

Department of Defense Response to

Executive Order 13287, "Preserve America," Section 3: Reporting Progress on the Identification, Protection, and Use of Federal Historic Properties

Includes Information on the Departments of the Army, Navy, and Air Force
Fiscal Years 2020-2022

Introduction

This report satisfies the Department of Defense's (DoD's) requirements for Section 3(c) of Executive Order (EO) 13287, "Preserve America," The Preserve America EO directs each Federal agency with real property management responsibilities to submit reports on its "progress in identifying, protecting, and using historic properties in its ownership." The Advisory Council on Historic Preservation (ACHP) developed questions to assist Federal agencies in meeting the Preserve America EO reporting requirements. The DoD's consolidated answers to the ACHP questions includes information on the Departments of the Army, Navy, and Air Force for fiscal years (FYs) 2020-2022. This report references policy and guidance documents from the Office of the Secretary of Defense (OSD) and the Military Departments. These documents provide the framework necessary to balance and integrate proactive management of cultural resources with all aspects of the military mission. This report also provides summary data on the DoD Cultural Resources Program.

The DoD is a large and 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.³ The DoD's installations and facilities are critical pieces of the national defense mission. The DoD manages the largest portfolio of real property assets (e.g., structures and buildings), which includes historic properties, in the Federal government. In FY 2022, DoD managed more than 643,900 real property assets on over 4,860 sites across nearly 25.8 million acres.⁴

The DoD is proud of its rich history and acts as a productive and responsible steward of the lands and resources it manages. The DoD works to maintain, promote, and interpret the cultural resources it manages, which supports the defense mission through the preservation of the country's military heritage for future generations. Cultural resources are mission enhancing assets that connect our warfighters with their proud history and traditions.

¹ Available at: https://www.achp.gov/digital-library-section-106-landing/preserve-america-executive-order-13287.

² Included within the Military Departments are the U.S. Marine Corps and U.S. Space Force and their Reserve Components. This report also includes property under the direct management of the Secretary of Defense (e.g., the Pentagon Reservation).

³ DoD's mission can be found on its homepage: https://www.defense.gov/Our-Story/.

⁴ This data was obtained from the DoD Agency Financial Report for FY 2022, page 12, which is available at: https://comptroller.defense.gov/Portals/45/Documents/afr/fy2022/DoD_FY22_Agency_Financial_Report.pdf.

IDENTIFYING HISTORIC PROPERTIES

1. How many, and what percentage of your assets, are historic as reported in: (a) your bureau or agency's proprietary database and/or (b) your bureau's or agency's reports to the Federal Real Property Profile MS (FRPP MS)? (Note: To find out about FRPP MS data, you may need to contact your Senior Real Property Officer or the Federal Real Property Council.)

If known, how many of these historic properties are buildings, structures, sites, objects, and/or districts?

The Office of the Assistant Secretary of Defense for Sustainment (OASD(S)) consolidates all DoD real property assets in its Real Property Assets Database (RPAD) annually. Appendix 1 shows real property asset data reported in RPAD for FY 2020 - FY 2022.

In FY 2022, the DoD historic property portfolio included:

- 68 individual National Historic Landmarks (NHL)
- 2,928 NHL-contributing properties
- 2,521 individual and contributing historic structures listed in the National Register of Historic Places (NRHP)
- 15,138 historic assets determined eligible for inclusion in the NRHP
- 14,000 archaeological sites eligible for or listed in the NRHP⁵

The DoD evaluates its real property facilities and land to identify NRHP-eligible properties when mission-supporting undertakings require it and through proactive survey and planning efforts. Asset evaluation for historic significance is prioritized by asset age, proximity to mission activities, and mission use. Using these prioritization methods and management practices, the DoD continues to evaluate properties for NRHP eligibility, and thereby improve the accuracy of its real property and heritage asset data collections.

The DoD also assesses its progress on archaeological site identification and evaluation through analysis of the number of acres surveyed for archaeological sites each year and the number of acres available for survey. Please note, the difference between the total number of DoD-managed acres and the acres available for survey reflect the number of acres that cannot be surveyed for archaeological sites because of safety or other concerns.

2. Have your identification methods changed during this reporting period? Approximately what total percentage or portion of inventory have now been surveyed and evaluated for the National Register, and does this represent an increase from your agency's 2020 progress report, if applicable?

The DoD's identification methods remain unchanged during this reporting period. The DoD evaluates its real property facilities and land to identify NRHP-eligible historic properties when mission-supporting undertakings require it and through proactive survey and planning efforts. Asset evaluation for historic significance is prioritized by asset age, proximity to mission activities, and mission use. Using these

⁵ DoD obtained data for these historic properties from DoD's RPAD FY 2021 records.

prioritization methods and management practices, the DoD continues to evaluate its properties for NRHP eligibility, and thereby improve the accuracy of its real property and heritage asset data collections.

DoD has surveyed and evaluated 68% of its real property assets over fifty years old as of the end of FY 2022. While DoD also surveyed 68% of real property assets over fifty years old in FY 2019, the number of assets surveyed was greater by the end of FY 2022 because DoD's real property assets has increased. DoD surveyed 47% of its land for archaeological sites in FY 2019, and as of FY 2021 it surveyed 48%.⁶

3. Has your agency implemented any new policies or programs that promote awareness and identification of historic properties over the last three years?

Agencies have a variety of policies to identify and evaluate historic properties and make parties interested in historic preservation aware of them. Describe any new policies or programs, such as new benchmarks or performance measures, instituted to meet existing requirements.

The DoD has established performance measures for determining progress identifying assets. However, the DoD has not established formal benchmarks for completing the identification of historic properties. The DoD continues to require the Military Services to report on these performance measures annually to the OASD(S). These measures can be found in DoD cultural resources management policy, DoD Instruction (DoDI) 4715.16 *Cultural Resources Management*.⁷

Through the DoD Legacy Resource Management Program (Legacy Program), DoD has initiated the DoD Nationwide Approach to National Historic Preservation Act Section 110 Surveys. This program will allow installations to get ahead of compliance requirements, including Section 106 and Section 110, by completing baseline data collection and evaluation ahead of training and mission readiness planning efforts. For example, rather than installation personnel completing Section 106 cultural resource management compliance at the end of an umbrella of other environmental reviews, they will use the Section 110 survey project to maximize efficiencies and reduce workload prior to DoD undertakings.

Subquestion 3.1: How has the agency evaluated the effectiveness of existing agency policies, procedures, and guidelines to promote awareness and identification of historic properties during the reporting period? Have any updates been planned or implemented?

The DoD is committed to sound and dynamic stewardship of the cultural resources for which it is responsible, as well as compliance with the National Historic Preservation Act (NHPA) and other cultural resources statutes, laws, regulations, and executive orders. The DoD cultural resources management policy, DoDI 4715.16, provides overarching policy direction and assigns responsibilities to the DoD Components. Additionally, the Military Services issue more specific cultural resources management policy and guidance to assist installations implementing DoDI 4715.16. The OSD leadership engages with Military Services leadership to discuss successes, challenges, and opportunities across their portfolio.

⁶ DoD obtained data for these historic properties directly from DoD's RPAD FY 2019 and FY 2021 records.

⁷ DoDI 4715.16 *Cultural Resources Management* can be accessed at: https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/471516p.pdf?ver=2017-11-21-114100-670.

Subquestion 3.2: How has your agency considered equity, access, and involvement of underserved communities in its federal stewardship activities? Has your agency implemented any policies that promote equity and diversity in the identification process?

The DoD prioritizes protecting the environment, health, and safety of both its military and the surrounding communities that may be affected by the Department's operations. The DoD understands that its primary mission is to provide national security, ensuring that it trains and equips Service members with the infrastructure and weapons systems to maintain a high readiness level. The DoD specifically considers environmental justice impacts within its environmental and cultural planning programs.

As of August 2023, the Department is working on an update to the *DoD Strategy on Environmental Justice*, ⁸ which focuses on identifying the impacts of DoD activities on minority and low-income populations; promoting partnerships with all stakeholders; streamlining Government; and fostering nondiscrimination in DoD programs. By updating the *DoD Strategy on Environmental Justice*, the Department will better adhere to the requirements of Executive Order (EO) 14096, *Revitalizing Our Nation's Commitment to Environmental Justice for All*. The DoD Cultural Resources Program (CRP) is reviewing and providing input to the updated EJ strategy, as necessary with an eye towards ensuring equity and diversity in the identification of cultural resources for underserved communities.

Additionally, in April 2022, the Department issued the *DoD Equity Action Plan⁹* to help advance equity for underserved communities by enhancing support for military families and addressing the barriers underserved military families face in achieving economic security and health equity.

Department of the Navy

The Department of the Navy (DON) works closely with tribal partners at the installation level. For example, as part of DON's modernization of the Fallon Range Training Complex (FRTC) in Fallon, NV DON worked with local tribes to identify measures to minimize impacts and implemented a multi-pronged approach to incorporate tribal engagement and Indigenous Knowledge (IK) into planning and implementation. Tribal engagement included:

- the establishment of an Intergovernmental Executive Committee to exchange views, information, and recommendations relating to the management of the natural and cultural resources of the FRTC;
- development of a managed access plan to provide continued access to areas of religious and cultural significance to tribal members;
- engagement with tribes to update and implement the Naval Air Station Fallon (Integrated Cultural Resources Management Plan (ICRMP);
- completion of an ethnographic study; and
- tribal representation in all cultural resources surveys of the expanded Bravo ranges.

⁸ The 1995 *DoD Strategy on Environmental Justice* is available at: https://www.denix.osd.mil/ej/denix-files/sites/95/2023/04/DoD-Environmental-Justice-Strategy-24-Mar-1995 508.pdf.

⁹ The *DoD Equity Action Plan* is available at: https://media.defense.gov/2022/Apr/13/2002976515/-1/-1/0/DOD-EQUITY-ACTION-PLAN.PDF.

Department of the Air Force

It is the policy of the Department of the Air Force (DAF) to engage with Federally-recognized tribes and communities historically and culturally affiliated with lands affected by DAF undertakings. For example, DAF invites tribal partners to participate in survey and historic property inventory projects; and provide input and interpretation on undertaking planning, determinations of effect, and NRHP evaluations. This involvement offers tribal partners to have meaningful input when significant historic properties and resources have the potential to be affected. Additionally, DAF coordinates with descendent communities on the identification and stewardship of resources on DAF property.

Subquestion 3.3: Has your agency prioritized the identification of historic properties in areas with the highest potential for climate impacts?

The DoD mission need drives identification of historic properties. DoD Components develop strategies and actions to reduce climate-related risks and enhance military mission or installation resilience and incorporate them into ICRMPs.

Department of the Air Force

Prior to Hurricane Michael in 2018, the Argonne National Laboratory's Sociocultural Systems
Department began developing a coastal erosion control plan for Tyndall Air Force Base (AFB). The
Argonne National Laboratory revised the scope of the projects after the hurricane to include a new
monitoring plan targeted toward archaeological sites at greater risk of impacts from climate change.
Creating geospatial datasets that show the extent of future coastal flooding and erosion allowed Tyndall
AFB to take protectively measure and identify the most at-risk archaeological sites.

4. Federal agencies are encouraged to share information regarding the number and percentage of historic property identification completed in the context of Section 106 for specific undertakings and programs versus that completed for unspecified planning needs (Section 110 survey). Has the implementation of Section 106 agreements contributed to the identification of historic properties?

DoD does not collect the data requested in Question 4 and does not differentiate between Section 106 and Section 110 identification in RPAD. Section 106 compliance accounts for the majority of the DoD's historic property identification. Historic property identification and evaluation efforts relating to Section 110 are often part of an installation-specific ICRMP. Section 110 projects are contingent on mission needs, funding, and personnel availability.

5. How has your agency employed partnerships to assist in the identification and evaluation of historic properties over the last three years?

One of the core policies stated in DoDI 4715.16 is to: "Consult in good faith with internal and external stakeholders and promote partnerships to manage and maintain cultural resources by developing and fostering positive partnerships with Federal, tribal, State, and local government agencies; professional and advocacy organizations; and the general public." While partnerships to identify and evaluate historic properties are not routinely established at the Department level, installation personnel engage in partnerships to support and improve their cultural resources programs.

Per DoDI 4715.16, the Departments shall: "Establish appropriate partnerships with government, public, and private organizations to promote local economic development and vitality through the use of DoD historic properties in a manner that contributes to the long-term preservation and productive use of those properties" and "[p]romote partnerships with communities to increase opportunities for public benefit from, and access to, DoD cultural resources, taking into account mission activities, sustainability, safety and security issues, and fiscal soundness."

Where installations manage lands historically or culturally affiliated with American Indian tribes, Alaska Native villages, or Native Hawaiian Organizations (NHOs), the installations frequently partner and consult with these Indigenous communities to identify and evaluate cultural resources and sacred sites. DoDI 4710.02, *DoD Interactions with Federally-Recognized Tribes*¹⁰ includes information about when to consult tribes, what laws trigger the requirement to consult, who should be involved, how to address culturally sensitive information and tribal protocols, and how to record consultation results. DoDI 4710.03, *Consultation With Native Hawaiian Organizations*¹¹ establishes policy, assigns responsibilities when proposing actions that may affect a property or place of traditional religious and cultural importance to an NHO, and provides a framework for DoD Components to develop localized processes to facilitate consultation. Compliance with the NHPA is emphasized throughout DoDI 4710.02, DoDI 4710.03, and the related Military Department-specific implementing guidance policies.

The DoD assists uniformed and civilian personnel in expanding their consultation and intracultural communication skills, which are necessary to establish and maintain effective working relationships with tribes and NHOs, through the DoD American Indian Cultural Communications and Consultation Course; the DoD Native Hawaiian Cultural Communication and Consultation Course; and the DoD Alaska Native Cultural Communications and Consultations Course. The DoD Native American Affairs Program offers these trainings annually to installations upon request.

Additionally, the Military Departments can enter into cooperative agreements, as permitted by 10 United States Code (U.S.C.) 2684, Cooperative Agreements for Management of Cultural Resources, which authorizes "the Secretary of Defense or the Secretary of a military department" to form cooperative agreements with: "a State or local government or other entity for the preservation, management, maintenance, and improvement of cultural resources located on a site authorized by subsection (b) and for the conduct of research regarding the cultural resources. Activities under the cooperative agreement shall be subject to the availability of funds to carry out the cooperative agreement." The authority to enter into a cooperative agreement is, however, restricted to the following circumstances: "cultural resources must be located—

- (1) on a military installation; or
- (2) on a site outside of a military installation, but only if the cooperative agreement will directly relieve or eliminate current or anticipated restrictions that would or might restrict, impede, or otherwise interfere, whether directly or indirectly, with current or anticipated military training, testing, or operations on a military installation."

¹⁰ DoDI 4710.02 *DoD Interactions with Federally-Recognized Tribes* is available at: https://www.denix.osd.mil/na/denix-files/sites/42/2020/05/DoDI 4710.02 2018.pdf.

¹¹ DoDI 4710.03, *Consultation Policy With Native Hawaiian Organizations* is available at: https://www.denix.osd.mil/na/denix-files/sites/42/2020/05/DoDI-4710.03.pdf.

Subquestion 5.1: Provide examples of how agency policies, procedures, and capabilities have increased opportunities for partnership initiatives involving collaboration with nonfederal entities and marginalized communities. For example, some agencies have entered into cooperative management agreements with tribes, while others have utilized innovative contracting approaches that allow for hiring local students to help identify historic properties.

Department of the Air Force

The DAF leverages the Cooperative Ecosystem Studies Units (CESU) and standing relationships between installations and universities to provide students opportunities to gain valuable historic preservation experience. Since 2021, DAF has hosted paid interns at multiple Air Force installations across the United States. These internships aid installation cultural resources managers in carrying out their day-to-day activities and provide students a unique experience of working within a land managing Federal agency's historic preservation program.

Subquestion 5.2: What methods does your agency use to seek out and establish new partnerships? How does your agency make partnerships work within its structures and goals?

The DoD Legacy Program provides coordinated, Department-wide and partnership-based integration of military mission readiness with the conservation of irreplaceable natural and cultural resources. The Legacy Program, established in 1990, annually funds cultural and natural resources management projects of regional or national significance that support mission, resource stewardship, and regulatory compliance. This program fosters the development of partnerships, leveraging the knowledge and talents of individuals outside of DoD to contribute toward the improvement of the cultural and natural resources management of military lands. Legacy Program funding is strategic and competitive and has supported DoD as a conservation program leader and an incubator of innovative land management strategies. Since its establishment, the Legacy Program has funded over 3,200 projects, totaling \$380 million. Furthermore, over 300 military installations worldwide have received and benefited from Legacy Program funding. These projects have developed new or leveraged existing partnerships with other Federal agencies; state, tribal, and local governments; and academic and non-profit organizations.

In collaboration with the Legacy Program, USACE developed the *Department of Defense Tribal Engagement Guidebook*, ¹³ to improve DoD consistency in the successful engagement of federally-recognized tribes. The guidebook accomplished this by establishing consistency of language, setting up the effective management of tribal resources, and using a compassionate and respectful approach to establishing government-to-government relationships.

Department of the Navy

In FY 2022, Navy Region Northwest implemented a partnership-based approach to tribal engagement to incorporate early information sharing, frequent communication, consideration of IK, and active support from Navy leadership. These efforts included collaboration with tribes to identify and fund environmental resilience projects that consider tribal cultural equities and concerns.

¹² More information about the Legacy Resources Management Program is available at: https://www.denix.osd.mil/legacy/.

¹³ The *Department of Defense Tribal Engagement Guidebook* is available at: <u>20230724 CR-21-001 Tribal-Engagement-Guidebook -FINALV2.pdf (osd.mil).</u>

In May 2023, Marine Corps Base Hawaii (MCBH) signed a Memorandum of Understanding (MOU) with a consortium of NHOs from Windward O'ahu. The MOU called for base personnel to work with community representatives to develop ways to assist in active management of both cultural and natural resources in MCBH's Nu'upia Fishponds. MCBH cultural and natural resources managers have agreed to work with our Native Hawaiian partners to find activities that can enhance the resources present. For example, base and community members have participated in volunteer workdays to remove invasive vegetation from highly overgrown areas in the ponds. Plans are underway for clearing fishpond walls of vegetation to assess condition and develop ways to stabilize walls to prevent or slow degradation.

PROTECTING HISTORIC PROPERTIES

6. Have the policies and programs your agency has in place to protect historic properties changed over the reporting period in ways that benefit historic properties?

Over the reporting period, DoD has not implemented agency-wide policy or programming that changes its processes for managing historic properties. The DoD continues to maintain, promote, and interpret the cultural resources it manages, in support of the defense mission.

Department of the Army

In October 2019, the Smithsonian Institution and the U.S. Army Civil Affairs & Psychological Operations Command (Airborne) entered into an MOU to increase collaboration in protecting and preserving cultural property in armed conflict and develop a training program for Army Reserve Civil Affairs Soldiers. Training started with the Army Monuments Officer Training (AMOT) at the Smithsonian in Fall 2020. The AMOT program has continued the legacy of the World War II Monuments Men and Women, a group of curators, architects and other cultural heritage specialists serving in the Army Civil Affairs Division tasked to save many of Europe's cultural treasures.

Subquestion 6.1: Describe any changes over the last three years in the manner in which the agency manages compliance with Sections 106 (54 U.S.C. 306108), 110 (54 U.S.C. 306101 306107 and 306109 306114), and 111 (54 U.S.C. 306121 306122) of the NHPA, and share successes in this area.

The DoD has not changed its process for complying with Sections 106, 110, and 111 in the past three years. The DoD continues to follow the guidelines established in DoDI 4715.16 for complying with NHPA and all other cultural resource statutes, laws, regulations, and executive orders.

Subquestion 6.2: How has the number of full-time cultural resources professionals in your agency assigned to help the agency fulfill its responsibilities under the NHPA changed over the last three years? Has your agency encountered any best practices or challenges in the hiring process?

The DoD does not collect this information. Most installations have a government civilian employee designated as the Cultural Resources Manager (CRM), and many installations retain multiple government or contract employees as cultural resources subject matter experts. Similar staffing is replicated in DoD Component regions, commands, and headquarters.

DoD's hiring process is not optimized for hiring qualified cultural resources staff. The lack of job qualification standards for cultural resources professions aligned with the Secretary of Interior's Professional Qualifications Standards (SOI PQS) hinder legally qualified personnel from being hired to

the Federal workforce. The only Office of Personnel Management (OPM) job series for cultural resources professionals is archaeology, and the qualification standards for that series do not match the SOI PQS. The authority 54 USC 306131(a)(1)(B) requires agency personnel responsible for historic properties to meet qualification standards established by the OPM in consultation with the SOI. The SOI published the PQS in the Code of Federal Regulations (CFR), 36 CFR Part 61, in 1983. The qualifications therein define minimum education and experience required to perform identification, evaluation, registration, and treatment activities. The authority 54 USC 306131(a)(3) further requires OPM to revise qualification standards for the disciplines involved, but this has not occurred to date, resulting in inconsistency between the OPM Job Series and the SOI PQS. The minimum professional qualifications set in 36 CFR 61 exceed those of the OPM Job Series, creating challenges when DoD attempts to hire cultural resources professionals who meet the SOI PQS, as required by 54 U.S.C 306131(a)(1)(B).

DoD intends to perform a job analysis, a process supported by OPM (per Equal Employment Opportunity Commission Uniform Guidelines on Employment Selection Procedures, 29 CFR Part 1607) and DoD (per DoDI 1400.25: *Civilian Personnel Management*, Volume 250), for CRMs, archaeologists, and architectural historians. The job analysis will result in the identification of selective factors and quality ranking factors tailored to the unique needs of DoD, improving DoD's ability to hire truly qualified cultural resources professionals.

Subquestion 6.3: Has your agency incorporated climate change adaptation/mitigation principles into its policies, programs, and procedures in place to protect historic properties over the last three years?

In September 2021, the DoD issued the *Department of Defense Climate Adaptation Plan*, which outlined DoD's enhanced approach to mitigating the effects of climate change. ¹⁴ The DoD will ensure built and natural infrastructure are in place for successful mission preparedness, military readiness and operational success in changing conditions, and leverage the Defense Climate Assessment Tool to develop comprehensive installation resilience plans. DoD's policy, DoDI 4715.21, *Climate Change Adaptation and Resilience*,) states that all operations, planning activities, business processes, and resource allocation decisions include climate change considerations¹⁵. The purpose of this policy is to ensure the military forces of the United States retain operational advantage under all conditions, leveraging efficiency and resilience to ensure our forces are agile, capable, and effective. Climate change adaptation must align with and support the Department's warfighting requirements. As no entity has the luxury of "opting out" of the effects of climate change, no portion of the Department—not a Service, a Command, or an activity—can "opt out" of the requirement to adapt to a changing climate.

The Military Services are implementing Service-level climate change adaptation plans, which will preserve operational capability, increase resiliency, and help mitigate future climate impacts through specific and measurable objectives and key results. In 2022, the Military Departments published: *The*

¹⁴ The *Department of Defense Climate Adaptation Plan* is available at: https://media.defense.gov/2021/Oct/07/2002869699/-1/-1/0/DEPARTMENT-OF-DEFENSE-CLIMATE-ADAPTATION-PLAN-2.PDF.

¹⁵ The Department of Defense Directive 4715.21 *Climate Change Adaptation and Resilience* is available at: https://dod.defense.gov/Portals/1/Documents/pubs/471521p.pdf.

Department of the Army Climate Strategy Implementation Plan, ¹⁶ The Department of the Navy Climate Action 2030, ¹⁷ and The Department of the Air Force Climate Action Plan. ¹⁸

Department of the Air Force

Fort Eustis (of Joint Base Langley-Eustis), VA preserves and documents its rich history and significant cultural resources. Many archaeological sites along the James and Warwick Rivers are endangered by erosion and rising sea levels. Fort Eustis's cultural resources team monitors and documents the impact of climate change to these archaeological sites. Fort Eustis is working with the U.S. Army Corps of Engineers (USACE) to develop solutions to mitigate these threats, such as installing a living shoreline of oyster beds adjacent to endangered sites to alleviate sea-level rise.

Subquestion 6.4: Has your agency employed partnerships to assist in the protection of historic properties over the last three years? How does your agency involve stakeholders, such as tribes and Native Hawaiian organizations (NHOs) and other underrepresented communities in the protection and management of properties of significance to them?

The DoD Legacy Program partners with the National Environmental Education Foundation to fund National Public Lands Day (NPLD) service projects. Through this partnership, NPLD events provide opportunities for military personnel to lead stewardship efforts on installations. These events directly benefit participants by promoting physical activity, building camaraderie, and strengthening the military's relationship with neighboring residents, businesses, and communities. By advancing environmental stewardship while focusing on cultural, community-significant projects, the military takes an active, hands-on role in caring for our environment in a manner that involves DoD members, their families, retirees, and veterans. These projects strengthen environmental and cultural resource enhancement activities, as well as occupational health, at their military installations.

Subquestion 6.5: Has your agency developed methods, guidance, or best practices to engage with tribes and NHOs to incorporate Indigenous Knowledge when locating and/or preserving historic properties of direct concern to Indian tribes and NHOs?

DoDI 4710.02 and DoDI 4710.03 establish policy, assign responsibilities, and provide procedures for DoD's interactions with federally-recognized tribes and NHOs. Both consultation policies are being updated to include language strengthening the consideration of Indigenous Knowledge (IK) shared by tribes and NHOs as expert evidence or opinion. The Department recognizes that the use of IK in consultations, policies, research, and decision-making leads to stronger working relationships with Indigenous communities and will continue to work with the Military Components to develop an

¹⁶ The *Department of the Army Climate Strategy Implementation Plan* is available at: https://www.army.mil/e2/downloads/rv7/about/2022 army climate strategy.pdf.

¹⁷ The Department of the Navy Climate Action 2030 is available at:
https://www.navy.mil/Portals/1/Documents/Department%20of%20the%20Navy%20Climate%2

 $[\]frac{https://www.navy.mil/Portals/1/Documents/Department%20of%20the%20Navy%20Climate%20Action%202030%}{20220531.pdf?ver=3Q7ynB4Z0qUzlFg_2uKnYw%3d%3d×tamp=1654016322287.}$

¹⁸ The Department of the Air Force Climate Action Plan is available at: https://www.safie.hq.af.mil/Portals/78/documents/Climate/DAF%20Climate%20Action%20Plan.pdf?ver=YcQAZsG M.Xom3DkNP fL3g%3d%3d.

approach to IK that is appropriate for the national defense mission, the tribes, and Indigenous Peoples with whom we partner, and the communities we serve.

Department of the Army

The Ho-Chunk Nation and Fort McCoy signed an MOU in May 2022. The MOU allowed tribal members access to the installation for visiting sacred sites, collecting plants, and protecting Native American burial, historical, and sacred sites. It also outlines opportunities for tribal members to give input on cultural and natural resources.

Subquestion 6.6: How has your agency's use of digital information sources changed since the previous reporting period? What new or updated sources of digital information about the location of historic properties does your agency use? Does your agency utilize digital information in order to protect historic properties in the context of the effects of climate change?

DoD uses RPAD to meet its FRPP MS (formerly known as the FRPP) requirements. RPAD was originally created in accordance with EO 13327 *Federal Real Property Asset Management* as the Federal Government's "database of all real property under the custody and control of all executive branch agencies, except when otherwise required for reasons of national security."

In 2021, the DoD CRP began using The Digital Archaeological Record (tDAR), an international digital repository. tDAR includes digital records of archaeological investigations, and archived cultural resource documents and Legacy project deliverables. The use, development, and maintenance of tDAR is governed by Digital Antiquity, an organization dedicated to ensuring the long-term preservation of irreplaceable archaeological data and to broadening access to these data.

Department of the Air Force

Over the next 20 years, the DAF will decommission the Minuteman III Intercontinental Ballistic Missile (ICBM) and replace it with the Sentinel ICBM. This project includes the replacement of 450 missile launch facilities and 45 missile alert facilities, the installation of 8,000 miles of utility lines and 62 communications towers, and the construction of over 50 new facilities on 5 DAF installations across 6 states. To complete the project and comply with the NHPA, the DAF consulted with 7 State Historic Preservation Officers (SHPOs), 63 tribal governments, the ACHP, and over 20 State and Federal agencies to develop a Programmatic Agreement (PA) that covers the 20-year lifespan of the project. As the project is a schedule-driven national security project, the DAF had to compress many of the normal Section 106 timelines. To facilitate and expedite future consultations over dozens of reports annually, the DAF developed the Cultural Resources—Common Operational Picture (CR-COP) as a collaborative tool. The CR-COP standardizes reporting, serves as a data repository, provides real-time tracking of field crews, and provides a workflow tracking system.

Subquestion 6.7: Has your agency faced challenges or seen costs increase in attempting to ensure your historic rehabilitations, if any, comply with the Secretary of the Interior's Standards for the Rehabilitation of Historic Properties?

DoD faces procedural issues related to the application of the SOI for the Treatment of Historic Properties Standards- (SOI Standards) for projects subject to Section 106. SHPOs and regional National Park Service staff have different interpretations and applications of SOI Standards which creates inconsistencies

among installations and Services. This inconsistency limits DoD's ability to effectively manage and plan for renovations of historic properties located in different states and regions. In addition, the acceptable application of compatible substitute materials remains unclear and inconsistent. The SOI Standards state that use of "compatible substitute materials" during Rehabilitation is appropriate; however, DoD has experienced SHPOs determining the use of substitute materials an adverse effect that requires mitigation.

Department of the Army

The Army has faced challenges implementing the SOI Standards within their historic housing inventory. The annual cost to maintain privatized historic Army housing is typically double the cost to maintain non-historic privatized homes. The operating costs of pre-1919 housing exceed the privatized housing partners income. Privatized housing partners are therefore not able to sustain their pre-1919 historic housing inventory in the long term.

7. How has your agency used program alternatives such as programmatic agreements, program comments, and other tools to identify, manage, and protect your agency's historic properties over the last three years, if at all?

DoD has 18 nationwide program alternatives to help manage its historic properties and actively uses them as a key tool for program management. At the installation level, the Military Services regularly develop program alternatives in the form of PAs covering undertakings such as operations and maintenance, housing privatization and management, and training area activities.

Subquestion 7.1: Has your agency developed any new Section 106 program alternatives or revised existing program alternatives during the reporting period? For what projects or programs?

Department of the Army

In the last three years, the Army has developed two Program Comments for historic housing: *Program Comment for Department of the Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940),* and the *Program Comment for Department of the Army Vietnam War Era Historic Housing and Associated Buildings and Structures, and Landscape Features (1963–1975).* These Program Comments support the growing inventory of actively used historic housing.

Subquestion 7.2: How do your agency's Section 106 agreements support the planning and implementation of infrastructure projects, such as those linked to large-scale infrastructure, sustainability, or clean energy projects? How have the agreements helped to support the implementation of these projects?

¹⁹ The Program Comment for Department of the Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940) is available at: https://www.denix.osd.mil/army-pchh/denix-files/sites/24/2020/09/Overview-and-Text-of-the-Program-Comment-for-Army-Inter-War-Era-Housing.pdf.

²⁰ The Program Comment for Department of the Army Vietnam War Era Historic Housing and Associated Buildings and Structures, and Landscape Features (1963–1975) is available at: https://www.denix.osd.mil/army-vwehh-pc/denix-files/sites/25/2023/03/Program-Comment-for-Army-Vietnam-War-Era-Housing.pdf.

Over the reporting period, DoD has not implemented Department-wide policy or programming related to Section 106 agreements supporting infrastructure planning. However, the Military Departments use agreements to support cultural resources as part of large-scale energy projects.

Department of the Air Force

The DAF signed a Memorandum of Agreement (MOA) establishing a 2,600-acre Solar Enhanced Use Lease (EUL) project at Edwards AFB that began to produce power in December 2022. DAF evaluated 6,000 acres of Edwards AFB's northwest corner to identify 4,000 acres appropriate to lease for solar development, which ultimately included an area of 2,519 acres. Within the project Area of Potential Effect (APE) is the Bissell Basin Archaeological District (BBAD) that includes 151 eligible or contributing prehistoric archaeological sites, 2 historic homesteads, and 71 additional non-eligible sites. To resolve adverse effects to eligible resources, the Edwards AFB CRM coordinated with 14 local tribes, the SHPO, the ACHP, and project managers to prepare and implement a MOA with a Historic Property Treatment plan (HPTP). The HPTP excluded, avoided, and preserved 14 sites from data recovery. The Solar EUL provided increased and open communication with tribal partners in addition to protection of resources, where possible, and retrieval of the most information about the sites subject to impact.



Archaeological data recovery underway at a site within the Solar EUL project area.

Subquestion 7.3: How does your agency evaluate the results of program alternatives in terms of preservation outcomes and time and cost savings for the agency's Section 106 review responsibilities? How does your agency measure the effectiveness of program alternatives, if the agency uses them?

The DoD does not universally quantify the effects of its program alternatives. The DoD does, however, track the number of assets which are included in a Program Comment using the historic status code "Eligible for the purposes of a Program Comment (ELPA)" in RPAD.

Department of the Army

Army Program Comments include data elements collected in annual reports. This data is then used to evaluate efficacy of cost savings, time, and life-cycle analysis of historic properties. Each annual report required by Army-wide Program Comments includes an overall assessment of the effectiveness of the Program Comment. Likewise, most installation-level Programmatic Agreements include a similar annual reporting requirement.

USING HISTORIC PROPERTIES

8. How does your agency coordinate historic preservation and sustainability/climate resiliency goals in project planning?

The DoD incorporates historic preservation and sustainability/climate resilience goals in project development from master planning efforts, through design and construction processes, and into post-occupancy operations and maintenance planning. As climate risks intensify, there is an increased need to use resilient and sustainable building materials and implement climate adaptation measures to ensure the DoD real property assets remain effective in supporting the mission.

Subquestion 8.1: Has your agency rehabilitated or adaptively reused historic properties to achieve sustainability and climate resiliency goals during the reporting period?

The DoD adaptively reuses historic properties to meet new and emerging mission requirements. Every rehabilitation and adaptive reuse project must meet the requirements of the *Guiding Principles for Sustainable Federal Buildings*, updated in December 2020, as well as other sustainability and resilience requirements from laws and EOs.

Department of the Army

Under the *Program Comment for Army Inter-War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1919-1940)*, the Army has been able to achieve sustainability and climate resilience goals because that Program Comment modified the SOI Standards to prioritize the use of imitative substitute building materials equivalent to in-kind materials. An example of implementation is the clay tile roof replacement on Inter-War Era housing at U.S. Army Post Fort Bliss in Texas. Metal tile roofing is a climate resilient imitative substitute building material used at Fort Bliss that simulates the appearance of and was used to replace deteriorated historic clay tiles on 98 Spanish Revival homes built in the 1930s. Climate resilient metal tile roofing is more durable in extreme Texas hailstorm events with a Class Four impact rating vs Class Three rating for clay tile. This Army project saved \$2.2 million by using metal tile roofing instead of high-cost clay tile roofing. By simulating the appearance of historic clay tiles, the metal tile roofing maintains the historic character of the homes and historic neighborhood aesthetic in a cost effective and climate resilient manner.

Subquestion 8.2: Has your agency increased over the past three years the number of historic buildings that have been retrofitted to improve operational energy efficiency?

The DoD does not track this data, however the *DoD Sustainable Buildings Policy* requires all projects to improve operational energy efficiency. The selection of projects for renovation is usually driven by mission requirements, master planning, and the physical location of the buildings. ²¹ The policy also requires buildings to comply with DoD Unified Facilities Criteria (UFC) 1-200-02, *High Performance and*

²¹ The Department of Defense Sustainable Buildings Policy is available at: https://wbdg.org/FFC/DOD/dod sustainable buildings policy.pdf.

Sustainable Building Requirements.²² UFC 1-200-02 sets the minimum standards for energy efficiency on all new construction and renovation projects. Triggers for building renovations and retrofitting can include, but are not limited to: system failure, change of tenant, and planned end-of-life of equipment. The historic status of the building is not a driver in decision making for operational retrofitting.

Subquestion 8.3: Has your agency used full life-cycle accounting to value the embodied carbon in historic buildings when considering rehabilitation versus new construction?

The DoD is not currently accounting for the full life-cycle of embodied carbon. DoD is considering developing policy in the next 18 months to address this gap in data collection.

Subquestion 8.4: Has your agency faced resistance to reuse of historic properties due to the perceived incompatibility of preservation with sustainability and climate resiliency goals?

The DoD has faced resistance to reuse of historic properties. In addition to sustainability and resilience goals, DoD perceives an incompatibility between historic property rehabilitation and building code requirements, such as accessibility, force protection, fire protection, seismic, security, telecommunications, and many other types of requirements. Building performance and mission requirements are extremely tough to meet cost-effectively in an historic property.

Subquestion 8.5: Has your agency seen a reduction in sustainability performance (e.g., reduced energy efficiency, increased carbon-intensive materials use, or failure to integrate renewable energy) as a result of historic rehabilitations needing to comply with the Secretary of the Interior's Standards for the Rehabilitation of Historic Properties?

The adaptive reuse of historic properties is not viewed as incompatible with preservation, but can be viewed as time intensive and restrictive. Solar panels, reflective roofs, energy efficient windows, water efficiency measures (e.g., rainwater collection) are often as incompatible with historic properties due to additional costs to mitigate the impacts, which make already costly projects more prohibitive.

All projects must deal with cost, schedule, and quality constraints that impact sustainability performance. The DoD does not track sustainability performance in historic buildings versus non-historic buildings.

9. How do your agency's historic federal properties contribute to local communities and their economies, and how have their contributions changed over the reporting period?

How do you consider impacts to local communities and economics in your asset planning? Has consideration of local economic development and job creation in your asset planning changed over the last three years? If so, how?

²² For more information on DoD UFC 1-200-002, please see: https://wbdg.org/ffc/dod/unified-facilities-criteria-ufc/ufc20002#:~:text=This%20UFC%20provides%20minimum%20requirements%20and%20guidance%20to,is%20considered%20compliant%20with%20the%20HPSB%20Guiding%20Principles.

Consideration of local economic development has not changed over the last three years. The Military Departments maintain legal jurisdiction of their property for the U.S. Government and decision making occurs at the Department level. DoD's project planning and infrastructure development decisions are driven by the defense mission, not local economic development considerations.

Subquestion 9.1: Does your agency use its historic properties for educational purposes, such as to support or sponsor historic preservation trades training? If so, please describe these programs and how they have supported your agency over the reporting period.

The USACE Veterans Curation Program (VCP) connects veterans with the opportunity to become involved with the archaeological community. Through its investment in Service members, the VCP builds on skills that veterans acquire during military service, including leadership, teamwork, and attention to detail, and assists these valuable members of society with finding permanent employment and enrolling in institutions of higher education. Working under the direct supervision of professionals in the field of archaeology, veterans receive competitive pay and technical training in a peer-to-peer veterans environment.

Subquestion 9.2: Does your agency use historic properties to foster heritage tourism, when consistent with agency mission? If so, please describe any new heritage tourism efforts during the reporting period and whether they include public access to historic properties. Include any examples that promote diversity and equity in the use of historic properties for heritage tourism.

The DoD's historic and culturally significant resources form an integral part of mission support and readiness. DoD does not use them for economic development or heritage tourism purposes. The DoD typically does not spend funds on heritage tourism efforts. DoD museums, such as the National Museum of the Army, provide opportunities for education and public engagement on DoD's mission and history; however, the museums do not include public access to historic properties. The DoD works closely with descendant communities, when possible, to provide access to Traditional Cultural Places or other sites of cultural significance to those communities.

SUCCESSES, OPPORTUNITIES, AND CHALLENGES

10. Provide specific examples of major successes, opportunities, and/or challenges your agency has experienced during the past three years.

Subquestion 10.1: Identify particular successes or challenges your agency has experienced in the incorporation of equity and climate change adaptation/mitigation into the identification, protection, and use of historic properties.

Department of the Army

The Army presented the Iowa Army National Guard (IA-ARNG) with the 2021 Cultural Resources Management Award for the small installation category for their innovative rehabilitation of the pool house at Camp Dodge Joint Maneuver Training Center (JMTC). This award recognizes efforts to promote the management of cultural resources, including historical buildings, archaeological sites, tribal items and sites, curation, and the promotion of the cultural resource's conservation ethic. The pool house at Camp Dodge JMTC was listed on the NRHP in 1995 and recently underwent rehabilitation and is still in

use today. Camp Dodge is the primary training installation for the state, encompassing just under 4,500 acres near the state capital. Camp Dodge is notable for its long history; it is one of the few training sites still in operation to predate World War I. The Cultural Resources Management program for the training site has achieved a unique harmony in sustaining the post's legacy while promoting its present-day mission.

IA-ARNG was innovative in adapting its historic bathing pavilion at Camp Dodge into modern classroom spaces. IA-ARNG replaced leaking windows with modern windows that were weatherized with wood trim to match the structure's original historic character after consultation with the SHPO. IA-ARNG is currently replacing the roof but keeping its original, 45-degree-angle design, which will help keep the building cool. The interior rehabilitation of the historic pool house highlighted the trusses but allowed for modernization of windows and lighting for energy efficiency.



Interior of the historic pool house at Camp Dodge Joint Maneuver Training Center.

The Program Comment for Inter-War Era Housing, Associated Buildings and Structures, and Landscape Features (1919-1940) introduced the programmatic application of modern climate resilient imitative substitute building materials following a materials selection procedure prioritizing financial feasibility, quality of life, health, and safety criteria equally with preservation goals. Roofing on Fort Bliss Inter-war Era housing covered under the Program Comment required replacement due to its deteriorated condition. The Army's housing partner used imitative substitute material in the form of metal tile roofing to replace deteriorated historic clay tiles on 98 Spanish Revival style Army Inter-War Era homes. The installation of metal tile roofing on Inter-War Era housing at Fort Bliss maintains the historic Spanish Revival style, improves quality of life for military families, and provides climate resilient and cost-effective historic housing preservation. The metal tile roofing is more durable in extreme weather events and saved \$2.2 million by using metal tile roofing rather than high-cost historic clay tile roofing. Metal tile has lower maintenance requirements and equivalent warranties which provided significant cost savings that were able to be reinvested into other housing improvements for military families.



Metal tile roofing on Inter-War Era housing at Fort Bliss.

Department of the Air Force

Since 2017, Space Launch Delta 45 (SLD 45) of the U.S. Space Force in collaboration with the University of Central Florida (UCF) Anthropology Department has been undertaking archaeological research at Cape Canaveral Space Force Station (CCSFS) in Florida. The purpose of the ten-year Cape Canaveral Archaeological Mitigation Project (CCAMP) is to further understand the cultural significance of various archaeology sites located within CCSFS and inform their eligibility for the NRHP. The information gathered both aids SLD 45's climate change and sea-level rise planning efforts and mitigates effects caused by those impacts I. CCAMP also provides valuable, local job training to UCF students who, in some cases, cannot afford the traditionally high cost of a six-week archaeological field school or travel due to full-time employment or family obligations.



University of Central Florida students excavating the Penny Site at Cape Canaveral SFS (U.S. Space Force photo by Senior Airman Samuel Becker).

The SLD 45 also continued its decade long initiative to use three-dimensional (3D) laser scanning to digitally preserve NRHP-eligible facilities. Most recently, the SLD 45 through terrestrial laser scanning and 3D spatial technologies, digitally recorded the Cape Canaveral Lighthouse site for purposes of preservation planning and management, archiving, and educational programs. Like many historic structures on CCSFS, the Cape Canaveral Lighthouse site is subject to the deteriorating effects of climate change and sea-level rise.

Subquestion 10.2: Describe any policies or programs the agency has developed to prepare for current or future infrastructure funding or projects during the reporting period.

While the DoD has not developed infrastructure funding policy during the reporting period, DoD is actively encouraging use of the ACHP's *Exemption From Historic Preservation Review for Electric Vehicle Supply Equipment*. This policy relieves Federal agencies from the NHPA review requirements regarding the effects of the installation of certain electric vehicle supply equipment on historic properties.

Subquestion 10.3: Include examples of how partnerships have been used to assist in their historic properties stewardship.

Department of the Army

After more than ten years of partnership and cooperative work with consulting parties, the Army signed a Programmatic Agreement for the rehabilitation of Building 66050, the historic Mountain View Officers Club, at Fort Huachuca in January 2023. A viable plan to rehabilitate the building as a Range Operations Synchronization Center is moving forward for funding consideration. The rehabilitation plan includes exhibit space for consulting parties to tell the story of the African American World War II military experience.



The Army is currently transforming Mountain View Officers Club at Fort Huachuca into a Range Operations Synchronization
Center.

Building 66050 was constructed in 1942 as a Series 700 Service Club and was originally used as an African American officers' club until the end of World War II. The building is covered by the 1991 *Programmatic Memorandum of Agreement for World War II Temporary Buildings* and was put on the demolition list in 1998. In 2006, the Army took the building off the demolition list due to a five-year lease with the Southwest Association of Buffalo Soldiers. When the lease was not renewed in 2011, the Army determined that the building had no mission use and would not invest additional resources in the building. Over the last 10 years, the Army has engaged with the Arizona SHPO, the ACHP, and a coalition of consulting parties to determine disposition of Building 66050. In 2020, the Army identified a use for Building 66050 as a Range Operations and Synchronization Center.

Department of the Air Force

Since 2020, MacDill AFB in Florida, in coordination with the Hillsborough County Chapter of the National Association for the Advancement of Colored People (Hillsborough NAACP), has been searching for the Port Tampa Cemetery, established in the early 1900's. Historic records and verbal accounts indicate that the cemetery is an informal burial ground used for the interment of disenfranchised individuals, frequently African American citizens. Indications of the presence of a burial ground were discovered during the early years of base development in the 1940's; however, the cemetery has been neglected until recent years. Through two phases of extensive literature research, interviews, and non-destructive archaeology testing, DAF has located the possible site of the cemetery. In February 2021, MacDill AFB and the Hillsborough NAACP dedicated a historic marker during a Port Tampa Cemetery Service of Remembrance ceremony to document and acknowledge the general location where the lost Port Tampa Cemetery is believed to exist. Following the discovery of historic records describing two unmarked graves during construction of the MacDill AFB runway, DAF completed additional archaeological surveys in late 2022 and early 2023 to help better define the location of the cemetery. The draft findings from the recent survey work provided stronger evidence of the cemetery's existence and suggested that the cemetery may be slightly further to the east than originally suspected.

The Eglin Gulf Test and Training Range (EGTTR) at Eglin AFB includes nearly 123,000 square miles of airspace over the Gulf of Mexico, an area with a rich maritime history and known for submerged archaeological sites and historic shipwrecks. The EGTTR provides the DAF with an exceptional opportunity to safely execute research, test, and evaluate missions. Eglin AFB partnered with the Bureau of Ocean Energy Management, National Oceanic and Atmospheric Administration, USACE, and the State of Florida to create a comprehensive cultural database that covers the entire EGTTR. Each organization contributed unique cultural resources data to the database enabling DAF to better to balance supporting the mission use of the EGTTR and stewardship of cultural resources at Eglin AFB. Eglin AFB and its partners will continue to leverage and improve their shared database to further identify historic properties and consider their effects on historic properties within the Gulf of Mexico.

Subquestion 10.4: Case studies that highlight or exemplify agency achievements should include images or other graphics if available.

Department of the Navy

In 2016, the Navy entered into a MOU with Ali'i Pauahi Hawaiian Civic Club (APHCC) for the preservation and restoration of the Loko I'a Pā'aiau Fishpond. As of 2022, the Navy is amending the MOU to include the Living Life Source Foundation and Nalima No'eau as additional lineal and cultural descendants of the fishpond site. Upcoming activities include developing a fishpond restoration implementation plan to ensure NHO engagement throughout the project, preparing an archaeological monitoring plan, reconstructing the historic fishpond rock wall, restoring wetlands, and developing interpretive and educational products in consultation with NHOs. These activities will include volunteer days, demonstrations by traditional practitioners, and other community events.

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Military members, community volunteers, members of the Ali'i Pauahi Hawaiian Civic Club, along with crew members of the Polynesian Voyaging Society's Hōkūle'a remove trash and invasive plant species to the Loko Pa'aiau Fishpond. (U.S. Navy photo by Mass Communication Specialist 3rd Class Jessica O. Blackwell)

Appendix 1: DoD Historic Property Data

Table 1: FYs 2020 - 2022 - Percentage (and Number) of DoD Real Property by Assets Historic Status

Historic Status	FY 2020	FY 2021	FY 2022
Determined Not Eligible for Listing (DNE)	15%	15%	15%
Determined Not Eligible for Listing (DNE)	(60,897)	(62,529)	(62,733)
 Individual National Historic Landmark (NHLI)	<1%	<1%	<1%
Individual National Historic Landmark (NHLI)	(46)	(49)	(68)
Contributing Element of an NHL District (NHLC)	<1%	<1%	<1%
Contributing Element of an Wile District (Wile)	(3,062)	(3,171)	(2,991)
 Individual National Register Eligible (NREI)	1%	1%	1%
Individual National Register Eligible (NREI)	(4,096)	(3,940)	(3,866)
Contributing Flore and of NDF District (NDFC)	3%	3%	3%
Contributing Element of NRE District (NREC)	(12,141)	(11,556)	(11,272)
Individual National Register Listed (NRLI)	6%	5%	5%
litatviduai ivationai kegister Listea (ivkli)	(21,869)	(21,112)	(20,718)
Contributing Element of NRL District (NRLC)	<1%	<1%	<1%
Contributing Element of MRE District (MREC)	(2,314)	(2,188)	(2,310)
Non-Contributing element of NHL/NRL District (NCE)	<1%	<1%	<1%
Non-contributing element of NHL/NKL District (NCL)	(2,400)	(2,432)	(2,518)
 Eligible for the purposes of a Program Alternative (ELPA)	9%	9%	8%
Eligible for the purposes of a Program Alternative (ELPA)	(36,554)	(36,159)	33,688
	65%	59%	60%
Not Evaluated (NEV) ²³	(256,869)	(237,733)	(245,807)
	4%	10%	10%
Not Routinely Assessed (NAR) ²⁴	(13,981)	(40,717)	(42,306)

Table 2: FYs 2020 - 2022 - Archeological Sites listed, or eligible for listing, on the National Register of Historic Places

	FY 2020	FY 2021	FY 2022
Archaeological sites identified ²⁵	14,087	13,763	14,302

²³ NEV numbers represent all assets not evaluated regardless of the age or type of facility.

https://comptroller.defense.gov/Portals/45/Documents/afr/fy2022/DoD FY22 Agency Financial Report.pdf.

²⁴ NAR numbers represent all assets that are not routinely planned to be evaluated for eligibility.

²⁵ Archaeological sites listed in or eligible for listing in the National Register of Historic Places are reported in the DoD Agency Financial Report. FY20:

https://comptroller.defense.gov/Portals/45/Documents/afr/fy2020/DoD FY20 Agency Financial Report.pdf; and FY21:

https://comptroller.defense.gov/Portals/45/Documents/afr/fy2021/DoD FY21 Agency Financial Report.pdf; FY22:

Table 3: FYs 2020 - 2022 - DoD Buildings/Structures Not Evaluated for Historic Status

Age	FY 2020	FY 2021	FY 2022
NEV greater than or equal to 50 years old	41,435	41,486	42,206
NEV less than 50 years old	229,412	236,942	245,866
Total not evaluated for historic status	270,847	278,450	288,113

Table 4: FYs 2020 - 2022 - DoD Acres Surveyed for Archaeological Sites

	Total DoD Military Department managed acres	Acres available for archaeological survey	Acres surveyed for archaeological sites	% Surveyed
FY20	26,334,825	20,551,085	10,001,222	48.7%
FY21	26,088,533	20,864,126	10,020,533	48.0%
FY22	12,701,571	10,862,387	10,277,516	94.6%



2023 Department of Defense Response to:

Executive Order 13287, "Preserve America,"
Section 3: Reporting Progress on the
Identification, Protection, and Use of
Federal Historic Properties