



Department of Defense Report to Congress on Historic Preservation

November 2021

Office of the Deputy Assistant Secretary of Defense for
Environment & Energy Resilience

Summary

This report satisfies the requirements of House Report 116-445, page 7, accompanying H.R. 7609, the Military Construction, Veterans Affairs, and Related Agencies Appropriations Bill, 2021.¹ House Report 116-445 requests that the Office of the Assistant Secretary of Defense for Energy, Installations, and Environment (OASD(EI&E)) provide a study to Congress regarding services DoD provides to State Historic Preservation Officers (SHPOs) and systemic departmental issues when requesting concurrence on historical designations from SHPOs; and best practices and recommendations for improving the Section 106 process of the National Historic Preservation Act (NHPA).² The Office of the Secretary of Defense (OSD) recently reorganized OASD(EI&E) into the Office of the Assistant Secretary of Defense for Sustainment (OASD(Sustainment); a directorate of OASD(Sustainment), the Office of the Deputy Assistant Secretary of Defense for Environment & Energy Resilience (ODASD(E&ER), prepared this report in response to the Congressional request. DoD’s consolidated response to the requested study includes information on the Departments of the Army (Army); Navy (DON), which includes the U.S. Marine Corps (USMC); and Air Force (DAF); the Defense Logistics Agency (DLA); and Washington Headquarters Services (WHS) for fiscal years (FYs) 2015-2020.³

The Department has a long record of consultation and coordination with SHPOs. DoD completes actions required as part of statutory requirements under Section 106 or Section 110(a) of the NHPA, or under signed Memorandums of Agreement (MOAs), Programmatic Agreements (PAs), or Program Comments (PCs). Other activities not required by existing laws or agreements are not obligated by DoD policy, and installation commanding officers complete those activities at their discretion.

In preparing this report, the DoD Components’ most-cited issue with SHPOs concerned delays in performing required functions under Section 106 and Section 110(a). The report identifies five best practices to help streamline and improve this process. Table 1 summarizes these recommendations.

Table 1: Best Practices Identified by DoD Components

#1	Identify and evaluate cultural resources in accordance with Section 110(a) of the NHPA.
#2	Follow OSD and DoD Components’ policies, guidance, and instructions.
#3	Execute program alternatives, such as PAs and PCs, at an installation or nationwide level.
#4	Establish and maintain sound working relationships with SHPOs.
#5	Continue cultural resources training for DoD personnel.

¹ The full text of this section of the Congressional Report can be found here on page 7:

<https://www.congress.gov/116/crpt/hrpt445/CRPT-116hrpt445.pdf>.

² NHPA, 54 U.S.C. § 300101 et seq.: <https://www.achp.gov/sites/default/files/2018-06/nhpa.pdf>.

³ Included within the Military Departments are their Reserve components.

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It is against established fiscal laws for DoD to provide funding assistance to SHPOs for completion of their statutory and regulatory requirements under Sections 106 and 110(a) of the NHPA, or under signed MOAs, PAs, or PCs. Title 31's Purpose Statute (31 U.S. Code [U.S.C.] 1301) as well as the Constitution's Appropriations Clause (Article 1, Section 9, Clause 7) both establish that appropriations are available only for purposes or expenses for which the appropriations were made. DoD has the authority to obtain support from the SHPOs to assist with and enhance the completion of DoD projects, such as funding expedited SHPO reviews; however, DoD does not have the authority to fund SHPO operations or expenses in conducting the SHPOs' mission responsibilities, including activities that pertain to standard review of applications and paperwork concerning property on DoD installations.⁴ The NHPA established the Historic Preservation Fund (HPF) to provide Federal funding to SHPOs to carry out their roles in the Section 106 process.

The most equitable and direct way to improve the Section 106 process is to increase Federal funding to the HPF to allow SHPOs to increase staffing levels, invest in geographic information systems (GISs) and online database systems, and increase their NHPA review capabilities. Additional funding will help SHPOs meet their statutory and regulatory requirements.

Background

The NHPA established the importance of preserving significant historic properties throughout the Nation. Additionally, the Act:

- Established the National Register of Historic Places (NRHP) and authorized the development of its criteria for nomination;
- Provided for the designation and appointment of SHPOs and State Review Boards by State Governors to evaluate National Register nominations;⁵
- Established the "Section 106 process," implemented through 36 Code of Federal Regulations (C.F.R.) Part 800, which instructs Federal agencies that prior to carrying out, approving financial assistance for, or issuing a permit for any undertaking or project the Federal agency must consider the effect of its undertakings on historic properties;
- Established Federal agencies' historic preservation responsibilities in Section 110(a), including the use and preservation of historic properties owned or controlled by an agency as well as an agency's required establishment of a preservation program for identification, evaluation, nomination to the NRHP, and protection of historic properties;⁶
- Established the Advisory Council on Historic Preservation (ACHP) to advise the President and Congress on matters relating to historic preservation and to comment on Federal agency compliance with Section 106 of the NHPA; and

⁴ 31 U.S.C. 1301: <https://uscode.house.gov/view.xhtml?path=/prelim@title31/subtitle2/chapter13&edition=prelim>;
U.S. Constitution, Appropriations Clause, Article I, Section 9, Clause 7:
https://constitution.congress.gov/browse/essay/artI-S9-C7-1/ALDE_00001095/.

⁵ National Register of Historic Places: <https://www.nps.gov/subjects/nationalregister/index.htm>.

⁶ National Park Service, Federal Preservation Institute, Section 110 of the National Historic Preservation Act:
<https://www.nps.gov/fpi/Section110.html>.

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- Created the HPF to assist States and local and tribal governments with carrying out their roles in furthering historic preservation.

DoD is a large, complex Federal agency with the critical mission to provide the military forces needed to deter war and to protect the security of the United States.⁷ DoD's installations and facilities are critical pieces of this national defense mission. DoD manages the largest portfolio of real property assets (structures and buildings), which includes historic properties, in the Federal Government. In FY2020, DoD managed more than 603,000 facilities (buildings, structures, and linear structures), on more than 4,600 sites, across nearly 26.5 million acres.⁸

DoD is proud of its rich history and consistently works to be a productive and responsible steward of the lands and resources it manages. DoD's historic property portfolio includes 46 individual National Historic Landmarks (NHLs), 3,062 NHL contributing properties, 2,524 individual and contributing historic assets listed in the NRHP, nearly 16,000 historic assets determined eligible for inclusion in the NRHP, and more than 131,000 recorded archaeological sites.⁹ DoD works to maintain, promote, and interpret the cultural resources it manages, to support the defense mission through the preservation of the Nation's military heritage for future generations. Cultural resources are mission-enhancing assets that connect America's fighting men and women with their proud history and traditions.

DoD complies with the NHPA and all other cultural resource statutes, laws, regulations, and executive orders and follows the guidelines established in DoD Instruction 4715.16, *Cultural Resources Management*.¹⁰ DoD completes actions required as a part of statutory requirements under Section 106 or Section 110(a) of the NHPA, or under signed MOAs, PAs, or PCs. These actions include the identification, evaluation, nomination to the NRHP, and monitoring and protection of historic properties on DoD lands; consideration of the effects of DoD undertakings on historic properties; and related consultation and coordination with SHPOs.

Report Methodology

This report results from a data call to a representative sample of DoD Component installations' Cultural Resources Managers (CRMs) and their headquarters' leadership. DoD Components requested data from 39 DoD installations in Spring 2021 to acquire specific information about installations' consultation efforts and current and/or past interactions with SHPOs.

ODASD(E&ER) asked a representative sample of DoD Component installation CRMs whether their installation provided a SHPO with services, such as tailored training, supplementary

⁷ A statement of the DoD mission can be found on its homepage: <https://www.defense.gov/Our-Story/>.

⁸ This data was obtained from the DoD Agency Financial Report for FY 2020, page 14, which is available at: https://comptroller.defense.gov/Portals/45/Documents/afr/fy2020/DoD_FY20_Agency_Financial_Report.pdf.

⁹ Data for these historic properties was obtained directly from DoD's Real Property Assets Database (RPAD) FY2019 records.

¹⁰ Federal Laws, Executive Orders, and DoD Policies for Consultation and Cultural Resources Management: <https://www.denix.osd.mil/cr/policy-legal/federal-law-regulations-and-executive-orders/policies/>; DoD Instruction 4715.16, *Cultural Resources Management*: <https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/471516p.pdf?ver=2017-11-21-114100-670>.

cultural resources surveys, data recovery, and data recordation, in the past five years.¹¹ This inquiry **excluded** any actions that installations completed as a part of statutory requirements under Section 106 or Section 110(a) of the NHPA, or under a signed MOA, PA, or PC. ODASD(E&ER) also asked the same installation CRMs about the number of times, in the past five years, their installation experienced any disagreement when requesting concurrence from the SHPO for NRHP eligibility determinations or other historic designations from SHPOs.¹²

ODASD(E&ER) asked DoD Component headquarters' leadership, specifically their Federal Preservation Officer (FPO) (or Deputy FPO, responding on the FPO's behalf), to describe their Component's best-practice requirements for completing the Section 106 process, any recommendations for procedures that could enhance the completion of the Section 106 process, and any actions for accelerating individual project reviews. The results of these surveys are found in the sections below.

DoD Installations and SHPO Consultation

DoD completes actions required as part of statutory requirements under Section 106 or Section 110(a) of the NHPA, or under program alternatives developed consistent with 36 C.F.R. 800. These actions include consultation and coordination with SHPOs. Activities not required by existing laws or agreements, such as providing services to SHPOs, are not obligated by DoD policy, and installation commanding officers complete these activities at their discretion.

It is against DoD policy and established fiscal laws to provide funding assistance to SHPOs for completion of their statutory and regulatory requirements, as outlined in Title 31 and the U.S. Constitution. The HPF, established by the NHPA, provides Federal funding to SHPOs to assist them with carrying out these roles.

The Assistant Deputy Under Secretary of Defense for Installations and Environment released a memorandum, "Section 110(g) of the National Historic Preservation Act," on October 26, 2010, that addresses Federal agencies' ability to fund their historic preservation responsibilities under Section 110(g) of the NHPA and identifies limits on DoD's authority to fund SHPO activities (Appendix A).¹³ As stated in the memorandum, "[The] only limitation on the Federal agency's authority to provide such funding to a SHPO is that doing so must assist the Federal agency in meeting its—that is, the Federal agency's—preservation responsibilities." Specifically, DoD does not have the authority to provide direct funding assistance to SHPOs for standard project review, consultation, or other workload help. DoD cannot provide funding to SHPOs to assist them in meeting their own standard consultation and review responsibilities, but DoD can fund SHPOs to provide services, such as expedited reviews, and technical expertise that extend beyond SHPOs' mission responsibilities.

¹¹ Other examples of services provided to SHPOs included SHPO visit or tour of installation, survey of additional lands outside of a project area, payment for access to a database, payment to access files or records, payment to digitize records, payment for GISs or other mapping of historic resources, and payment for mitigative actions beyond scope and scale of a project, agreement, or program alternative.

¹² Examples of systemic challenges included challenges or delays in receiving concurrence from SHPO for NRHP eligibility due to request for additional survey, request for additional research or additional information, SHPO refusal to provide concurrence on Section 110(a) NRHP eligibility, etc.

¹³ NHPA, Section 110(g), 54 U.S.C §306109: <https://www.govinfo.gov/content/pkg/USCODE-2014-title54/html/USCODE-2014-title54-subtitleIII-divsnA-app-dup4-chap3061-subchapI-sec306109.htm>.

As the memorandum indicates, DoD Components can contract with SHPOs to obtain technical expertise to assist DoD in meeting its historic preservation responsibilities, as appropriate. However, the memorandum distinguishes DoD’s ability to pay for technical expertise from its ability to provide funding for SHPOs to meet their separate statutory and regulatory responsibilities while participating in and overseeing the Section 106 process; this process is a statutory and regulatory duty to consult with Federal agencies on their undertakings. In 2021, the OSD Office of the General Counsel reviewed the 2010 memorandum and verified that its content still comports with applicable fiscal law.

Table 2 summarizes DoD Components’ responses to ODASD(E&ER) questions to installation CRMs. The CRMs stated whether and how often, in the past five years, their installations provided SHPOs with services that are not required as part of statutory requirements under Section 106 or Section 110(a) of the NHPA, or under signed MOAs, PAs, or PCs. They also reported how many times their installations experienced dissent from SHPOs when requesting concurrence for NRHP eligibility determinations or other historic designations.

Table 2: Representative Sample of DoD Component Installations’ Number of Times Services Provided for and Disagreement from SHPOs, FYs 2015-2020

DoD Component	Number of Installations Queried	Number of Times Services Were Provided by Installations to SHPOs	Number of Times SHPOs Disagreed with Installations When Requesting Concurrence
Army	10	11	55
DON	10	0	36
DAF	13	26	57
DLA	4	0	0
WHS	2	0	0

DoD Best Practices

DoD complies with NHPA and all other cultural resource statutes, laws, regulations, and executive orders and follows the guidelines established in DoD Instruction 4715.16, *Cultural Resources Management*.¹⁴ Each DoD Component follows DoD policy and its respective Component-specific policy regarding cultural resources management and the completion of the Section 106 process. DoD policy is to “consult early and consult often” for all undertakings. Frequently, the amount of time the SHPO and other consulting entities have for their individual review and consultation is defined in regulations. As such, installations can accelerate individual project reviews only at the front end of the process. Therefore, preparation and coordination of submittals early in the project planning process are essential.

The research completed for this report identified five best practices for interactions with SHPOs.

¹⁴ DoD Instruction 4715.16, *Cultural Resources Management*: <https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/471516p.pdf?ver=2017-11-21-114100-670>.

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Best Practice #1

Proactive identification and evaluation of cultural resources can help installations identify historic properties ahead of Section 106 project reviews. By using the results of surveys, determinations of NRHP eligibility, and concurrences from SHPOs for project planning, they can reduce the time needed for these individual reviews.

Best Practice #2

Each DoD Component has existing policies, guidance, and/or instructions that identify best practices for cultural resources management, including interactions with SHPOs.

Army

Army Regulation (AR) 200–1, *Environmental Protection and Enhancement*, December 13, 2007, contains Army policy related to cultural resources.¹⁵ Army-wide NHPA policy memoranda are located on the Army’s historic preservation website: www.denix.osd.mil/army-cr/home/. In addition, Chapter 12 of the *Army National Guard Cultural Resources Handbook* focuses on NHPA and Section 106 compliance.¹⁶

Navy and Marine Corps

For best practices, the USN and USMC follow guidance provided in Secretary of the Navy Instruction 4000.35B, *Department of Navy Cultural Resources Program*; Marine Corps Order 5090.2 Volume 8, *Cultural Resources Management*; Office of the Chief of Naval Operations Instruction 5090.1E, *Environmental Readiness Program*; and Office of Chief of Naval Operations Manual 5090.1, *Environmental Readiness Program Manual*, for completing the Section 106 process.¹⁷

Air Force and Space Force

Air Force Manual (AFMAN) 32-7003, *Environmental Conservation*, April 20, 2020, contains DAF policy and guidance related to cultural resources and how installations implement those policies and guidance.¹⁸

¹⁵ Army Regulation 200–1, *Environmental Protection and Enhancement*: https://armypubs.army.mil/epubs/DR_pubs/DR_a/pdf/web/r200_1.pdf.

¹⁶ *Army National Guard Cultural Resources Handbook*: <https://mil.wa.gov/asset/5e4d5343a682b>.

¹⁷ Secretary of the Navy Instruction 4000.35B, *Department of Navy Cultural Resources Program*: <https://www.secnav.navy.mil/doni/Directives/04000%20Logistical%20Support%20and%20Services/04-00%20General%20Logistical%20Support/4000.35B.pdf>; Marine Corps Order 5090.2 Volume 8, *Cultural Resources Management*: https://www.marines.mil/Portals/1/Publications/MCO%205090.2_Vol_8.pdf?ver=2018-06-19-090351-240; Office of the Chief of Naval Operations 5090.1E, *Environmental Readiness Program*: <https://www.secnav.navy.mil/doni/Directives/05000%20General%20Management%20Security%20and%20Safety%20Services/05-00%20General%20Admin%20and%20Management%20Support/5090.1E.pdf>; Office of Chief of Naval Operations Manual 5090.1, *Environmental Readiness Program Manual*: <https://www.secnav.navy.mil/doni/SECNAV%20Manuals1/5090.1.pdf>.

¹⁸ Air Force Manual 32-7003, *Environmental Conservation*: https://static.e-publishing.af.mil/production/1/af_a4/publication/afman32-7003/afman32-7003.pdf.

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Defense Logistics Agency

DLA Instruction 4715.03, *Environmental Management of Real Property*, establishes policies, processes, and procedures necessary for effective cultural resources management.¹⁹

Washington Headquarters Service

WHS complies with Section 106 by including consideration of effects on historic properties in the National Environmental Protection Act (NEPA) review process of major Federal activities; the *Draft WHS NEPA Procedures* describe when and how to do so.

Best Practice #3

Execution of program alternatives, such as PAs and PCs, at an installation or nationwide level allows installations to streamline the Section 106 process, enabling all parties to focus on undertakings and consultations that require the most attention.²⁰

DoD encourages the use of PAs to enhance and streamline the Section 106 process.²¹

Installations develop PAs in consultation with SHPOs and other consulting parties to provide an alternative means for installations to comply with Section 106. PAs allow installations, SHPOs, Federally recognized Native American tribes, Native Hawaiian Organizations (NHOs), Alaskan Natives, and others to focus their resources and consultation efforts to govern the implementation of a particular program or the resolution of adverse effects from certain complex or multiple undertakings. When appropriate, a long-term PA in concert with the installation's Master Plan or specific operation program can help establish a clear understanding of the installation's future projects and milestones as they relate to historical resources.

PCs are another best practice for completing the Section 106 process. PCs are a method of NHPA compliance that allow agencies to tailor Section 106 to meet agency-specific needs.²² PCs provide the ACHP the flexibility to issue its comment and allow Federal agencies to comply with Section 106 in a single compliance action that addresses a category of undertakings and large class of property types. This is especially helpful to Federal agencies, like the DoD Components, that have repetitive management actions occurring in very large inventories of similar property types. Once issued by the ACHP, PCs generally satisfy and complete Section 106 compliance for the entire class of property types and categories of undertakings for the agency. DoD Components have seven PCs in total that enhance the Section 106 process for large inventories of historic properties, such as Capehart Wherry military housing.²³

Best Practice #4

Establishing and maintaining sound working relationships with SHPOs is critical to building a foundation of planning and openness. Projects involving SHPO consultation usually require

¹⁹ DLA Instruction 4715.03, *Environmental Management of Real Property*, is available upon request.

²⁰ To learn more about program alternatives, please refer to the ACHP's "Program Alternatives" webpage: https://www.achp.gov/program_alternatives.

²¹ To learn more about PAs, please refer to the ACHP's "Programmatic Agreements" webpage: https://www.achp.gov/program_alternatives/pa.

²² To learn more about PCs, please refer to the ACHP's "Program Comments" webpage: https://www.achp.gov/program_alternatives/program_comments.

²³ DoD Components' PCs are available on the DENIX Cultural Resources website: <https://denix.osd.mil/cr/planning/program-alternatives/>.

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long-term planning. The amount of funding and extent of planning needed to support consultation requirements depend on past planning, research and studies, the magnitude and nature of the undertaking, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the area of potential effects. Effective communication early in the planning process helps eliminate surprises and supports confidence and professionalism across organizations.

Best Practice #5

In accordance with DoD and Component-specific policies, DoD Components train personnel on topics related to cultural resources. Annual Section 106 training can be helpful for installation staff members who are involved in the consultation process:

- Master Planners and Construction Engineers who are knowledgeable in Section 106 can budget and appropriately plan for Section 106 costs and time requirements.
- Installation Commanders and other DoD leaders who are responsible for installation oversight can support their staff and make decisions regarding Section 106 consultations.
- Installation facilities maintenance personnel who understand DoD's Section 106 compliance responsibilities can recognize when and how to coordinate maintenance requests with CRM staff, particularly for maintenance of historic building features such as windows, roofs, brick, etc.
- DoD Components' NEPA (40 C.F.R. § 1502.25(a)) specialists can comply more efficiently with Section 106 requirements when preparing draft environmental impact statements.
- Natural Resources Managers knowledgeable in Section 106 can better support cultural resources that align with goals and objectives of the Integrated Natural Resources Management Plan.

In line with the DoD and Component-specific policies, continued cultural resources training among DoD personnel will facilitate the Section 106 process.

Recommendations

DoD will continue to engage with the ACHP to streamline development of Section 106 program alternatives that enhance completion of the Section 106 process and allow installations to conduct and document qualified project reviews. To do this, DoD must follow the ACHP's internal processes in order for it to approve additional PCs. The processes developed by the ACHP can take at least one year to complete. Expediting the process would greatly benefit DoD and all Federal agencies and enhance the completion of Section 106 for large historic property inventories. In addition, DoD will continue to encourage individual installations to execute PAs with SHPOs, Federally recognized Native American tribes, NHOs, Alaskan Natives, and other consulting parties.

SHPOs typically receive limited resources to meet their statutory and regulatory requirements. Increased funding to the HPF is an equitable and direct way to improve and expedite the Section 106 process. With greater resources, SHPOs can maintain and increase staffing levels, invest in GIS and online database systems, and enhance their NHPA review capabilities to consult with Federal agencies more effectively.

Appendix A – “Section 110(g) of the National Historic Preservation Act” Memorandum



ACQUISITION,
TECHNOLOGY
AND LOGISTICS

OFFICE OF THE UNDER SECRETARY OF DEFENSE

3000 DEFENSE PENTAGON
WASHINGTON, DC 20301-3000

OCT 26 2010

MEMORANDUM FOR DEPUTY ASSISTANT SECRETARY OF THE ARMY
(ENVIRONMENT, SAFETY AND OCCUPATIONAL HEALTH)
DEPUTY ASSISTANT SECRETARY OF THE NAVY
(ENVIRONMENT)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE
(ENERGY, ENVIRONMENT, SAFETY AND OCCUPATIONAL
HEALTH)
STAFF DIRECTOR, DEFENSE LOGISTICS AGENCY
ENTERPRISE SUPPORT, ENVIRONMENT (DES-E)

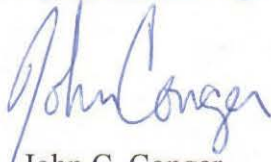
SUBJECT: Section 110(g) of the National Historic Preservation Act

On September 7, 2010, the Advisory Council on Historic Preservation issued a legal opinion entitled "National Historic Preservation Act Authorization for Federal Agency Assistance to State Historic Preservation Officers" (attached). Relying on Section 110(g) of the National Historic Preservation Act (16 U.S.C. § 470h-2(g)), the Council's opinion concludes that Federal agencies have broad authority to provide funding assistance to State Historic Preservation Officers (SHPOs).

The Department of Defense acknowledges that Section 110(g) authorizes a Federal agency to provide funding assistance to a SHPO to enable the SHPO to assist that Federal agency in meeting its preservation responsibilities. Under this authority, a Federal agency may provide funding assistance to a SHPO to enable the SHPO to provide a wide variety of discretionary services to a Federal agency, such as tailored training, cultural resources surveys, and data recovery and recordation. The only limitation on the Federal agency's authority to provide such funding to a SHPO is that doing so must assist the Federal agency in meeting its—preservation responsibilities. We encourage Department of Defense Components to use the authority provided by Section 110(g) to obtain expert technical assistance from SHPOs whenever doing so will assist the Component in meeting its preservation responsibilities.

The Department of Defense does not, however, believe it appropriate under Section 110(g) (or any other authority) for a Federal agency to provide funding to a SHPO to enable the SHPO to carry out its statutory and regulatory responsibilities to participate in and oversee the Section 106 (16 U.S.C. § 470f) process. SHPOs, having assumed responsibility for a Federally approved preservation program, have a nondiscretionary statutory and regulatory duty to administer the Section 106 process and consult with Federal agencies on individual Federal undertakings. SHPOs receive funding to support their execution of the Section 106 process through the Historic Preservation Fund matching grant process administered by the National Park Service; Section 110(g) does not authorize a Federal agency to provide funding assistance to a SHPO related to the SHPO's Section 106 compliance oversight and individual project reviews.

My points of contact for this memorandum are Serena Bellew at serena.bellew.fn.uk@osd.mil, 703-604-1885, or James Van Ness, Acting Deputy General Counsel (Environment & Installations), at james.vanness@osd.mil, 703-693-4841.

A handwritten signature in blue ink that reads "John Conger". The signature is written in a cursive style with a large initial "J" and "C".

John C. Conger
Assistant Deputy Under Secretary of Defense
(Installations and Environment)



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Office of the Deputy Assistant Secretary of Defense for
Environment & Energy Resilience