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Audit Report

Office of the Inspector General

Defense Base Realignment and Closure
Budget Data for Realignment of
Construction Battalion Unit 416
From Naval Air Station Alameda, California,
To Naval Air Station Fallon, Nevada

Report No. 95-208
May 31, 1995

Department of Defense

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Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<tbody>
<tr>
<td>BRAC</td>
<td>Base Realignment and Closure</td>
</tr>
<tr>
<td>CBU</td>
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</tr>
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<td>Naval Facilities Engineering Command</td>
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<td>WESTDIV</td>
<td>Western Division</td>
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May 31, 1995

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE (COMPTROLLER)
ASSISTANT SECRETARY OF THE NAVY (FINANCIAL
MANAGEMENT AND COMPTROLLER)
COMMANDER, NAVAL FACILITIES ENGINEERING
COMMAND

SUBJECT: Audit Report on Defense Base Realignment and Closure Budget Data for
Realignment of Construction Battalion Unit 416 From Naval Air Station
Alameda, California, to Naval Air Station Fallon, Nevada
(Report No. 95-208)

We are providing this audit report for your review and comment. Management
comments on a draft of this report were considered in preparing the final report. This
report is one in a series of reports about FY 1995 Defense base realignment and closure
military construction costs.

DoD Directive 7650.3 requires that all recommendations be resolved promptly.
We did not receive comments from the Commander, Naval Facilities Engineering
Command, addressing Recommendation 2. We request that the Commander, Naval

We appreciate the courtesies extended to the audit staff. Questions on the audit
should be directed to Mr. Garold E. Stephenson, Audit Program Director, at
(703) 604-9332 (DSN 664-9332) or Mr. Timothy J. Staehling, Audit Project Manager,
at (703) 604-9256 (DSN 664-9256). If management requests, we will provide a formal
briefing on the audit. See Appendix F for the report distribution. The audit team
members are listed inside the back cover.

David K. Steensma
Deputy Assistant Inspector General
for Auditing
Office of the Inspector General, DoD

Report No. 95-208 May 31, 1995
(Project No. 5CG-5017.20)

Defense Base Realignment and Closure Budget Data for
Realignment of Construction Battalion Unit 416 From
Naval Air Station Alameda, California, to
Naval Air Station Fallon, Nevada

Executive Summary

Introduction. Public Law 102-190, "National Defense Authorization Act for Fiscal Years 1992 and 1993," December 5, 1991, directs the Secretary of Defense to ensure that the amount of the authorization that DoD requested for each military construction project associated with Defense base realignment and closure does not exceed the original estimated cost provided to the Commission on Defense Base Closure and Realignment (the Commission). If the requested budget amounts exceed the original project cost estimates provided to the Commission, the Secretary of Defense is required to explain to Congress the reasons for the differences. The Inspector General, DoD, is required to review each Defense base realignment and closure military construction project for which a significant difference exists from the original cost estimate and to provide the results of the review to the congressional Defense committees. This report is one in a series of reports about FY 1995 Defense base realignment and closure military construction costs.

Audit Objectives. The overall audit objective was to determine the accuracy of Defense base realignment and closure military construction budget data. This report provides the results of the audit of one project, valued at $1.05 million, for the realignment of Construction Battalion Unit 416 from Naval Air Station Alameda, California, to Naval Air Station Fallon, Nevada. This audit also assessed the adequacy of the management control program as it applied to the audit objective.

Audit Results. The Navy understated facility requirements for Construction Battalion Unit 416 at Naval Air Station Fallon in Defense base realignment and closure military construction project P-316T, "Construction Battalion Unit." As a result, project P-316T was not properly prepared and will not be sufficient to accommodate Construction Battalion Unit 416 after it is realigned to Naval Air Station Fallon. The review of the management control program will be discussed in a summary report on Defense base realignment and closure military construction budget data.

Summary of Recommendations. We recommend that the Commander, Naval Air Station Fallon, perform an engineering analysis using the updated construction battalion unit facility allowances and resubmit the DD Form 1391, "Military Construction Project Data," for project P-316T based on the updated allowances and engineering analysis. We also recommend the Commander, Naval Facilities Engineering

Management Comments. The Commander, Naval Air Station Fallon, agreed to perform an engineering analysis using the updated construction battalion unit facility allowances, and to resubmit the DD Form 1391, "Military Construction Project Data," for project P-316T, "Construction Battalion Unit," based on the updated allowances and engineering analysis. Also, the Commander, Naval Air Station Fallon, stated that these actions were complete. We did not receive comments from the Commander, Naval Facilities Engineering Command, addressing the recommendation to revise the facility allowances in Naval Facilities Engineering Command Publication 80, "Facility Planning Criteria for the Navy and Marine Corps Shore Installations," October 1982, to properly reflect the facility allowances of construction battalion units. Although not required to comment, the Commander, Naval Air Station Alameda, agreed that the facility requirements for Construction Battalion Unit 416 were understated and that the Naval Facilities Engineering Command P-80 construction criteria of 12,000 square feet was not sufficient to meet all the needs of Construction Battalion Unit 416. A summary of management comments is at the end of the finding in Part 1. The complete text of management comments is in Part III.

Audit Response. The actions taken by the Commander, Naval Air Station Fallon, met the intent of our recommendations. The Commander, Naval Facilities Engineering Command, did not comment on the draft report. We request that the Commander, Naval Facilities Engineering Command, comment on this report by July 31, 1995.
# Table of Contents

Executive Summary ........................................... i

Part I - Audit Results

Audit Background ............................................. 2
Other Construction Battalion Unit Realignments .......... 2
Audit Objectives .............................................. 3
Military Construction Project for
Construction Battalion Unit 416 ......................... 4

Part II - Additional Information

Appendix A. Scope and Methodology ....................... 10
Appendix B. Summary of Prior Audits and Other Reviews .... 11
Appendix C. Background of Defense Base Realignment and Closures
and Scope of the Audit of FY 1996 Defense Base
Realignment and Closure Military Construction Costs .... 16
Appendix D. Summary of Potential Benefits Resulting From Audit ... 18
Appendix E. Organizations Visited or Contacted ............ 19
Appendix F. Report Distribution ............................ 20

Part III - Management Comments

Department of the Navy Comments ....................... 24
Part I - Audit Results
Audit Background

The Inspector General, DoD, is performing various audits of the Defense base realignment and closure (BRAC) process. This report is one in a series of reports about FY 1995 BRAC military construction (MILCON) costs. For additional information on the BRAC process and the overall scope of the audit of BRAC MILCON costs, see Appendix C.

Other Construction Battalion Unit Realignments

The Office of the Inspector General, DoD, recently examined two other construction battalion unit (CBU) realignments resulting from BRACs. Both audits determined that adequate support existed for a greater space allowance for the CBU mission than authorized by the Naval Facilities Engineering Command (NAVFAC), Publication 80 (P-80), "Facility Planning Criteria for the Navy and Marine Corps Shore Installations," October 1982, construction criteria. The NAVFAC P-80 criteria specified 12,000 square feet for a CBU.

CBU 421 Realignment From Mare Island Shipyard, California, to Naval Air Station Everett, Washington. Inspector General, DoD, Report No. 95-051, "Defense Base Realignment and Closure Budget Data for Closing Mare Island Naval Shipyard, California, and Realigning Projects to Various Sites," December 9, 1994, states that the Navy had adequate support for MILCON project P-088T, "Construction Battalion Unit Facility." Project P-088T exceeded the NAVFAC P-80 construction criteria of 12,000 square feet. The Navy had several reasons for requiring more space.

- The NAVFAC P-80 criteria did not provide sufficient space for men’s and women’s showers and lockers.

- CBU on-hand equipment exceeded the equipment allowance in the NAVFAC P-80 criteria.

- The CBU was significantly involved in the training of reserve Seabees, requiring space to accommodate an additional 12 to 15 Seabees. (CBU members who build naval shore facilities in combat zones.)

- CBU manning averaged between 45 and 60 people.
CBU 412 Realignment From Naval Air Station Charleston, South Carolina, to Naval Submarine Base, Kings Bay, Georgia. Inspector General, DoD, Report No. 95-150, "Defense Base Realignment and Closure Budget Data for Closing Naval Station Charleston, South Carolina, and Realigning Projects at Various Sites," March 15, 1995, states that the Navy had adequate support for MILCON project P-053T, "Construction Battalion Unit Facility." Project P-053T exceeded NAVFAC P-80 criteria because the CBU needed additional space for equipment storage, women's lockers, bathrooms, and classroom training.

Audit Objectives

The overall audit objective was to determine the accuracy of BRAC MILCON budget data. The specific objectives were to determine whether the proposed projects were valid BRAC requirements, whether the decision for MILCON was supported with required documentation including an economic analysis, and whether the economic analysis considered existing facilities. The audit also assessed the adequacy of the Navy management control program as it applied to the overall audit objective.

This report provides the results of the audit for BRAC MILCON project P-316T, "Construction Battalion Unit," valued at $1.05 million, for the realignment of CBU 416 from Naval Air Station (NAS) Alameda, California, to NAS Fallon, Nevada. See Appendix A for a discussion of the scope and methodology and Appendix B for a summary of prior coverage related to the audit objectives. The management control program will be discussed in a summary report on BRAC MILCON budget data. Therefore, this report does not discuss our review of management controls.
Military Construction Project for Construction Battalion Unit 416

Based on previous CBU realignments, the Navy understated facility requirements by an estimated 3,000 to 4,000 square feet for CBU 416 in BRAC MILCON project P-316T at NAS Fallon. The facility requirements were understated because the Navy did not perform an engineering analysis of the CBU mission requirements and the project was based on space planning criteria that needed updating. As a result, project P-316T was not properly planned and will not be sufficient to accommodate CBU 416 without modifications that will increase project costs and that could delay project completion.

CBU 416 Mission and MILCON Guidance

Mission of CBU 416. CBU 416 is a naval shore activity and a component of the naval construction force. Specifically, its mission is to mobilize as a naval mobile construction battalion and provide public works support for a fleet hospital. The CBU conducts the individual military and technical skill training essential to maintain required readiness and performs base construction assignments to maintain military construction skills.

NAVFAC MILCON Project Guidance. NAVFAC Instruction 11010.44E, "Shore Facilities Planning Manual," October 1, 1990, specifies guidance and procedures for Navy preparation of MILCON project documentation. Specifically, the instruction covers guidance for MILCON and nonappropriated funded project documentation. Instruction 11010.44E describes the planning process for developing both the organizations' mission requirements and the basic facility requirements to support the defined mission.

Navy Facility Space-Planning Criteria. NAVFAC P-80 describes the space allowance for CBU facilities. NAVFAC P-80 identifies a total of 12,000 square feet to support the mission requirements of a CBU. However, NAVFAC P-80 does not specifically state the typical CBU size or how the 12,000 square feet was derived.
MILCON Project P-316T, "Construction Battalion Unit"

Project Planning. The Public Works Office at NAS Fallon tasked NAVFAC Western Division (WESTDIV) to prepare MILCON project P-316T. WESTDIV contracted with an architecture and engineering firm to prepare the basic facility requirements and the DD Form 1391, "Military Construction Project Data." The architecture and engineering firm applied the NAVFAC P-80 construction criteria to develop the DD Form 1391. The DD Form 1391 identified the 12,000-square-foot facility specified in NAVFAC P-80. The basic facility requirements listed total building area space at 27,912 square feet and additional parking and open storage at 1,800 square feet, for a total of 29,712 square feet. However, because NAVFAC P-80 criteria specified 12,000 square feet, the lesser amount was used for developing the DD Form 1391.

CBU Mission Engineering Analysis. The Public Works Office at NAS Fallon and WESTDIV did not perform an engineering analysis, as required by NAVFAC Instruction 11010.44E, to identify facility requirements. An analysis of the CBU mission would have determined that CBU 416 mission requirements exceeded the NAVFAC P-80 criteria.

Evaluation of CBU 416 Mission Requirements

MILCON Project Budget Submission. According to officials at NAS Fallon Public Works Office and WESTDIV, the Navy did not commit resources to evaluate the mission requirements for CBU 416 because of the need to quickly develop the MILCON budget submission for project P-316T and planning for other larger MILCON projects at NAS Fallon.

NAVFAC P-80 Facility Allowances for CBUs. WESTDIV planners stated that once the design of project P-316T began, the WESTDIV planners realized that current NAVFAC P-80 criteria would not meet the CBU mission requirements. However, WESTDIV did not perform an engineering analysis of the CBU 416 mission and did not prepare a new DD Form 1391. An updated DD Form 1391 should be prepared and approved for budget submission after the actual facility requirements for CBU 416 are identified.
WESTDIV, NAS Fallon Public Works officials, and CBU 416 personnel agree that the NAVFAC P-80 facility allowance does not provide sufficient space allowances for:

- gear storage,
- women's locker and bathroom space, and
- classroom and training requirements.

Based on previous CBU realignments and the fact that CBUs all have the same mission requirements, we estimate that project P-316T is underestimated by 3,000 to 4,000 square feet. Because the Navy did not perform an engineering analysis for the CBU mission, the exact underestimated amount has not been determined.

**Supporting Facility Requirements**

Because facility requirements for CBU 416 were not identified, the current planned MILCON project will not be sufficient to accommodate CBU 416 without modifications that will increase project costs and that could delay project completion.

**Facility Allowance Criteria.** The mission requirements for CBU 416 are the same as for the two prior CBU relocations reviewed by the Office of the Inspector General, DoD. WESTDIV did not use current facility allowance criteria based on prior CBU relocations. By not using the most current NAVFAC P-80 facility allowance for CBUs, WESTDIV did not properly plan BRAC MILCON project P-316T.

**Updating NAVFAC P-80 Criteria for CBUs.** The updating of NAVFAC P-80 criteria to properly represent the facility allowance for the current CBU mission will allow project P-316T and future CBU relocations to be adequately planned. Also, an engineering analysis of the current CBU mission requirements, including the use of the updated NAVFAC P-80 criteria, should provide additional MILCON support for development of the DD Form 1391.
Recommendations, Management Comments, and Audit Response

1. We recommend the Commander, Naval Air Station Fallon:

   a. Perform an engineering analysis using the updated construction battalion unit facility allowances.


2. We recommend that the Commander, Naval Facilities Engineering Command, revise the facility allowances in Naval Facilities Engineering Command Publication 80, "Facility Planning Criteria for the Navy and Marine Corps Shore Installations," October 1982, to properly reflect the facility allowances of construction battalion units.

Commander, Naval Air Station Fallon, Comments. The Commander, Naval Air Station Fallon, concurred with the report finding and Recommendations 1.a. and 1.b. Also, the Commander, Naval Air Station Fallon, stated that an engineering analysis using the updated CBU facility allowances is complete and that a new DD Form 1391 for project P-316T has been resubmitted representing the updated allowances and engineering analysis.

Management Comments Required. The Commander, Naval Facilities Engineering Command, did not comment on the draft report. We request that the Commander, Naval Facilities Engineering Command, comment on this report by July 31, 1995.

Commander, Naval Air Station Alameda, Comments. Although not required to comment, the Commander, Naval Air Station Alameda, concurred with the report finding and recommendations.
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Part II - Additional Information
Appendix A. Scope and Methodology

Scope of This Audit. We examined the FY 1996 BRAC MILCON budget request and related documentation for one realignment project regarding the transfer of CBU 416 from NAS Alameda to NAS Fallon.

Audit Standards, Potential Benefits, and Locations. This economy and efficiency audit was made from January through March 1995 in accordance with auditing standards issued by the Comptroller General of the United States as implemented by the Inspector General, DoD. Accordingly, we included tests of management controls considered necessary. The audit did not rely on computer-processed data or statistical sampling procedures. See Appendix D for the potential benefits resulting from the audit. Appendix E lists the organizations visited or contacted during the audit.
Appendix B. Summary of Prior Audits and Other Reviews

Since 1991, numerous audit reports have addressed DoD BRAC issues. This appendix lists selected DoD and Navy BRAC reports.

Inspector General, DoD

<table>
<thead>
<tr>
<th>Report No.</th>
<th>Report Title</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>95-205</td>
<td>Defense Base Realignment and Closure Budget Data for the Relocation of Marine Corps Manpower Center at Marine Corps Combat Development Command, Quantico, Virginia</td>
<td>May 26, 1995</td>
</tr>
<tr>
<td>95-198</td>
<td>Defense Base Realignment and Closure Budget Data for the Closure of the Underway Replenishment Training Facility, Treasure Island, California, and Realignment to the Expeditionary Warfare Training Group Atlantic, Norfolk, Virginia</td>
<td>May 19, 1995</td>
</tr>
<tr>
<td>95-196</td>
<td>Defense Base Realignment and Closure Budget Data for the Closure of Naval Air Station Alameda, California, and Realignment to Puget Sound Naval Shipyard, Washington</td>
<td>May 17, 1995</td>
</tr>
<tr>
<td>95-191</td>
<td>Defense Base Realignment and Closure Budget Data for the Closure of Naval Reserve Readiness Center San Francisco, California, and Realignment to Naval and Marine Corps Reserve Center Alameda, California</td>
<td>May 15, 1995</td>
</tr>
<tr>
<td>95-172</td>
<td>Defense Base Realignment and Closure Budget Data for Griffis Air Force Base, New York</td>
<td>April 13, 1995</td>
</tr>
<tr>
<td>95-154</td>
<td>Audit of Construction Budget Data for Realigning Naval Training Centers Orlando and San Diego to Various Locations</td>
<td>March 21, 1995</td>
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### Appendix B. Summary of Prior Audits and Other Reviews

#### Inspector General, DoD (cont'd)

<table>
<thead>
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<th>Report No.</th>
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<tr>
<td>95-150</td>
<td>Defense Base Realignment and Closure Budget Data for Closing Naval Air Station Charleston, South Carolina, and Realigning Projects to Various Sites</td>
<td>March 15, 1995</td>
</tr>
<tr>
<td>95-051</td>
<td>Defense Base Realignment and Closure Budget Data for the Closing of Mare Island Naval Shipyard, California, and Realigning Projects to Various Sites</td>
<td>December 9, 1994</td>
</tr>
<tr>
<td>95-041</td>
<td>Defense Base Realignment and Closure Budget Data for the Closure of Marine Corps Air Stations El Toro and Tustin, California, and the Realignment to Naval Air Station Miramar, California</td>
<td>November 25, 1994</td>
</tr>
<tr>
<td>95-039</td>
<td>Defense Base Realignment and Closure Budget Data for Naval Air Station Miramar, California, and Realigning Projects to Naval Air Station Fallon, Nevada</td>
<td>November 25, 1994</td>
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<tr>
<td>95-037</td>
<td>Realignment of the Fleet and Mine Warfare Training Center from Naval Station Charleston, South Carolina, to Naval Station Ingleside, Texas</td>
<td>November 23, 1994</td>
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<tr>
<td>95-029</td>
<td>Defense Base Realignment and Closure Budget Data for Naval Air Station Miramar, California, and Realigning to Various Sites</td>
<td>November 15, 1994</td>
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<td>95-010</td>
<td>Defense Base Realignment and Closure Budget Data for Marine Corps Air Station Tustin, California, and Realignment to Marine Corps Air Station Camp Pendleton, California</td>
<td>October 17, 1994</td>
</tr>
</tbody>
</table>
### Appendix B. Summary of Prior Audits and Other Reviews

**Inspector General, DoD (cont'd)**

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<thead>
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</thead>
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<tr>
<td>94-146</td>
<td>Defense Base Realignment and Closure Budget Data for Closing Naval Air Station Cecil Field, Florida, and Realigning Projects to Various Sites</td>
<td>June 21, 1994</td>
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<tr>
<td>94-141</td>
<td>Defense Base Realignment and Closure Budget Data for Naval Air Stations Dallas, Texas, and Memphis, Tennessee, Realigning to Carswell Air Reserve Base, Texas</td>
<td>June 17, 1994</td>
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<tr>
<td>94-126</td>
<td>Defense Base Realignment and Closure Budget Data for the Closure of Naval Air Station Glenview, Illinois, and Realignment Projects at Fort McCoy, Wisconsin, and Carswell Air Reserve Base, Texas</td>
<td>June 10, 1994</td>
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<td>94-125</td>
<td>Defense Base Realignment and Closure Budget Data for the Naval Medical Center Portsmouth, Virginia</td>
<td>June 8, 1994</td>
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<td>94-121</td>
<td>Defense Base Realignment and Closure Budget Data for Naval Air Technical Training Center, Naval Air Station Pensacola, Florida</td>
<td>June 7, 1994</td>
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## Appendix B. Summary of Prior Audits and Other Reviews

### Inspector General, DoD (cont'd)

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<td>Budget Data for Military Construction at Other Sites</td>
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<td>94-105</td>
<td>Defense Base Realignment and Closure Budget Data for a Tactical Support Center</td>
<td>May 18, 1994</td>
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<td>94-104</td>
<td>Defense Base Realignment and Closure Budget Data for the Defense Contract</td>
<td>May 18, 1994</td>
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<td>94-103</td>
<td>Air Force Reserve 301st Fighter Wing Covered Aircraft Washrack Project,</td>
<td>May 18, 1994</td>
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<td>Carswell Air Reserve Base, Texas</td>
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<td>94-040</td>
<td>Summary Report on the Audit of Defense Base Closure and Realignment Budget</td>
<td>February 14,</td>
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<td>023-S-94</td>
<td>Military Construction Projects Budgeted and Programmed for Bases Identified for Closure or Realignment</td>
<td>January 14, 1994</td>
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<td>028-C-93</td>
<td>Implementation of the 1993 Base Closure and Realignment Process</td>
<td>March 15, 1993</td>
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Appendix C. Background of Defense Base Realignment and Closures and Scope of the Audit of FY 1996 Defense Base Realignment and Closure Military Construction Costs

Commission on Defense Base Closure and Realignment. On May 3, 1988, the Secretary of Defense chartered the Commission on Defense Base Closure and Realignment (the Commission) to recommend military installations for realignment and closure. Congress passed Public Law 100-526, "Defense Authorization Amendments and Base Closure and Realignment Act," October 24, 1988, which enacted the Commission's recommendations. The law also established the DoD Base Closure Account to fund any necessary facility renovation or MILCON projects associated with BRAC. Public Law 101-510, "Defense Base Closure and Realignment Act of 1990," November 5, 1990, reestablished the Commission. The law also chartered the Commission to meet during calendar years 1991, 1993, and 1995 to verify that the process for realigning and closing military installations was timely and independent. In addition, the law stipulates that realignment and closure actions must be completed within 6 years after the President transmits the recommendations to Congress. The following table summarizes the current estimated costs and net savings for the previous three BRAC actions and the actions recommended in the 1995 Commission decisions:

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Appendix C. Background of Defense Base Realignment and Closures and Scope of the Audit of FY 1996 Defense Base Realignment and Closure Military Construction Costs

Required Defense Reviews of BRAC Estimates. Public Law 102-190, "National Defense Authorization Act for Fiscal Years 1992 and 1993," December 5, 1991, states that the Secretary of Defense shall ensure that the authorization amount that DoD requested for each MILCON project associated with BRAC actions does not exceed the original estimated cost provided to the Commission. If the requested budget amounts exceed the original project cost estimates provided to the Commission, the Secretary of Defense is required to explain to Congress the reasons for the differences. Also, Public Law 102-190 prescribes that the Inspector General, DoD, must evaluate significant increases in MILCON project costs over the estimated costs provided to the Commission and provide a report to appropriate congressional Defense committees.

Military Department BRAC Cost-Estimating Process. To develop cost estimates for the Commission, the Military Departments used the Cost of Base Realignment Actions computer model (COBRA). COBRA uses standard cost factors to convert the suggested BRAC options into dollar values to provide a way to compare the different options. After the President and Congress approve the BRAC actions, DoD realigning activity officials prepare DD Form 1391, "FY 1996 Military Construction Project Data," for individual MILCON projects required to accomplish the realigning actions. COBRA provides cost estimates as a realignment and closure package for a particular realigning or closing base. The DD Form 1391 provides specific cost estimates for an individual BRAC MILCON project.

Limitations and Expansion to Overall Audit Scope. Because COBRA develops cost estimates as a BRAC package and not for individual BRAC MILCON projects, we were unable to determine the amount of cost increases for each individual BRAC MILCON project. Additionally, because of prior audit efforts that determined potential problems with all BRAC MILCON projects, our audit objectives included all large BRAC MILCON projects.

Overall Audit Selection Process. We reviewed the FY 1996 BRAC MILCON $1.4 billion budget submitted by the Military Departments and the Defense Logistics Agency. We excluded projects that were previously reviewed by DoD audit organizations. We grouped the remaining BRAC MILCON projects by location and selected groups of projects that totaled at least $1 million for each group.
Appendix D. Summary of Potential Benefits Resulting From Audit

<table>
<thead>
<tr>
<th>Recommendation Reference</th>
<th>Description of Benefit</th>
<th>Amount and Type of Benefit</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.a.</td>
<td>Economy and Efficiency. Performs an engineering analysis using updated CBU facility allowances.</td>
<td>Undeterminable*</td>
</tr>
<tr>
<td>1.b.</td>
<td>Economy and Efficiency. Revises and resubmits DD Form 1391, &quot;Military Construction Project Data,&quot; to reflect current mission facility allowances.</td>
<td>Undeterminable*</td>
</tr>
<tr>
<td>2.</td>
<td>Economy and Efficiency. Revises the facility allowances in NAVFAC P-80, &quot;Facility Planning Criteria for the Navy and Marine Corps Shore Installations,&quot; to properly reflect the facility allowances of CBUs.</td>
<td>Undeterminable*</td>
</tr>
</tbody>
</table>

*Exact amount of additional benefits to be realized will be determined by future budget decisions and budget requests.*
Appendix E. Organizations Visited or Contacted

Department of the Navy

Naval Facilities Engineering Command, Alexandria, VA
  Western Division, San Bruno, CA
Naval Air Station Alameda, CA
Naval Air Station Fallon, NV
Appendix F. Report Distribution

Office of the Secretary of Defense

Under Secretary of Defense for Acquisition and Technology
  Director, Defense Logistics Studies Information Exchange
Under Secretary of Defense (Comptroller)
  Deputy Under Secretary of Defense (Comptroller/Management)
  Deputy Under Secretary of Defense (Comptroller/Program/Budget)
Under Secretary of Defense (Personnel and Readiness)
Assistant Secretary of Defense (Economic Security)
  Deputy Assistant Secretary of Defense (Installations)
Deputy Under Secretary of Defense (Acquisition Reform)
Assistant to the Secretary of Defense (Public Affairs)

Department of the Army

Auditor General, Department of the Army

Department of the Navy

Assistant Secretary of the Navy (Financial Management and Comptroller)
Assistant Secretary of the Navy (Installations and Environment)
Commander, Naval Air Force, U.S. Pacific Fleet
Commander, Naval Facilities Engineering Command
  Commander, Western Division
Commander, Naval Air Station Alameda, CA
Commander, Naval Air Station Fallon, NV
Auditor General, Department of the Navy

Department of the Air Force

Assistant Secretary of the Air Force (Financial Management and Comptroller)
Auditor General, Department of the Air Force
Other Defense Organizations

Director, Defense Contract Audit Agency
Director, Defense Logistics Agency
Director, National Security Agency
   Inspector General, National Security Agency
Inspector General, Central Imagery Office

Non-Defense Federal Organizations and Individuals

Office of Management and Budget
Technical Information Center, National Security and International Affairs Division,
   General Accounting Office

Chairman and ranking minority member of each of the following congressional
committees and subcommittees:

   Senate Committee on Appropriations
   Senate Subcommittee on Defense, Committee on Appropriations
   Senate Committee on Armed Services
   Senate Committee on Governmental Affairs
   House Committee on Appropriations
   House Subcommittee on National Security, Committee on Appropriations
   House Committee on Government Reform and Oversight
   House Subcommittee on National Security, International Affairs, and Criminal
      Justice, Committee on Government Reform and Oversight
   House Committee on National Security

Honorable Richard H. Bryan, U.S. Senate
Honorable Harry Reid, U.S. Senate
Honorable John Ensign, U.S. House of Representatives
Honorable Barbara Vucanovich, U.S. House of Representatives
This page was left out of original document
Part III - Management Comments
From: Commanding Officer, Naval Air Station, Fallon
To: Inspector General, Department of Defense, Arlington, VA

Subj: AUDIT REPORT ON DEFENSE BASE REALIGNMENT AND CLOSURE
BUDGET DATA FOR REALIGNMENT OF CONSTRUCTION BATTALION UNIT
416 FROM NAVAL AIR STATION ALAMEDA, CALIFORNIA, TO NAVAL
AIR STATION FALLON, NEVADA (PROJECT NO. SGC-5017.20)

Ref: (a) Inspector General ltr of 17 Apr 95

1. For reference (a), concur with findings and recommendations
   of subject report. Recommendations 1a and 1b from report are
   already complete.

2. NAS Fallon point of contact is LCDR Steve Iselin at DSN 830-
   2804 or commercial (702) 426-2804.

STEVE ISELIN
By direction
From: Commanding Officer, Naval Air Station, Alameda
To: Inspector General Department of Defense, 400 Army Navy Drive, Arlington, Va

Subj: DRAFT AUDIT REPORT ON DEFENSE BASE REALIGNMENT AND CLOSURE BUDGET DATA FOR REALIGNMENT OF CONSTRUCTION BATTALION UNIT 416 FROM NAVAL AIR STATION ALAMEDA, CALIFORNIA, TO NAVAL AIR STATION FALLON, NEVADA (PROJECT NO. 5CD-501720)

Ref: (a) Inspector General Draft Audit Report dated 17 April 1995

1. As requested by reference (a) the following comments are provided: Concur with the findings that the facility requirements for Construction Battalion Unit 416, as cited in military construction Project No. P-3167, are understated. The Naval Facilities Engineering Command (NAVFAC) P-60 construction criteria of 12,000 sq. ft. is not sufficient to meet all needs of Construction Battalion Unit 416. The newly calculated Basic Facility Requirements (BFR) are 17,377 sq. ft.

F. J. [Signature]
Audit Team Members

This report was prepared by the Contract Management Directorate, Office of the Assistant Inspector General for Auditing, DoD.

Paul J. Granetto
Garold E. Stephenson
Timothy J. Staehling
David P. Cole
Janice Alston
INTERNET DOCUMENT INFORMATION FORM

A. Report Title: Defense Base Realignment and Closure Budget Data for Realignment of Construction Battalion Unit 416 from Naval Air Station Alameda, California, to Naval Air Station Fallon, Nevada

B. DATE Report Downloaded From the Internet: 01/14/99

C. Report’s Point of Contact: (Name, Organization, Address, Office Symbol, & Ph #): OAIG-AUD (ATTN: AFTS Audit Suggestions) Inspector General, Department of Defense 400 Army Navy Drive (Room 801) Arlington, VA 22202-2884

D. Currently Applicable Classification Level: Unclassified

E. Distribution Statement A: Approved for Public Release

F. The foregoing information was compiled and provided by: DTIC-OCA, Initials: _VM_ Preparation Date 01/14/99

The foregoing information should exactly correspond to the Title, Report Number, and the Date on the accompanying report document. If there are mismatches, or other questions, contact the above OCA Representative for resolution.