

July 1997

NATIONAL WEATHER SERVICE

Closure of Regional Office Not Supported by Risk Analysis



**Accounting and Information
Management Division**

B-277460

July 31, 1997

The Honorable Thad Cochran
United States SenateThe Honorable Bob Graham
United States SenateThe Honorable Kay Bailey Hutchison
United States SenateThe Honorable Connie Mack
United States SenateThe Honorable E. Clay Shaw, Jr.
House of Representatives

This report is in response to your request that we review proposed staffing cuts at the National Weather Service (NWS), a component of the National Oceanic and Atmospheric Administration (NOAA) within the Department of Commerce. The objective of our review, based on subsequent discussions with your staff, was to assess the NWS analysis supporting the planned closure of its southern regional headquarters office, and its analysis of alternative plans for maintaining its current regional structure of four mainland offices.

Results in Brief

NWS did not perform any documented risk analysis to support its decision to close its southern regional headquarters office. Accelerating the planned closure of this office was one of several actions taken in response to a budget shortfall estimated by both NOAA and NWS to be about \$47 million for fiscal year 1997. While acknowledging that no risk analysis was conducted, NWS officials stated that, on the basis of their professional judgment, no degradation of service would occur from the closure because the southern region's responsibilities would be transferred to other regional offices. Weather service users have raised concerns, however, including whether the closure would adversely affect weather services and jeopardize public safety and the protection of property.

Several alternative strategies for maintaining the current regional structure were proposed by NWS regional officials. Headquarters officials rejected these strategies primarily because they did not meet the agency's overall

staffing targets for the regions. Because of uncertainties surrounding NWS funding, the Secretary of Commerce announced on June 25, 1997, that a decision to close the southern regional office would be delayed for 60 days, to give outside experts an opportunity to complete a review of NWS' budget and operations.

Background

NWS' primary mission is to help protect life and property by providing weather and flood warnings, public forecasts, and advisories for all of the United States, its territories, adjacent waters, and ocean areas. NWS operations also support other agencies' missions and the nation's commercial interests. For example, NWS provides specialized forecasts to support aviation safety and the marine industry.

To fulfill its mission, NWS uses a variety of systems and manual processes to collect, process, and disseminate weather data to and among its network of field offices and regional and national centers. Many of these systems and processes are outdated.

To address this obsolescence, during the 1980s NWS began modernizing its observing, information processing, and communications systems to improve the accuracy, timeliness, and efficiency of weather forecasts and warnings. The modernization includes four major systems development programs.

- The Next Generation Weather Radar, which is a program to acquire 163 Doppler radars that are expected to increase the accuracy and timeliness of warnings for severe thunderstorms, tornadoes, and other hazardous weather events.
- The Next Generation Geostationary Operational Environmental Satellite, a program to acquire, launch, and control five satellites for identifying and tracking severe weather events, such as hurricanes.
- The Automated Surface Observing System, a program to replace human weather observers through automating and enhancing the current, largely manual methods of collecting, processing, and displaying information on surface weather conditions, such as temperature and precipitation.
- The Advanced Weather Interactive Processing System, intended to integrate for the first time satellite, radar, and other data to support weather forecaster decision-making and communications.

The modernization also includes upgrades to existing systems and several smaller system acquisitions. The total cost of the modernization is estimated at about \$4.5 billion.

We have identified several weaknesses in NWS' actions to modernize its operations and manage its information technology resources and made numerous recommendations on how NWS can strengthen its management of these resources. In 1995 we designated the NWS modernization as a high-risk area due to its cost, complexity, past problems, and criticality to NWS' mission.¹ We again included the modernization in our 1997 high-risk report because of continuing concerns regarding cost increases and schedule delays associated with the modernization.²

In conjunction with the modernization program, NWS plans to restructure its field offices. As envisioned, this restructuring would reduce the number of field offices from 254 to 118 and reduce the number of mainland regional headquarters offices from 4 to 3. However, delays in implementing two major modernization systems—the Advanced Weather Interactive Processing System and the Automated Surface Observing System—have slowed progress in office restructuring. NWS now expects the modernization to be completed in fiscal year 1999.

As part of its restructuring, NWS had expected to close the southern regional office after modernization was complete. The deployment of the Advanced Weather Interactive Processing System was expected to help facilitate this closure because the system would provide a means for quick and easy communication among weather forecast offices, thus handling the coordination function currently performed by the regional offices. Other southern regional functions were to be transferred to the eastern and central regional headquarters offices.

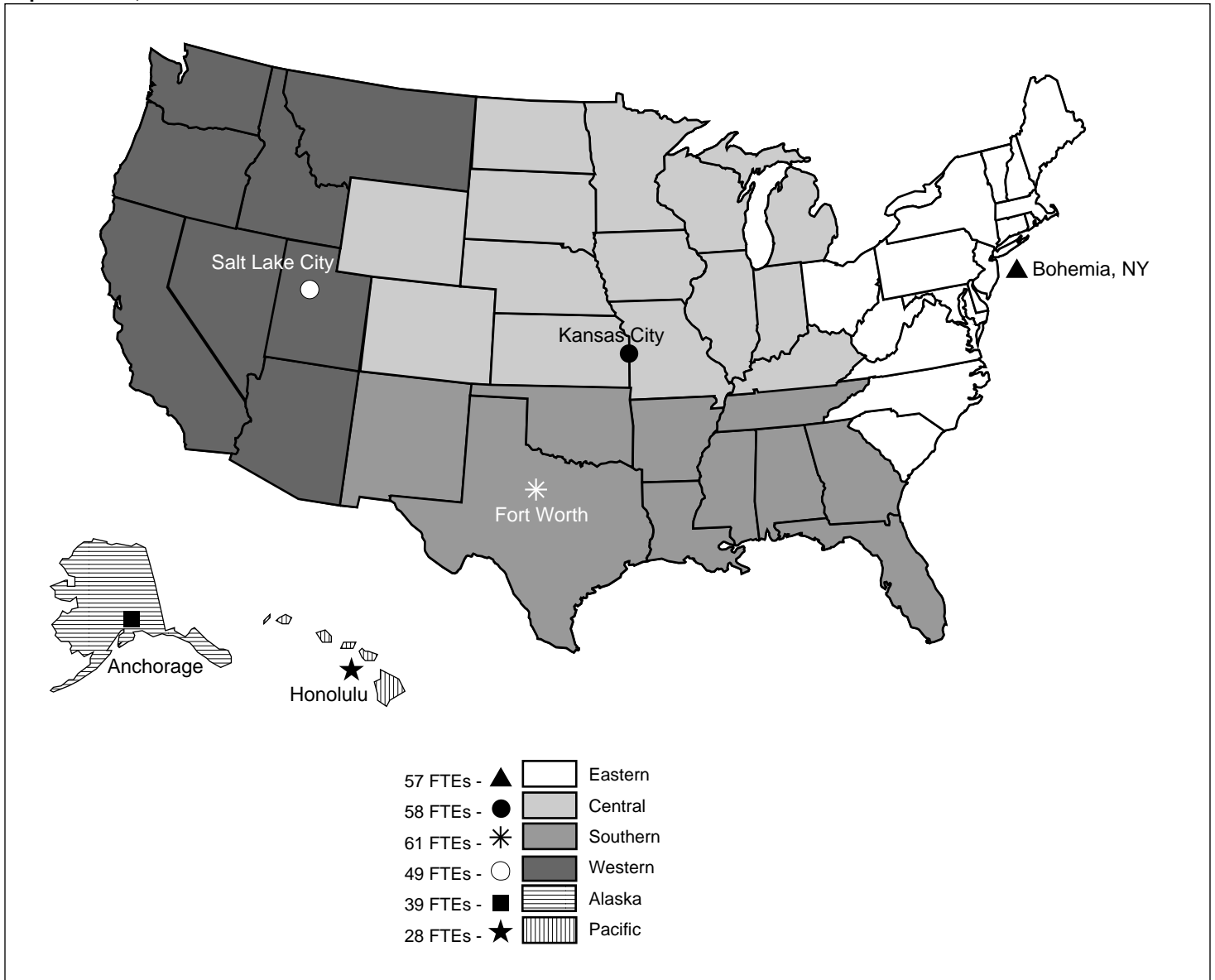
The NWS regional headquarters offices manage agency programs for weather and flood warnings and forecast operations, including (1) emergency preparedness; (2) modernization transition activities and certification processes; (3) scientific, technical, and administrative support to field offices; and (4) coordination of multistate programs and projects. The regional offices provide management and technical support to field offices, which are responsible for providing weather forecasts. As shown in figure 1, NWS has six regional headquarters offices—southern, western,

¹High-Risk Series: Overview (GAO/HR-95-1, February 1995).

²High-Risk Series: Information Management and Technology (GAO/HR-97-9, February 1997).

central, eastern, Alaska, and Pacific—with a total of 292 full-time equivalents (FTE) as of September 30, 1996.

Figure 1: Location, Jurisdiction, and Full-Time Equivalent Employees of Each NWS Regional Headquarters Office as of September 30, 1996



Scope and Methodology

To assess the degree of NWS analysis in support of the planned closure of the southern regional headquarters office, we reviewed NWS documents, including a transition report on the closure, cost comparisons of maintaining a four mainland regional structure versus a three mainland regional structure, alternative plans for keeping the four mainland regional structures intact, and the estimated cost savings associated with the closure of the southern region. In addition, we interviewed NOAA and NWS officials about their closure plan; the costs, benefits, and risks associated with the closure; and alternative plans to keep the four mainland regions—southern, western, central, and eastern—intact. We also interviewed southern region officials and weather service users in the region, including representatives of the Texas Department of Public Safety’s Division of Emergency Management, the National Emergency Management Council of America, the Texas Gulf Coast Emergency Management Association, and the Florida Division of Emergency Management.

We performed our work at NOAA headquarters in Washington, D.C., and at NWS headquarters in Silver Spring, Maryland, from May 1997 through July 9, 1997. Our work was performed in accordance with generally accepted government auditing standards. We requested comments on a draft of this report from the Secretary of Commerce or his designee. NOAA provided comments, which are discussed in the “Agency Comments and Our Evaluation” section and are reprinted in appendix I. The comments have been incorporated into the report where appropriate.

Planned Closure of Southern Regional Headquarters Office

According to the former director³ of NWS and its deputy for operations, the southern regional headquarters office had been earmarked for closure since 1982. At that time, NWS was considering a three mainland regional structure in an effort to streamline regional operations. The former director told us that since both the central and southern regional headquarters are located in the central part of the United States,⁴ closing one of the headquarters appeared to be the most economical solution.

According to the former director, an internal NWS analysis showed it to be more cost-effective to close the southern region and keep the central region open. He explained that several other NOAA and NWS facilities were

³The Secretary of Commerce reassigned the director of NWS to other duties within NOAA on June 25, 1997.

⁴The central regional headquarters office is located in Kansas City, Missouri; the southern region is located in Fort Worth, Texas.

collocated within the area of the central regional office—a weather service office, a NOAA administrative support center, and the National Reconditioning Center.⁵ In contrast, he said there were no other NWS activities collocated in the southern regional area. He also mentioned that southern region functions, such as hurricane and severe weather support, could be provided by both the eastern and central regional headquarters, whereas the reverse was not the case. The southern region, for example, could provide only limited support on winter weather warnings. The former director was unable to provide us with a copy of the analysis providing these reasons for closing the southern rather than the central regional office, explaining that NWS may not have documented its analysis.

Despite attempts in the President's annual budget proposals between fiscal years 1982 and 1993 to close the southern region, the Congress continued to restore funding to keep it open. In 1993, the Senate, concerned that the closing would have an adverse effect on the pace of modernization, directed in its report accompanying the appropriations act that "any decision on consolidation of NWS regional headquarters be made by the Administrator of NOAA only after a careful review of the savings involved and of the impact on the NWS activities in the southern region."⁶

In response, the Department of Commerce's former chief financial officer, in a January 28, 1994, letter, told the Chairman, Subcommittee on Commerce, Justice, State, and the Judiciary, Senate Committee on Appropriations, that NOAA had determined that consolidating NWS regions at this time would be disruptive. She said that, as the largest region, the southern region was responsible for managing the modernization over a 10-state area,⁷ along with its day-to-day national public safety mission. She said that NOAA would, therefore, delay the consolidation until the modernization in 1998. However, due to delays in the implementation of the Advanced Weather Interactive Processing System, the modernization is now scheduled to be completed in 1999 at the earliest. NWS planned to move from a four mainland regional structure to one with three mainland regional offices after modernization.

⁵The National Reconditioning Center provides depot-level maintenance, reconditioning, and quality assurance of NWS operational equipment in support of NWS and other NOAA meteorological, hydrological, and oceanographic equipment programs.

⁶Departments of Commerce, Justice, and State, the Judiciary, and Related Agencies Appropriation Bill, 1994 (U.S. Senate Report 103-105, July 22, 1993).

⁷Alabama, Arkansas, Florida, Georgia, New Mexico, Oklahoma, Louisiana, Mississippi, Tennessee, and Texas.

Budget Shortfall Prompts Proposal to Close Southern Region Ahead of Schedule

As part of an effort to downsize the federal government, NWS had to operate within a tighter budget in fiscal year 1997 and anticipates reduced budget levels planned for the outyears. According to NWS' deputy for operations, the estimated budget shortfall totalled about \$47 million. As shown in table 1, the appropriation for base operations was about \$27 million less than in 1996. In addition, she said, NWS had to absorb another \$20 million⁸ for pay-related inflation, personnel separations, and NOAA-wide and departmental costs. These figures were confirmed by the Administrator of NOAA. We did not independently verify this information.

Table 1: NOAA's View of Fiscal Year 1997 Budget Shortfall

(Dollars in millions)	
Reduction in NWS budget base for fiscal year 1997	\$-27.5 ^a
Inflationary costs for fiscal year 1997	-9.7
Estimated separation costs	-5.0
Additional share of department costs	-5.9
Reprogramming of funds for the National Hurricane Center	0.7
Net shortfall	\$-47.4

^aThe NWS budget for fiscal year 1997 was \$27.5 million less than the amount appropriated in fiscal year 1996. Of this amount, \$17 million in reductions was requested by the Administration in the President's fiscal year 1997 budget, and \$10.5 million was based on congressional action.

Source: Dr. D. James Baker, Administrator of NOAA, in testimony before the Subcommittee on Science, Technology and Space, Committee on Commerce, Science and Transportation, U.S. Senate, May 15, 1997.

To address this shortfall, NWS initiated a number of measures, both temporary and permanent. Temporary actions included freezing operational equipment replacements, reducing central logistics quantities, deferring central communications network operations and maintenance, and reducing operational supplies and stock levels. According to the former director and the deputy for operations, these measures—which total about \$10.8 million—must be restored in fiscal year 1998 if NWS is to carry out its mission. Further, NWS officials did not fill 118 vacant positions in fiscal year 1997. In commenting on a draft of this report, the Department stated that these positions were not filled in order to mitigate the effect of reductions-in-force in the southern regional headquarters and the national

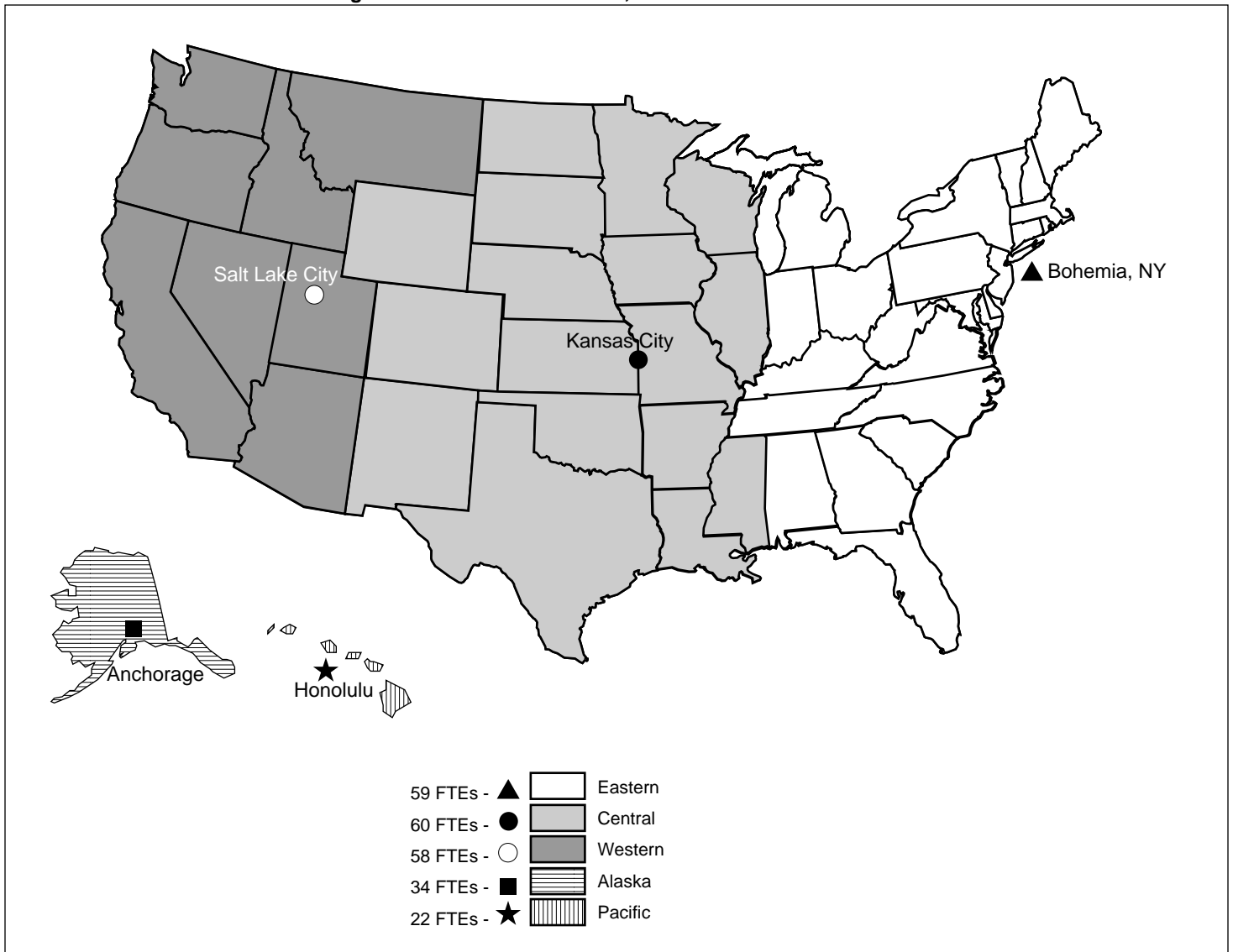
⁸The \$20 million includes a \$715,000 one-time reprogramming of funds for the National Hurricane Center in Miami.

capital area.⁹ The Department added that by holding these vacancies, NWS was able to provide the maximum level of placement opportunities for employees directly affected by the reduction-in-force. NWS officials consider these positions critical, however, and plan to fill them in fiscal years 1997 and/or 1998.

Permanent measures included reducing staff in the national capital area, streamlining central computer operations, reducing field outreach activities, and curtailing most nonoperational travel. Another permanent measure was to accelerate the closure of the southern region. As shown in figure 2, by the closure of the southern region, NWS expected to go from a 6 region structure to a 5 region structure which included three mainland regions, with a total of 233 FTES (representing a reduction of 59 FTES) as of October 1, 1998.

⁹The national capital area refers to all NWS organizations managed directly by NWS headquarters in Silver Spring, Maryland, and includes the national centers and NWS systems development teams and operations.

Figure 2: Location, Jurisdiction, and Full-Time Equivalent Employees of Each NWS Regional Headquarters Office After the Planned Closure of the Southern Regional Office as of October 1, 1998



Acceleration of Closure Not Supported by Documented Risk Analysis

According to the former director of NWS, the decision to accelerate the closure of the southern region was based on (1) the agency's need to address budget reductions and (2) the fact that it was already scheduled for closure in fiscal year 1999, upon completion of the modernization. The former director said that he met with the Administrator of NOAA on various dates from August through December 1996 to discuss staff cutting options available to address the fiscal year 1997 budget shortfall. Among the

options proposed by the former director were (1) closing the southern region, (2) consolidating the six regional offices into one, and (3) reducing staff at the four mainland regional offices. He indicated that the Administrator rejected both the consolidating the six regional offices into one option and the reducing staff at the four mainland regions option.

The Administrator of NOAA told us that he provided overall guidance to the former director of NWS to address the budget shortfall and that specific cuts within this broad guidance were to be decided by NWS. Specifically, he stated that the guidance mandated (1) no cuts to weather forecast offices and river forecast centers, (2) no impact on the scheduled completion of the modernization, and (3) no direct impact on the weather service warning system. In December 1996, NWS proposed and NOAA approved a decision to close the southern region, effective September 30, 1997.

According to NWS' deputy for operations, the decision to accelerate the closure of the southern region was based on "professional judgment" rather than on any documented risk analysis. She did say, though, that several internal cost analyses were conducted to support NWS' decision to close the region. For example, a December 5, 1996, cost analysis showed that a general reduction-in-force, involving NWS headquarters and a four mainland region structure, would result in a cumulative savings of about \$11.5 million. In contrast, a more targeted reduction-in-force, focusing on some NWS headquarters staff and the closure of the southern regional headquarters office, would result in savings of about \$15.4 million, according to NWS. And, in another cost analysis, prepared in May 1997, and limited to just the closure of the southern region, NWS expected to save \$4.5 million in fiscal year 1998 and each subsequent year through the closing.

However, according to cost information provided by NWS, the decision to close the southern region, although triggered by the agency's budget demands, will actually result in additional costs of about \$661,000 in fiscal year 1997. This is primarily due to delays in staff termination. According to information provided by NWS' deputy for operations, of the 49 people in the southern region as of May 27, 1997, 22 are expected to be reassigned to other positions within NWS, 18 have not been placed, and 9 have accepted financial enticements to retire. If the southern region was closed on September 30, 1997, \$4.4 million in savings would result, beginning in fiscal year 1998, according to NWS.

Emergency management officials we interviewed expressed concern that the risks of the closing would not be worth the NWS-claimed budget savings. Some of these officials believed that the closing would have a direct effect on the people living in the areas covered by the southern region, including a loss of public confidence in NWS warnings, an increase in property damage, and loss of lives. One official pointed out that the effects of NWS' budget cuts were already being felt. Other emergency officials were concerned that the planning and training for hurricanes, tornadoes, and other severe weather events would not be performed as effectively by the other regional offices.

NWS' deputy for operations recognized that the closing would result in some loss of service to users in the southern region. However, she said that there would be no degradation in NWS' ability to issue system warnings. To alleviate some user concerns, she said NWS plans to reassign two hurricane experts from the southern region to the central region, which does not have meteorologists experienced with hurricanes. NWS also plans to reassign a computer specialist to the eastern regional office. According to the deputy for operations, the experts have been identified and have agreed to report to their new locations.

Our discussions with the eastern and central regional office directors also raised concerns about the closure and the transferring of functions to their regions. The director of the eastern regional headquarters office was very concerned that his office would be taking on far greater responsibilities than could be managed. The director of the central region reserved judgment as to whether his office could provide the necessary support to the six additional states it will be assuming.

No Viable, Documented Alternative Developed for Maintaining Current Regional Structure

NWS headquarters did not, according to its deputy for operations, develop any documented alternative plans that would enable it to keep intact the current regional structure of four mainland offices and to meet the budget shortfall and minimize adverse impact to weather service users. However, she stated that several alternative proposals in support of keeping the southern region were prepared by the regional offices.

According to one proposal submitted by the 6 regional directors in June 1996, each mainland regional office would have a staff of 45 FTEs for a total of 180 FTEs, and an overall regional structure of 240 FTEs.¹⁰ According to NWS' deputy for operations, this proposal was rejected because it fell

¹⁰The Alaska and Pacific regions were expected to have a total staffing level of 60 FTEs.

short of the agency's goal of reaching an overall regional staffing level of 189 FTES and also because NWS believed that an across-the-board reduction-in-force in all four mainland regions was seen as costing more than closing one regional office in terms of staff morale as well as funds.

In a May 9, 1997, memorandum to the former director of NWS, the 4 mainland regional directors reaffirmed their June 1996 position favoring the current management structure of 6 regions. They stated that any plans to restructure the regions should wait until the modernization is complete. Two of the regional directors informed the former director of NWS on June 6, 1997, however, that while they signed the reaffirmation letter, they could not effectively run their regions with a staff of 42-45 FTES per regional office. One regional director stated that given the choice of 3 mainland regions with a staff of 60 or 4 regional offices with staffs of 42-45 or fewer, he would have to support the 3 region structure.

The deputy director of the southern region also prepared a proposal in April 1997, giving each of the 4 mainland regional offices 45 FTES. This proposal was similarly rejected for exceeding the regional staffing target of 189.

Our analysis, however, showed that while the three alternative proposals prepared by the regional offices exceeded the overall regional staffing target of 189, NWS' three mainland regional structure also exceeded that ceiling. Specifically, if the southern regional headquarters office was closed and its functions were transferred to the central and eastern regions, the new regional staffing level would be 233—44 over the target.

In addition, according to NWS' deputy for operations, the proposal from the deputy director of the southern region was flawed in that it failed to factor in additional non-labor costs of \$900,000 for the four-region structure, and it overstated the costs to close the southern region by \$500,000 and to consolidate the central and eastern regions by about \$300,000. NWS further stated that reducing staffing levels at each of the four mainland offices increases the potential risk to the modernization program and operational infrastructure because this risk would be spread to all four mainland regions. Officials felt that the closure of the southern region would limit this potential risk to just one region.

Recent Development Affecting Closure of the Southern Region

On June 25, 1997, the Secretary of Commerce, saying that a great deal of uncertainty had been raised recently regarding the funding needed by NWS to continue to perform its essential services, announced that he had appointed an outside special advisor on weather services to the Administrator of NOAA. According to the Secretary's announcement, the special advisor, assisted by expert consultants, will conduct a rigorous evaluation of NWS' budget and operations and report back to him within 60 days. He also announced that the closure of the southern region would be deferred until the review has been completed. To keep the modernization effort on track, the Secretary announced that the Department would be submitting a reprogramming request to cover unanticipated expenses for fiscal year 1997.

Conclusions

Recognizing that NWS, like many other federal agencies, must make unpopular decisions in order to downsize and streamline its operations to meet budgetary constraints, it is nonetheless important that such decisions be thoroughly analyzed and justified in terms of costs, benefits, and risks. By not completing and documenting a risk analysis to support its decision to close the southern regional headquarters office, NWS does not have an adequate basis on which to assure weather service users in that area that they will not be exposed to unnecessary risk. Similarly, NWS would have benefited from a documented analysis of alternative plans that would have demonstrated the best approach for addressing the budget shortfall, while minimizing the negative impact on weather service operations.

Recommendation

To ensure that weather service users are not adversely affected by a decision to restructure NWS offices, we recommend that, prior to making any decision to close the southern regional headquarters office, the Secretary of Commerce direct that the Administrator, National Oceanic and Atmospheric Administration, complete a documented analysis of the risks associated with a range of alternative actions to address NWS budget shortfalls. This analysis should also include a set of actions to minimize any risk associated with office restructuring to meet present and future budgetary goals.

Agency Comments and Our Evaluation

In commenting on a draft of this report, the Department of Commerce stated that it found the report to be factual and reflective of a fair and objective review process. The Department concurred with our recommendation and reiterated that NWS management used its

professional judgment in making the decision to close the southern regional headquarters office. The Department also stated that the risks associated with the decision to accelerate the closing of the southern regional office and its alternatives, while fully reviewed, were not documented. The Department stated that it will document its analysis of the risks associated with the planned closing of the southern regional headquarters office by October 1, 1997. The Department also provided several comments on the draft report for clarification purposes. We have incorporated these comments as appropriate in the report.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we will not distribute it until 14 days from its date. At that time, we will send copies of this report to the Chairmen and Ranking Minority Members of the House Committee on Science; Senate Committee on Commerce, Science, and Transportation; House and Senate Committees on Appropriations; House Committee on Government Reform and Oversight; Senate Committee on Governmental Affairs; and Director, Office of Management and Budget. We are also sending copies to the Secretary of Commerce and to the Administrator of the National Oceanic and Atmospheric Administration. Copies will also be made available to other parties upon request.

Please contact me at (202) 512-6253, or by e-mail at *willemsenj.aimd@gao.gov*, if you have any questions concerning this report. Major contributors to this report are listed in appendix II.



Joel C. Willemsen
Director, Information Resources Management

Comments From the Department of Commerce



THE SECRETARY OF COMMERCE
Washington, D.C. 20230

JUL 25 1997

Mr. Gene L. Dodaro
Assistant Comptroller General
Accounting and Information Management Division
United States General Accounting Office
Washington, D. C. 20548

Dear Mr. Dodaro:

Enclosed are the Department of Commerce's comments on the General Accounting Office's draft report entitled, "National Weather Service: Closure of Regional Office Not Supported by Risk Analysis."

These comments were prepared in accordance with the Office of Management and Budget Circular A-50.

Sincerely,

A handwritten signature in black ink, appearing to read "William M. Daley".

William M. Daley

Enclosure

**Appendix I
Comments From the Department of
Commerce**

NOAA Response to the GAO Report entitled "National Weather Service: Closure of Regional Office Not Supported by Risk Analysis," Report No. GAO/AIMD-97-133, dated July 11, 1997.

COMMENTS:

We appreciate the opportunity to review and comment on this draft report. Overall, we found it to be factual and reflective of a fair and objective review process. The following comments should be incorporated into the final report for clarification purposes.

Now on p. 2.

Page 3: The report states "NWS provides specialized forecasts to support agricultural interests." The word "agricultural" should be deleted. The NWS no longer provides specialized forecasts for agriculture. In compliance with the Administration's policy and Congressional direction, the NWS terminated Agricultural Weather Services on April 1, 1996, and Fruit-Frost Forecasts on April 20, 1996.

Now on p. 3.

Page 5: Advanced Weather Interactive Processing System (AWIPS) capability, as it relates to forecast office coordination, is weighted too heavily in paragraph 3. While AWIPS will contribute to forecast and warning coordination activities during a real-time event, regional headquarters offices are still required to set regional policies and provide oversight for inter-office coordination, and state, local, and emergency management coordination. The closure of the Southern Region Headquarters was originally planned for the Fiscal Year 1999 time frame, and not earlier, mainly to address the transition management workload during the modernization.

Now on p. 7.

Page 11: Add to the first sentence of paragraph 2: "...tighter budget in Fiscal Year 1997 as well as reduced budget levels planned for the out years."

Now on p. 7.

Page 13: The last two sentences of the first paragraph should read as follows: NWS officials did not fill 118 vacant positions in Fiscal Year 1997 in order to mitigate the impact of reductions-in-force (RIF) in the Southern Region Headquarters and the National Capital area. By holding these vacancies, the NWS was able to provide the maximum level of placement opportunities for employees directly affected by the RIF. It considers these positions critical, however, and plans to fill them in Fiscal Year 1997 and/or 1998.

Now on p. 12.

Page 20: The second sentence in the first paragraph should be changed to read: "...increases the potential risk to the modernization program **and operational infrastructure** because this risk would be spread to all four regions."

Now on p. 13.

Page 22: The last sentence in the first paragraph should be removed for the following reason: It is important to distinguish between service impacts and the "no degradation of service" standard as defined in Public Law 102-567. This standard refers

**Appendix I
Comments From the Department of
Commerce**

specifically to field offices and operations during the modernization and associated restructuring. While Southern Region Headquarters is not subject to the criteria used to establish a degradation of service in the public law, the NWS will identify actions necessary to mitigate any risk associated with the consolidation.

RECOMMENDATION 1: To ensure that weather service users are not adversely affected by a decision to restructure NWS offices, we recommend that, prior to making any decision to close the Southern Region Headquarters Office, the Secretary of Commerce direct that the Under Secretary for Oceans and Atmosphere and Administrator, National Oceanic and Atmospheric Administration, complete a documented analysis of risks associated with a range of alternative actions to address NWS budget shortfalls. This analysis should also include a set of actions to minimize any degradation of service as part of an effort to meet present and future budgetary goals.

RESPONSE: We concur with this recommendation. Again, NWS management used its professional judgment in making the decisions for the Southern Region Headquarters consolidation. This decision was resource driven, and we chose to make reductions in administrative functions rather than making further reductions in operations. We agree that risks associated with the acceleration of this consolidation and its alternatives, while fully reviewed, were not documented. We will document our analysis of the risks associated with the planned consolidation of the Southern Region Headquarters by October 1, 1997. As stated in our general comments, Southern Region Headquarters is not subject to the degradation of service criteria established in Public Law 102-567.

Major Contributors to This Report

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