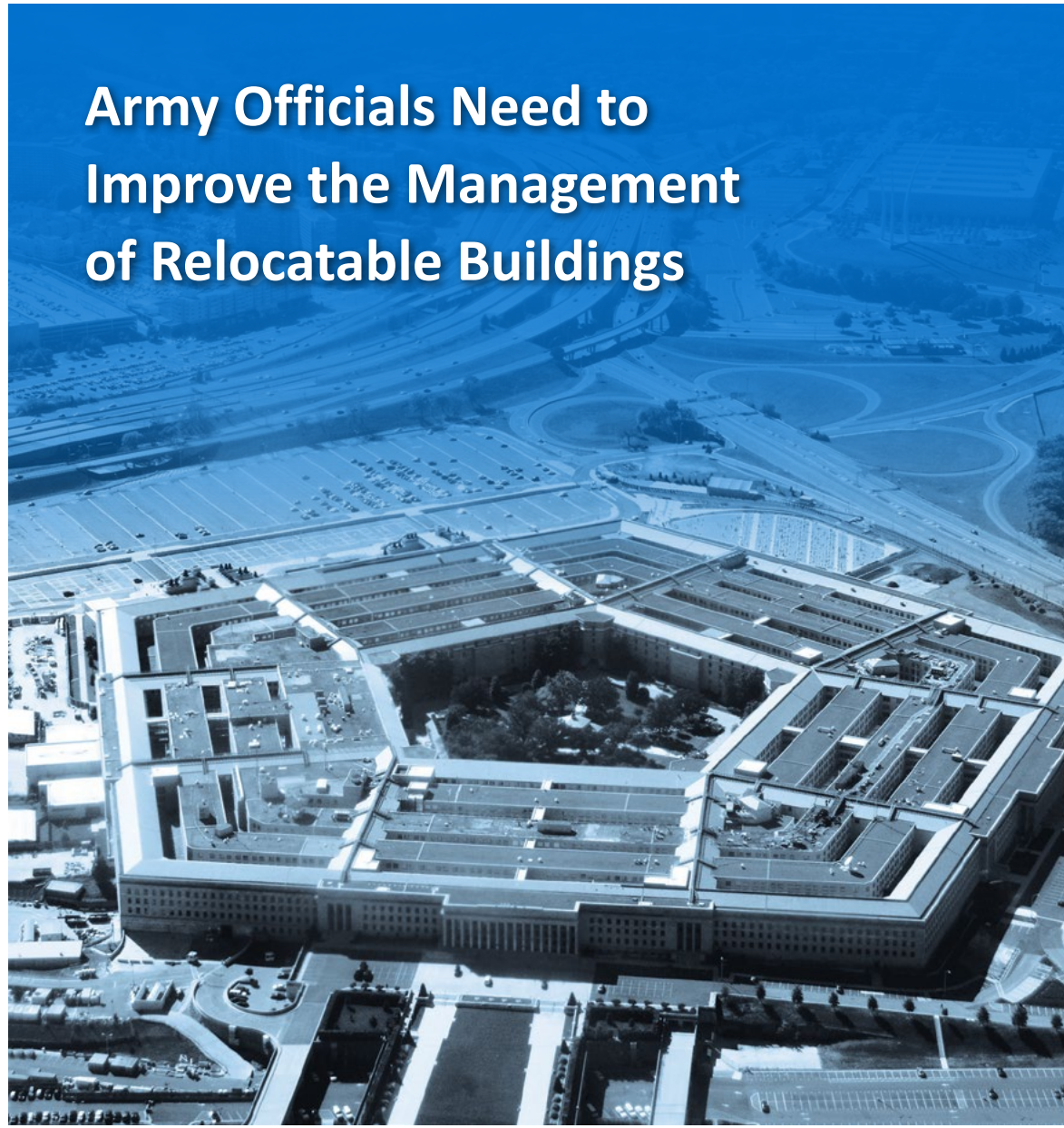




# INSPECTOR GENERAL

*U.S. Department of Defense*

FEBRUARY 16, 2017



## Army Officials Need to Improve the Management of Relocatable Buildings

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# Results in Brief

## *Army Officials Need to Improve the Management of Relocatable Buildings*

February 16, 2017

### Objective

We determined whether the Army is properly using relocatable buildings in accordance with Federal and DoD policies at four Army installations.

We performed this audit in response to DoD hotline allegations related to the misuse of relocatable buildings throughout the DoD. Rather than focusing on the allegations, we decided to perform an audit on whether the Army was properly using relocatable buildings in accordance with Federal and DoD policies.

DoD guidance defines a relocatable building as a structure designed to be readily moved, erected, disassembled, stored, and reused. Army guidance states that relocatable buildings are for interim use, usually 3 years or less but no more than 6 years.

We nonstatistically sampled 116 relocatable buildings at 4 Army installations to determine whether the buildings were properly approved, procured, and used, and whether there was an adequate strategy to discontinue use and dispose of the buildings. Of the 116 relocatable buildings, 33 buildings belonged to tenant organizations. Army officials do not have control over the approval, use, and disposition of these buildings and were unable to provide complete documentation for tenant buildings.

### Finding

Army officials obtained approvals to acquire 73 of the 83 relocatable buildings acquired under their authority. However, Army officials:

- did not always determine whether the structures obtained were relocatable based on the Army's criteria for relocatable buildings. This occurred because Army officials at the installations did not conduct the analysis required by Army guidance.
- did not ensure that relocatable buildings were used only in situations where a relocatable building was required or interim situations. This occurred because Army officials purchased relocatable buildings to meet changes in the force structure rather than purchasing real property or using minor construction authorities to meet the requirements.
- continue to use structures purchased as relocatable buildings to meet long-term requirements without documented approval or a valid exit strategy. This occurred because Army officials did not follow procedures to obtain additional approval to use relocatable buildings once the original approval expired and planned exit strategies were costly and inefficient.

Furthermore, Army officials reported inaccurate data on relocatable buildings to the Office of the Deputy Under Secretary of Defense for Installations and Environment. This occurred because U.S. Army Installation Management Command officials reported data to the Office of the Deputy Under Secretary of Defense for Installations and Environment that did not consistently incorporate installation updates to the relocatable building data such as building costs, surge status, and acquisition method.

As a result, Army officials continue to use relocatable buildings to meet long-term requirements that could have initially been met using more efficient methods below military construction thresholds, unspecified minor construction, or military construction. Additionally, Army officials' use of relocatable buildings to meet requirements may not be the most effective use of appropriated funds.



# Results in Brief

## *Army Officials Need to Improve the Management of Relocatable Buildings*

### Recommendations

We recommend that the Deputy Assistant Secretary of the Army for Installations, Housing, and Partnerships:

- revise Army regulations to align the Army definition of a relocatable building with the DoD definition, and
- develop additional policy for circumstances where requirements dictate that relocatable buildings are appropriate instead of modular buildings or minor construction.

We recommend that the Commander, U.S. Army Installation Management Command, coordinate with the Defense Logistics Agency, Disposition Services officials to streamline the demolition process once officials have determined that the opportunities for reuse or sale of relocatable buildings are minimal.

We recommend that the Chiefs of Public Works at Fort Stewart, Joint Base Lewis–McChord, Fort Campbell, and Fort Bragg submit extensions for the relocatable buildings on the installation where disposal is not imminent.

### Management Comments and Our Response

Comments from the Deputy Commanding General for the U.S. Army Installation Management Command, responding for the Chiefs, Directorate of Public Works at Fort Stewart, Joint Base Lewis–McChord, Fort Campbell, and Fort Bragg, addressed all the

specifics of the recommendations to submit extensions for the relocatable buildings on installations where disposal is not imminent. We will close these recommendations upon completion and verification of the proposed corrective actions.

As a result of management comments, we redirected the recommendations to revise Army regulations and develop additional policy to the Deputy Assistant Secretary of the Army for Installations, Housing, and Partnerships. We will close these recommendations upon completion and verification that the proposed corrective actions taken by the Deputy Assistant Secretary fully addresses our recommendations.

In addition, we revised the recommendation to the Commander, U.S. Army Installation Management Command, to streamline the demolition process in order to clarify the nature of the actions needed to streamline the demolition process for relocatable buildings. We will close this recommendation upon completion and verification that the proposed corrective action taken by the Commander fully addresses and meets the intent of our recommendation.

Please see the Recommendations Table on the next page for the status of individual recommendations.

## ***Recommendations Table***

<b>Management</b>	<b>Recommendations Unresolved</b>	<b>Recommendations Resolved</b>	<b>Recommendations Closed</b>
Deputy Assistant Secretary of the Army for Installations, Housing, and Partnerships	1.a, 1.b	None	None
Commander, U.S. Army Installation Management Command	2	None	None
Chief, Directorate of Public Works, Fort Stewart	None	3	None
Chief, Directorate of Public Works, Joint Base Lewis–McChord	None	4.a, 4.b, 4.c	None
Chief, Directorate of Public Works, Fort Campbell	None	5	None
Chief, Directorate of Public Works, Fort Bragg	None	6	None

Please provide Management Comments by March 17, 2017.





**INSPECTOR GENERAL  
DEPARTMENT OF DEFENSE  
4800 MARK CENTER DRIVE  
ALEXANDRIA, VIRGINIA 22350-1500**

February 16, 2017

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR ACQUISITION,  
TECHNOLOGY, AND LOGISTICS  
AUDITOR GENERAL, DEPARTMENT OF THE ARMY

SUBJECT: Army Officials Need to Improve the Management of Relocatable Buildings  
(Report No. DODIG-2017-057)

We are providing this report for review and comment. Army officials generally obtained approval for the use of relocatable buildings; however, officials did not always determine whether the structures obtained were relocatable based on the Army definition of a relocatable building or ensure relocatable buildings were acquired only in situations where the requirements involved mobility. In addition, Army officials continue to use structures for long-term scenarios without an approved extension or exit strategy. Army officials' use of relocatable buildings to meet requirements may not be the most effective use of appropriated funds. We conducted this audit in accordance with generally accepted government auditing standards.

We considered management comments on a draft of this report when preparing the final report. DoD Instruction 7650.03 requires that recommendations be resolved promptly. Comments from the Deputy Commanding General for the U.S. Army Installation Management Command, responding for the Chiefs, Directorate of Public Works at Fort Stewart, Joint Base Lewis-McChord, Fort Campbell, and Fort Bragg, conformed to the requirements of DoD Directive 7650.3; therefore, we do not require additional comments from them. As a result of management comments, we redirected Recommendations 1.a and 1.b to the Deputy Assistant Secretary of the Army for Installations, Housing, and Partnerships and revised Recommendation 2. Therefore, we request that the Deputy Assistant Secretary of the Army for Installations, Housing, and Partnerships comment on Recommendations 1.a and 1.b and the Commander, U.S. Army Installation Management Command, comment on Recommendation 2 by March 17, 2017.

Please send a PDF file containing your comments to [audcmp@dodig.mil](mailto:audcmp@dodig.mil). Copies of your comments must have the actual signature of the authorizing official for your organization. We cannot accept the /Signed/ symbol in place of the actual signature. If you arrange to send classified comments electronically, you must send them over the SECRET Internet Protocol Router Network (SIPRNET).

We appreciate the courtesies extended to the staff. Please direct questions to me at [Michael.Roark@dodig.mil](mailto:Michael.Roark@dodig.mil), (703) 604-9187 (DSN 664-9187).

A handwritten signature in black ink, appearing to read "M. Roark", is positioned above the typed name.

Michael J. Roark  
Assistant Inspector General  
Contract Management and Payments

# Contents

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## Introduction

Objective .....	1
Background .....	1
Review of Internal Controls .....	6

## Finding. IMCOM and Installation Personnel Need Improved Plans and Processes for the Use of Relocatable Buildings

DPW Officials Obtained Approvals for Relocatable Buildings .....	8
Army Officials Did Not Determine Whether Buildings Met the Army’s Criteria for Relocatable Buildings .....	8
Army Officials Obtained Buildings That Did Not Need to Be Relocatable and Were Not Relocatable .....	9
Army Officials Did Not Obtain Extensions or Have Exit Strategies for Using Relocatable Buildings .....	12
IMCOM Database of the Army’s Relocatable Buildings is Not Accurate .....	18
Conclusion .....	19
Recommendations, Management Comments, and Our Response .....	19

## Appendixes

Appendix A. Scope and Methodology .....	25
Universe and Sample Information .....	25
Review of Documentation and Interviews .....	27
Use of Computer-Processed Data .....	28
Prior Coverage .....	28
Appendix B. Relocatable Building Reviewed .....	29

## Management Comments

Assistant Chief of Staff for Installation Management .....	36
U.S. Army Installation Management Command .....	37

## Acronyms and Abbreviations



# Introduction

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## Objective

We determined whether the Army is properly using relocatable buildings in accordance with Federal and DoD policies. See Appendix A for scope and methodology related to the audit objective.

## Background

We received DoD hotline allegations related to the misuse of relocatable buildings throughout the DoD. The allegations expressed concerns that DoD officials used the incorrect funding type when acquiring hundreds of relocatable buildings because the buildings are not truly relocatable. Specifically, we determined that we would perform an audit on whether the Army is properly using relocatable buildings in accordance with Federal and DoD policies.

### ***DoD Instruction 4165.56***

As defined by DoD Instruction 4165.56, “Relocatable Buildings,” January 7, 2013, a relocatable building is:

a habitable prefabricated structure that is designed and constructed to be readily moved (transportable over public roads), erected, disassembled, stored, and reused. Also included in the definition are tension fabric structures assembled from modular components and air supported domes, both of which can be easily disassembled, moved, and reused.

DoD personnel may use relocatable buildings classified as equipment that are used to satisfy interim facility requirements for a period longer than 5 years when: supporting contingency operations; permanent construction is funded and not completed; or funds are programmed and prioritized in the components budget request. DoD Components must report their inventory of leased and owned relocatable buildings classified as equipment to the Office of the Deputy Under Secretary of Defense for Installations and Environment (DUSD[I&E]) at the end of each fiscal year by December 31st. In their report to the Office of the DUSD(I&E), DoD Components must also include relocatable buildings occupied by tenant organizations on their installations. Figure 1 shows an example of a relocatable building on Joint Base Lewis–McChord (JBLM).



Figure 1. Relocatable Building on JBLM  
Source: DoD OIG.

### ***Army Regulation 420-1***

Army Regulation (AR) 420-1, “Army Facilities Management,” revised August 24, 2012, states that the sum of building disassembly, repackaging, and nonrecoverable building components must not exceed 20 percent of the purchase cost of the relocatable building. If the calculated costs exceed the 20 percent, the relocatable building must be acquired and tracked as real property instead of equipment. A previous version of DoD Instruction 4165.56 also contained the same requirement; however, DoD officials updated DoD Instruction 4165.56 in January 2013 and removed the 20 percent requirement. The AR 420-1 was not updated after the revisions to DoD Instruction 4165.56.

On February 8, 2008, the Office of the Assistant Secretary of the Army (Installations and Environment), issued a memorandum<sup>1</sup> that superseded sections of the previous AR 420-1. The memorandum states that relocatable buildings are for interim use, usually 3 years or less but no more than 6 years. U.S. Army Installation Management Command (IMCOM) personnel approve requests to acquire relocatable buildings. On February 22, 2011, the Army’s Assistant Chief of Staff for Installation Management (ACSIM) issued a memorandum<sup>2</sup> delegating to the Deputy Commander,

<sup>1</sup> Office of the Assistant Secretary of the Army (Installations and Environment) memorandum, “Delegation of Authority-Relocatable Buildings,” February 8, 2008.

<sup>2</sup> Assistant Chief of Staff for Installation Management memorandum, “Relocatable Buildings Delegation of Authority,” February 22, 2011.

IMCOM, authority to approve new relocatable buildings not to exceed 6 years or extend existing relocatable buildings not to exceed 6 years. In the memorandum, the ACSIM stated that a change in the location, building use, and organization requires a new approval.

### ***IMCOM Operations Orders***

In December 2012, IMCOM personnel issued Operations Order 13-056, “IMCOM Re-locatable Buildings Reduction,” with the intent of reducing the number of relocatable buildings to reduce expenses. To meet this goal, IMCOM officials initiated a mandatory 10-percent reduction of relocatable buildings in FY 2013 and a 25-percent reduction in both FY 2014 and FY 2015. This strategy would result in a 60-percent reduction of the current relocatable building inventory by the end of FY 2015 and complete disposal of relocatable buildings by FY 2018.

In January 2016, IMCOM personnel issued Operations Order 16-037, “Relocatable Building Reduction,” which superseded Operations Order 13-056. In the order, IMCOM officials stated, “the IMCOM [relocatable building] inventory remains unsustainable due in part to discrepancies between DoD and IMCOM reporting processes of [relocatable buildings] inventories.” Additionally, IMCOM personnel recognized that no metrics existed to track when relocatable building approvals will expire. Without accurate information, IMCOM personnel cannot properly allocate limited funds to sustain and dispose of relocatable buildings. Operations Order 16-037 states that, no later than August 12, 2016, and annually thereafter, garrisons will improve processes in reporting relocatable buildings and provide an inventory update to continue efforts to completely divest relocatable buildings from across IMCOM.

### ***Memorandum of Agreement between Defense Logistics Agency Disposition Services and IMCOM***

In September 2014, Defense Logistics Agency-Disposition Services (DLA-DS) and IMCOM personnel signed a memorandum of agreement that outlined mutually agreeable disposal processing for excess relocatable buildings in support of IMCOM Operations Order 13-056. In the memorandum of agreement, DLA-DS personnel receive relocatable buildings in place and add the buildings to the DLA-DS inventory. Once DLA-DS personnel add the building to the inventory, they screen the property through the reutilization, transfer, donation, and sales process in

efforts to redistribute to a customer or sell through a DLA-DS scrap sales partner. If this effort fails, the party that originally turned the building into DLA-DS for disposal has 30 days to either:

1. provide funding to DLA-DS for ultimate disposal through a service contract or
2. take back accountability of the relocatable building through submission of a requisition for the property.

### ***Army's Relocatable Buildings, Sites Visited, and Sample***

Using the Office of the DUSD(I&E)'s FY 2013 report on the DoD's inventory of relocatable buildings, we determined that the Army had the highest number of relocatable buildings in the DoD at that time. See Table 1 for the number of relocatable buildings each of the Services reported to the Office of the DUSD(I&E) for FY 2013 and the associated square footage.

*Table 1. Relocatable Buildings Reported to the Office of the DUSD(I&E) for FY 2013*

Service	Number of Relocatable Buildings	Square Footage of Relocatable Buildings
Army	2209	8,027,759
Navy and Marine Corps	1548	3,250,516
Air Force	218	1,709,410
<b>Total</b>	<b>3975</b>	<b>12,987,685</b>

We obtained the FY 2014 report shortly before announcing the project. We compared the number of relocatable buildings Army personnel reported to the Office of the DUSD(I&E) in FY 2013 and FY 2014 to determine what sites we would visit. We considered the total number of relocatable buildings on the base and whether relocatable buildings were disposed of, or acquired, from FY 2013 to FY 2014. See Table 2 for the four bases we judgmentally selected to visit and the number of relocatable buildings reported to the Office of the DUSD(I&E) for FY 2013 and FY 2014 for each location.

*Table 2. Bases the Audit Team Visited*

Base	Relocatable Buildings Reported in FY 2013	Relocatable Buildings Reported in FY 2014	Change
Fort Stewart	333	142	-191
Joint Base Lewis–McChord	237	243	+6
Fort Campbell	145	130	-15
Fort Bragg	134	135	+1

We nonstatistically selected a sample of 127 relocatable buildings at 4 Army installations. For each of these installations, we reviewed about 30 relocatable buildings to assess whether they were properly approved, procured, used, and whether there was an adequate strategy to discontinue use and dispose of the building. We also included 11 relocatable buildings identified as surge in the Office of the DUSD(I&E) report (meaning they are being used for a contingency operation), in our nonstatistical sample, but for those buildings we verified only that they were being used for that purpose and did no further analysis. See Table 3 for the number of relocatable buildings in our nonstatistical sample for four of the installations visited and the number of relocatable buildings listed as surge in the nonstatistical sample. See Appendix B for a list of relocatable buildings reviewed.

*Table 3. Number of Surge and Non-Surge Relocatable Buildings in Audit Sample*

Base	Non-Surge Relocatable Buildings in Audit Sample	Surge Relocatable Buildings in Audit Sample
Fort Stewart	23	5
Joint Base Lewis–McChord	33	1
Fort Campbell	30	5
Fort Bragg	30	0
<b>Total</b>	<b>116</b>	<b>11</b>

DoD Instruction 4165.56 required Army officials to include relocatable buildings occupied by tenant organizations on their installations in their report to the Office of the DUSD(I&E). Of the 116 non-surge relocatable buildings, 33 buildings belonged to tenant organizations such as the U.S. Army Medical Command or DoD Education Activity. Although Army officials reported these 33 buildings to the Office of the DUSD(I&E), they do not have control over the use or disposal of the tenants' buildings. As a result, Army officials were unable to provide complete documentation for some tenants' relocatable buildings. See Table 4 for the number of tenant buildings per installation in our nonstatistical sample of 116 relocatable buildings.

*Table 4. Number of Tenant Relocatable Buildings in Nonstatistical Sample*

Base	Non-Tenant Relocatable Buildings in Audit Sample	Tenant Buildings in Audit Sample
Fort Stewart	10	13
Joint Base Lewis–McChord	26	7
Fort Campbell	21	9
Fort Bragg	26	4
<b>Total</b>	<b>83</b>	<b>33</b>

## Review of Internal Controls

DoD Instruction 5010.40<sup>3</sup> requires DoD organizations to implement a comprehensive system of internal controls that provides reasonable assurance that programs are operating as intended and to evaluate the effectiveness of the controls. We identified internal control weaknesses regarding the continued use and disposal of relocatable buildings within the Army. We will forward a copy of the report to the senior official responsible for internal controls for the Army.

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<sup>3</sup> DoD Instruction 5010.40, "Managers' Internal Control Program Procedures," May 30, 2013.

## Finding

### IMCOM and Installation Personnel Need Improved Plans and Processes for the Use of Relocatable Buildings

Army officials obtained approvals to acquire 73 of 83<sup>4</sup> relocatable buildings acquired under their authority. However, Army officials:

- did not always determine whether the structures obtained were relocatable based on the Army's criteria for relocatable buildings.<sup>5</sup> This occurred because Army officials at the installations did not conduct the analysis required by Army guidance.
- did not ensure that relocatable buildings were used only in situations where a relocatable building was required or interim situations. This occurred because Army officials purchased relocatable buildings to meet changes in the force structure rather than purchasing real property or using minor construction authorities to meet the requirements.
- continue to use structures purchased as relocatable buildings to meet long-term requirements without documented approval or a valid exit strategy. This occurred because Army officials did not follow procedures to obtain additional approval to use relocatable buildings once the original approval expired and planned exit strategies were costly and inefficient.

Furthermore, Army officials reported inaccurate data on relocatable buildings to the Office of the DUSD(I&E). This occurred because IMCOM officials reported data to the Office of the DUSD(I&E) that did not consistently incorporate installation updates to the relocatable building data such as building costs, surge status, and acquisition method.

As a result, Army officials continue to use relocatable buildings to meet long-term requirements that could have initially been met using more efficient methods below military construction thresholds, unspecified minor construction, or military construction. Additionally, Army officials' use of relocatable buildings to meet requirements may not be the most effective use of appropriated funds.

<sup>4</sup> Army officials did not maintain complete files for all tenant organizations on the installation. We did not include those buildings in our overall numbers.

<sup>5</sup> AR 420-1, states that the sum of building disassembly, repackaging, and nonrecoverable building components must not exceed 20 percent of the purchase cost of the relocatable building.

## DPW Officials Obtained Approvals for Relocatable Buildings

Directorate of Public Works (DPW) officials at the 4 installations obtained approval to acquire 73 of 83 relocatable buildings under their authority. Our nonstatistical sample of relocatable buildings contained buildings acquired by DoD personnel as far back as 1975,<sup>6</sup> and approval paperwork from the Army was not available for review in some instances. We are not making a recommendation because IMCOM officials issued Operations Order 16-037 requiring garrisons to continue efforts to completely divest relocatable buildings and the missing approvals are for buildings purchased at least 5 years ago or longer. For the 11 relocatable buildings identified as surge in the Office of the DUSD(I&E) report in our nonstatistical sample, we determined that 6 were being used for that purpose and 5 were not. We performed no further analysis on these buildings.

Directorate of Public Works (DPW) officials at the 4 installations obtained approval to acquire 73 of 83 relocatable buildings under their authority.

## Army Officials Did Not Determine Whether Buildings Met the Army's Criteria for Relocatable Buildings

Army officials did not conduct the required analysis to determine whether buildings met the Army's criteria for relocatable buildings. AR 420-1 states that the sum of building disassembly, repackaging, and nonrecoverable building components must not exceed 20 percent of the purchase cost of the relocatable building. Army officials at the installations visited stated that other commands, such as the U.S. Army Corps of Engineers, performed this analysis.

### ***Army Personnel Relied on the U.S. Army Corps of Engineers to Determine Whether Relocatable Buildings Comply With AR 420-1***

Army DPW personnel did not include any documentation with details about the completion of analysis assessing whether a building met AR 420-1 requirements; however, Army officials included the additional analysis requirement that is no longer required by DoD Instruction 4165.56. Army personnel stated that they relied on the U.S. Army Corps of Engineers to assess whether a building met AR 420-1 requirements. AR 420-1 states that if the identified costs exceed the 20 percent requirements, Army personnel should track the assets as real

<sup>6</sup> Army officials acquired five of the relocatable buildings in our sample before FY 2000.



property. Army DPW personnel did not have documentation that the analysis was performed by the U.S. Army Corps of Engineers and we did not verify with the U.S. Army Corps of Engineers that they performed the analysis. DoD Instruction 4165.56 defines relocatable buildings similarly to the definition in AR 420-1; however, DoD Instruction 4165.56 contains no similar requirement analyzing disassembly, repackaging, and nonrecoverable costs. DoD officials updated DoD Instruction 4165.56 in January 2013 and removed the 20 percent requirement. Army officials did not update the AR 420-1 after the revisions to DoD Instruction 4165.56. According to Army officials, they are in the process of updating AR 420-1 and will consider removing the 20 percent requirement in the updated regulation.

### ***Calculating Compliance with AR 420-1 Requires Estimating Unpredictable Future Costs Associated with Disassembly***

Army DPW personnel stated that the U.S. Army Corps of Engineers performed analysis to determine whether a building should be tracked as equipment or real property based on the disassembly, repackaging, and nonrecoverable costs. In order to comply with AR 420-1, Army personnel were required to predict and calculate costs that would be incurred many years in the future. The Deputy Assistant Secretary of the Army for Installations, Housing, and Partnerships should revise AR 420-1 to align the Army's definition of relocatable buildings to the overall DoD definition in DoD Instruction 4165.56, thus eliminating the requirement for analysis pertaining to the disassembly, repackaging, and nonrecoverable costs of relocatable buildings.

### **Army Officials Obtained Buildings That Did Not Need to Be Relocatable and Were Not Relocatable**

Army officials obtained relocatable buildings that did not need to be relocatable to meet requirements and in some cases were not relocatable. Therefore, Army officials purchased relocatable buildings to meet changes in their force structure requirements instead of purchasing real property or completing minor construction projects.

### ***Army Officials Acquired Buildings That Were Not Required to be Relocatable***

Army officials obtained 76 of the 83 relocatable buildings at the 4 installations that would not require a relocatable building to meet the Army's needs, potentially increasing costs and decreasing competition because another vendor may have been able to meet the requirement with another type of structure. Army officials used some of the 76 relocatable buildings as office space, barracks, and storage that

would not necessarily require it to be a relocatable building. Army officials used only seven buildings as vehicle maintenance facilities that potentially needed to be relocated to meet the Army's needs. Army DPW personnel stated that obtaining new relocatable buildings would be more cost-effective than moving existing relocatable buildings.

Army officials purchased relocatable buildings to meet changes in their force structure requirements instead of purchasing real property or completing minor construction projects. For example, JBLM officials stated they obtained relocatable buildings because no other structure could be constructed to meet their space needs on such a short timeframe. In some cases, IMCOM officials approved relocatable buildings when a pending construction project was programmed for execution. However, after the relocatable building was set up, Army officials canceled the construction project. The Deputy Assistant Secretary of the Army for Installations, Housing, and Partnerships should develop additional policy to define circumstances where relocatable buildings are appropriate instead of modular facilities or other minor construction. Figure 2 shows examples of tent-like relocatable buildings called sprung shelters. These relocatable buildings are vehicle maintenance buildings on Fort Stewart, Georgia.



Figure 2. Relocatable Sprung Shelters on Fort Stewart  
Source: DoD OIG.

## ***Army Officials Acquired Buildings That Were Not Easily Relocatable***

JBLM officials reported in their inventory of relocatable buildings, six buildings in our nonstatistical sample that are not easily relocatable without significant damage to the structure. Office of Secretary of Defense officials stated that the buildings similar to Figure 3 below were clearly permanent construction and not a temporary structure as defined by DoD relocatable regulations. DoD Instruction 4165.56 defines a relocatable building as a “habitable prefabricated structure that is designed and constructed to be readily moved (transportable over public roads), erected, disassembled, stored, and reused.”

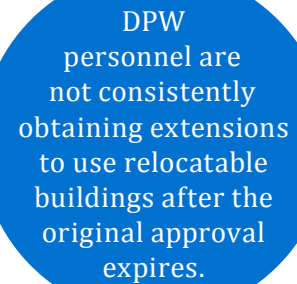
JBLM personnel purchased relocatable buildings that do not meet DoD Instruction 4165.56’s definition of a relocatable building because it cannot be readily moved (transportable over public roads), erected, disassembled, stored, and reused. JBLM personnel used five of the six buildings they considered relocatable as vehicle maintenance facilities that would not be easily relocatable. See Figure 3 for a picture of one of the vehicle maintenance facilities on JBLM. JBLM and Army officials should determine the proper method to convert the six nonrelocatable buildings from relocatable to real property.



Figure 3. Vehicle Maintenance Facility on JBLM  
Source: JBLM Community Planner.

## Army Officials Did Not Obtain Extensions or Have Exit Strategies for Using Relocatable Buildings

DPW personnel are not consistently obtaining extensions to use relocatable buildings after the original approval expires and once DPW personnel no longer need the relocatable buildings, the disposal process is costly and time consuming. At each of the four installations visited, DPW officials experienced unique situations while eliminating the need for and disposing of relocatable buildings.



DPW personnel are not consistently obtaining extensions to use relocatable buildings after the original approval expires.

### ***Army DPW Personnel Are Not Obtaining Extensions to Continue Using Relocatable Buildings Past the Original Approval Period***

DPW personnel are not consistently obtaining extensions to use relocatable buildings after the original approval expires. Of the 83 relocatable buildings reviewed, 67 were past the original approval date. DPW personnel requested an extension from IMCOM for 29 relocatable buildings. IMCOM approved 4 of the 29 extension requests. For 38 of the buildings past expiration, DPW personnel did not request approvals to continue using the relocatable buildings as of January 2016. However, DPW personnel did identify instances where they provided requests to IMCOM, but according to installation personnel, no response was received. See Appendix B for the status of extension requests per installation visited including the extensions needed, requested, and approved by IMCOM.

According to DPW personnel, one reason they did not submit extension requests was because installation officials were waiting on an updated Total Army Analysis study so they could determine which relocatable buildings they actually need. The Chiefs, Directorate of Public Works for Fort Stewart, Fort Campbell, Fort Bragg, and JBLM should submit requests for extensions for the relocatable buildings on the installation where disposal is not imminent.

## ***Army DPW Personnel Do Not Have an Efficient Process to Discontinue Use and Dispose of Relocatable Buildings***

Army officials at all four locations use processes for exiting from relocatable buildings that are costly and time consuming. Army officials at each of the four installations encountered unique situations while eliminating the need for and disposing of relocatable buildings. Specifically, the inefficiencies occurred because:

- IMCOM personnel issued operations orders directing installations to remove relocatable buildings even though adequate space to relocate personnel is unavailable. For example, Fort Bragg personnel explained that they continue to use older wood structures that they want to dispose of before the relocatable buildings.
- DLA-DS and IMCOM personnel signed a memorandum of agreement that requires a lengthy disposition process to be completed for each building even in cases when the likely outcome will be to demolish the buildings.
- tenant organizations control the use and disposal of their relocatable buildings; therefore, DPW personnel are not able to develop an exit strategy for those buildings.

Army personnel experienced obstacles executing the existing strategies for the relocatable buildings based on factors such as geographical locations and mission requirements. The following sections explain the circumstances at each of the four installations visited.

### ***Fort Stewart Officials Had Acceptable Exit Strategies***

Fort Stewart officials had acceptable exit strategies for nine of the ten relocatable buildings reviewed and are disposing of vacant relocatable buildings through DLA-DS. According to the Office of the DUSD(I&E) report, Fort Stewart personnel disposed of 191 relocatable buildings from FY 2013 through FY 2014. The Fort Stewart Chief of the Real Property Branch stated that DPW officials are turning in about 20 to 30 buildings per quarter to DLA-DS, and DLA-DS personnel have been successful at selling the relocatable buildings. The Chief stated that DPW officials could turn in more than 20 to 30 buildings a quarter, but they are doing it in increments to avoid flooding the market and driving prices down.

Fort Stewart officials stated that they are working with their onsite DLA-DS representative to remove vacant relocatable buildings from the installation by selling the buildings for reuse or scrap. The Fort Stewart DLA-DS Property Disposal Specialist explained that he inspects the building before advertising it for reutilization or donation. If the disposal specialist is unable to find a suitable reuse for the property through the advertisement, the specialist downgrades

the building to scrap with an estimated weight of 30,000 pounds. The disposal specialist explained that when the relocatable buildings are put on base, the axles and tires must be removed to meet city codes; therefore, when the buildings are sold, the buyers must bring axles and tires for removal.

Fort Stewart DPW personnel had acceptable exit strategies for most of the relocatable buildings not yet sold or scheduled to be sold. For example, for some of the relocatable buildings reviewed, Fort Stewart DPW personnel provided a document showing a military construction project that must be completed before they can move personnel out of the relocatable building. DPW personnel plan to turn the relocatable buildings into DLA-DS for disposal once the construction project is completed. Figure 4 shows a field where relocatable buildings being used as barracks once stood on Fort Stewart before being converted to scrap and sold to a third party.



Figure 4. Field on Fort Stewart Where Relocatable Buildings Were Removed  
Source: DoD OIG.

### ***Fort Bragg Personnel Still Need Relocatable Building Space***

Fort Bragg personnel stated that they still have a need for most of the 26 relocatable buildings, and the installation's priority is to replace older buildings before disposing of the relocatable buildings. Because of this, Fort Bragg personnel do not have exit strategies for most of the relocatable buildings reviewed. The Fort Bragg Deputy Garrison Commander stated that the Commanding General's priority is to replace World War II wood structures before the relocatable buildings. The Deputy Garrison Commander stated that although the Army's personnel numbers are decreasing, Fort Bragg has lost only about 800 troops; therefore, the relocatable building space is still required. Fort Bragg officials stated that they use the relocatable buildings as temporary space for troops transitioning to different assignments. For example, Fort Bragg DPW personnel explained that troops returning from deployments for the Ebola mission in Africa stayed in relocatable buildings during the time the troops were required to be in quarantine. The Fort Bragg, Chief, Master Planning Division, explained that Fort Bragg officials could discontinue use of relocatable buildings by 2018; however, the Chief doubted funding would be available because the priority is to first get out of World War II wood structures. IMCOM officials issued Operations Order 16-037 on January 21, 2016, directing garrisons to submit requests for extensions for all relocatable buildings requiring an extension (for example, buildings with expired or expiring approval). At the time of our site visit, Fort Bragg officials had prepared requests for extensions for the majority of the relocatable buildings requiring extensions; however, the extensions had not been submitted to IMCOM officials for approval. The Chief, DPW, Fort Bragg, should submit extensions for the relocatable buildings on the installation where disposal is not imminent.

### ***JBLM Personnel Not Following Memorandum of Agreement Between IMCOM and DLA-DS***

JBLM personnel are not following the memorandum of agreement between IMCOM and DLA-DS for relocatable buildings because they explained that demolishing the relocatable buildings is more cost-effective than selling the relocatable buildings to a third party. The JBLM, Chief, Master Planning Division, explained that the most economical method for JBLM officials is to use a demolition contract the Army has with the U.S. Army Corps of Engineers, Seattle District, to dispose of the relocatable buildings. The Chief explained that the cost for a non-government source to purchase the relocatable buildings is high because the purchaser has to obtain permits and inspections to move the relocatable buildings from the installation. Previous attempts by JBLM and DLA-DS officials to dispose of relocatable buildings by selling them to non-government sources or selling the relocatable buildings for scrap were unsuccessful.

The JBLM, DLA-DS representative stated that he attempted to dispose of relocatable buildings to other Government agencies; however, no other agency had interest in the buildings. He explained that unlike other geographical areas where a market exists for used relocatable buildings, that is not the case in the Washington state area. The Chief, DPW, JBLM, should coordinate with IMCOM and DLA-DS officials to streamline the demolition process once officials have determined that opportunities for reuse or sale of relocatable buildings are minimal. In addition, IMCOM officials should coordinate with the DLA-DS officials to streamline the demolition process once officials have determined that the opportunities for reuse or sale of relocatable buildings are minimal.

JBLM DPW personnel had acceptable exit strategies for 17 of the 26 relocatable buildings not yet disposed of. For example, for some of the relocatable buildings reviewed, JBLM DPW personnel provided a document showing a military construction project that must be completed before they can move personnel out of the relocatable building. JBLM personnel planned to demolish the relocatable buildings. JBLM DPW personnel did not have exit strategies for four of the vehicle maintenance facilities on JBLM. According to the JBLM Community Planner, the vehicle maintenance facilities are in high demand; therefore, they do not have an exit plan for these facilities and plan to keep them until the buildings are no longer useable. JBLM officials' plan to continue using the current structures for vehicle maintenance facilities does not meet the DoD's policy for eliminating the use of relocatable buildings. We are not making a recommendation concerning exit strategies for the remaining relocatable buildings because JBLM officials have a high need for these structures.

### ***Fort Campbell Had Acceptable Exit Strategies for All Relocatable Buildings***

Fort Campbell DLA-DS personnel explained that they attempted to dispose of their excess relocatable buildings in accordance with the memorandum of agreement between IMCOM and DLA-DS for relocatable buildings. However, after multiple failed sales attempts, DPW and DLA-DS personnel are working together to streamline the demolition process. The Fort Campbell, Chief, Master Planning Division, explained that in some cases, the relocatable buildings were sold only to have the buyers abandon the buildings after realizing the costs associated with moving the buildings from the installation. Once the buyer abandons the buildings, DLA-DS personnel must start the sales process over again, creating the additional costs to both sustain the buildings and repeat the disposal process. The Fort Campbell, Facility Manager, explained that the majority of the relocatable buildings are empty and ready to be demolished.



The Fort Campbell DLA-DS site supervisor explained that DLA-DS officials follow the memorandum of agreement between IMCOM and DLA-DS for relocatable buildings. The site supervisor explained that when DPW personnel first turn a relocatable building into DLA-DS for disposal, DLA-DS personnel record the building and attempt to resell the building. The site supervisor concluded after many unsuccessful attempts to sell the relocatable buildings that it would be cheaper and easier to demolish the buildings. She stated that DLA-DS would not attempt to sell any more relocatable buildings and that she gave the Fort Campbell, Community Planner, the authorization to demolish the buildings. Fort Campbell personnel are using a process that follows applicable criteria to dispose of relocatable buildings and continued attempts to sell the relocatable buildings are not efficient or cost-effective. Therefore, we are not making a recommendation.

Fort Campbell DPW personnel had acceptable exit strategies for all of the relocatable buildings not yet demolished. For most of the relocatable buildings reviewed, DPW personnel stated that they prepared them for demolition by removing all furniture and appliances. According to IMCOM officials, they provided Fort Campbell funding for the disposal of relocatable buildings in April 2016. The Chief, Directorate of Public Works for Fort Campbell should submit requests for extensions for the relocatable buildings on the installation where disposal is not imminent.

### ***DPW Officials Do Not Have Control Over the Use Or Disposal of Tenant Organization Relocatable Buildings***

DPW personnel at the installations visited do not have control over the use or disposal for 33 of 116 relocatable buildings in our nonstatistical sample for tenants on their installations; therefore, DPW personnel are not able to develop an exit strategy for those buildings. Tenant organizations, such as the DoD Education Activity and the U.S. Army Medical Command, had relocatable buildings on the installations visited that were included in our nonstatistical sample. DPW personnel accounted for the tenant organization's relocatable buildings when they reported inventory to IMCOM officials for inclusion in the Office of the DUSD(I&E) annual relocatable buildings report. For example, the U.S. Army Medical Command officials placed three relocatable buildings on JBLM that are used as embedded behavioral health clinics. JBLM officials explained that the U.S. Army Medical Command personnel are responsible for getting approvals and extensions and developing exit plans for those buildings. According to DPW officials, the behavioral health clinic relocatable buildings are needed until a military construction project is completed; however, Army DPW officials have no knowledge

of the date for completion. According to DPW officials, they cannot control the use or disposal of relocatable buildings belonging to tenant organizations. We limited our review to the information available from DPW personnel and did not contact tenant organizations for additional documentation.

## IMCOM Database of the Army's Relocatable Buildings is Not Accurate

IMCOM officials do not have an accurate inventory of relocatable buildings and in many cases cannot accurately report the purchase or sustainment costs for the relocatable buildings through the ACSIM to the Office of the DUSD(I&E). DoD Components report their inventory of leased and owned relocatable buildings classified as equipment to the Office of the DUSD(I&E) at the end of each fiscal year by December 31st as required by DoD Instruction 4165.56. DPW personnel report details of relocatable building inventory to IMCOM. IMCOM officials compile the information and send it to the ACSIM, who submits it to the Office of the DUSD(I&E). DPW personnel stated that they routinely sent updated information to IMCOM officials that was not reflected in subsequent reports.

ACSIM officials submitted data they received from IMCOM for the Office of the DUSD(I&E) FY 2014 relocatable building report related to the buildings in our nonstatistical sample that contained some errors concerning the purchase cost of the facility and the current use of the facility. For example, five relocatable buildings in our nonstatistical sample for Fort Campbell were classified as surge in the Office of the DUSD(I&E) report (meaning they are being used for a contingency operation). Fort Campbell personnel did not include verification in the files for these five buildings to document the relocatable buildings were supporting a contingency operation as the Office of the DUSD(I&E) report indicated. The Fort Campbell, Chief, Master Planning Division, confirmed that none of the buildings on Fort Campbell should be considered surge; therefore, the Office of the DUSD(I&E) report was inaccurate.<sup>7</sup>

IMCOM officials stated that they are working to correct the inaccuracies in the Office of the DUSD(I&E) report by reconciling what is reported in the General Fund Enterprise Business System with what the garrisons are reporting to IMCOM on relocatable buildings. Because IMCOM officials have taken action to correct the inaccuracies in the DUSD(I&E) report, we are not making a recommendation on this matter.

<sup>7</sup> We performed no further analysis on these five buildings once we determined that they were incorrectly classified as surge.

## Conclusion

Army DPW officials at the installations visited generally obtained approval to acquire relocatable buildings. However, Army officials at the installations did not always ensure that structures obtained were and needed to be relocatable based on criteria outlined in AR 420-1 because officials at the installations did not conduct the analysis required by the regulation. In addition, Army officials did not ensure the buildings acquired were used only in interim situations or circumstances requiring a relocatable building because Army officials acquired the relocatable buildings rather than purchase real property to meet long-term changes in force structure. Furthermore, Army officials do not have documented approval for the extended long-term use of relocatable buildings on their installations because they are not consistently obtaining extensions to use relocatable buildings after the original approval expires. In addition, Office of the DUSD(I&E) officials do not have an accurate inventory of Army relocatable buildings because IMCOM officials did not report changes in their data submission provided by the installations. As a result, Army officials continue to use relocatable buildings to meet requirements that could have initially been met using more efficient methods below military construction thresholds, unspecified minor construction, or military construction, and may not be the making the most effective use of appropriated funds.

## Recommendations, Management Comments, and Our Response

### ***Redirected and Revised Recommendations***

As a result of management comments, we redirected Recommendations 1.a and 1.b to the Deputy Assistant Secretary of the Army for Installations, Housing, and Partnerships, who has the authority to implement the recommendations. In addition, we revised Recommendation 2 to clarify the nature of the actions needed to streamline the disposal process for relocatable buildings.

### ***Recommendation 1***

**We recommend that the Deputy Assistant Secretary of the Army for Installations, Housing, and Partnerships:**

- a. **Revise Army Regulation 420-1, “Army Facilities Management” to align the Army’s definition of relocatable buildings to the definition in DoD Instruction 4165.56, “Relocatable Buildings,” thus eliminating the requirement for the analysis pertaining to the disassembly, repackaging, and nonrecoverable costs of relocatable buildings.**

- b. Develop additional policy for circumstances where requirements would dictate that relocatable buildings are appropriate instead of modular facilities or other minor construction.**

*Deputy Assistant Secretary of the Army for Installations, Housing, and Partnerships Comments*

The Deputy Assistant Secretary of the Army for Installations, Housing, and Partnerships did not respond to Recommendations 1.a and 1.b because we redirected the recommendations to the Deputy Assistant Secretary from the draft version of this report.

*Our Response*

Because the comments from the Office of the Assistant Chief of Staff for Installation Management requested we redirect the recommendations, we consider the recommendations to be unresolved. We request that the Deputy Assistant Secretary provide comments on the final report. We will close Recommendations 1.a and 1.b upon completion and verification that the actions taken by the Deputy Assistant Secretary of the Army for Installations, Housing and Partnerships fully addresses the recommendations.

***Recommendation 2***

**We recommend that the Commander, U.S. Army Installation Management Command, coordinate with the Defense Logistics Agency, Disposition Services officials to streamline the demolition process once officials have determined that the opportunities for reuse or sale of relocatable buildings are minimal.**

*Commander, U.S. Army Installation Management Command Comments*

The Deputy Commanding General, U.S. Army Installation Management Command, responding for the Commander, U.S. Army Installation Management Command, disagreed, stating that per the memorandum of agreement, the Defense Logistics Agency returns relocatable buildings to the U.S. Army Installation Management Command when the Defense Logistics Agency cannot sell or scrap the buildings. The Deputy Commanding General stated that it is implied that the U.S. Army Installation Management Command will dispose of relocatable buildings upon return from the Defense Logistics Agency and U.S. Army Installation Management Command personnel would follow up with Defense Logistics Agency personnel to ensure they interpret the memorandum in these terms.

### *Our Response*

Because the Deputy Commanding General's comments did not address the specifics of the recommendation, we consider the recommendation to be unresolved.

We revised the recommendation to clarify the nature of the actions needed to streamline the disposal process for relocatable buildings. We request that the Commander detail actions that the U.S. Army Installation Management Command will take to streamline the demolition process once it has been determined that opportunities for reuse or sale of relocatable buildings are minimal. We will close Recommendation 2 upon completion and verification that the proposed corrective actions taken by the U.S. Army Installation Management Command fully address the recommendation.

### **Recommendation 3**

**We recommend that the Chief, Directorate of Public Works, Fort Stewart, submit extensions for the relocatable buildings on the installation where disposal is not imminent.**

### *Chief, Directorate of Public Works, Fort Stewart Comments*

The Deputy Commanding General for the U.S. Army Installation Management Command, responding for the Chief, Directorate of Public Works, Fort Stewart, agreed, stating that the U.S. Army Garrison, Fort Stewart, will submit extensions to the U.S. Army Installation Management Command for all relocatable buildings where disposal is not imminent by January 30, 2017.

### *Our Response*

Comments from the Deputy Commanding General responding for the Chief, Directorate of Public Works, Fort Stewart, addressed all the specifics of the recommendation. We will close Recommendation 3 upon completion and verification of the proposed corrective actions.

### **Recommendation 4**

**We recommend that the Chief, Directorate of Public Works at Joint Base Lewis–McChord:**

- a. **Perform the steps necessary to convert the six nonrelocatable buildings from relocatable to real property.**

*Chief, Directorate of Public Works, Joint Base Lewis–McChord Comments*

The Deputy Commanding General for the U.S. Army Installation Management Command responding for the Chief, Directorate of Public Works, Joint Base Lewis–McChord agreed, stating that the six relocatable buildings would be reclassified as real property. The Deputy Commanding General stated that completion of this recommendation is pursuant to a policy change by the Deputy Assistant Secretary of the Army for Installations, Housing, and Partnerships.

*Our Response*

Comments from the Deputy Commanding General responding for the Chief, Directorate of Public Works, Joint Base Lewis–McChord addressed all the specifics of the recommendation. We will close Recommendation 4.a upon completion and verification of the proposed corrective actions.

- b. Submit extensions for the relocatable buildings on the installation where disposal is not imminent.**

*Chief, Directorate of Public Works, Joint Base Lewis–McChord Comments*

The Deputy Commanding General for the U.S. Army Installation Management Command, responding for the Chief, Directorate of Public Works, Joint Base Lewis–McChord, agreed, stating that personnel from the Directorate of Public Works, Joint Base Lewis–McChord, will submit extensions for the relocatable buildings where disposal is not imminent. According to the Deputy Commanding General, Joint Base Lewis–McChord personnel submitted packages requesting approval to remission and/or extend the approval date for all relocatable buildings in that category to the U.S. Army Installation Management Command during the course of calendar year 2016. Directorate of Public Works, Joint Base Lewis–McChord, personnel did not request extensions for 51 relocatable buildings that are programmed for disposal during FY 2017.

*Our Response*

Comments from the Deputy Commanding General responding for the Chief, Directorate of Public Works, Joint Base Lewis–McChord addressed all the specifics of the recommendation. We will close Recommendation 4.b upon completion and verification of the proposed corrective actions.

- c. **Coordinate with U.S. Army Installation Command and Defense Logistics Agency, Disposition Services officials to streamline the demolition process once officials have determined that the opportunities for reuse or sale of relocatable buildings are minimal.**

*Chief, Directorate of Public Works, Joint Base Lewis–McChord Comments*

The Deputy Commanding General for the U.S. Army Installation Management Command responding for the Chief, Directorate of Public Works, Joint Base Lewis–McChord agreed, stating that personnel from the U.S. Army Installation Management Command will coordinate with Defense Logistics Agency-Disposition Services officials to streamline the demolition process.

*Our Response*

Comments from the Deputy Commanding General responding for the Chief, Directorate of Public Works, Joint Base Lewis–McChord addressed all the specifics of the recommendation. We will close Recommendation 4.c upon completion and verification of the proposed corrective actions.

## **Recommendation 5**

**We recommend that the Chief, Directorate of Public Works, Fort Campbell, submit extensions for the relocatable buildings on the installation where disposal is not imminent.**

*Chief, Directorate of Public Works, Fort Campbell Comments*

The Deputy Commanding General for the U.S. Army Installation Management Command, responding for the Chief, Directorate of Public Works, Fort Campbell, agreed, stating that personnel from the Directorate of Public Works, Fort Campbell, will submit extensions for relocatable buildings where disposal is not imminent by February 24, 2017.

*Our Response*

Comments from the Deputy Commanding General responding for the Chief, Directorate of Public Works, Fort Campbell addressed all the specifics of the recommendation. We will close Recommendation 5 upon completion and verification of the proposed corrective actions.

### ***Recommendation 6***

**We recommend that the Chief, Directorate of Public Works, Fort Bragg, submit extensions for the relocatable buildings on the installation where disposal is not imminent.**

#### *Chief, Directorate of Public Works, Fort Bragg Comments*

The Deputy Commanding General for the U.S. Army Installation Management Command, responding for the Chief, Directorate of Public Works, Fort Bragg, agreed, stating that personnel from the Directorate of Public Works, Fort Bragg, will submit extensions for relocatable buildings where disposal is not imminent by January 31, 2017.

#### *Our Response*

Comments from the Deputy Commanding General responding for the Chief, Directorate of Public Works, Fort Bragg addressed all the specifics of the recommendation. We will close Recommendation 6 upon completion and verification of the proposed corrective actions.



## Appendix A

### Scope and Methodology

We conducted this performance audit from September 2015 through December 2016. We suspended the project from April 2016 through September 2016 to address high-visibility congressional requests. We completed the project in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

### Universe and Sample Information

We used the Office of the DUSD(I&E)'s FY 2013 report on the DoD's inventory of relocatable buildings to determine which Service had the highest number of relocatable buildings. We determined that the Army reported the highest number of relocatable buildings within DoD at that time. See Table 5 for the number and associated square footage of relocatable buildings each of the Services reported to the Office of the DUSD(I&E) for FY 2013.

*Table 5. Relocatable Buildings Reported to the Office of the DUSD(I&E) for FY 2013*

Service	Number of Relocatable Buildings	Square Footage of Relocatable Buildings
Army	2209	8,027,259
Navy and Marine Corps	1548	3,250,516
Air Force	218	1,709,410
<b>Total</b>	<b>3975</b>	<b>12,987,185</b>

We obtained the Office of the DUSD(I&E)'s FY 2014 report shortly before announcing the project. We compared the number of relocatable buildings Army personnel reported to the Office of the DUSD(I&E) in FY 2013 and FY 2014 to determine what sites we would visit. We considered the total number of relocatable buildings on the base and whether relocatable buildings were disposed of, or acquired, from FY 2013 to FY 2014. See Table 6 for the five bases we nonstatistically selected and the number of relocatable buildings reported to the Office of the DUSD(I&E) for FY 2013 and FY 2014 for each location.

Table 6. Bases the Audit Team Visited

Base	Relocatable Buildings Reported in FY 2013	Relocatable Buildings Reported in FY 2014	Change
Fort Drum	123	3	-120
Fort Stewart	333	142	-191
Joint Base Lewis–McChord	237	243	+6
Fort Campbell	145	130	-15
Fort Bragg	134	135	+1

We nonstatistically selected a sample of 127 relocatable buildings at 4 Army installations.<sup>8</sup> Using the Office of the DUSD(I&E)’s FY 2014 report, we selected about 30 buildings per installation with a variety of dates acquired, uses, and methods of acquisition. We also included 11 relocatable buildings identified as surge in the Office of the DUSD(I&E) report (meaning they are being used for a contingency operation), in our sample, but for those buildings we only verified that they were being used for that purpose and did no further analysis. See Table 7 for the number of relocatable buildings in our nonstatistical sample for the four installations visited and the number of relocatable buildings listed as surge in the nonstatistical sample.

Table 7. Number of Surge and Non-Surge Relocatable Buildings in Audit Sample

Base	Non-Surge Relocatable Buildings in Audit Sample	Surge Relocatable Buildings in Audit Sample
Fort Stewart	23	5
Joint Base Lewis–McChord	33	1
Fort Campbell	30	5
Fort Bragg	30	0
<b>Total</b>	<b>116</b>	<b>11</b>

Of the 116 relocatable buildings, 33 belonged to a tenant organization such as the U.S. Army Medical Command or DoD Education Activity. Although Army officials included these 33 buildings in the numbers reported to the Office of the DUSD(I&E), they do not have control over the use or disposal of the tenants’ buildings. Because of this, in many cases Army officials were unable to provide

<sup>8</sup> Fort Drum’s 3 relocatable buildings are not included in the 127 buildings we reviewed for the finding. We visited Fort Drum because the number of buildings reported dropped from 121 in the FY 2013 to 3 in the FY 2014 report. In addition, we did not review the relocatable buildings because the Army (Financial Management and Comptroller) is reviewing the relocatable buildings on Fort Drum.

complete documentation for tenants' relocatable buildings. We limited our review to the information available from DPW personnel and did not visit the tenant locations for additional documentation. See Table 8 for the number of tenant buildings per installation we included in our nonstatistical sample of 116 relocatable buildings.

*Table 8. Number of Tenant Relocatable Buildings in Nonstatistical Sample*

Base	Non-Tenant Relocatable Buildings in Audit Sample	Tenant Buildings in Audit Sample
Fort Stewart	10	13
Joint Base Lewis–McChord	26	7
Fort Campbell	21	9
Fort Bragg	26	4
<b>Total</b>	<b>83</b>	<b>33</b>

## Review of Documentation and Interviews

We reviewed documentation on relocatable buildings at Fort Stewart, Georgia; Joint Base Lewis–McChord, Washington; Fort Campbell, Kentucky and Tennessee; and Fort Bragg, North Carolina. For all of the installations, we selected a nonstatistical sample of buildings from the Office of the DUSD(I&E) FY 2014 report on the DoD's inventory of relocatable buildings to review. From the relocatable building files, we reviewed:

- DD Form 1354, "Transfer and Acceptance of Real Property;"
- pictures of the buildings;
- approvals to purchase the relocatable buildings;
- extended use justifications; and
- exit strategies (in some cases this was a form with information similar to information that is in a DD Form 1391, "Military Construction Project Data.")

In some cases, DPW personnel provided military construction documentation (this is a form with information similar to information that would be contained in a DD Form 1391) to show they were using a relocatable building until a pending military construction project was complete. DPW personnel provided us the military construction documentation form with the handwritten relocatable building number on the form indicating what project related to a specific building. We accepted this documentation with their testimony as proof of the pending completion of a military construction project before they could dispose of a relocatable building.

If there was not a picture of the relocatable building in the file, we physically inspected the relocatable building, when possible; to verify that it actually was relocatable. For relocatable buildings identified as surge in the Office of the DUSD(I&E) report (meaning they are being used for a contingency operation), we verified only whether the buildings were being used for that purpose.

We also reviewed:

- DoD Instruction 4165.56, “Relocatable Buildings,” January 7, 2013;
- AR 420-1, “Army Facilities Management,” revised August 24, 2012;
- Office of the Assistant Secretary of the Army (Installations and Environment) memorandum, “Delegation of Authority-Relocatable Buildings,” February 8, 2008;
- Memorandum of Agreement between DLA-DS and IMCOM, signed September 2014;
- Operations Order 13-056, “IMCOM Re-locatable Buildings Reduction,” December 2012; and
- Operations Order 16-037, “Relocatable Building Reduction,” January 2016.

We interviewed personnel from the Army Assistant Chief of Staff, Installation Management; the Assistant Secretary of the Army (Financial Management and Comptroller); DLA-DS; and IMCOM. At the installations, we interviewed personnel from the Directorate of Public Works, DLA-DS, and Resource Management.

## **Use of Computer-Processed Data**

We did not use computer-processed data to perform this audit.

## **Prior Coverage**

No prior coverage has been conducted on the Army’s use of relocatable buildings during the last 5 years.

## Appendix B

### Relocatable Buildings Reviewed

Relocatable Building Number		Date Acquired	Approval Prior to Purchase?	Extended Use Approval?	Relocatable	Exit Strategy In Place
<b>Fort Stewart</b>						
1	202 <sup>1</sup>	February 15, 2006	Yes	No	Yes	Yes
2	7396 <sup>1,2</sup>	October 31, 2002	Unknown	N/A	Yes	Already Demolished
3	7398 <sup>1,2</sup>	October 31, 2002	Unknown	N/A	Yes	Already Demolished
4	2900A <sup>5</sup>	Unknown	Unknown	N/A	Yes	Yes
5	S0921 <sup>1</sup>	February 24, 2005	Yes	No	Yes	Yes
6	S1053 <sup>5</sup>	Unknown	Unknown	N/A	Yes	Yes
7	S1054	May 24, 2006	Yes	No	Yes	Yes
8	S1346	2000	No	N/A	Yes	Yes
9	S2906	1997	No	N/A	Yes	Yes
10	S2911	June 1, 2004	Yes	No	Yes	Yes
11	S2912	August 8, 2007	Yes	No	Yes	Yes
12	TF146	N/A because this building is listed as surge in the ODUSD(I&E) report.				
13	TF231	N/A because this building is listed as surge in the ODUSD(I&E) report.				
14	TF257	N/A because this building is listed as surge in the ODUSD(I&E) report.				
15	TF265	N/A because this building is listed as surge in the ODUSD(I&E) report.				
16	853	March 2, 2006	Yes	No	Yes	Yes
17	1213	February 1, 2010	Yes	No	Yes	Yes
18	1210A <sup>1</sup>	July 5, 2007	Yes	No	Yes	Yes

Please see the final page of Appendix B for the Table notes.

## Relocatable Buildings Reviewed (cont'd)

Relocatable Building Number		Date Acquired	Approval Prior to Purchase?	Extended Use Approval?	Relocatable	Exit Strategy In Place
19	1210F <sup>1</sup>	July 5, 2007	Yes	No	Yes	Yes
20	R1350 <sup>1</sup>	July 18, 2007	Yes	No	Yes	Yes
21	TF055	N/A because this building is listed as surge in the ODUSD(I&E) report.				
22	TF810 <sup>1</sup>	July 5, 2007	Yes	No	Yes	Yes
23	TF814 <sup>1</sup>	June 18, 2007	Yes	No	Yes	Yes
24	TF815 <sup>1</sup>	June 18, 2007	Yes	No	Yes	Yes
25	TF818 <sup>1</sup>	June 18, 2007	Yes	No	Yes	Yes
26	TF820 <sup>1</sup>	July 5, 2007	Yes	No	Yes	Yes
27	TF851 <sup>1</sup>	June 18, 2007	Yes	No	Yes	Yes
28	TR727	July 24, 2007	Yes	No	Yes	No
<b>Fort Stewart Totals</b>		<b>28 Buildings</b>	<b>17</b>	<b>0</b>	<b>23</b>	<b>20</b>
<b>Joint Base Lewis-McChord (JBLM)</b>						
29	R6022	N/A because this building is listed as surge in the ODUSD(I&E) report.				
30	R0912 <sup>3</sup>	June 24, 2004	No	N/A	Yes	Yes
31	R0144	October 28, 2005	Yes	N/A	No	No
32	R0151	October 28, 2005	Yes	N/A	Yes	Yes
33	R0170	November 9, 2005	Yes	N/A	Yes	Already Demolished
34	R0180	August 19, 2005	Yes	N/A	No	No
35	R0194	October 28, 2005	Yes	N/A	No	No
36	R0202	September 1, 2005	Yes	N/A	Yes	Yes
37	R0246	October 29, 2005	Yes	N/A	Yes	Yes

Please see the final page of Appendix B for the Table notes.

## Relocatable Buildings Reviewed (cont'd)

	Relocatable Building Number	Date Acquired	Approval Prior to Purchase?	Extended Use Approval?	Relocatable	Exit Strategy In Place
38	R1402	September 16, 2005	Yes	N/A	Yes	Yes
39	R1408	November 9, 2005	Yes	N/A	Yes	Yes
40	R3017	August 19, 2005	Yes	N/A	Yes	Yes
41	R3131	August 31, 2005	Yes	Yes	Yes	Already Demolished
42	R3176	September 16, 2005	Yes	N/A	Yes	Yes
43	R3219	August 19, 2005	Yes	N/A	Yes	Already Demolished
44	R3228	August 15, 2005	Yes	N/A	Yes	Already Demolished
45	R3240	July 26, 2005	Yes	N/A	Yes	Yes
46	R3255	August 19, 2005	Yes	N/A	Yes	Yes
47	R3267	September 16, 2005	Yes	N/A	No	No
48	R3702	August 19, 2005	Yes	N/A	Yes	Yes
49	R3765	November 9, 2005	Yes	N/A	Yes	Yes
50	R6006	September 16, 2005	Yes	N/A	Yes	Already Demolished
51	R9915	July 18, 2005	Yes	Yes	Yes	Yes
52	R1295	May 1, 2007	Yes	N/A	Yes	Yes
53	R9658	May 1, 2007	Yes	N/A	No	Yes
54	R1284	May 1, 2008	Yes	N/A	Yes	Yes
55	R3406 <sup>1</sup>	August 4, 2008	Yes	N/A	Yes	Yes
56	R1880 <sup>1</sup>	Unknown	Unknown	N/A	Yes	Yes
57	R3150 <sup>1</sup>	Unknown	Unknown	N/A	Yes	Yes
58	R3742 <sup>1</sup>	October 16, 2004	No	N/A	Yes	Yes

Please see the final page of Appendix B for the Table notes.

## Relocatable Buildings Reviewed (cont'd)

Relocatable Building Number		Date Acquired	Approval Prior to Purchase?	Extended Use Approval?	Relocatable	Exit Strategy In Place
59	R6100 <sup>1</sup>	Unknown	Unknown	N/A	Yes	Yes
60	R9642 <sup>1</sup>	Unknown	Unknown	N/A	Yes	Yes
61	R9654 <sup>1</sup>	May 1, 2007	Yes	N/A	Yes	Yes
62	9031	November 20, 2012	No	N/A	No	Yes
<b>JBLM Totals</b>		<b>34 Buildings</b>	<b>26</b>	<b>2</b>	<b>27</b>	<b>24</b>
<b>Fort Campbell</b>						
63	A6800	February 1, 2005	Yes	No	Yes	Yes
64	A7833 <sup>4</sup>	Unknown	Unknown	Yes	Unknown <sup>6</sup>	N/A
65	B6800	February 1, 2005	Yes	No	Yes	Yes
66	C5513 <sup>1, 5</sup>	Unknown	Unknown	Yes	Yes	Yes
67	D6820 <sup>1</sup>	February 1, 2005	Yes	No	Yes	Yes
68	E6820 <sup>1</sup>	February 1, 2005	Yes	No	Yes	Yes
69	F6820	February 1, 2005	Yes	No	Yes	Yes
70	H6800	February 1, 2005	Yes	No	Yes	Yes
71	03781	February 28, 2005	Yes	No	Yes	Yes
72	04003 <sup>5</sup>	Unknown	Unknown	No	Unknown	Yes
73	05977 <sup>1, 5</sup>	Unknown	Unknown	N/A	Unknown	Yes
74	05982 <sup>1, 5</sup>	Unknown	Unknown	Yes	Unknown	Yes
75	07135	June 8, 2005	Yes	No	Yes	Yes
76	07151 <sup>5</sup>	Unknown	Unknown	No	Unknown	Yes
77	A3781 <sup>1</sup>	February 28, 2005	Yes	No	Yes	Yes

Please see the final page of Appendix B for the Table notes.



## Relocatable Buildings Reviewed (cont'd)

	Relocatable Building Number	Date Acquired	Approval Prior to Purchase?	Extended Use Approval?	Relocatable	Exit Strategy In Place
78	A7000 <sup>1, 5</sup>	Unknown	Unknown	No	Unknown	Yes
79	A7001 <sup>5</sup>	Unknown	Unknown	No	Yes	Yes
80	B3781 <sup>1</sup>	February 28, 2005	Yes	No	Yes	Yes
81	B7000 <sup>5</sup>	Unknown	Unknown	No	Yes	Yes
82	C3904 <sup>5</sup>	Unknown	Unknown	No	Yes	Yes
83	C7000 <sup>5</sup>	Unknown	Unknown	No	Yes	Yes
84	D3900	February 1, 2005	Yes	No	Yes	Yes
85	D7062 <sup>1</sup>	June 6, 2006	Yes	No	Unknown <sup>6</sup>	Yes
86	E4000	November 30, 2004	Yes	No	Yes	Already Removed
87	E7151 <sup>5</sup>	Unknown	Unknown	No	Unknown <sup>6</sup>	Yes
88	G4000	November 30, 2004	Yes	No	Yes	Already Removed
89	H4003	November 30, 2004	Yes	No	Yes	Yes
90	I7151 <sup>5</sup>	Unknown	Unknown	No	Unknown <sup>6</sup>	Yes
91	J7135	June 8, 2005	Yes	No	Yes	Yes
92	L7000 <sup>5</sup>	Unknown	Unknown	No	Yes	Yes
93	A2194 <sup>7</sup>	N/A because this building is listed as surge in the ODUSD(I&E) report.				
94	A2604 <sup>7</sup>	N/A because this building is listed as surge in the ODUSD(I&E) report.				
95	A5737 <sup>7</sup>	N/A because this building is listed as surge in the ODUSD(I&E) report.				
96	B2195 <sup>7</sup>	N/A because this building is listed as surge in the ODUSD(I&E) report.				
97	H2195 <sup>7</sup>	N/A because this building is listed as surge in the ODUSD(I&E) report.				
	<b>Ft. Campbell Totals</b>	<b>35 Buildings</b>	<b>16</b>	<b>3</b>	<b>21</b>	<b>27</b>

Please see the final page of Appendix B for the Table notes.

## Relocatable Buildings Reviewed (cont'd)

Relocatable Building Number		Date Acquired	Approval Prior to Purchase?	Extended Use Approval?	Relocatable	Exit Strategy In Place
<b>Fort Bragg</b>						
98	D2312 <sup>1</sup>	April 5, 2010	No	N/A	Yes	Yes
99	O19T2	July 22, 2009	No	N/A	Unknown <sup>6</sup>	Already Demolished
100	33109	June 27, 2006	Yes	N/A <sup>7</sup>	Yes	No
101	A6372	July 28, 2006	Yes	N/A <sup>7</sup>	Yes	No
102	A6472	July 28, 2006	Yes	N/A <sup>7</sup>	Yes	Already Demolished
103	31324	May 10, 2006	Yes	N/A <sup>7</sup>	Yes	No
104	31726	June 7, 2006	Yes	N/A <sup>7</sup>	Yes	No
105	31723	June 15, 2006	Yes	N/A <sup>7</sup>	Yes	No
106	31822	June 15, 2006	Yes	N/A <sup>7</sup>	Yes	No
107	31414	May 19, 2006	Yes	N/A <sup>7</sup>	Yes	No
108	31425	May 10, 2006	Yes	N/A <sup>7</sup>	Yes	No
109	31325	May 12, 2006	Yes	N/A <sup>7</sup>	Yes	No
110	31828	June 7, 2006	Yes	N/A <sup>7</sup>	Yes	No
111	31727	June 7, 2006	Yes	N/A <sup>7</sup>	Yes	No
112	31910	April 27, 2006	Yes	N/A <sup>7</sup>	Yes	No
113	32310	May 2, 2006	Yes	N/A <sup>7</sup>	Yes	No
114	32413	May 2, 2006	Yes	N/A <sup>7</sup>	Yes	No
115	32904	June 27, 2006	Yes	N/A <sup>7</sup>	Yes	No
116	33003	June 27, 2006	Yes	N/A <sup>7</sup>	Yes	No
117	F4130	Unknown <sup>5</sup>	Unknown	N/A	Yes	Yes

Please see the final page of Appendix B for the Table notes.

## Relocatable Buildings Reviewed (cont'd)

	Relocatable Building Number	Date Acquired	Approval Prior to Purchase?	Extended Use Approval?	Relocatable	Exit Strategy In Place
118	31854 <sup>1</sup>	May 19, 2008	Yes	Yes	Yes	Yes
119	C1624	February 23, 2012	Unknown	N/A	Yes	Yes
120	X3714	August 19, 2011	Yes	Yes	Yes	No
121	L4622 <sup>1</sup>	March 22, 2013	Unknown	N/A	Yes	Yes
122	14769 <sup>1</sup>	March 29, 2010	Unknown	N/A	Yes	Yes
123	13683	April 5, 2010	Unknown	N/A	Yes	Relocated
124	13782	April 5, 2010	Unknown	N/A	Yes	Already Demolished
125	22014 <sup>5</sup>	April 5, 2010	Unknown	N/A	Yes	No
126	31318 <sup>8</sup>	May 12, 2006	No	N/A	Yes	No
127	32909 <sup>8</sup>	June 15, 2006	Yes	N/A	Yes	No
	<b>Fort Bragg Totals</b>	<b>30 Buildings</b>	<b>20</b>	<b>2</b>	<b>29</b>	<b>6</b>
	<b>Total</b>	<b>127 Buildings</b>	<b>79</b>	<b>7</b>	<b>100</b>	<b>77</b>

<sup>1</sup> Tenant organization.

<sup>2</sup> This building is a dependent school and under the jurisdiction of the DoD Education Activity, not the garrison (Tenant).

<sup>3</sup> The Reserve Officers' Training Corps purchased and placed on JBLM. DPW personnel did not provide documentation.

<sup>4</sup> This building was disposed before the audit and Fort Campbell no longer maintained a file. Any information specific to this building is incidental to other files and documents reviewed during the audit.

<sup>5</sup> No documentation on file for support.

<sup>6</sup> No picture on file, and the audit team was unable to physically inspect the building.

<sup>7</sup> No further analysis was performed on these five buildings once we determined that they were incorrectly classified as surge.

<sup>8</sup> Fort Bragg DPW personnel prepared a memorandum, "Interim Permission to Reuse Modular Village for Other Purposes," requesting approval to reuse the modular village; however, they did not send the memorandum to IMCOM.

# Management Comments

## Assistant Chief of Staff for Installation Management



DEPARTMENT OF THE ARMY  
OFFICE OF THE ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT  
600 ARMY PENTAGON  
WASHINGTON, DC 20310-0600

DAIM-ODF

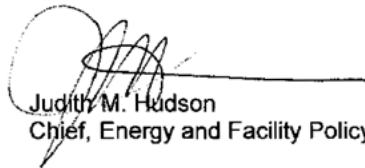
JAN 25 2017

MEMORANDUM FOR Inspector General, Department of Defense, 4800 Mark Center Drive, Alexandria, VA 22350-1500

SUBJECT: Army Officials Need to Improve the Management of Relocatable Buildings (Project No. D2015-D000CG-0254.000)

1. We have reviewed the report and believe that Recommendation 1 should be forwarded to the policy owner, DASA IH&P for review and comment.

2. The point of contact in [REDACTED].

  
Judith M. Hudson  
Chief, Energy and Facility Policy Division

CF: DASA IH&P

Redirected  
Recommendation 1.a  
and 1.b

## U.S. Army Installation Management Command



DEPARTMENT OF THE ARMY  
US ARMY INSTALLATION MANAGEMENT COMMAND  
2405 GUN SHED ROAD  
JOINT BASE SAN ANTONIO FORT SAM HOUSTON, TX 78234-1223

IMCG

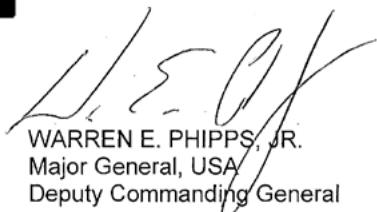
24 JAN 2017

MEMORANDUM FOR Inspector General, Department of Defense, 4800 Mark Center Drive, Alexandria, Virginia 22350-1500

SUBJECT: DODIG Draft Audit Report, Army Officials Need to Improve the Management of Relocatable Buildings (Project No. D2015-D000CG-0254.000)

1. The US Army Installation Management Command (IMCOM) has reviewed the subject draft report. IMCOM comments and US Army Garrison responses concerning the conclusions, recommendations, and discussions are enclosed.
2. The Internal Review point of contact is [REDACTED]

Encl  
Command Comments

  
WARREN E. PHIPPS, JR.  
Major General, USA  
Deputy Commanding General

## U.S. Army Installation Management Command (cont'd)

U.S. Army Installation Management Command Comments  
DODIG Draft Audit Report, Army Officials Need to Improve the  
Management of Relocatable Buildings (Project No. D2015-D000CG-0254.000)

### IMCOM Comments to Recommendation 2:

Non-Concur. The MOA does not need revision. Per MOA, DLA returns RLBs to U.S. Army Installation Management Command (IMCOM) when DLA cannot sell or scrap. It is implied that IMCOM will dispose RLBs upon return from DLA. IMCOM will follow-up with DLA to ensure DLA interprets MOA in these terms.

Revised  
Recommendation 2

### Command Comments to Recommendation 3:

Concur. All relocatable building extensions on Fort Stewart where disposal is not imminent will be submitted to HQ IMCOM by USAG Fort Stewart for approval by 30 January 2017.

### IMCOM Comments to Recommendation 4:

a. Concur with Comments. IMCOM concurs with the recommendation that the six relocatable buildings (RLBs) included in the audit (along with some other RLBs that share the construction characteristics of site built buildings) be reclassified as real property. Completion of Recommendation 4.a. is pursuant to policy change by the Deputy Assistant Secretary of the Army for Installations, Housing and Partnerships (DASA-IH&P).

b. Concur with Comments. IMCOM concurs with the recommendation to submit extensions for the relocatable buildings where disposal is not imminent. During the course of CY 2016, JBLM submitted packages requesting approval to remission and/or extend the approval date for all RLBs in that category to HQ IMCOM. JBLM will continue to utilize these RLBs until the programmed MILCON project that is specified as the exit strategy for each unit is completed. The installation then intends to dispose of those RLBs. Additionally, there are 51 RLBs that are programmed for disposal during FY 17 for which DPW has not requested extensions.

c. Concur with Comments. IMCOM concurs with the recommendation for IMCOM coordination with Defense Logistics Agency, Disposition Services (DLADS) officials to streamline the demolition process.

### IMCOM Comments to Recommendation 5:

Concur. The Directorate of Public Works, Fort Campbell, will submit extension requests for relocatable buildings where disposal is not imminent no later than 24 February 2017. In this context, imminence is defined as being vacant or targeted for disposal through DLA Disposition Services, demolition, funded military construction, or approved repair projects.

### IMCOM Comments to Recommendation 6:

Concur. Fort Bragg will submit extensions for our relocatable buildings by 31 January 2017, where disposal is not imminent. Fort Bragg currently has 128 Relocatable Buildings that total 923,482 square feet. Of these, 93% are at Modular Village.

## Acronyms and Abbreviations

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<b>ACSIM</b>	Assistant Chief of Staff for Installation Management
<b>AR</b>	Army Regulation
<b>DLA-DS</b>	Defense Logistics Agency-Disposition Services
<b>DPW</b>	Directorate of Public Works
<b>DUSD(I&amp;E)</b>	Deputy Under Secretary of Defense for Installations and Environment
<b>IMCOM</b>	U.S. Army Installation Management Command
<b>JBLM</b>	Joint Base Lewis–McChord





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