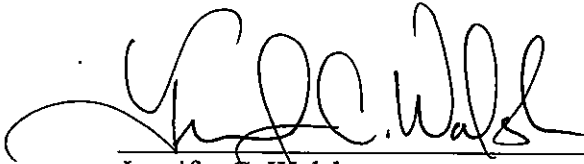


**DETERMINATION OF THE DIRECTOR OF ADMINISTRATION
AND MANAGEMENT**

Under the authority delegated to me by the Secretary of Defense, and in accordance with 10 U.S.C. § 130e, I have determined that Department of Defense Real Property Inventory Data and Installation Geospatial Information and Services (IGI&S) Data is Department of Defense critical infrastructure security information, and that the public interest consideration in the disclosure of such information does not outweigh preventing the disclosure of such information. Accordingly, this data is exempt from disclosure under Exemption 3 of the Freedom of Information Act (5 U.S.C. § 552(b)(3)).

Date: September 19, 2023



Jennifer C. Walsh
Director of Administration and Management

**STATEMENT OF THE BASIS FOR THE DETERMINATION BY
THE DIRECTOR OF ADMINISTRATION AND MANAGEMENT**

In accordance with 10 U.S.C. § 130e, I reviewed the information provided to me by the Assistant Secretary of Defense for Energy, Installations, and Environment (ASD(EI&E)) concerning Department of Defense (DoD) Real Property Inventory Data and Installation Geospatial Information and Services (IGI&S) Data. Following that review, I determined that such information qualifies as DoD critical infrastructure security information (DCRIT) and that the public interest consideration in the disclosure of such information does not outweigh preventing the disclosure of it. As defined by 10 U.S.C. § 130e(f), DCRIT includes:

sensitive but unclassified information that, if disclosed, would reveal vulnerabilities in Department of Defense critical infrastructure that, if exploited, would likely result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities, including information regarding the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense, including vulnerability assessments prepared by or on behalf of the Department of Defense, explosives safety information (including storage and handling), and other site-specific information on or relating to installation security.

DoD Real Property Inventory Data can be compiled to reveal vulnerabilities or combat readiness of installations, facilities, systems, or protection services relating to national security, and unauthorized disclosure could reasonably be expected to cause temporary limitation or degradation of the ability to execute an operational mission or capability, or damage to non-mission-related DoD activities (e.g. military community facilities and gathering places). Public law also supports the protection of this information with the implementation of P.L. 114-287, Federal Assets Sale and Transfer Act of 2016, which includes specific language that excludes the release of Federal Real Property Profile data on military installations in Sec 3, (5) (B), Exclusions, for security reasons. Real property inventory data at the constructed asset level, if exploited, would likely result in the significant disruption, destruction or damage of or to DoD operations, property, facilities and personnel by revealing valuable information about the storage contents, mission or critical military functions housed or performed within those assets. This could disclose sensitive data such as locations of munitions storage, communication nodes, hazardous materials, or details on critical utility systems along with their infrastructure support grid. Mishandling or improper release of this data could result in significant vulnerabilities to both federal personnel and property.

The Installation Geospatial Information and Services (IGI&S) capability exists across the entire Department to provide geospatial information and services (GI&S) applicable to the management of DoD installations to support military readiness in the Active, Guard, and Reserve Components. The Department's IGI&S programs maintain geospatial (mapping) data which describes facility construction, sustainment, and modernization; housing; base closures and reuse; base operations; energy use and conservation; utilities operation and maintenance;

property accountability; DoD compliance activities related to environmental, natural resource, cultural resource, and historic property management; environmental management systems, natural infrastructure capabilities and sustainment; safety; occupational health; fire protection; pest management; explosive safety; encroachment management; and the operation and sustainment of military test and training ranges.

Gaining access to this Real Property Inventory Data and IGI&S information, individually or in the aggregate, would reveal vulnerabilities in Department of Defense critical infrastructure that, if exploited, would likely result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities. Therefore, it is imperative that adversaries or potential adversaries are denied access to information that would enable them the ability to replicate, reverse engineer, compromise, defeat, or otherwise challenge the Department's real property infrastructure and its critical role as a platform for sustaining military readiness worldwide.

I considered the public interest in the disclosure of DoD Real Property Inventory Data and IGI&S data and weighed this against the risk of harm that might result if this information were to be disclosed. Because the public interest in the disclosure of asset specific information is minimal, and the risk of harm that might result from the disclosure of this specific information is extremely significant, I have determined that the protection of this information is critical to the security of the DoD infrastructure and should be exempt from disclosure. The Department satisfies the majority of public interest in such data by the Department's annual release of summary data such as the Base Structure Report (BSR) and Military Installations, Ranges, and Training areas (MIRTA) geospatial data.