

## **Introduction**

The Department of State has reviewed and evaluated the most recent Federal Law Enforcement Training Center (FLETC) proposal to the Office of Management and Budget (OMB) dated November 1, 2013. While the Department appreciates FLETC's efforts in attempting to find a "best-value" alternative site for the Foreign Affairs Security Training Center (FASTC), the Department continues to have serious reservations with FLETC's evaluation. The proposed solution does not adequately address the Department's training requirements, nor does it provide a detailed accounting of costs and assumptions that would allow for a critical evaluation of "best value." Additionally, FLETC's evaluation overlooks invaluable lost synergies that would significantly and adversely impact the Department's training. The Department maintains that FLETC is not a suitable alternative site for FASTC, and does not believe that the submitted proposal supports the conclusion that FLETC is a "best value" alternative.

## **Areas of Concern:**

### **1. The Department's Training Requirements Must Be Met Without Restriction**

During joint discussions with OMB and FLETC, OMB emphasized that the Department's training was not to be subject to interpretation or restriction. OMB concurred that an underlying planning assumption for both organizations is that the Department's training requirements, methodologies, and standards are not subject to interpretation or modification based upon FLETC-driven capabilities. FLETC was mandated to take the Department's training requirements and evaluate what could be provided with existing facilities, what requirements could be met with additional construction, and what requirements could not be met at all. FLETC's evaluation and proposal entails altering the Department's training requirements, which OMB stated is not an acceptable outcome.

FLETC has indicated that it can "*accommodate the DS projections while attaining the desired DS tempo and methodology of training*"; however, FLETC goes on to caveat the claim by stating "*all training conducted at a FLETC facility is required to undergo a formal risk assessment process to ensure all safety measures are applied and appropriate risk mitigation strategies are in place prior to commencement of training.*"

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Training for the Department and other U.S. foreign affairs agency personnel and their dependents is heavily focused on the paradigm of high-threat, high-risk operating environments as outlined by the policy directions of the National Security Council. In order to adequately train for these environments, higher levels of risk must be assumed in training that are more closely aligned with that of standard military training than those of domestic law enforcement.

The Department is concerned that the unique training requirements necessitated by the Department's mission are not being given adequate consideration in this discussion. The FLETC proposal repeatedly cites "*law enforcement*" capability; however, while DS does indeed have a strong law enforcement function and its special agents are federal law enforcement officers, the nature of its overseas activities is primarily security-focused, and not law enforcement centric. The vast majority of the Department's hard-skills training will be for foreign affairs personnel and not law enforcement agents. Foreign affairs hard-skills training is specifically focused on a non-permissive overseas environment, and has little relation to training designed for domestic U.S. law enforcement officers, which is FLETC's core strength. There is also a need for foreign partner personnel to be trained through the Department's Anti-Terrorism Assistance (ATA) program. This need is not addressed in FLETC's current proposal.

The Department rejects FLETC's categorization of the Fort Pickett option as being a "*single agency*" facility. Rather, the Department routinely trains personnel from multiple agencies who will serve in our posts abroad. While the majority of personnel will be from the Department, multiple agencies outside of FLETC's domestically-based law enforcement focus will be trained at the FASTC as well.

Of primary concern is the fact that FLETC has never addressed, including in this current proposal, our mandatory requirement to train 24-hours a day, 7 days a week, when necessary. Inherent to this requirement is the ability of a future training center to overcome noise abatement issues associated with local zoning ordinances, and other land use agreements. FLETC has indicated on multiple occasions that restrictions on noise and afterhours training currently exist with the local community. These existing prohibitions create a "cannot meet Department training requirements" situation that is not adequately addressed by FLETC's proposal.

**2. FLETC's "best value" alternative for a "full scope" FASTC is based on assumptions for which there are no consensus.**

On October 30, 2013, the Department and FLETC submitted to OMB a consensus document which addresses certain facilities required to support a reduced-scope hard-skills FASTC plan. However, the statement, "*Technical requirements were discussed with DS representatives during two separate field investigations*" in Section III. D of FLETC's current proposal is misleading. These discussions involved the need for a **reduced scope training facility evaluation**. While the Department has shared the previous complete full-scope Master Plan with FLETC, the facilities required to support a full-scope (hard and soft-skills) program were not jointly discussed, nor has the Department ever discussed the details of the full-scope staffing plans, student throughput, program/course outlines, schedules, etc. with FLETC. Given that a full-scope evaluation was not discussed with FLETC officials, there is no consensus on this point.

**3. Baseline Cost Estimate Not Accurately Reflecting All Factors**  
**FLETC's proposal suggests a full-scope solution by augmenting existing capabilities with new construction for only \$272 million, a significantly reduced capital investment vis-à-vis the Fort Pickett options, and the basis for subsequent operations and maintenance, and capital reinvestment calculations, as well as their overall "best value" determination.**

FLETC's proposal does not fully factor in the costs required for a full-scope solution. FASTC as a full-scope option was never jointly discussed and the cost estimate lacks a detailed list of assumptions used in its formulation, the Department must justifiably question FLETC's capability assessment and the accuracy of their cost estimates. The Department provided FLETC with a redacted version of the FASTC detailed cost estimate specifically so FLETC could develop a comparably detailed estimate for side-by-side comparison. However, FLETC's estimate attributes over \$112M for the Fort Pickett project that are not included in the FLETC proposal, although these costs should be included in the FLETC project. This incorrectly skews the cost comparison in favor of the FLETC proposal. The costs that should be included in the FLETC proposal include:

- Contingency - Unknown Site/Design, \$35.7M
- General Conditions plus Profit, \$41M
- 3rd party commissioning, \$1.7M

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- Estimated Design and Review Costs [EDRC], \$19M
- Management and inspection costs; \$15M

Specific areas that the Department would have expected to be addressed in a detailed cost estimate:

- What program requirement was used as the basis for cost development?
- What construction standard was used as the basis for cost development?
- What design and construction delivery method was used as the basis for cost development?
- What funding assumptions were used?
- Since a redacted FASTC estimate was provided to facilitate a side-by-side comparison, the Department would have expected to see some explanation of “vacant” cell; how and why the line items didn’t match up.
- What methodology was used to calculate add-ins like IT services, O&M costs, etc.?
- How were the below-the-line costs determined?

There are multiple areas where the FLETC cost estimate and the FASTC cost estimates differ greatly. Since the cost estimate did not articulate assumptions used to develop the estimate, it is impossible for the Department to understand how FLETC proposes to build the high-speed driving tracks for \$24M less than the Fort Pickett option, when FLETC has sited the tracks in an area that is roughly 50% designated wetlands; there is no indication of how FLETC would undertake wetlands mitigation, or the resultant added cost. While it’s reasonable to assume that some below-the-line efficiencies may be achieved by using in-house assets (e.g. differences in geographic locale, reduced material and labor costs, etc.), it is doubtful that those efficiencies would translate to the huge differences in the cost estimates for individual venues designated for new construction. That is unless the baseline cost estimate was developed without a complete understanding of the program/facility specifications or they are not planning to build to the required standards.

The Department has spent over two years developing the Master Plan and conducting environmental reviews. Two different professional construction estimating firms developed independent estimates based on those efforts, and the

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independently developed estimates have gone through multiple reconciliation efforts in accordance with GSA guidelines and industry best practices. The Department is therefore confident that the Fort Pickett estimate represents an accurate assessment of the project costs for this stage of the project. Conversely, FLETC's proposal was developed without the aid of expert, independent review and was completed in 90 days. The Department is confident that its estimate more accurately captures the true cost inherent in the project.

### **4. Reliance on Unidentified Alternative Sites**

FLETC's proposed site plan for the Glynco site is predicated on the ability of the Department to utilize what FLETC termed "*alternative sites in geographic proximity to the FLETC.*" It is only through utilization of these alternative, unnamed sites (other than Ft. Stewart) that FLETC can provide "*a full solution to meet the DS technical requirement.*" The Department cannot accept this planning assumption as it relies on the utilization of Fort Stewart to fulfill portions of DS' technical requirements, and provides no guarantees or detailed information on alternative sites in geographic proximity to the FLETC. Fort Stewart has already been evaluated by the Department and found to be inadequate for meeting the Department's needs. Furthermore the inclusion of other unnamed sites precludes the very type of side-by-side evaluation requested by OMB.

In their proposal, FLETC references "*alternative sites in geographic proximity to the FLETC,*" and states that "*viable alternatives have been identified within 30 miles of the GLYNCO site.*" However, as these sites have not been identified, the Department cannot assess the feasibility of the locations; determine what facilities would be located there and how they could be supported logistically; or how they would interconnect with other training venues. Of concern is the amount of land that would be required to support the explosives ranges and the 300 meter and 800 meter weapons ranges. As noted in Tab 1, the 800 meter range alone will have a sizable Surface Danger Zone requirement. The FLETC proposal does not appear to take this into consideration. Nor has the scope of this requirement been factored into the cost of acquisition and timeline to procure the property or assess the environmental impacts of the FASTC program. It is unclear what process and criteria FLETC is using to determine the viability of alternative sites.

The Department has repeatedly emphasized its need for interconnected training venues citing the need to maintain a "*training continuum from venue to venue for courses and exercises.*" FLETC has not addressed this need and the

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FLETC option further disperses Departmental training. The need for interconnected training venues is a key element of the Department's training requirements. The failure to take this need into account further illustrates FLETC's assumption that the Department's training is subject to modification.

### **Fort Stewart**

Referencing the utilization of Fort Stewart, FLETC indicated that interactions with Fort Stewart were "*very positive*", and while joint discussions with Fort Stewart were indeed professional, the FLETC option does not factor several problematic aspects for the Department. Chief among these aspects is the lack of availability of Fort Stewart facilities in both the short and long-term. While FLETC indicated that Fort Stewart may not be necessary, they neglected to note that if the facility was needed to support Department requirements, the ranges would likely be unavailable for FASTC use. Fort Stewart officials were explicit in their position that the availability of ranges would be determined after U.S. Army needs were met, noting that Ft. Stewart facilities are utilized by approximately 70,000 troops per year, with "hundreds of thousands" of training man-days each month. If U.S. Army priorities shift, the Department may be left with no alternatives to meet its requirements. Simply put, the Department's training would be the first training cancelled if a military unit needed the facility. Such a presumption eliminates Fort Stewart as a viable alternative training site.

Additionally, the Department requires the exclusive use of a separate, off-site Combined Arms Collective Training Facility (CACTF) to conduct key high threat training exercises, thirty-five days per year. The requirements for this off-site, separate facility are critical in preparing students as part of the recently revised, High Threat Operations Course training. However, when Department personnel broached the use of Fort Stewart's CACTF, Fort Stewart specifically rejected the Department's proposed use, citing U.S. Army unit scheduling priorities for military units at Fort Stewart. The Fort Pickett option provides no such obstacle due to the afore mentioned synergies and proximity with Fort AP Hill's new Advanced Battle Lab (a \$90M USD facility) with which DS has a standing agreement for conduct of high-threat training. Of note, the cost to build an additional Combined Arms Training Facility at Fort Stewart would be an additional ~\$30 million on top of previously identified estimates for new construction. Hence, the cost of Fort AP Hill's facilities should also be calculated into any potential cost savings for the government just as FLETC utilizes existing structure costs in their proposal.

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Equally important is the time and distance between Fort Stewart and the FLETC. Utilization of Fort Stewart adds over four hours to each training day, thus significantly increasing the length and cost of training and creates another, disconnected training site. This is counter-intuitive to the FASTC concept and provides no advantage over DOS's current training operations.

### **Other FLETC sites**

The FLETC proposal also briefly mentions that it has other training sites in Maryland, New Mexico, and South Carolina that could be utilized, but there are no details on how this would work; whether DS training would be done elsewhere, or whether FLETC's law enforcement training would be shifted elsewhere to accommodate the Department's use of Glynco. There is no analysis of resulting increased costs and inefficiencies.

### **5. Master/Site Plan Cost of Training; 10-Yr Cost Comparison**

FLETC's 10-year cost comparison data was used to calculate the estimated cost of training, including initial capital costs, reinvestment costs, and operations and maintenance costs. The recapitalization, investment, operations and maintenance costs appear to be a function of the capital costs. (3% & 2% respectively) *"The 10-year net present value of the FASTC full solution option is \$1.964 billion, compared with \$1.151 billion for the FLETC full solution option. The majority of savings are attributable to lower capital, recapitalization, operations and maintenance costs."* However, as has been noted in the Baseline Cost Estimate above, the identified capital cost of ~\$272 million is suspect because of problems identified with the assumptions used to develop the estimates. Since the baseline cost estimate establishes the capital cost, and the operations and maintenance and recapitalization are a function of the capital cost, then these derived costs must be considered questionable as well.

Additionally, the Department notes the following errors and/or issues that compromise the veracity of the 10-year comparison chart data:

- This datasheet comparing full-scope options is inaccurate. FLETC appears to be using staffing numbers and student throughput numbers associated with the reduced scope program. Thus, all assumptions and/or data cells that are a function of the Annual Students or the staffing number are inaccurate.

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- State's currently leased facilities costs are incorrect. The 2014 baseline number should be \$15.3M.
- Using only the airfare doesn't accurately capture the true cost of travel with ground transportation, baggage fees, etc. The Department suggests \$450 is a more accurate number.
- Four hours does not adequately capture the Lost Productivity associated with travel, especially with ground transportation, minimum check-in arrival times, etc. This should be adjusted to reflect a more realistic number.
- DOS estimates that to move 9,200 personnel by air to/from FLETC each year would result in an initial cost of \$7,820,000. Projecting this forward 10 years with an average inflation rate of 3% per year results in a projected transportation cost total of \$89,647,000.

It is difficult to evaluate the proposed Master Plan in specific detail, but the Department can identify these general concerns:

- Acreage allocated to new construction. The Department provided FLETC with facility requirements that included the necessary acreage to accommodate circulation and appropriate buffers for standoff and noise. If the acreage required is tallied to support the new construction within the existing FLETC perimeter, the result is 848 acres. While there maybe some slight variation, it is obvious that the proposed site plan does not allocate anywhere near that amount to the new construction. (Tab 3) This would suggest that the requirements have been "shrunk to fit", or the circulation, standoff and/or noise buffers have been reduced to squeeze venues into the available space. The latter would be problematic in that the venues squeezed onto the perimeters of FLETC are noisy, i.e., the driving tracks, with little buffer left remaining.
- Location of the driving tracks. It appears that the driving tracks have been located in areas with extensive wetlands. (Tab 4) While wetlands do not preclude use for this purpose, they do add additional layers of design, mitigation, environmental review, construction, scheduling and cost. This is particularly true for the high-speed tracks which must be designed to support high-speed operations of the Department's, heavy, fully-armored, vehicles. This fact further draws into question the FLETC cost estimates for this venue. The master plan at Fort Pickett has been designed to have extremely minimal impacts on wetlands there.

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- Location of the indoor firing ranges. A new ~250,000 square foot building is indicated entirely inside designated wetlands. (Tab 4) This would become the single largest building footprint at FLETC, and would have the same environmental, construction, schedule and cost issues as the driving track locations.
- As noted previously in this report, the Department is concerned that FLETC did not identify the alternate site where they intend to locate the 300M range, 800M range and the explosives pads. This is a concern because of the extensive acreage that is required to support the basic facilities, the surface danger zones, as well as the placement/compatible use issues that must be addressed with venues that use explosions.

### **6. Collaboration and Synergy Must Align**

FLETC indicates that they are well acquainted with the notion / concept of interagency synergy, again citing “*servicing the needs of over 90 Federal law enforcement agencies as well as state, local, tribal and select international law enforcement partners*“. Indeed, FLETC excels at training and supporting these domestically-focused law enforcement organizations; however, the FLETC option negates the physical proximity of the Department’s primary training partners which are not the majority of federal, state, local, or tribal law enforcement organizations. Rather, DS’ primary training synergies lay with the following internationally focused, mid-Atlantic based, security, military, and intelligence organizations:

- a. United States Marine Corps:
  1. Marine Corps Embassy Security Group (Quantico, Virginia)
  2. Marine Corps Embassy Security Force Regiment (Norfolk, Virginia)
- b. Department of State, Foreign Service Institute (Arlington, VA)
- c. U.S. Army Asymmetric Warfare Group (Ft Mead, Maryland and Ft. AP Hill, Virginia)
- d. Federal Bureau of Investigation
  1. Hostage Rescue Team (Quantico, Virginia)
  2. FBI Academy (Quantico, Virginia)
- e. Central Intelligence Agency (Williamsburg, Virginia and Northern Virginia)
- f. United States Secret Service (Beltsville, Maryland and Washington, DC)
- g. Defense Intelligence Agency (Washington, DC)
- h. Joint Special Operations Command (Fort Bragg, North Carolina)
- i. Naval Special Warfare (Norfolk, Virginia)
- j. National Counter Terrorism Center (Northern Virginia)

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### k. National Ground Intelligence Center (Charlottesville, Virginia)

It would be difficult to quantify the benefits and synergies achieved by close proximity with the above organizations. What can be determined, however, is that moving the Department's foreign affairs training outside the mid-Atlantic region will severely degrade the Department's ability to conduct needed training, facilitate liaison, and ultimately deteriorate interoperability with our historical partners at a time when these synergies must be maintained and strengthened.

FLETC's approach to interagency collaboration focuses on technology-based interaction. As its primary examples it cites the leveraging of DoD modeling and simulation; however, this type of synergy and collaboration does not meet the hard-skill, military-style training and interoperability needed by the Department and its historic partners. FLETC's leveraging of defense and academia advances in simulation and instrumentation is not equivalent to conducting the complex, overseas focused, military-style, multi-agency exercises that the Department requires.

Further, while FLETC does indeed provide programmatic, academic, and management support for the International Law Enforcement Academies based abroad, they are not structured to support the flexibility needed when scheduling strategic counterterrorism assistance training provided by the Antiterrorism Assistance program. Indeed, ATA has indicated that if the FLETC option was chosen, ATA would not be able to meet the advanced scheduling requirements mandated by the use of FLETC facilities due to the fluid nature of partner nation scheduling and availability. Thus, ATA's associated training would likely remain bifurcated, with ATA remaining at a contract facility separated from the remainder of the Department.

### **7. What FLETC Can Not Do Now**

The FLETC option is predicated on a long term cost savings with a phased-in transition approach to DS training. The Department strongly disagrees with FLETC's assertions on the courses that it states it can handle "now." For example, FLETC states that it can accommodate the Foreign Affairs Counter Threat (FACT) Course. The Department has repeatedly asked FLETC how they could handle required FACT flow through with only one bomb range, as the Department has indicated a minimum of two would be required for DS' needs alone. The sole FLETC bomb range is already "spoken for" with approximately 60% of the training year currently being utilized by their partner organizations.

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FLETC has not provided a cogent and detailed response to the Department advising how they propose to overcome this shortcoming. Thus the Department cannot accept FLETC's claim that this is something which can be immediately accommodated.

As another example, FLETC indicates they can immediately handle the High-Threat Operations Executive-Level Course. However, a full week of the course requires classified work spaces, including a classified processing area that heavily involves the Department's interagency partners and their facilities. No such facility currently exists for the Department's immediate use.

Finally, FLETC's proposal to have the Department immediately move certain specified courses to FLETC would be counterproductive and cost prohibitive. For example, moving Course "A" from contract venue "X" saves nothing if courses "B" and "C" must continue to be taught at that venue because FLETC lacks the training sites to accommodate them. Thus, contract facilities would continue to be required and sending some courses to FLETC would in fact increase costs due to transportation issues and the need to send DS instructors to yet another site.

### **8. Timeline Is A Factor**

The Department believes that the proposed FLETC timeline is impossibly aggressive and does not fully account for the intensive level of effort that will be required to program, design and construct the FASTC. It appears that FLETC is banking on the work already completed, their in-house capabilities and the belief that multiple activities can be completed concurrently. While the Department agrees that there are some synergies to be realized as a result of work completed to date, a decision to site FASTC at FLETC would be "starting over" for many of the activities. These activities include the following:

- Site selection. FLETC and the Department will be required to conduct a formal site selection and suitability analysis for an alternative site. This is a critical path activity that informs the Master Plan and Environmental Impact Statement.
- Suitability. FLETC will be required to assess the suitability of the proposed new site plan. As with the site selection process for the alternate site, the suitability assessment for the FLETC site is a critical path task that informs the Master Plan and EIS process.

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- **Master Plan.** The current Master Plan represents the full-scope FASTC program and is site specific to the Fort Pickett site. While some of the existing facilities-specific work will carry forward, the Master Plan will need to be modified to reflect the new, reduced-scope FASTC, and make it site-specific for the FLETC site and any newly acquired land. The original Master Plan for Fort Pickett was a ~25,000 man-hour effort, at a cost of ~\$4.3 million.
- **Environmental Impact Statement (EIS).** FLETC will be responsible for compliance with the National Environmental Policy Act, which will most likely mean conducting an EIS for the FASTC program. The industry standard timeline for conduct of an EIS is 18-24 months and is heavily dependent on the progress of the Master Plan. The location and nature of the land proposed for acquisition could further complicate this timeline.

Based on FASTC project team experience to date and industry standard planning factors, it is unlikely that FLETC could deliver FASTC with full operating capability before mid-2020. A notional project schedule showing the basic tasks and critical path is attached. (Tab 2).

### **In Conclusion**

The aftermath of 9/11 underscored the importance of working collaboratively together to counter threats against the homeland. This is perhaps equally if not more important in the overseas realm where members of our national foreign affairs agencies operate. To separate FASTC from the mid-Atlantic region is detrimental both to the quality of training that can be successfully achieved and to the partnerships the Department relies on while assigned to global hotspots. This geographic distance, combined with a non-integrated and disjointed training facility, diminishes the effectiveness of the Department's training programs, potentially jeopardizing the safety of our personnel and ultimately our foreign policy imperatives.

### **ATTACHMENTS:**

- Tab 1: Surface Danger Zone Diagram; .50 Caliber Weapons
- Tab 2: Notional Project Schedule
- Tab 3: FLETC Proposed Master Plan
- Tab 4: FLETC Facility Map