at a relative scoring of facilities within assigned functions.

To arrive at a quantitative military value score, the proponents began by identifying attributes, or characteristics, for each criterion. The proponents then weighted attributes to reflect their relative importance based upon things such as their military judgment or experience, the Secretary of Defense's transformational guidance, and BRAC principles. A set of metrics was subsequently developed to measure these attributes. These were also weighted to reflect relative importance, again using, for example, military judgment, transformational guidance, and BRAC principles. Once attributes had been identified and weighted, the proponent developed questions for use in military value data calls. If more than one question was required to assess a given metric, these were also weighted. Each analytical proponent prepared a scoring plan, and data call questions were forwarded to the field. These plans established how answers to data call questions were to be evaluated and scored. With the scoring plans in place, the Military Departments and JCSGs completed their military value data calls. These were then forwarded to the field by the Military Departments and Defense Agencies. The analytical proponents input the certified data responses into the scoring plans to arrive at a numerical score and a relative quantitative military value ranking of facilities/installations against their peers.

Scenario Development

With capacity and military value analyses complete, the Military Departments and JCSGs then began an iterative process to identify potential closure and realignment scenarios. These scenarios were developed using either a data-driven optimization model or strategy-driven approaches. Each approach relied heavily on the military judgment and experience of analytical proponents.

The optimization models used by proponents incorporated capacity and military value analysis results and force structure capabilities to identify scenarios that maximized military value and minimized the amount of capacity retained. These models were also used to explore options that minimized the number of sites required to accommodate a particular function or maximized potential savings. As data results were analyzed, additional scenario options were evaluated.

A second, equally valid methodology of generating scenarios for analysis was driven by overarching Military Department or JCSG strategy. For example, the Headquarters and Support Activities JCSG identified a strategy objective that would reduce the number of single-function administrative installations. Scenarios identified by this method were verified against data collected in earlier capacity and military value analyses. Regardless of the initial approach to scenario development, qualitative or quantitative, all scenario proposals were refined through further analysis.

Scenario Analysis

During scenario analysis, proponents evaluated scenarios against selection criteria 5-8 and also looked again at military value, criteria 1-4. The overall scenario analysis process was characterized by an effort to identify options that best support force structure capabilities; enhance military value; provide, in the aggregate, significant infrastructure and/or cost savings; and are not limited by negative community, economic, or environmental consequences.

For the second look at military value, each scenario was evaluated against the military value ranking discussed previously to assess how the scenario compared to the quantitative assessment of military value (i.e., does the scenario favor a location with higher quantitative military value over a location with lower quantitative military value). Decision makers also applied their military judgment and experience to assess the overall military value of the proposal. Once the decision makers determined that the scenario was consistent with or enhanced military value, they proceeded to evaluate the scenario against the remaining selection criteria, as further explained below.

Determining Payback (Criterion 5)

Selection Criterion 5 requires the Department to consider the “extent and timing of potential costs and savings, including the number of years, beginning with the date of completion of the closure or realignment, for the savings to exceed the costs.” The analytical groups used the COBRA model to calculate estimated costs and savings associated with various alternatives. This model was used in previous BRAC analyses and was updated by JPAT 5.

Although the COBRA model is simply an estimating tool, its principal strength is the uniform approach it applies to all competing scenarios. Its cost and savings estimates are not “budget quality,” but COBRA’s consistent methodology ensures that the financial implications of each competing scenario are analyzed in a uniform manner. The GAO has consistently cited the use of the COBRA model as effective for estimating costs and savings. In general, COBRA-generated cost and savings estimates tended to prove conservative once more discrete, budget-quality assessments were accomplished early in the BRAC implementation phase.

Section 2913(d) of the Defense Base Closure and Realignment Act of 1990, as amended, requires the Department’s cost and savings criteria to “take into account the effect of the proposed closure or realignment on the costs of any other activity of the Department of Defense or any other Federal agency that may be required to assume responsibility for activities at the military installations.” By estimating the costs and savings to the Department of Defense

associated with a proposed closure or realignment action, the COBRA model takes into account the effect of the proposed closure or realignment action on the costs of all DoD activities, satisfying the requirements of Section 2913(d) with respect to activities of the Department of Defense.

With respect to determining the effect of the proposed action on the costs of “any other Federal agency that may be required to assume responsibility for activities” at a closing or realigning installation, the COBRA model is insufficient because it does not include estimates of non-DoD entity costs or savings. Furthermore, independently estimating the costs and savings to these agencies may be inadequate because such information is outside the control of the Department and therefore any effort to estimate these costs would be highly speculative. Additionally, the non-DoD agency may choose to relocate rather than remain and assume base operating responsibilities, potentially achieving savings that would skew any DoD cost estimates. Consequently, the Department cannot rely on the COBRA model or undertake independent estimates of the costs and savings to these agencies in order to take into account the effect on these costs and satisfy the requirements of Section 2913(d) with respect to non-DoD Federal agencies.

In order to satisfy the requirements of Section 2913(d) with respect to non-DoD Federal agencies, when a scenario directly impacted a non-DoD Federal agency, the scenario proponent assumed that such agency will be required to assume responsibility for base operating activities on the military installation. The scenario proponent further assumed that because such agency will be required to assume base operating responsibilities it did not have before the proposed action, the effect of the action will be to increase that agency’s costs. The scenario proponent documented these effects for consideration by decisionmakers.

Policy Memorandum 3, Appendix E, provides additional information on the Department’s approach to considering the costs and savings of its recommendations.

Determining Economic Impact (Criterion 6)

Selection criterion 6 requires the Department to consider the “economic impact on existing communities in the vicinity of military installations.” The Department used a certified database and calculator developed by JPAT 6 to assess the economic impact of closures and realignments on communities. The calculator, called the Economic Impact Tool (EIT), measured the total potential job change (direct and indirect) in the economic area or region of influence (ROI) of a scenario, and the total potential job change as a percentage of total employment in that region.

To assist in assessing the relative economic impact of a scenario, the EIT also displayed the:

- population and employment of the region of influence,
- installation’s authorized manpower,
- authorized manpower as a percentage of the region’s employment,
- total job change (the sum of the estimated direct and indirect job changes), and
- total job change as a percentage of the region’s employment.

Additionally, the EIT provided graphs displaying the total employment from 1988-2002, the annual unemployment rates from 1990-2003, and the per capita income during 1988-2002 for each region of influence. These graphs provided users a basis for assessing the relative impact a scenario might have on a local community's economy. Policy Memorandum 6, Appendix E, provides additional information on the Department's approach to evaluating economic impact.

As the Department finalized its recommendations, decision makers reviewed the aggregate economic impacts to understand how all the actions encompassed in the BRAC 05 recommendation package might affect a given ROI.

Assessing Community Infrastructure (Criterion 7)

Selection Criterion 7 requires the Department to consider the "ability of the infrastructure of both the existing and potential receiving communities to support forces, missions, and personnel." Using procedures that JPAT 7 developed, the Military Departments and JCSGs examined the ability of both the existing and potential receiving communities' infrastructure to support forces, missions, and personnel. The process required the evaluation of 10 key community attributes-- demographics, childcare, cost of living, education, employment, housing, medical care, safety/crime, transportation, and utilities. JPAT 7 created databases on each military installation for the Military Department and JCSG assessments. Policy Memorandum 4, Appendix E, provides additional information on the Department's approach to evaluating Community Impact.

As the Department finalized its recommendations, decision makers reviewed the aggregate of all recommendations in a community to assess the ability of the communities to support missions, forces, and personnel.

Determining Environmental Impact (Criterion 8)

Selection Criterion 8 requires the Department to consider the "environmental impact, including the impact of costs related to potential environmental restoration, waste management, and environmental compliance activities." To assist the Military Departments and JCSGs in assessing these impacts, JPAT 8 obtained environmental data from all DoD installations and provided procedural instructions on a range of environmental assessment issues.

Environmental Resources Impact To assess and consider the environmental resource impacts of different scenarios, JPAT 8 identified 10 environmental resource areas for consideration: air quality; cultural/archeological/tribal resources; dredging; land use constraints/sensitive resource areas; marine mammals/marine resources/marine sanctuaries; noise; threatened and endangered species/critical habitat; waste management; water resources; and wetlands. The Military Departments and the Defense Logistics Agency (DLA) arrayed environmental data on these resource areas for each of their installations in an environmental profile. The profiles also noted the Fiscal Year 2003 estimate of the costs to complete restoration of sites managed under the Defense Environmental Restoration Account (DERA).

Analytical groups used these profiles to assess each scenario. When a scenario appeared to merit additional review, the proponent requested a Summary of Scenario Environmental Impacts to

evaluate impacts in the 10 environmental resource areas and identify any one-time waste management and compliance costs. The Military Departments and JCSGs then evaluated their scenarios in light of any identified impacts.

Impact of Potential Environmental Restoration Costs. The Department considered the impact of costs related to potential environmental restoration through the review of certified data on preexisting environmental restoration projects at installations that were identified during scenario development as candidates for closure or realignment. In this regard, the certified data considered by the Military Departments and JCSGs included the Fiscal Year 2003 estimate of costs to complete for Installation Restoration (IR) sites managed and reported under the DERA.

Under DERA, the costs are generally calculated on a “clean-to-current-use” standard. The cost of environmental restoration did not dictate any installation closure decision. The presence of DERA-managed sites, however, was considered as a land use constraint for installations receiving missions as a result of a potential realignment decision.

Since the Department is legally obligated to perform environmental restoration whether a base is closed, realigned, or remains open, proponents did not consider environmental restoration costs in their payback calculations. Moreover the consideration of such costs could provide a perverse incentive that would reward (through retention) polluted sites and close clean sites. This approach was consistent with procedures used in prior BRAC rounds and responds to the Government Accountability Office (GAO) concerns. The GAO has stated that determining final restoration costs could be problematic before a closure decision, since neither reuse plans nor studies to identify related restoration requirements would have been initiated.

Impact of Potential Waste Management and Environmental Compliance Cost. Any one-time waste management and compliance costs associated with closing a facility (e.g., costs generated as the result of operation permit termination requirements) or similar one-time costs associated with realignment actions (expanding treatment or compliance operation permits) were also identified for inclusion in the payback calculations.

In addition to this overall effort to create environmental profiles of each installation that address major issues, the groups also asked scenario-specific questions about environmental issues at gaining and losing bases. The results are incorporated in their recommendations and justifications.

It should be noted that the process for applying criterion 8 did not include an environmental assessment or impact study under the National Environmental Policy Act of 1969 (42 USC 4321 et seq.) (NEPA). Under the BRAC statute (Section 2905(c) of the Defense Base Closure and Realignment Act of 1990, as amended through the FY05 Authorization Act), the NEPA process is not triggered until the implementation of the BRAC recommendations. Rather, the environmental part of the BRAC process was an effort to efficiently package and analyze the certified environmental data, thus making it easily accessible to the Military Departments and JCSGs for integration into their analytical processes. Policy Memoranda 4 and 8, Appendix E, provide additional information on the Department’s approach to evaluating environmental impact.

As the Department finalized its recommendations, decisionmakers reviewed the summary of aggregate environmental impacts for each affected installation to assess whether the combination of all the actions encompassed in the BRAC 2005 recommendation package might generate environmental concerns that would need further review.

Integrating Military Department and JCSG Recommendations

In the final stages of the scenario analysis process, using its analysis against all eight selection criteria, each analytical proponent deliberated and decided which of its scenarios to recommend to the ISG and IEC for approval. Any scenario so recommended became a candidate recommendation.

After the ISG and IEC completed their review and approval of individual candidate recommendations, the Department conducted a process of integration. Integration involved allocating costs and savings among candidate recommendations and combining multiple candidate recommendations into a single candidate recommendation where that would produce a complete closure or would make functional or strategic sense. All newly combined recommendations were then evaluated against selection criteria 5-8, as described above.